

SR 0080 Section 17M
I-80 Reconstruction Project
Environmental Justice Technical Memorandum

Prepared for the:

**Pennsylvania Department of
Transportation**

Engineering District 5-0

Agreement E02656 - MPMS 76357

August 16, 2018

Prepared By:

AECOM

TABLE OF CONTENTS

Introduction 1

1. Regulatory Context and Methodology..... 2

2. Project Description..... 3

3. Identification of EJ Populations 4

 3.1. Demographic Data 4

 3.2. Field Observations 7

 3.3. Coordination with Knowledgeable Parties 8

 3.4. Other Disadvantaged Groups..... 9

4. Impact Assessment 11

 4.1. Impacts on EJ Populations 12

 4.2. High or Substantial Impacts 16

 4.3. Disproportionate Impacts 17

 4.4. Mitigation and Enhancement Measures..... 18

 4.5. Offsetting Benefits 19

5. Public Involvement..... 20

 5.1. Public Open House Meetings..... 20

 5.2. Stakeholder Outreach 20

6. Conclusion..... 21

7. References 22

APPENDICES

Appendix A – Knowledgeable Parties Correspondence Summary

LIST OF FIGURES

Figure 1 - Project Location and Study Area..... 1
Figure 2 - Census Block Groups and EJ Areas..... 6

LIST OF TABLES

Table 1 – Demographic Data for Study Area Block Groups5
Table 2 -- Projected Displacements..... 12
Table 3 -- Noise Impacts to Unit in Low-Income Housing Complexes.....15
Table 4 – Displacements of EJ and Non-EJ Residential Units16
Table 5 – Percentage of Displacements of EJ and Non-EJ Area Residential Units..... 17

ACRONYMS / DEFINITIONS

AASHTO	American Association of State Highway and Transportation Officials
ACS	American Community Survey
APE	Area of Potential Effects of the I-80 Reconstruction Project, as delineated during the study of cultural resources
EA	Environmental Assessment
EIS	Environmental Impact Statement
EJ	Environmental Justice
EJ Area	A Census Block Group in which low-income and/or minority populations are present in higher concentrations than in Monroe County as a whole
EO 12898	Executive Order 12898, <i>Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations</i> (February 11, 1994)
FHWA	Federal Highway Administration
HAMC	Housing Authority of Monroe County
HHS	United States Department of Health and Human Services
HUD	United States Department of Housing and Urban Development
LOS	Level of Service
Low-income	A person whose median household income is at or below the Department of Health and Human Services poverty guidelines
Low-income population	Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed U.S. Department of Transportation program, policy or activity.
Minority	A person who is: <ol style="list-style-type: none"> 1. Black: a person having origins in any of the black racial groups of Africa; 2. Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race; 3. Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent; 4. American Indian and Alaskan Native: a person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or 5. Native Hawaiian and Other Pacific Islander: people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
Minority population	Any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed U.S. Department of Transportation program, policy or activity.
NB	Northbound
NEPA	National Environmental Policy Act of 1969
PennDOT	Pennsylvania Department of Transportation
Pub. 746	PennDOT Publication No. 746, <i>Project Level Environmental Justice Guidance</i> (March 2016)
Pub. 747	PennDOT Publication No. 747, <i>Every Voice Counts</i> (July 2012)
SB	Southbound
SR	State Route
USDOT	United States Department of Transportation

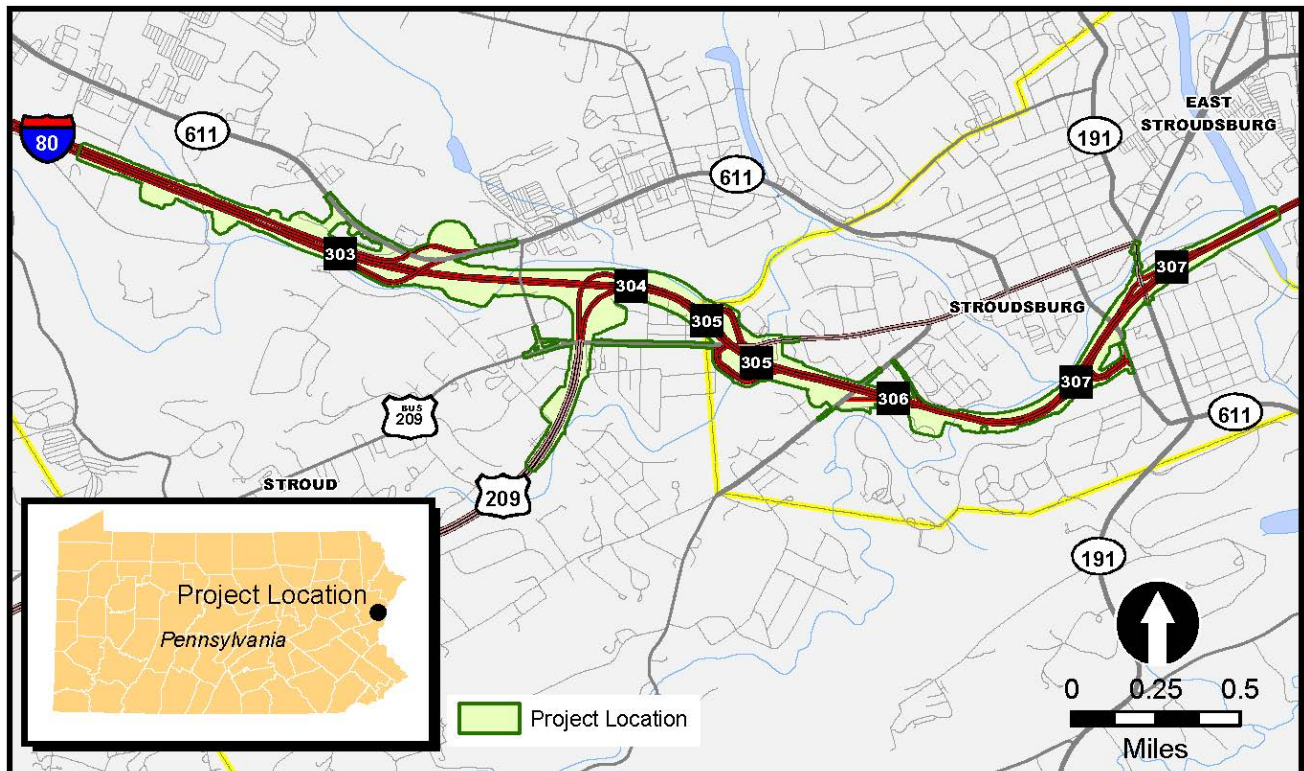
Introduction

Interstate 80 (I-80) is a transcontinental highway that runs east-west through Pennsylvania between New Jersey to California. In 2005, PennDOT completed the *I-80 Corridor Study*, which examined an 18-mile stretch between Interchange 293 (I-380) and Interchange 307 (Delaware Water Gap). The study recommended a 3.5-mile segment between Interchange 303 (PA 611) and Interchange 307 (PA 611/PA 191) for reconstruction. That segment, which passes through Stroud Township, the Borough of Stroudsburg, and the Borough of East Stroudsburg in Monroe County, is the subject of the current I-80 Reconstruction Project (S.R. 0080, Section 17M, PennDOT MPMS# 76357). Figure 1 shows the project location and study area.

