



MEMORANDUM

TO: Planning Directors Technical Advisory Committee
FROM: Kanti Srikanth, TPB Staff Director
SUBJECT: Modified Methodology for “Equity Emphasis Areas” for the TPB’s Enhanced Title VI/Environmental Justice Analysis
DATE: February 10, 2017

Thank you for your collaboration and input on the TPB’s staff work to enhance the approach to analyzing the Financially Constrained Long-Range Transportation Plan (CLRP) for Title VI and Environmental Justice (EJ) considerations. The purpose of this memorandum is twofold: 1) to update the committee since the last briefing on this topic on September 16, 2016; and 2) to solicit feedback on a modification staff is proposing to the methodology in response to comments received during TPB’s comment period (December 2016 thru January 2017).

The Planning Directors, as individuals and a committee, have been invaluable to the TPB’s efforts to enhance its Title VI and EJ Analyses. I thank you in advance for reviewing this modified methodology, and kindly request that feedback be provided by March 1, 2017. Any questions or comments can be provided to my colleague Sergio Ritacco at sritacco@mwkog.org or (202) 962-3232.

The planned next steps are: briefing the Planning Directors Technical Committee (February 17, 2017); hosting a webinar to review the updated methodology and the results (February 22, 2017); review of the revisions made in response to comments by the TPB’s Technical Committee (March 3, 2017) and TPB’s endorsement of the analysis at its March 15, 2017 meeting.

UPDATES

After a lengthy consultation process during 2016 with you, your colleagues and the Technical Committee, TPB staff presented the first draft map of these small geographic areas, at that time called “Communities of Concern”, to the TPB’s Citizens Advisory Committee (CAC), its Access for All (AFA) Advisory Committee and to the TPB on December 21, 2016 to seek their input. Two changes have occurred as a result of these consultations which are described in the following sections of the memo: 1) a change in the name of the geographic areas with high concentrations the Title VI and EJ population groups (Low Income, African-American, Asian, and Hispanic or Latino); and 2) a proposed modification to the methodology in response to comments from the TPB.

The New Name: Equity Emphasis Areas

The feedback from members of the TPB Technical Committee, CAC and AFA was that the term “Communities of Concern” used to represent small geographic areas with high concentration of Title VI and EJ population groups has a negative connotation to it and does not convey the intent of the analysis. With input from members of these committees and the Board the term was changed to “Equity Emphasis Areas”. This name was endorsed as being more descriptive of intent of TPB’s analysis - examine for / emphasize equity in the benefits of planned transportation improvements /

investments in areas that may be vulnerable given the demographic make-up of these areas. The Equity Emphasis Areas will be used to evaluate the CLRP and other TPB activities.

We have also heard from some of you that you'd like to use the map in community planning initiatives, such as in areas like housing, education or green space, and we will make all GIS files available to your agencies by request for tailoring the map for local purposes.

Proposed Modification to the Methodology for the Map

In September of 2016, this Committee had reviewed and supported the methodology used to identify U.S. Census tracts in this region with high concentrations of Title VI and EJ population groups (Low Income, African-American, Asian, and Hispanic or Latino). As you know, to identify the Equity Emphasis Areas, staff used data from the U.S. Census Bureau's 2010-2014 American Community Survey to calculate the regional averages of low-income, African-American, Asian, and Hispanic or Latino populations as a share of the total population at the Census tract level. An index score was created based on concentrations of each of the four population groups. The scoring system placed greater weight on low-income populations, given feedback from you about the important role income plays in predicting someone's ability to access transportation services. The Committee reviewed a map of these Equity Emphasis Areas (EEA) and generally concurred with the areas identified and the distribution of the areas within the region.

During the TPB's comment period and at the January 18 TPB meeting, representatives from Prince George's County identified an unintended and hitherto unnoticed anomaly in the EEA identified and requested that staff re-examine the EEAs. The anomalous results identified by Prince Georges County representatives to the TPB was that Census tracts with high concentrations of only one of three minority population with higher than regional average concentrations of low-income population were not being identified as EEAs while Census tracts with high concentrations of two minority population groups but with lower than regional average concentrations of low income populations were being identified as EEAs.

