



MEMORANDUM

TO: TPB Technical Committee
FROM: Wendy Klancher and Sergio Ritacco, TPB Transportation Planners
SUBJECT: Proposed Map for Enhancements to the Title VI/Environmental Justice (EJ) Analysis of the CLRP
DATE: January 6, 2017

PURPOSE

This memorandum is being provided in preparation for the TPB agenda item at the January 18 meeting in which the TPB will be asked to adopt the attached “communities of concern” map for use in the Title VI and Environmental Justice (EJ) analysis of the Constrained Long-Range Transportation Plan (CLRP). The memorandum concludes with information under next steps about Phase 2 in which the CLRP will be analyzed for disproportionately high and adverse impacts on the “communities of concern”.

The TPB was briefed on the proposed “communities of concern” map at its December 21, 2016 meeting and in general Board members accepted the methodology and resulting map. However, the TPB concurred with the AFA recommendation that the name of the map be changed. Both the Technical Committee and the Access for All Advisory Committee provided feedback that the name “Communities of Concern” have a negative connotation. The name will be changed and alternatives include “Equity Areas”, “Environmental Justice Areas” or “Transportation Emphasis Areas”. The Technical Committee will be asked for input at its January 6 meeting.

BACKGROUND

Per federal requirements, the CLRP must be evaluated for disproportionately high and adverse impacts on low-income and minority populations that may result from the planned transportation improvements as a whole. The legal basis for this requirement comes from Title VI of the 1964 Civil Rights Act and Executive Order 12898 on Environmental Justice (EJ).

While the focus of this Title VI and EJ work is on the analysis of the CLRP, COG and TPB have several policies, plans and programs in place in order meet a broader set of federal requirements for compliance with Title VI and nondiscrimination. The TPB, and COG, as the TPB’s administrative agent, have a Title VI Plan and Program that include a Language Assistance Plan, an accommodations policy for people with disabilities and those with Limited English skills and the TPB has a proactive public involvement strategy to ensure that the transportation planning process includes input from traditionally-disadvantaged population groups.

TPB staff undertook a review of the state of the practice in Title VI and EJ analysis methods used by other MPOs in 2016. The major finding from the scan was that while the TPB’s approach was typical and compliant with the federal requirements, it could be enhanced. The review found that other

MPO EJ analysis first define small geographic areas, sometimes called “EJ Areas”, and examine these smaller areas in comparison with the rest of their planning area. The review also found many MPOs use multiple transportation accessibility measures.

Based on further examination of these methods and testing of alternative enhancements, TPB staff developed a revised EJ analysis methodology for identifying disproportionate impacts of the transportation system due to the CLRP. The revised methodology reflects two key enhancements, which are also the two phases for this work: (1) identifying small geographic areas with higher than average concentrations of low-income and/or minority populations; and (2) examining the CLRP for changes in accessibility to multiple trip destinations (rather than to jobs alone) between the small areas and the rest of the region.

CONSULTATION AND STAKEHOLDER INPUT

TPB staff did extensive consultation with land use planning directors from local jurisdictions on the methodology and map. COG’s Planning Directors Technical Advisory Committee was briefed on September 16, 2016 and comments were solicited during a 3-week period. This briefing followed a series of staff level consultations in the District of Columbia, Montgomery County, MD, Prince George’s County, MD, and Fairfax County, VA. The staff level consultation with select jurisdictions solicited feedback on the technical methods used to identify the areas highlighted on the attached map. The planning directors have endorsed the technical process used which reflects their consensus recommendation of placing additional weight to low-income as a factor in determining if an area is to be considered a “community of concern” given the importance of income in someone’s ability to access transportation options.

The TPB Technical Committee was also consulted and received three briefings in which feedback and comments were requested on the proposed enhancements to the Title VI/EJ analysis: September 9, October 7, and December 2, 2016. Only one written comment was received during the comment period for the Technical Committee, and underscored the overall support from the Technical Committee for the proposed enhancements.

The TPB Citizens Advisory Committee was briefed on November 10, 2016 and CAC members expressed enthusiasm for the proposed enhanced EJ analysis, including the map. The TPB Access for All Advisory Committee was briefed on December 15, 2016 and enthusiastically supported the work but felt the name should be more positive in nature. The Chair of the AFA, Charles Allen, and several AFA members have expressed support for either “Equity Areas” or “Environmental Justice Areas”.

METHODOLOGY AND ONLINE INTERACTIVE MAP

The methodology for determining what areas are designated a “community of concern” was described in previous memos to the Technical Committee. To summarize, the methodology relies on U.S. Census American Community Survey (ACS) data at the tract level and an index is used to define concentration of multiple populations in this majority-minority region. The index is based on higher than average regional percentages for Low-Income, Asian, African-American and Hispanic/Latino population groups. Low-Income populations are weighted to ensure tracts with low-income criteria alone will identify tracts as “communities of concern”.