The purpose of the I-80 Reconstruction Project is to provide a safe and efficient transportation system for both local and regional connections in the area by reducing future congestion in the 2045 design year to Level of Service E or better, improving safety and bringing I-80 up to current standards. More information about the project can be found on the project website at <http://www.i80project.com/>.

This technical memorandum assesses the potential impacts of the project alternatives on low-income and minority populations (collectively referred to as Environmental Justice populations) in keeping with Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994) and other applicable guidelines. Results of this memorandum will be incorporated into the project Environmental Assessment, which is being prepared pursuant to the National Environmental Policy Act of 1969.

Figure 1 - Project Location and Study Area



1. Regulatory Context and Methodology

As described in PennDOT Publication No. 746, Project Level Environmental Justice Guidance (March 2016), Environmental Justice (EJ) refers to implementing Executive Order (EO) 12898, which reinforces many of the requirements contained in Title VI of the Civil Rights Act of 1964. EO 12898 directs Federal agencies to put into place procedures to identify and address any disproportionately high and adverse human health or environmental effects on minority and low-income population populations.

A “minority” is a person who is:

1. Black: a person having origins in any of the black racial groups of Africa;
2. Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
3. Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent;
4. American Indian and Alaskan Native: a person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or

“Low-income” refers to a household with a median household income at or below the United States Department of Health and Human Services (HHS) poverty guidelines. The HHS poverty guidelines state that the poverty threshold for a four-person family in 2014, the latest year for which Census data is available, was \$23,850. The Census Bureau’s poverty threshold for a family of four in that same year was \$24,028. Therefore, the Census data may underestimate the percentage of households in poverty. This discrepancy did not affect the analysis in this report, however, because Census data was used only as a screening tool for early identification of potential EJ populations and was augmented via information gleaned through coordination with knowledgeable parties, field view, and public involvement.

Minority and low-income populations are defined by USDOT as any readily identifiable groups of minority and low-income persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed USDOT program, policy or activity.

To meet their obligations under EO 12898, and create consistency in implementation, the USDOT and the Federal Highway Administration (FHWA) have published a series of orders, memoranda, and other guidance documents directed internally and to their funding recipients, including state departments of transportation. These documents include the USDOT *Environmental Justice Strategy* (March 2012), USDOT Order 5610.2(a) *Final DOT Environmental Justice Order* (May 2012), and FHWA Order 6640.23A, *FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (June 2012). PennDOT’s EJ guidelines are set forth in Pub. 746 cited above as well as in Publication No. 747, *Every Voice Counts* (July 2012).

Within this regulatory context, the fundamental principles of EJ for projects with FHWA funding can be defined as:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

As documented in the project technical support data files, the I-80 Reconstruction Project will involve more than minor right-of-way acquisitions and involves work activities outside the criteria for projects exempt from detailed EJ analysis under Pub. 746. Therefore, a detailed project-level EJ analysis was conducted in keeping with the methodology set forth in Pub. 746, as described below.

2. Project Description

I-80 is classified as an urban interstate (limited access freeway). Through the project area, I-80 includes four lanes (two in each direction) with shoulders and a median barrier of varying widths. The project corridor shows improvement needs due to safety, congestion, mobility as described below.

Five-year crash data (2008-2012) for segments in the project corridor displays high crash rates (0.84 westbound, 1.09 eastbound) compared to statewide average for urban interstates (0.56) consistent with roadways with congestion and deficiencies in geometry. These geometric deficiencies include:

- Acceleration and deceleration lane lengths below PennDOT/AASHTO design criteria.
- Insufficient weave lengths when both entrance and exit ramps are in close proximity.
- Insufficient shoulder widths: existing shoulders range from 1 foot to 10 feet, with 10 feet to 12 feet minimum required. This results in reduced access for emergency vehicles during incidents.

In addition, the pavement, constructed in the 1950s and 1960s, has reached the end of its useful life and is in poor condition, and the I-80 bridge over Bridge Street is structurally deficient. Deteriorated roadway and bridge components cause hazardous conditions under normal use as well as during lane closures for ongoing maintenance issues.

Projections of 2045 traffic volumes show that additional future traffic in the no-build condition will increase congestion, with the entire mainline from Exit 304 to Exit 307 operating at an unacceptable Level of Service (LOS) F.

Mobility is lacking in the project corridor because the corridor does not provide system continuity, although current design criteria as well as driver expectation call for all movements to be available at each interchange. Also, the project corridor services both local and through traffic, creating conflicts between the types of traffic and deviating from the intent of the Interstate system to facilitate long range travel.

3. Identification of EJ Populations

The PennDOT guidance document describes three main ways to identify EJ populations. These ways are to review demographic data, conduct field observations, and perform outreach activities. This section provides a summary of work to identify EJ populations for this project.

3.1. Demographic Data

The United States Census Bureau serves as the leading source of data about the nation's people and economy. The Census Bureau maintains data for political units at the national, state, county, and municipal levels. It also maintains data at the Census-defined tract, block group, and block levels. Data for the Decennial Census provides the official counts of population and housing units and is gathered down to the block level. The most recent Decennial Census was conducted in 2010. Data for the American Community Survey (ACS) produces demographic, social, housing and economic estimates in the form of 1-year, 3-year and 5-year estimates based on population thresholds and is gathered down to the block group level. The most recent 5-year ACS data is from 2014.

