

MEMORANDUM

TO: TPB Technical Committee

FROM: Wendy Klancher and Sergio Ritacco, TPB Transportation Planners

SUBJECT: Map of "Communities of Concern" for use in the TPB's Title VI/Environmental Justice (EJ)

Analysis and Other Planning Efforts

DATE: December 2, 2016

PURPOSE

This memorandum provides the broader context for the staff's work identifying "Communities of Concern" within the TPB's planning area as displayed on the attached map. A "Community of Concern" is a small geographic area (corresponding to US Census tracts) with a higher than average concentration of low-income and/or minority populations. The proposed "Communities of Concern" will be shared with the TPB at its December 21, 2016 meeting and the TPB will be asked to adopt these at its January 18, 2017 meeting. The memo also provides a recap of the methodology used in designating a geographic area as a "Community of Concern".

SUMMARY

On September 9, 2016, the Technical Committee was briefed on the federal requirements for a Metropolitan Planning Organization (MPO) to conduct a Title VI and Environmental Justice (EJ) analysis of its long-range transportation plan (CLRP). According to the Federal requirements, the MPO should evaluate its long-range transportation plan to identify if the planned transportation improvements as a whole have a disproportionately high and adverse impact on low-income and minority populations.

The TPB's previous approach to Title VI and EJ Analysis, last performed on its 2010 CLRP, was to examine for disproportionate benefits or burdens on low-income and minority population at a regional level using a single transportation measure: accessibility to jobs. In an effort to improve the ability to discern changes in transportation accessibility on low income and minority populations, TPB staff undertook a review of the state of the practice in Title VI and EJ analysis methods used by other MPOs. 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 MPO's use multiple transportation accessibility measures.

Based on further examination of these methods and testing of few alternative enhancements, TPB staff developed a revised EJ analysis methodology. The revised methodology reflects two key enhancements: (1) identifying small geographic areas, referred to as "Communities of Concern", with higher than average concentrations of low-income and/or minority populations to assess benefits

and burdens of changes in the transportation system due to the Constrained Long-Range Transportation Plan (CLRP), and (2) examining change in accessibility to multiple trip destinations rather than to jobs alone.

The Planning Directors Technical Advisory Committee was briefed on September 16, 2016 on the methodology and resulting "Communities of Concern" map (attached). This briefing to the local planning directors as a whole 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 "Communities of Concern". 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".

On October 7, 2016, the TPB Technical Committee was briefed on the enhanced EJ Analysis methodology and a map of the TPB region displaying the identified Communities of Concern.

NEXT STEPS

The TPB will be briefed on December 21 on the process used to identify "Communities of Concern" and presented with the attached regional map displaying these communities within the TPB planning area.

Upon adoption of the regional "Communities of Concern", anticipated to occur at the January 18, 2017 TPB meeting, staff will proceed with comparative analysis of the changes in mobility and accessibility, attributable to the 2016 CLRP, within the Communities of Concern relative to the rest of the region.

The regionally agreed upon "Communities of Concern" will be used in other TPB work activities. The "Communities of Concern" 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 studies involving "Communities of Concern". "Communities of Concern" can be used in long-range planning work, including scenario analysis. Beyond transportation planning, the regionally agreed upon "Communities of Concern" 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.

RECAP OF PROPOSED ENHANCEMENTS TO THE TITLE VI/ENVIRONMENTAL JUSTICE ANALYSIS: PHASE 1: IDENTIFICATION OF "COMMUNITIES OF CONCERN"

Figure 1 summarizes the statutory and regulatory requirements applicable to MPOs, like the TPB, related to Title VI and Environmental Justice. Consistent with federal regulations, the EJ Analysis methodology focuses on low-income populations and minority populations in this region. The analysis uses current demographic data from the U.S. Census 2010-2014 American Community Survey (ACS) at the tract-level. TPB staff used data specific to this region to identify the income thresholds for low-income population group and the specific racial and ethnic groups that would constitute the minority population group to be used in the EJ analysis. According to the U.S. Census 2010-2014 ACS data the largest racial and ethnic minority populations in this region are African American, Asian and Hispanic or Latino. Figure 2 displays the demographic profile for the region

Title VI: Civil Rights Act of 1964

Prohibit discrimination based on race, color, or national origin under any program or activity receiving Federal financial assistance

Environmental Justice

Executive Order 12898 (1994): Recipients of Federal funds must identify and avoid disproportionately high and adverse effects on minority and low-income populations

Figure 1: Relationship Between Title VI and Environmental Justice

Steps for Identifying "Communities of Concern"

Each of the 1,231 Census tracts in the TPB planning area were analyzed using the following steps to determine which would be considered a "Community of Concern".

- 1. Determine the percentage of the Census tract's population for each of the four groups (shown in the "Definitions" text box).
- 2. Calculate the "Ratio of Concentration" (ROC) for each group in every Census tract.; the "Ratio of Concentration or" "times regional average", is the tract-level percentage divided by the total regional percentage.
- 3. Assign an Index score depending on the ROC. Table 1 displays the index scoring system.
- 4. Sum the index scores for each of the four population groups in every Census tract.
- 5. Designate any tract with a <u>total</u> Index score greater than 3.0 a "Community of Concern".

A greater weight was placed on low-income populations in the methodology because of discussions with the Planning Directors on the importance of income as a demographic factor impacting s

on the importance of income as a demographic factor impacting someone's ability to access transportation.

Definitions for Population Groups

Low-Income: Individuals with household income less than one- and- a- half times the federal government's official poverty threshold, depending on household size. In the current analysis, a household of four people with an annual income less than \$36.346 would be considered low-income.

African American*: A person having origins in any of the Black racial groups of Africa.

Asian*: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.

Hispanic or Latino*: a person of Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin regardless of race.

*Definitions are from the U.S. Census.

26% 25% 20% 15% 15% 14% 10% 10% 2.9% 0.3% 0.2% 0.1% Low-Income African Asian Latino or American Native Other alone Two or more Population American Hispanic Indian Hawaiian alone Alaskan Pacific Native Islander

Figure 2: Demographic Profile of Low-Income and Minority Populations in the Region

Source: U.S. Census; American Community Survey, 2010 to 2014 5-Year Estimates.

Table 1: Rules for Determining if a Tract is a "Community of Concern"

RATIO OF CONCENTRATION (ROC)	INDEX SCORE (for each population group)				TOTAL INDEX SCORE
	Low- Income*	African American	Asian	Hispanic Or Latino	Index scores for each
Less than 1.5 times the regional average	0	0	0	0	population group are totaled (ranging from 0-15)
Between 1.5 and 3.0 times the regional average	3.0 to 6.0	1.5 to 3.0	1.5 to 3.0	1.5 to 3.0	
Greater than 3.0 times the regional average	6.0	3.0	3.0	3.0	
✓ Community of Concern (Total Index > 3.00)□ Not a Community of Concern (Total Index ≤ 3.00)					

^{*}Low-Income Index scores are weighted to ensure that low-income criteria alone will identify tracts as Communities of Concern

Online Interactive Map

An interactive edition of this map is available at https://gis.mwcog.org/webmaps/tpb/clrp/ej.

Additionally, jurisdiction-specific maps of the "Communities of Concern" with detailed tables of the Ratio of Concentration (or times the regional average) for each population group by census tract are made available at mwcog.org/clrp/performance/EJ/EJ_CoC.asp.

Proposed Communities of Concern in the National Capital Region

