

1 their own more inclusive methodology in
 2 *Environmental Justice in Colorado's Statewide and*
 3 *Regional Planning Process Guidebook* (December
 4 2003). The methods described in that publication
 5 are more representative of particular sub-areas
 6 of the state than using poverty guidelines estab-
 7 lished by the Department of Health and Human
 8 Services. The Colorado Guidebook states, "...
 9 income thresholds used in determining the
 10 allocation of Colorado Community Development
 11 Block Grant (CBDG) funds were selected for
 12 environmental justice mapping." These methods
 13 include using a low-income threshold that
 14 equals 30 percent of the area median income
 15 (AMI) for each metropolitan statistical area
 16 (MSA). The AMI for the Denver MSA, including
 17 Arapahoe, Douglas, and Jefferson Counties for
 18 2000 was \$62,100 for a four-person household.
 19 The 30 percent AMI low-income threshold is
 20 then \$18,630. This threshold was used to
 21 evaluate household income data for the project
 22 area, as compared to the average for each
 23 respective county in the project area.

24
 25 The low-income populations for Arapahoe,
 26 Douglas, and Jefferson Counties are 11.76, 4.45,
 27 and 10.83 percent, respectively. **Figure 3-3** shows
 28 individual block groups with household
 29 percentages below the 30 percent AMI low-
 30 income threshold within the C-470 project area.

31
 32 Based on U.S. Census data alone, several block
 33 groups appear to have higher percentages of
 34 households below the \$18,630 low-income
 35 threshold, as compared to the three-county area.
 36 However, in order to determine whether this
 37 data represented actual low-income populations,
 38 as defined by the DOT Order, additional data
 39 was evaluated. Douglas and Jefferson County
 40 planning departments indicated that no low-
 41 income populations were known to exist within
 42 the C-470 project area. Statistics were evaluated
 43 to determine the percentage of students
 44 attending area schools that were eligible for
 45 reduced-price or free lunches. These percentages
 46 for schools within the project area were below
 47 six percent. Housing authorities in Douglas
 48 County and the City of Littleton revealed that