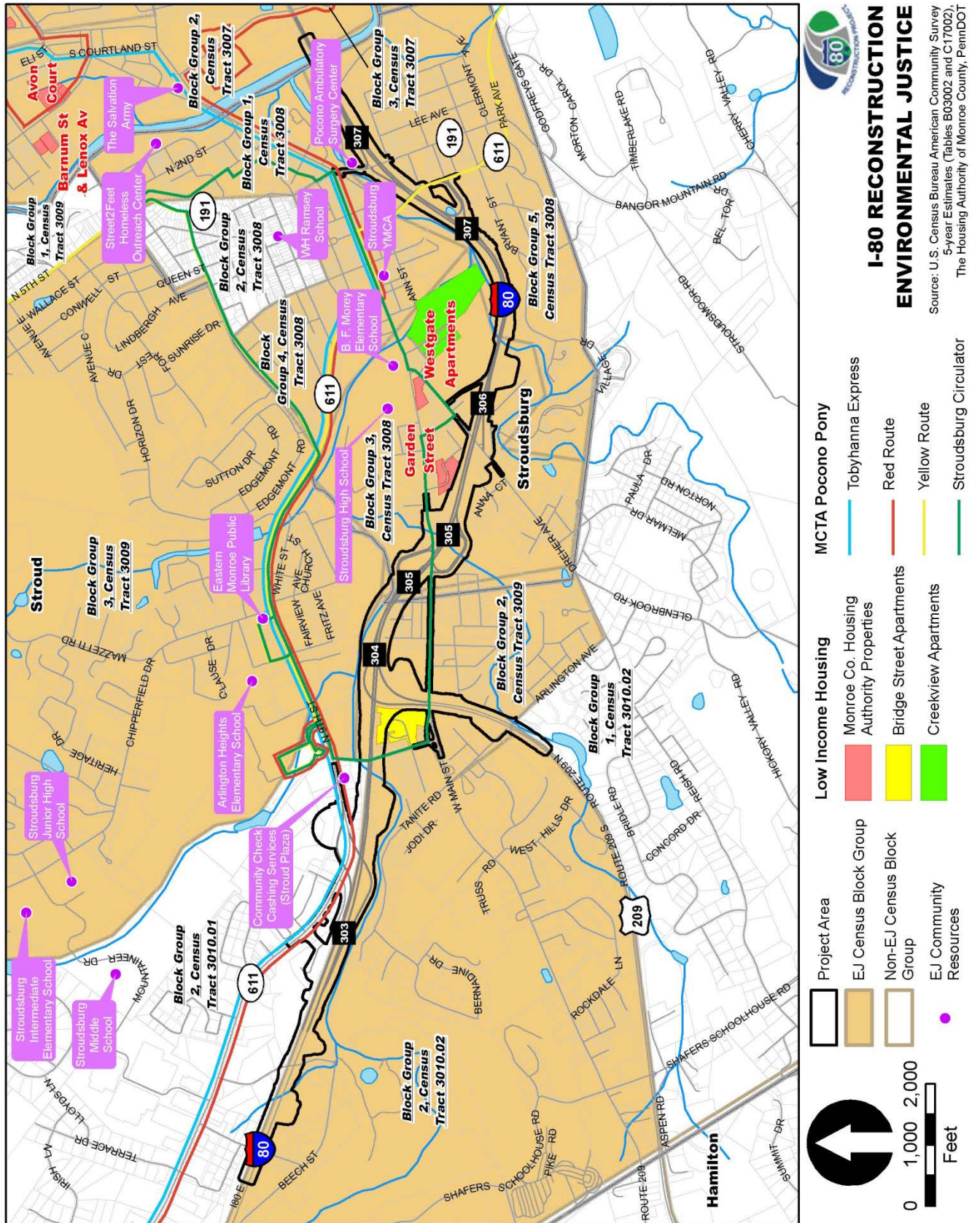
The 2014 ACS 5-year estimate data for these Census block groups was compared with similar data for Monroe County to determine which Census block groups, if any, had percentages of low-income and/or minority populations greater than average. Even though each of the three municipalities as a whole has a higher percentage of EJ populations than the County average, those populations are not evenly distributed. Only Census block groups with percentages of low-income and/or minority populations greater than the County average were classified as "EJ Areas" that warrant further assessment. Table 1 and Figure 2 show the results of this review, which finds that the study area for I-80 Reconstruction Project includes portions of nine Census block groups.

Table 1 – Demographic Data for Study Area Block Groups

Geography	Census Tract	Block Group	Percent Minority	Percent in Poverty	EJ Area?
Pennsylvania	-	-	18.1	13.5	-
Monroe County	-	-	30.9	12.5	-
East Stroudsburg	-	-	34.6	22.6	-
Stroudsburg	-	-	34.6	34.8	-
Stroud Twp.	-	-	35.6	10.9	-
East Stroudsburg	3007	2	34.7	34.2	Yes
East Stroudsburg	3007	3	40.8	10.2	Yes
Stroudsburg	3008	1	46.6	41.7	Yes
Stroudsburg	3008	3	58.7	44.2	Yes
Stroudsburg	3008	4	22.7	51.4	Yes
Stroudsburg	3008	5	27.5	15.7	Yes
Stroud	3009	2	21.4	13.0	Yes
Stroud	3009	3	37.8	10.1	Yes
Stroud	3010.01	2	22.3	2.3	No
Stroud	3010.02	1	12.7	3.9	No
Stroud	3010.02	2	7.0	17.8	Yes

Source: 2014 American Community Survey.

Figure 2 - Census Block Groups and EJ Areas



3.2. Field Observations

AECOM planners conducted an August 29, 2016 field view of the study area to identify potential indicators of EJ populations such as the following:

- Grocery stores specializing in ethnic cuisine and associated provisions
- Retail stores specializing in ethnic goods and services
- Places of worship serving ethnic groups or providing minority language services
- Identifiable public and elderly housing facilities
- Local government agencies serving special minority or low-income needs
- Local non-governmental minority or low-income advocacy organizations
- Use of non-English language on local signs and advertising
- Local newspapers or newsletters or radio stations.

These work activities led to identifying the following resources associated with low-income and minority populations in the project study area:

Low-Income Housing

- Bridge Street Apartments (60 units), at the intersection of Bridge and Miller Streets in Stroudsburg. Rents at this complex are subsidized by the Department of Housing and Urban Development's (HUD) Low-Income Tax Credit (LIHTC) program.
- Westgate Apartments (70 units), 1055 W. Main Street, Stroudsburg. The Housing Authority of Monroe County (HAMC) owns this complex.
- Garden Street Apartments (28 units), just north of I-80 near Dreher Avenue in Stroudsburg. HAMC also owns this complex.
- Creekview Apartments (80 units), near the intersection of W. Main Street (SR 611) and Dreher Avenue in Stroudsburg. Rents at this complex are subsidized by HUD's Section 8 program.

Businesses

The only business within the project area that is of that type that typically caters to low-income populations appears to be the Community Check Cashing Services in the Stroud Plaza strip mall at 1240 N. 9th Street. No businesses with bi-lingual signs or other indications of serving minority populations were observed.

Social Services

Within the project study area, the Pennsylvania Department of Human Services Monroe County Assistance Office is located at 1972 West Main Street, Stroudsburg. The Assistance Office provides a wide range of social services to at-risk populations, including Supplemental Nutrition Assistance Program food stamps. In addition the Monroe County Food Assistance Program includes community meals at Stroudsburg United Methodist, 547 Main Street, and Holy Cross Greek Orthodox Church, 135 Stokes Avenue, Stroudsburg.

3.3. Coordination with Knowledgeable Parties

In addition to researching demographic data and conducting a field view of the study area, AECOM planners coordinated with knowledgeable parties to identify other potential EJ populations and community resources within the study area. These contacts included the following:

- The PennDOT District 5-0 EJ Coordinator
- The Northeastern Pennsylvania Alliance, a regional community and economic development agency and the transportation Metropolitan Planning Organization (MPO) for Carbon, Monroe, Pike, and Schuylkill Counties
- Monroe County elected officials and planning agencies
- Municipal governments
- School district administrators
- The Interagency Council of Monroe County (IAC Monroe), a member organization consisting of representatives from over 90 local agencies that provide coordinated services to low-income and other disadvantaged residents
- The Federation of Latinos for the Education about Cultures of Hispanic America (FLECHA), a nonprofit volunteer group that promotes the Latino population of northeastern Pennsylvania
- The African American Network of the Poconos (AAN), a nonprofit organization that focuses on networking, education, economic development, and cultural heritage for black persons
- Other non-governmental organizations that provide human services to minority, low-income and other at-risk residents in Monroe County

Coordination with knowledgeable parties confirmed the existence of EJ populations within the project area but provided no additional details as to the distribution of the population.

Appendix A provides a complete list of knowledgeable parties, contact information, and a summary of correspondence with them, including comments pertaining to the potential project impacts.