While the merits for identifying areas with higher than regional average concentrations of two or more minority population groups independent of their concentration of low income population was understood and acceptable, staff could not find an empirical basis or a rationale for not identifying areas with very high concentration of at least one minority population combined with higher than regional average concentration of low income population as an EEA.

After reviewing the approaches of a few other peer organizations and testing alternative changes to the criteria and index scoring system staff has found a slight revision, described below, to address the concern. TPB staff found that by using additional secondary criteria that took into account areas with high concentrations of one or more minority population groups and low income population concentrations that were at or above the regional average the anomaly in the original method for identifying EEAs could be addressed.

With this modified methodology, Census tracts with a high concentration of at least one minority population combined with low-income populations at or above the regional average are identified as EEAs. The earlier threshold for concentration of the low-income population (greater than 1.5 times the regional average) to identify the Census tract as an EEA in the original methodology is preserved; as is the earlier approach of using a high concentration of two or more minority population groups as a criterion to identify the Census tract as an EEA.

Previously the maximum index score and the threshold for being identified as a EEA was three corresponding to the use of just three minority population groups (African America, Asian, Hispanic/Latino). Now with the addition of low income population as the fourth group the maximum index score and threshold for being identified as an EEA is four. Additionally, there are now two income levels proposed to be used in determining if an area is a EEA: one when concentration of low income population alone is used as a criteria and another when income level in combination with concertation of at least one minority group population.

Criteria 1 identifies tracts with concentration of low-income populations greater than or equal to one-and-a-half times the regional average and applies an index score to ensure all are considered Equity Emphasis Areas (see Table 1).

Criteria 2 identifies tracts with high concentrations of two or more minority population groups and/or high concentrations of one or more minority population groups together with low income concentrations at or above the regional average. (see Table 2).

The modified methodology would mean that an additional 18 tracts (for a regional total of 360 tracts or nearly 30 percent) would be identified as an Equity Emphasis Area. The high concentration of low income population by itself (Criteria 1) accounts for 79 percent of the tracts that make up the EEAs in this modified methodology. The combination of high concentration of two or more minority population or one minority population with high concentration of low income population (Criteria 2) accounts for the remaining 21 percent. Given that the region is a majority-minority region with a wide distribution of income levels the extent of EEAs appears reasonable.

Table 1: Scoring for Criteria 1 - Low-Income Population Concentration

RATIO OF CONCENTRATION (ROC or times the regional average)	INDEX SCORE
	Low-Income*
Between 1.5 and 3.0	4.5 to 9.0
Greater than 3.0	9.0
Index Score	4.5 to 9.0
<input checked="" type="checkbox"/> Equity Emphasis Area (Total Index \geq 4.00) <input type="checkbox"/> Not an Equity Emphasis Area (Total Index $<$ 4.00)	

Table 2: Scoring for Criteria 2 - Minority Population Concentration and Secondary Low-Income Thresholds

RATIO OF CONCENTRATION (ROC or times the regional average)	INDEX SCORE			
	Low-Income*	African American	Asian	Hispanic or Latino
Less than 1.0	0	0	0	0
Between 1.0 and 1.49	1.0 to 1.49			
Between 1.5 and 3.0	See Criteria 1 (4.5 to 9.0)	1.5 to 3.0	1.5 to 3.0	1.5 to 3.0
Greater than 3.0	See Criteria 1 (9.0)	3.0	3.0	3.0
Total Index Score	Index scores are totaled (ranging from 0 to 10.49)			
<input checked="" type="checkbox"/> Equity Emphasis Area (EEA) (Total Index \geq 4.00) <input type="checkbox"/> Not an Equity Emphasis Area (EEA) (Total Index $<$ 4.00)				

The guiding principles in the modified methodology confirmed in our consultation meetings with you remain the same: (1) income is a more important demographic factor than minority status when evaluating someone’s ability to access transportation; and (2) a person who identifies as a racial or ethnic minority does not automatically mean that this person is transportation-disadvantaged. Thus, the original approach of using more than one of the four demographic factors to designate an area as an EEA continues to be the underlying tenet.

Regional and jurisdictional maps and tables of the modified “Equity Emphasis Areas” are available at http://old.mwcog.org/clrp/performance/EJ/EJ_CoC.asp.