51 while Section 8 housing vouchers were
 52 distributed to households within their jurisdic-
 53 tions, none were for areas within the C-470
 54 project area, except for the Wolhurst
 55 Community, hereafter referred to as "Wolhurst."
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57 While analysis of census data indicated that low-
 58 income populations might be present in other
 59 portions of the project area, additional analysis
 60 indicated that Wolhurst might also be low
 61 income. For this reason, a neighborhood survey
 62 of Wolhurst was conducted. This community
 63 spans the border of Arapahoe and Douglas
 64 Counties, and is composed of 272 units. The
 65 community is currently expanding to accom-
 66 modate 29 additional units. Residents lease lots
 67 from the community's owner, Wolhurst Adult
 68 Community, Incorporated.
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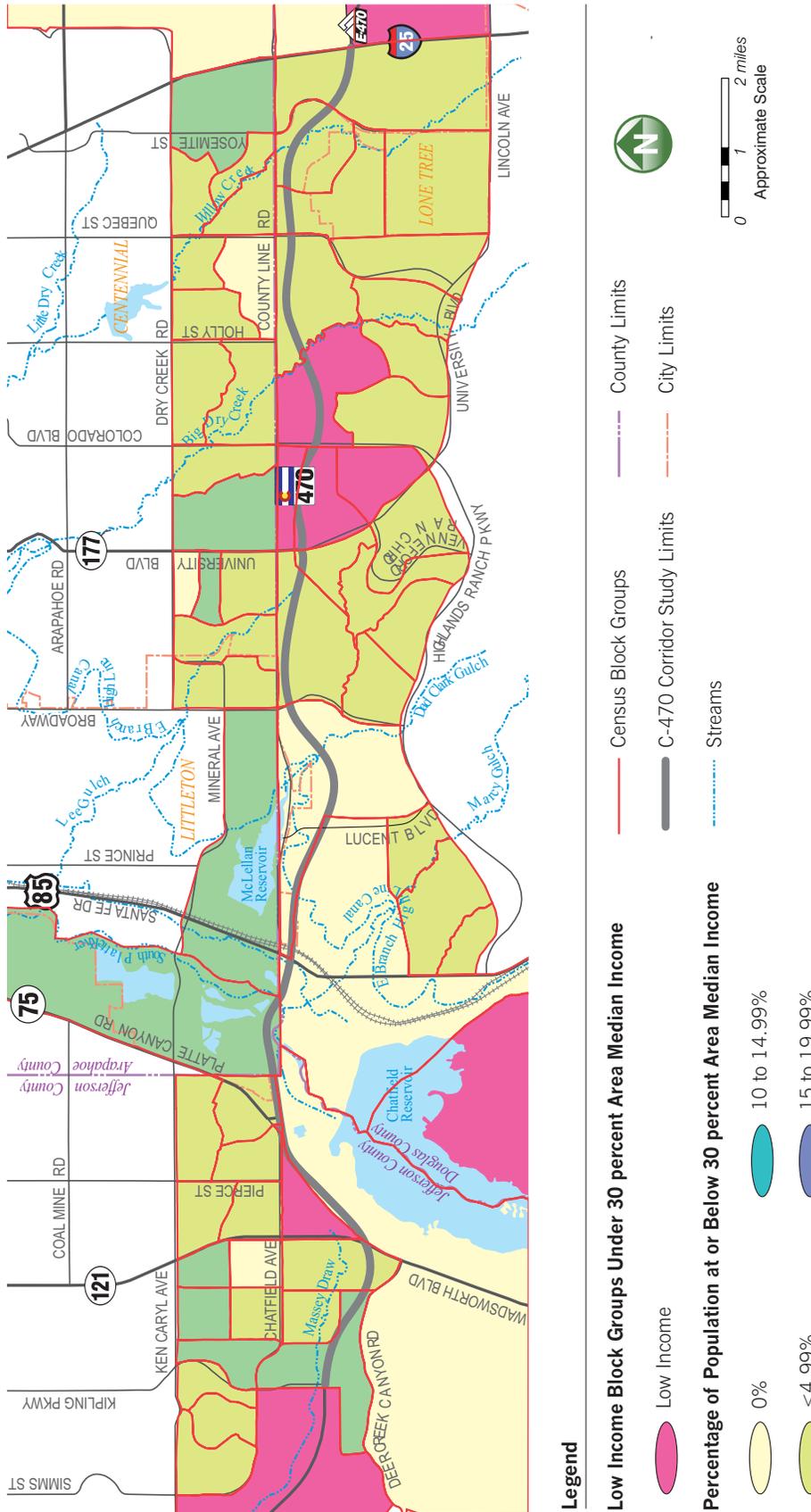
70 In September 2003, a community survey was
 71 developed and distributed to all 272 households
 72 in Wolhurst and nearly 50 percent of the surveys
 73 were returned. Based on the survey results,
 74 approximately 30 percent of the community has
 75 a household income at or below \$18,630. This is
 76 higher than the county averages for both
 77 Arapahoe and Douglas Counties of 11.76 and
 78 4.45 percent low-income, respectively. These two
 79 counties were used as comparisons, since
 80 Wolhurst is located in both counties.
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82 CDOT has identified Wolhurst as a low-income
 83 population because reported income levels from
 84 the community survey indicate a substantially
 85 higher percentage of households meets the low-
 86 income threshold than both the Arapahoe and
 87 Douglas County averages.
 88

89 **3.2.2.2 Environmental Consequences**

90 The FHWA Order 6640.23, *FHWA Actions to*
 91 *Address Environmental Justice in Minority*
 92 *Populations and Low-Income Populations*
 93 (December 1998) states, "It is the FHWA's
 94 longstanding policy to actively ensure nondis-
 95 crimination in federally funded activities.
 96 Furthermore, it is the FHWA's continuing policy
 97 to identify and prevent discriminatory effects by
 98 actively administering its programs, policies,
 99
 100

Figure 3-3
Percentages of Households Below 30 Percent AMI



Source: 2000 U.S. Census
 Note: Although the Wolhurst Community was identified as a low-income population, the Census block group where Wolhurst is located does not indicate a percentage of low-income households below the average for Arapahoe or Douglas County, based on the 30 percent AMI method.

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