3.4. Other Disadvantaged Groups

PennDOT Publication No. 478, *Title VI Compliance and Implementation Plan* (December 2015) and the PennDOT *Title VI Policy Statement* (March 2016) provide that PennDOT will also consider the effects of projects on individuals with disabilities, the elderly, and individuals with limited English proficiency (LEP) as part of the NEPA process, in accordance with Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans With Disabilities Act of 1990 (ADA). To facilitate this assessment, AECOM planners screened Census demographic data and interviewed knowledgeable parties for these populations.

Disability Status

To comply with the ADA, FHWA is responsible for ensuring that the planning, design, construction, and operations of projects under its control adequately address pedestrian access for people who have disabilities. The ADA does not require FHWA-funded projects to provide pedestrian facilities; however, when an FHWA-funded project provides a pedestrian facility, it must be accessible to persons with disabilities to the extent technically feasible. According to the Northeast Pennsylvania Alliance's LRTP, Monroe County has the lowest share of disabled persons out of the civilian non-institutionalized population among the four counties in its region. Within Stroudsburg, East Stroudsburg, and Stroud Township, persons with disabilities comprise 14% of the total population.

Limited English Proficiency

For the purposes of this report, "limited English proficiency" is defined as being able to speak English "less than very well," according to the Census Bureau's American Community Survey. Persons with limited English proficiency may have difficulty interpreting signs and are often low-income individuals who may be dependent on public transit. In Monroe County as a whole, 4.4% of the population age 5 and older reported that they spoke English less than very well, almost twice the NEPA region's average of 2.8%. One of Monroe County's largest limited English proficiency populations is located in Stroud Township, where over 9% of the population over 5 years of age speaks English less than very well.

Of those residents in the project study area municipalities with limited English proficiency, the most common language spoken is Spanish. This represents 2.1% of the entire population over 5 within the three municipalities, while 7.78% of the population speaks Spanish, regardless of English proficiency.

Elderly Population

While not every elderly individual has mobility challenges, the elderly are more likely to be dependent on services such as home healthcare, meals on wheels programs, and on-demand transit. As such, elderly populations were considered likely to be disadvantaged due to barriers to mobility.

Census data was examined at the block group level to discern whether there were high concentrations of elderly populations in any part of the study area. It was found that twelve block groups have higher concentrations of persons 65 years and over than the county as a whole. In some parts of Stroudsburg and Stroud Township, about one quarter of the population is 65 or older. In addition, there are 341 active retirement communities and elder care facilities in the Stroudsburg area, according to an online database search.¹ Senior living developments in the project area include Grace Park, which provides

¹ Retirenet.com

multiple lifestyle options for senior citizens. The property is located along West Main Street (209 Business), east of Exit 305. Other resources for seniors include the Monroe County Area Agency on Aging, the Loder Senior Center, and the Day Street community center (though the latter is not exclusive to senior citizens).

According to 2013 American Community Survey data gathered for the NEPA LRTP EJ study, the population 65 and over in Monroe County is 22,613 persons, or 13.4% of the County's total population. Within the project study area, this population is especially highly concentrated in Stroud Township, where one area consists of over 25% senior citizens. This is almost 10% higher than the regional average. Stroudsburg Borough and the Borough of East Stroudsburg both contain a relatively high density of senior persons—over 336 persons per square mile.

Homeless

The FHWA *Environmental Justice Reference Guide* (April 2015) recommends that practitioners consider gathering data on homeless persons. Although homeless persons are not covered by The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, agencies acquiring right-of-way should be aware of homeless and transient populations and may offer advisory services to those individuals at their discretion. It is difficult to gather data on the homeless due to the transient nature of this population. Homeless persons are not included in the US Census Bureau's estimates.

According to the Monroe County Comprehensive Plan, homelessness is an urgent issue in the County. A March 2015 article in the Pocono Record on-line newspaper, reported that teams of volunteers, some of whom represented the organizations serving the homeless, counted a homeless population of 250 in Monroe County in January 2015. Many of these persons were found living in an encampment near I-80, within the project area. None of the knowledgeable parties identified any known homeless encampments within the project area. Their general concern was the potential impact of the project on affordable housing. The Interagency Council of Monroe County identified the nearest facility serving the homeless as the Street2Feet Outreach Center, 130 N. First St., Stroudsburg, which is just north of the project study area near Brodhead Creek.

4. Impact Assessment

According to PennDOT Pub. 746, to meet the intent of EO 12898, adverse and disproportionate impacts of proposed projects must be determined if EJ populations are present and affected. The analysis of adverse effects must include the totality of significant individual or cumulative natural, social, community or human health effects. Many transportation projects involve both adverse effects (such as short-term construction impacts or displacement of residential or business properties) and positive benefits such as improvement in air quality or expanded connectivity.

Direct, indirect, and cumulative impacts must all be considered. Direct impacts are typically evident as an effect of project construction and operation, such as displacements, detours, and changes in transportation access, community aesthetics, or noise levels. Indirect effects are those which may be caused or influenced by the project but occur later in time or farther removed in distance, but are still reasonably foreseeable, including changes in the patterns of land use, population density, or growth. Similar effects to EJ populations could occur as a result of the aggregate cumulative impacts from foreseeable future actions in the community.

The following questions reflect the key decision points of this assessment:

- Are EJ populations impacted?
- Are there high or substantial impacts that adversely affect an EJ population?
- Do effects on EJ populations exceed those borne by non-EJ populations (including indirect and cumulative effects)?
- Will mitigation and enhancement measures be undertaken?
- Are there off-setting benefits to EJ populations?

4.1. Impacts on EJ Populations

The project would result in direct impacts to EJ populations as a result of roadway widening, interchange reconfigurations, and constructing stormwater detention basins. The following sections describe the specific impacts.

Property Acquisition / Displacements

Both alternatives would require some full property acquisitions and residential displacements, including low-income residential units. For each alternative, the majority of displacements are located in EJ areas. While this does not necessarily mean that the households that would potentially be displaced contain low-income or minority persons, some of them may.

Due to reconfiguring Exit 304, all alternatives would involve partial takes to the Bridge Street apartment complex. As they are currently designed, the basins for all alternatives would necessitate many of the full displacements generated, though the basins are still subject to refinement and avoidance of impact will be pursued first if at all possible. At this point, the alternatives have comparable impacts (see Table 2). Alternative 2B would entail displacing 70 total residential units – 69 in EJ areas. Of this number, 32 would be from the Bridge Street Apartments. Alternative 2D would entail displacing 66 total residential units – 65 in EJ areas. Of this number, 32 would be from the Bridge Street Apartments.

Table 2 – Projected Displacements

	2B	2D
Total Displacements	73	67
Displacements – Residential (parcels)	39	35
Displacements – Residential (units)	70	66
Displacements – Other (parcels)	34	32
Total EJ Displacements	66	62
EJ Displacements – Residential (parcels)	38	34
EJ Displacements – Residential (units)	69	65
EJ Displacements – Other (parcels)	28	28

Source: AECOM.

Economic

The project also would require acquiring parcels and displacing non-residential uses including businesses. Alternative 2B would result in displacing 22 active businesses, including 20 in EJ areas, while Alternative 2D would result in 21 business displacements, including 19 in EJ areas. Business displacements could result in long-term employment losses depending on the ability for displaced businesses to relocate within the area.

In addition, all full property acquisitions by PennDOT would result in the loss of current property tax revenues, as the acquired properties would become tax-exempt. This is a concern because property taxes are a major source of funding for the county, municipalities, and school district.