An online interactive map is available at <https://gis.mwcog.org/webmaps/tpb/clrp/ej>. Additionally, the methodology and jurisdiction-specific maps of the “communities of concern” with detailed tables for each population group by Census tract are available at mwcog.org/clrp/performance/EJ/EJ_CoC.asp

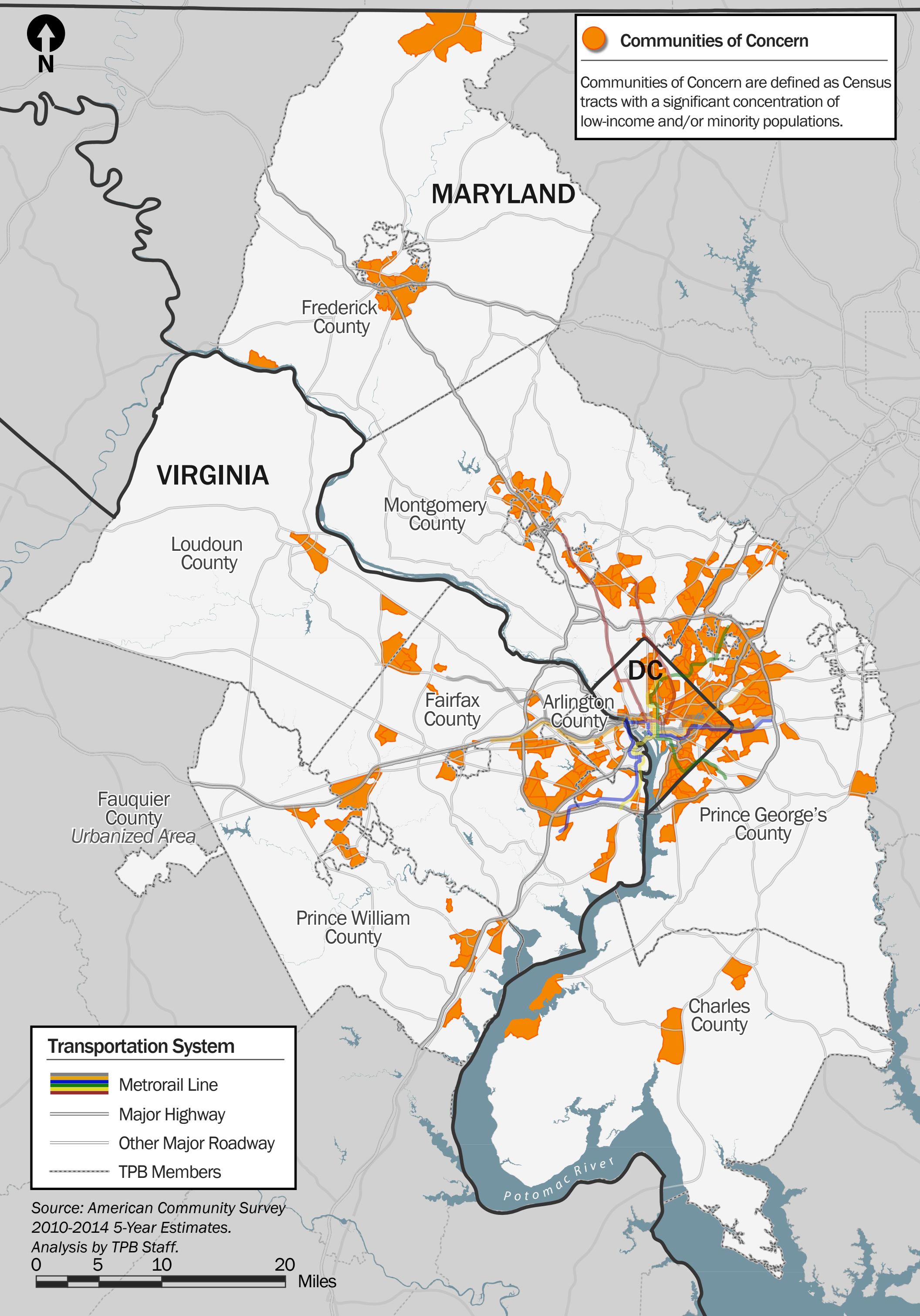
NEXT STEPS

The TPB will be asked to approve the attached map at its January 18, 2017 meeting. After the approval, staff will proceed with Phase 2 of the work, which is the analysis of the 2016 CLRP amendment. Phase 2 will examine multiple accessibility and mobility measures including “accessibility” to all jobs, retail jobs, educational institutions and hospitals by automobile and transit travel. These measures will be compared for “communities of concern” versus the rest of the region between 2016 and 2040 based on the 2016 CLRP performance as a whole. Phase 2 results will be presented to the Technical Committee for review and discussion; TPB staff anticipate that briefing to occur in March or April.

The regionally agreed upon map will also be used in other TPB work activities. These areas will inform the sampling strategy for the regional Household Travel Survey to ensure that low-income and minority populations are fully represented in the survey. The Transportation and Land-Use Connections (TLC) grant program will encourage applications from local governments for projects related to the emphasis areas. These areas can be used in long-range planning work, including scenario analysis. Beyond transportation planning, the regionally agreed upon map could also be used by local jurisdictions to assist with their community planning initiatives in areas such as housing, health care, education and parks or green space.

Proposed "Communities of Concern"





in the National Capital Region



Communities of Concern

Communities of Concern are defined as Census tracts with a significant concentration of low-income and/or minority populations.

Transportation System

-  Metrorail Line
-  Major Highway
-  Other Major Roadway
-  TPB Members

Source: American Community Survey 2010-2014 5-Year Estimates.
 Analysis by TPB Staff.

0 5 10 20 Miles