Attachments:

Figure 1: Modified Equity Emphasis Areas in the National Capital Region

Figure 2: Proposed Changes to the Equity Emphasis Areas in the National Capital Region

Figure 1: Modified Equity Emphasis Areas in the National Capital Region

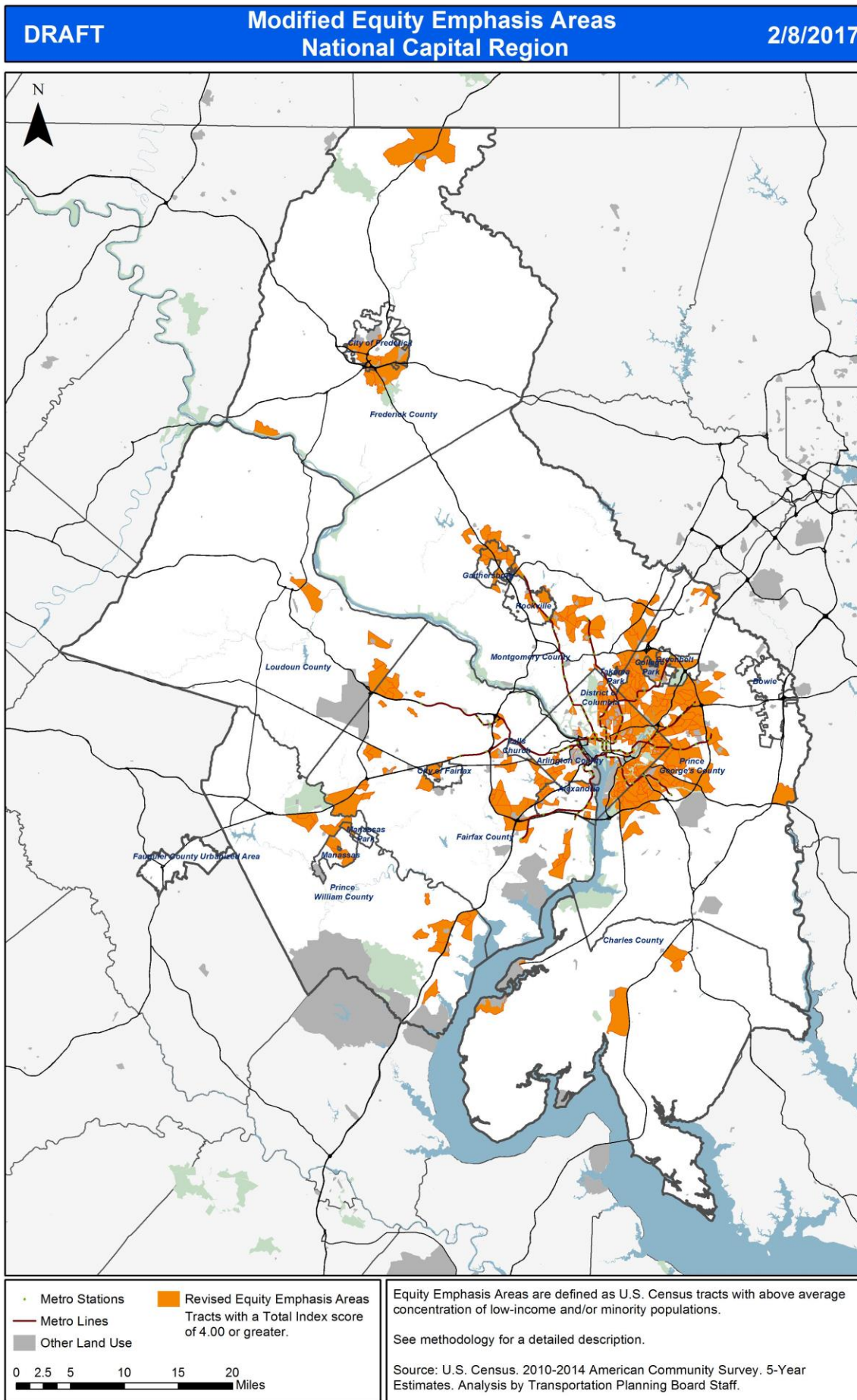


Figure 2: Proposed Changes to the Equity Emphasis Areas in the National Capital Region