Transportation

Potential transportation impacts relate to public transit service, local traffic circulation, and emergency access.

Though some Monroe County Transit Authority (MCTA) bus routes operate through the project area, none of them run on I-80 itself; therefore, no changes in service are anticipated to occur as a result of the project. Nonetheless, during construction, transit vehicles may be required to follow detours, which could negatively affect on-time performance and the system's ability to serve its customers effectively.

During the project's construction, two lanes of traffic would remain open on I-80 at all times. However, due to the reduction of traffic lane widths, some restrictions or detour routes may be needed for emergency vehicles during the construction phase. This will require temporary or permanent revisions to the Monroe County Emergency Interstate Detour plan for I-80, especially when traffic detours on ramps would be implemented.² Auxiliary access to I-80 for emergency vehicles will be maintained and optimized in order to minimize response times in the case of incidents on the highway.

² Constructability report, June 2015

Noise

Traffic along I-80 is projected to increase in future years whether or not improvements are made. Under the No-Build scenario, where the I-80 roadway level of service (LOS) decreases to F, residents and businesses in the study area could experience added noise and pollution from slow-moving highway traffic. Under either build alternative, noise levels would increase to a greater extent than in the No-Build Alternative. In addition, construction noise may temporarily contribute to the noise levels in the project area.

Noise impacts were measured at selected points in the project area as part of the May 2015 Preliminary Noise Analysis completed for this project. The analysis found that existing worst-case noise levels already exceed FHWA/PennDOT Noise Abatement Criteria (NAC) at 52 receptor sites, and under the No-Build Alternative, noise levels are anticipated to increase to the point where they would exceed the NAC at 66 receptor sites.

The analysis found that the project would result in relatively small increases in noise levels. Under Alternative 2B, noise levels would exceed the NAC at 75 sites, and under Alternative 2D noise levels would exceed the NAC at 69 sites.

The locations for this analysis included two low-income housing complexes: Garden Street Apartments and Bridge Street Apartments. **Table 3** provides a summary of the traffic noise levels under the no-build and future build conditions for these two locations under each build alternative.

For the Bridge Street Apartments, the no-build traffic noise levels equal or exceed the NAC at three sites with 27 residential units. Under the build alternatives, all sites either would be acquired or would have noise levels lower than the NAC. For the Garden Street Apartments, the no-build noise levels equal or exceed the NAC at 7 sites with 28 residential units. Under Alternative 2B, the noise levels would be slightly lower, while under Alternative 2D, the noise levels would be the same as under the no-build.

Table 3 - Noise Impacts to Units in Low-Income Housing Complexes

Noise Model Receptor Site	Number of Units Represented	No-Build Noise Level (Leq)	Unabated Build Noise Level (Leq)	
			2B	2D
Garden Street Apartments				
MM2	4	74	73	74
MM3	4	73	72	73
MM5	4	70	69	70
MM6	4	72	71	72
MM7	4	76	74	76
R24	4	69	67	69
R25	4	70	66	70
Bridge Street Apartments				
MB3	9	64	57	64
MB4	9	66	57	64
MB5	9	70	-	-
MB6	9	61	58	64
R6	9	66	-	-

Source: *Preliminary Noise Analysis*, May 2015.

Notes: Leq = the equivalent steady-state sound level which, in a stated period of time, contains the same acoustic energy as the time-varying sound level during the same period, measured in decibels corresponding to the A-scale.

Red text denotes sound levels that equal or exceed the FHWA Noise abatement criterion of 66 Leq for the exterior of residences.

Cells without numbers indicate that the residential units represented by the receptor site would be displaced under that alternative.

4.2. High or Substantial Impacts

The next question to address is whether the project would have a high or substantial impact that adversely affects an EJ population. Based upon the preceding assessment, the most substantial impact to EJ populations would be in terms of property acquisitions / displacements. As previously noted, it is important to recognize that not all households in EJ areas contain low-income or minority persons.

Table 4 provides a summary of the number of residential and non-residential displacements in EJ and non-EJ areas. As the table shows, nearly all the displacements are in EJ areas.

Table 4 – Displacements of EJ and Non-EJ Residential Units

	Alternative	
	2B	2D
Total Residential Displacements	70	66
Non-EJ Residential Displacements	1	1
Total EJ Displacements	69	65
Total Non-Residential Displacements	28	26
Non-EJ Non-Residential Displacements	4	2
Total EJ Non-Residential Displacements	24	24

Source: AECOM.

In general, other impacts will be mostly temporary impacts from delays on local roads due to detours or lane restrictions during construction, which, though adverse, are not high or substantial.

4.3. Disproportionate Impacts

Related to the previous question is assessing whether the projected effects on EJ populations would exceed those borne by non-EJ populations. Focusing on residential displacements, the project team was able to determine the total number of residential units in the EJ and non-EJ portions of the study area, and use these numbers as the basis for calculating and comparing the relative impacts of projected full residential property acquisitions. **Table 5** shows that, for both Alternatives 2B and 2D, the percentage of residential displacements in EJ areas is only slightly higher than the percentage for the overall study area.

Table 5 – Percentage of Displacements of EJ and Non-EJ Area Residential Units

	Alternative	
	2B	2D
Total Households	6,475	6,475
Total Residential Displacements	70	66
Percentage of Total Units Displaced	1.1%	1.0%
Total EJ Residential Units	5,127	5,127
Total EJ Displacements	69	65
Percentage of EJ Units Displaced	1.3%	1.3%
Total Non-EJ Residential Units	1,348	1,348
Non-EJ Residential Displacements	1	1
Percentage of Non-EJ Units Displaced	0.1%	0.1%

Source: U.S. Census, 2010. Summary File 1.

As previously noted, most other impacts will be only temporary impacts from delays on local roads due to detours or lane restrictions during construction. Further, these relatively small impacts will be dispersed among EJ and non-EJ portions of the study area.

4.4. Mitigation and Enhancement Measures

The next step in the assessment process is to identify mitigation and enhancement measures that PennDOT proposes to undertake to address projected impacts. If unique burdens to EJ populations are projected, then the EJ assessment should seek to minimize or eliminate these burdens through design modifications or mitigation measures. Proposed mitigation strategies should be commensurate to the project's impact on EJ populations in order to ensure that disproportionately high adverse effects are offset proportionately.

The exact impact of the project on EJ populations and a proportionate and feasible mitigation and minimization strategy will be refined once the preferred alternative has been selected and final design is complete. The following is a summary of potential mitigation measures, particularly relative to the projected impacts of property acquisitions and displacements.

Property Acquisitions / Displacements

- PennDOT will continue to refine the project design in order to minimize the number of necessary full property acquisitions. PennDOT already has prepared a draft revised version of Alternative 2D that would reduce the number of full acquisitions by about one half.
- Once the final design has been established, PennDOT will work with affected property owners to provide the necessary resources for relocation and/or compensation. Displaced residents would be relocated to decent, safe, and sanitary replacement housing according to the policies of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

Economy

- As noted above, PennDOT will continue to refine the design of the preferred alternative to minimize the necessary acquisition of properties, including commercial properties. In addition, PennDOT will follow established procedures in working with displaced businesses to identify suitable relocation opportunities, which would mitigate the potential decrease in employment.

Transportation

- During construction, PennDOT will implement a traffic control plan to ensure continued access for local circulation, including public transit vehicles, and emergency vehicle access.

Noise

- Preliminary analysis has determined that noise barriers are feasible and reasonable at several locations. PennDOT is focusing on noise barriers as a noise abatement strategy because insufficient land is available for other strategies such as berms.

4.5. Offsetting Benefits

The next item to consider is whether the project would generate benefits that could balance or outweigh the adverse effects to the EJ population. It is clear from the impact assessment that the project would generate benefits for both EJ and non-EJ populations in the study area. The project is anticipated to have largely positive effects on traffic congestion, safety, and quality of life in the Stroudsburg area. These effects will benefit the entire local population, including low-income and minority residents.

Transportation

The transportation system as a whole will benefit from improved traffic flow on I-80 and the local roadway network. The project thus will benefit both EJ and non-EJ populations. As envisioned in the Purpose and Need, the project would address and improve issues related to roadway congestion, traffic safety, emergency response time, and local circulation. Notably, the project would reduce the impact of highway incidents on local roads and maintain, if not improve, on-time performance for the Pocono Pony bus routes in the study area. Similarly, the project would maintain and improve access to local businesses, social services and community facilities, and parks and recreational facilities

Economy

The project also would help to sustain and grow the local and regional economy. In the short term, the project would benefit the local economy by creating construction jobs and related spending. When complete, the improved traffic flow would have a beneficial long-term economic effect. In the long term, the mobility, access, and safety benefits of the transportation improvements would maintain and enhance the region's attractiveness for tourism, shopping, and distribution businesses. Employment growth would generate more income, spending, and tax revenues for the study area municipalities, while providing job opportunities for residents of EJ and non-EJ areas.

5. Public Involvement

Public involvement is an integral component of the environmental justice process as outlined in EO 12898 and PennDOT Publication #746: *Project Level Environmental Justice Guidance*. One component of the implementation of EJ principles is ensuring that EJ populations have adequate opportunity to engage in the planning process and comment on federally-funded projects during the design process. Public involvement has been incorporated into the design phase of this project through two public open house meetings, and efforts will continue to engage EJ populations as part of this process as the project progresses. Public involvement efforts will continue throughout the design process, taking care to reach out to EJ communities with the assistance of the Interagency Council of Monroe County (IAC Monroe) and informing these communities if and when substantial changes are made to the project.

5.1. Public Open House Meetings

On February 20th and 23rd, 2014, the Round 1 Public Open House Meetings occurred. At these meetings, the project team presented and compared the five Phase I Alternatives on the basis of how well they would meet the project need in terms of safety, mobility, environmental impacts, community impacts, constructability, maintenance, and protection of traffic and staging.

These meetings occurred at the Stroudsburg High School cafeteria, which is accessible to persons with disabilities. Sign language and foreign language interpreters were available upon request. Future meetings may be held at alternate locations if issues are identified with the high school.

Based on more detailed study, several internal meetings, and the feedback received at the first round of Open House meetings, the Phase I Alternatives were refined and put through a screening process to reduce them to three alternatives for Phase II. A second round of public meetings was held on December 4, 2014 and December 7, 2014 where the Phase II alternatives were presented.

5.2. Stakeholder Outreach

The project team has identified key stakeholders that support EJ communities in the study area. After it was determined which groups to reach out to, contact information was obtained for each agency or government office. Stakeholders were contacted by mail to inform them about the project and request their feedback and again by phone to ensure that they had received the letters and to obtain further feedback. Included in the letters were a map of EJ areas by Census block group and a list of other parties to whom the letter was sent.

As a result of these efforts, IAC Monroe was identified as a major stakeholder that is crucial to involve in future outreach in order to engage minority and low-income populations. Because the organization consists of an extensive network of member agencies that provide a broad variety of services, IAC Monroe has a wide reach that will be instrumental in reaching the most critical underserved populations as a part of the public involvement process for EJ communities.

The project team will conduct further public outreach as appropriate in order to ensure that EJ communities have ample opportunity to provide input that can aid in minimizing disproportionate adverse impacts. Possible forms of outreach may include flyers, posters, phone calls and emails to community groups and organizations that provide services to EJ populations, and other strategies. In the case of public hearings/discussions/listening sessions, the date(s) of the event(s) will be announced in the *Pocono Record*, posted on the project website, and a postcard announcement will be sent to identified EJ communities and stakeholders in advance of the event(s). Materials may be disseminated in Spanish as well as English in order to ensure the participation of the Hispanic population.

Additional outreach may be undertaken by informing IAC Monroe of upcoming events related to the project, as this organization will be able to reach a broader spectrum of EJ populations. Also, postcards should be sent out to all residents and businesses in the study area (including the owners of apartment complexes) in order to inform community members of any additional public meetings that are held.

6. Conclusion

In summary, no known minority or low-income populations have been identified that would be disproportionately highly and adversely affected by this project as determined above. Therefore, this project has met the provisions of Executive Order 12898.

7. References

American Community Survey, 2014.

Interstate 80 Reconstruction Project, Preliminary Noise Analysis, McCormick Taylor. May 2015.

I-80 Reconstruction SR 0080 Section 17M Conceptual Point of Access Study, AECOM. October 2015.

Project Level Environmental Justice Guidance, PennDOT Publication No. 746. March 2016.

Summary File 1, US Census. 2010.

APPENDIX A

KNOWLEDGEABLE PARTIES CORRESPONDENCE SUMMARY

SUMMARY OF KNOWLEDGEABLE PARTY CONTACT INFORMATION

Agency	Street Address	City	State	ZIP	Phone	Contact Person	Email	Website	Additional Info
Monroe County Commissioners	1 Quaker Plaza, Room 201	Stroudsburg	PA	18360	(570) 517-3102	Chairman John Moyer, County Commissioner	jmoyer@monroecountypa.gov	www.co.monroe.pa.us	
Monroe County Planning Commission	1 Quaker Plaza, Room 106	Stroudsburg	PA	18361	(570) 517-3100	Christine Meinhart-Fritz, Planning Director	cmeinhardt@monroecountypa.gov	http://www.monroecountypa.gov/Dept/Planning/Pages/default.aspx	
East Stroudsburg Borough	24 Analomink Street	East Stroudsburg	PA	18301	(570) 421-8300	Mayor: Armand Martinelli	boroeseb@epix.net	www.eastburg.org	
Stroud Township	1211 North Fifth Street	Stroudsburg	PA	18360	(570) 421-3362	Chairman of the Board of Supervisors: Edward C. Cramer	stroud17@ptd.net	www.township.stroud.pa.us	
Stroudsburg Borough	700 Sarah Street	Stroudsburg	PA	18360	(570) 421-5444	Borough Manager: Cathryn C. Thomas; Mayor: Tarah Probst (as of Jan. 4, 2016--was filling the remainder of term of previous mayor who died)	CThomas@StroudsburgBoro.com	www.stroudsburgboro.com	
Interagency Council of Monroe County	PO Box 1278	Stroudsburg	PA	18360	(570) 629-5657	Michael Albert, President	Michael@unitedwaymonroe.org	www.iacmonroe.org	Meetings held in PA Keystone Building, Rm 202, at Northampton Community College; Address for current presiden): 135 Warner Rd, Tannersville, PA 18372
African American Network of the Poconos	556 Main Street	Stroudsburg	PA	18360	(570) 517-3672	Cleo MeriAbut Jarvis, President	info@theoriginalaan.org	www.theoriginalaan.org	
Federation of Latinos for the Education about Cultures of Hispanic America (FLECHA)	724 Phillips Street (office)	Stroudsburg	PA	18360	(570) 291-7333	Vincent Henry, Support Services Coordinator @ Latino Countywide Services Partnership (services arm of FLECHA)	flechanepa@gmail.com	www.flechanepa.org	Mailing address: P.O. Box 228, Stroudsburg, PA 18360-0228
Northeastern Pennsylvania Alliance	1151 Oak Street	Pittston	PA	18640	(570) 655-5581	Alan Baranski – Vice President, Transportation Planning Services Division	abaranski@nepa-alliance.org		
Stroudsburg Area School District	123 Linden St.	Stroudsburg	PA	18360	(570) 421-1990	Mr. Cosmas C. Curry - Superintendent; Stephen Brodmerkel - Asst Superintendent for Personnel and Personnel Services	personnel@sburg.org , sbrodmer@sburg.org , ccurry@sburg.org		
East Stroudsburg Area School District	50 Vine Street	East Stroudsburg	PA	18301	(570) 424-8500 Ext. 10001	William Riker -Superintendent (as of July 2016)	william-riker@esasd.net		
Housing Authority of Monroe County	1055 W Main St.	Stroudsburg	PA	18360	(570) 421-7770 Ext. 238	Joseph V. Ruggiero Director of Capital Improvements	jruggiero@housingauthoritymonroecounty.org		

SUMMARY OF CORRESPONDENCE WITH KNOWLEDGEABLE PARTIES

Date	Organization	Intended Contact		Actual Contact		Method	Type of Communication	Summary of Input
		Name	Title	Name	Title			
7/28/2016	Monroe Co. Commissioners	John Moyer	Chairman			Phone	No answer; phone stopped ringing but did not go to voicemail	n/a
7/28/2016	County Planning Commission	Christine Meinhart-Fritz	Director	Nate Staruch	Senior Planner	Phone	Asked for Ms. Meinhart-Fritz, who was unavailable. Transferred to Mr. Staruch, had preliminary discussion as he had not seen EJ letter	MCPC is fully aware of project and has performed internal review of Phase II alternatives. General community feeling = mixed (some concerned with property impacts, some who have a better understanding of transportation issues understand need for safety improvements) County's priority = safety and minimizing the frequency of disruptions to traffic (i.e. get it all done at once so we don't have to do this again in 20 years)
7/28/2016	County Planning Commission	Nate Staruch	Senior Planner			Email	Sent EJ letter and attachments	
8/31/2016	County Planning Commission	Nate Staruch	Senior Planner			Phone	Follow up call made	Consult EJ appendix of LRTP EJ Resources: County Housing Authority, Street2Feet homeless day center, public transit *Public transit negatively impacted by incidents on I-80 because they cause local road congestion **CCT potential to be negatively impacted by project **Public (and Chamber of Commerce) concern: negative affect to local economy with property takes (residential and biz) **Section 8 housing where basins are proposed = potential negative impact ***Positive impact: pedestrian infrastructure improvements<--Are these definitely happening? ***Little positive impact foreseen for EJ, as not many drive ***General consensus: safety improvements will be benefit ***County's official stance: Recommend 2D
7/28/2016	East Stroudsburg Borough	Armand Martinelli	Mayor	James S. Phillips	Borough Manager	Phone	Initial outreach call; was informed the mayor did not sit in that office and asked to speak to Borough manager instead	
7/28/2016	East Stroudsburg Borough	James (Jim) Phillips	Borough Manager			Email	Sent EJ letter and attachments	
8/31/2016	East Stroudsburg Borough	James (Jim) Phillips	Borough Manager			Phone	Follow up call made; Mr. Phillips was unavailable, so left message	
8/31/2016	East Stroudsburg Borough	James (Jim) Phillips	Borough Manager			Phone	Mr. Phillips returned my call	Borough Council discussed letter @ Council meeting Resources: County housing authority & their properties, Loder Senior Center, Day Street Community Center *Impacts: none specific to EJ anticipated; few in ESB in general due to location of project **Positive impact: improved access in general ***Suggested outreach agency: County housing authority
7/28/2016	Stroud Township	Edward C. Cramer	Supervisor			Phone	Initial outreach call; was told Mr. Cramer was not in the office and other supervisors were not available either	
7/28/2016	Stroudsburg Borough	Cathryn C. Thomas	Borough Manager			Phone	Initial outreach call; unable to reach anyone through automated phone menu	
7/28/2016	African American Network	Cleo MeriAbut Jarvis				Phone	Initial outreach call; went to voicemail so left brief message	
7/29/2016	FLECHA	Vincent Henry	Support Services Coordinator			Phone	Initial outreach call; left message	

SUMMARY OF CORRESPONDENCE WITH KNOWLEDGEABLE PARTIES

Date	Organization	Intended Contact		Actual Contact		Method	Type of Communication	Summary of Input
		Name	Title	Name	Title			
7/29/2016	Stroud Township	Edward C. Cramer	Supervisor			Phone	Follow up call	<p>*Impacts to Section 8 housing on Bridge Street but otherwise not concerned about negative EJ impacts</p> <p>*Positive impact for EJ: would benefit from general transportation improvement; benefit public transit service</p> <p>**Resources for EJ: Aldi, BJ's, County-run services on Phillips Street (Children & Youth Services) and Rt. 209 Business (agency on aging), Stroudsburg churches (Wesleyan Church = food pantry), Salvation Army, YMCA, Monroe County Transit Authority, United Way</p> <p>***Potential impacts to these resources: None mentioned directly; concerned about access</p> <p>****Community feelings/concern: does not know much about project yet; would mostly be concerned with location of ramps (access). Gray Chevy owner concerned about access</p> <p>Resources: FLECHA = connector to Catholic Social Services for Spanish-speaking community and immigrants; FLECHA also connected to other services thru IAC; formerly--bilingual radio program (has been taken off air due to ESU station no longer being able to host it)</p> <p>General info: Hispanic population has exploded in past 7 or 8 years; many are LI</p> <p>Community feeling: Currently, traffic is bad and improvements are sorely needed</p> <p>Ways to get in touch with EJ: Local Access TV, Pocono Record (FLECHA has contact there who reports on Hispanic issues), Catholic Church</p>
8/1/2016	FLECHA	Vincent Henry	Support Services Coordinator			Phone	Call back	
8/2/2016	Interagency Council of the Poconos	Merle Turitz	Former President			Email	Initial outreach (No phone # for IAC); this email bounced back undeliverable	
8/9/2016	NE Pennsylvania Alliance	Alan Baranski	Transportation Planner			Phone	Initial outreach call; Mr. Baranski was out of the office, so I left a message	
8/10/2016	Stroudsburg Area School District	Stephen Brodmerkel	Assistant Superintendent			Phone	Initial outreach call; was informed Mr. Brodmerkel was not in office; left message	
8/10/2016	East Stroudsburg Area School District	Sharon Laverdure	Former Superintendent	Robert Sutjak	Director of Transportation	Phone	Initial outreach attempt; was informed by administrative assistant that Ms. Laverdure was no longer the superintendent.	
							She was aware of the EJ letter and noted that it had been received and handed off to Mr. Sutjak; was transferred to Mr. Sutjak's voicemail and left message	
8/11/2016	East Stroudsburg Area School District	Robert Sutjak	Director of Transportation			Phone	Mr. Sutjak returned my call and requested the letter be sent by email; I asked if I could call back after he had a chance to look at it and he agreed	
8/11/2016	East Stroudsburg Area School District	Robert Sutjak	Director of Transportation			Email	Sent EJ letter and attachments	
8/11/2016	Interagency Council of the Poconos	Merle Turitz	Former President			Email	2nd outreach attempt (Previous email bounced back undeliverable)	
8/11/2016	Interagency Council of the Poconos	Merle Turitz	Former President	Michael Albert	President (IAC and United Way)	Email	Email response--Ms. Turitz indicated she was no longer president of IAC and copied Mr. Albert, current president	
8/17/2016	East Stroudsburg Area School District	Robert Sutjak	Director of Transportation			Email	Email response--Mr. Sutjak provided a few comments. Confirmed with Marc that this was sufficient for feedback from ESASD	<p>"As pictured in the attached image [no image was attached], the Interstate 80, Section 17M Project referenced in the June 27, 2016 letter from PennDOT affects only a 0.5 mile section of roadway within our school district boundary. The vast majority of the project's 3.5 mile scope (85.7%) falls within the Stroudsburg Area School District. Furthermore, our economically disadvantaged minority (EJ) populations would seem to be the least likely affected by any potential impacts on westward (homeward) bound commuter traffic returning from New Jersey and New York."</p>

SUMMARY OF CORRESPONDENCE WITH KNOWLEDGEABLE PARTIES

Date	Organization	Intended Contact		Actual Contact		Method	Type of Communication	Summary of Input
		Name	Title	Name	Title			
8/17/2016	Interagency Council of the Poconos	Merle Turitz	Former President			Email	Replied to Ms. Turitz's email thanking her for informing me of the change; indicated desire to follow up with Mr. Albert	
8/17/2016	East Stroudsburg Area School District	Robert Sutjak	Director of Transportation			Email	Replied to Mr. Sutjak's email thanking him for his input	
8/17/2016	Interagency Council of the Poconos	Michael Albert	President			Email	2 responses--1) asked if I could send him EJ info; 2) acknowledged receipt of EJ info in Ms. Turitz's forwarded email	
8/17/2016	Interagency Council of the Poconos	Michael Albert				Email	Replied to Mr. Albert's email indicating intent to ask further questions	
9/2/2016	County Planning Commission	Nate Staruch	Senior Planner			Email	Per phone conversation, sent I-80 project reviews that MCPC had done and link to NEPA EJ appendix of LRTP	
9/8/2016	County Planning Commission	Nate Staruch	Senior Planner			Email	Thanked Mr. Staruch for the reviews and EJ appendix	
9/8/2016	Interagency Council of the Poconos	Michael Albert				Phone	Follow up to email conversation	<p>Concern: Maintain ER access</p> <p>Negative impact foreseen: Stroudsburg tax base concerns (already housing burdened poor and working poor/minorities would see rent increase as result of loss of Boro tax income due to takings and the associated property tax increases; Boro itself would be negatively affected if tax revenue were to decrease, esp bad for schools)</p> <p>Area characteristics: 3rd highest minority population in state; recent growth in minority pop due to migration from NYC area</p> <p>*Suggestion for dealing with tax impact: plan at boro level</p> <p>**Potential impact concerns: Working poor (200% poverty level), homeless population, Perkins restaurant</p> <p>Community feel: Project is needed but displacement = huge concern; some in general pop don't know much about the project; others are very aware</p> <p>***Suggestion for outreach: Sharon Laverdure, former school district superintendent, John Christy, Monroe County Commissioner, Monroe Chamber of Commerce (Chair = George ?), ESU president Marsha Welsh, homeownership counseling</p> <p>****Positive effects: Safety--improved access to ER, reduction in congestion benefits everyone</p> <p>****Negative effects: Residential and commercial displacements; noted exact impact was hard to determine at this point</p>
9/8/2016	Interagency Council of the Poconos	Michael Albert		Geoffrey Roche		Email	Mr. Albert forwarded input from IAC members	"Our only request is to ensure Exit 307 is done first and we make sure EMS, fire, and police always have easy and fast access."
9/8/2016	Interagency Council of the Poconos	Michael Albert		Jen Strauch		Email	Mr. Albert forwarded input from IAC members	"I don't think that these changes will affect my clients a great deal as many of them utilize Brodheadsville, Palmerton, and Mount Pocono Area Resources, or have alternative routes to get to 80. This project, long overdue, will be vital for our community and will hopefully mean some good jobs for local individuals."
9/8/2016	Interagency Council of the Poconos	Michael Albert		Johanna Ortegon		Email	Mr. Albert forwarded input from IAC members	"Can they become members? Then they can do a presentation! I would be extremely interested in seeing this issue as a presentation."
9/15/2016	Monroe Co. Commissioners	John Moyer	Chairman	John Christy	Commissioner	Phone	Asked for Mr. Moyer; was told he was not in but Mr. Christy was, could he return my call. Left info	
9/15/2016	Monroe Co. Commissioners	John Christy	Commissioner			Phone	Mr. Christy returned my call	
9/15/2016	Monroe Co. Commissioners	John Christy	Commissioner			Email	Sent EJ letter and attachments	
9/15/2016	Stroudsburg Borough	Cathryn C. Thomas	Borough Manager			Phone	Reached voicemail; left message	

SUMMARY OF CORRESPONDENCE WITH KNOWLEDGEABLE PARTIES

Date	Organization	Intended Contact		Actual Contact		Method	Type of Communication	Summary of Input
		Name	Title	Name	Title			
9/22/2016	NE Pennsylvania Alliance	Alan Baranski	Transportation Planner	Steven Zaricki	Research and Information Manager, Community Services Division	Phone	Followed up on initial call; was told Mr. Baranski was not in office but I could talk to Steve Zaricki. Left message with Mr. Zaricki	
9/22/2016	NE Pennsylvania Alliance	Steven Zaricki	Research and Information Manager, Community Services Division			Phone	Mr. Zaricki returned my call, saying Mr. Baranski would follow up with me	
9/22/2016	African American Network	Cleo MeriAbut Jarvis	President			Phone	Followed up on initial call; no answer, left message	
9/22/2016	Stroudsburg Area School District	Stephen Brodmerkel				Phone	Followed up on initial call. Left message with Mr. Brodmerkel's secretary	
9/22/2016	Stroudsburg Area School District	Dina Straub	Administrative Assistant to Mr. Brodmerkel			Phone	Called me back; requested the letter by email	
9/22/2016	Stroudsburg Area School District	Dina Straub	Administrative Assistant to Mr. Brodmerkel			Email	Sent EJ letter and attachments	
9/23/2016	Monroe Co. Commissioners	John Christy	Commissioner			Email	Asked if he had reviewed the letter; requested that he be in touch for questions	