

Metropolitan Transportation Commission and Association of Bay Area Governments

Regional Equity Working Group

April 15, 2021

Plan Bay Area 2050 Equity Analysis Update

Subject: Update on recent outreach through community-based organizations on the Communities of Concern framework and nomenclature, and preview and discussion of the Plan Bay Area 2050 Equity Analysis, slated for draft release in late spring 2021.

Background: In November 2020, the Regional Equity Working Group focused on two specific topics, focusing on U.S. Census Bureau data updates and downstream effects on the Communities of Concern mapping as well as an initial framework for the Plan Bay Area 2050 Equity Analysis Report (meeting materials and recording [here](#); memo attached for reference in **Attachment A**). This month's Regional Equity Working Group meeting provides updates on both of these topics, following a presentation to the Equity & Access Subcommittee in March 2021.

Communities of Concern

In November 2020, staff had described the impact of the U.S. Census Bureau's American Community Survey (ACS) data refresh and consequent updates to census tracts identified as Communities of Concern. Staff also outlined some of the challenges with the existing framework and provided initial thoughts on revising the nomenclature as part of Plan Bay Area 2050. Since then, staff has engaged with underserved communities through community-based organizations to get feedback on the overall framework itself and the nomenclature.

Despite this being an abstract topic to discuss, the small group discussions were rich and offered diverse feedback. Staff will share a summary of synthesized feedback based on recurring themes and provide initial recommendations for future long-term reexamination of the framework and the short-term change in nomenclature, included in **Attachment B**. Later this spring, staff envisions updating the Community of Concern nomenclature with one of the new naming options currently under consideration. Further work on reexamining the framework is slated to begin next year, in advance of the next long-range regional plan and in sync with the Equity Platform effort underway across the organization.

Staff is seeking discussion on a few questions:

Framework:

- Does the REWG have feedback on staff recommendations?
- Are there any other issues that the REWG recommends for study in the future?

Nomenclature:

- Can REWG members provide opinions on why they may or may not favor each of the names that staff has shortlisted?
- Do the REWG members have a preference towards any of the names, or have other suggestions?

Plan Bay Area 2050 Equity Analysis

At the previous Regional Equity Working Group meeting, staff provided an overview of the three primary sections of the Equity Analysis Report slated for release later this year:

- 1) **Equity Lens on Strategies:** Captures equity-focused aspects that are woven into each of the Plan Bay Area 2050 strategies.
- 2) **Investment Analysis:** Identifies share of investment in all four elements of the Plan (Transportation, Housing, Economy and Environment) that benefit populations with low incomes; includes the Title VI analysis for transit investments.
- 3) **Plan Outcomes Analysis:** Forecasts outcomes and disparities among population subgroups in 2050 with metrics that are aligned with the five Guiding Principles (Affordable, Connected, Diverse, Healthy and Vibrant).

Today's item previews these key components of the Draft Plan Bay Area 2050 Equity Analysis Report, which will be released in late spring 2021 as a supplemental report alongside the Draft Plan Bay Area 2050 Document. The content builds on extensive analysis over the last three years during the Horizon and Blueprint phases of the long-range planning process. Today's presentation, featured in **Attachment B**, provides the main highlights of that broader report.

Staff is seeking discussion on a few questions:

Short-term:

- Does the REWG have any feedback on this preview of the Equity Analysis Report?
- How can findings shape the Implementation Plan actions?

Long-term:

- How can findings inform what we prioritize for study, or how we study, in the next plan update?
- What tools and methods can we invest in to better study equity impacts during the next Plan Bay Area update?

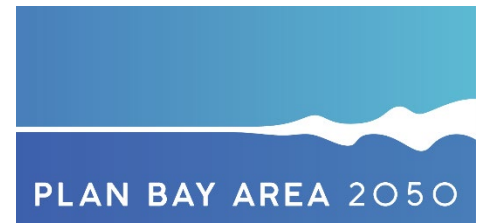
Next Steps

- May 2021: Staff to share recommended revised nomenclature for Communities of Concern with Joint MTC Planning Committee and ABAG Administrative Committee for approval.
- Late Spring 2021: Staff to release Draft Plan (including Draft Equity Analysis Supplemental Report), Draft EIR and Draft Implementation Plan.
- Fall 2021: Staff to bring forward Final Plan Bay Area 2050 for adoption.

Recommendation: Information

Attachments: Attachment A: Memo - Plan Bay Area 2050 Equity Analysis: Communities of Concern Update and Equity Analysis Report Framework (*November 2020, attached for reference*)
Attachment B: Presentation (*April 2021*)

MEMORANDUM



TO: Regional Equity Working Group

DATE: November 10, 2020

FR: Anup Tapase

RE: Plan Bay Area 2050 Equity Analysis: Communities of Concern Update and Equity Analysis Report Framework

Introduction

MTC has conducted an equity analysis for the last five regional plans in compliance with federal civil rights and environmental justice laws, primarily focused on the transportation investments included in the plan. In this memorandum, staff is presenting an update on the Equity Analysis Report for Plan Bay Area 2050. The first section provides background on the progress so far that will contribute towards developing the Equity Analysis Report. The second section provides an update on the methodology to measure disparities, including MTC's Communities of Concern methodology. The third section presents a framework to be used in the Equity Analysis Report. The memorandum concludes with next steps until the release of the Equity Analysis Report in April 2021, along with the Draft Plan.

Background and Progress So Far

During Plan Bay Area 2040, staff collaborated extensively with stakeholders to refine the Communities of Concern definition and identify Equity Measures for conducting a disparate impact analysis. This groundwork, along with the extensive policy and investment analysis during the Horizon scenario-planning process, enabled staff to switch the focus of its collaboration with stakeholders in Plan Bay Area 2050 towards weaving equity into the strategies that make up the Plan.

- Fall 2019: Engagement with the Regional Equity Working Group (REWG) kicked off in September 2019, beginning with a review of past work, and a discussion of existing inequities and equity-related issues to prioritize during the Blueprint phase. Staff had proposed then to continue using the Community of Concern (CoC) methodology for Plan Bay Area 2050 and refresh the underlying data, while acknowledging the need for a robust update to the overall CoC framework in the next few years.
- Winter 2019-20: Staff engaged the REWG to review Horizon outputs, refine strategies for the Draft Blueprint - the very first iteration of the Plan - and better define outcomes of the Plan to help staff determine appropriate metrics to measure performance and equity.
- Spring 2020: Staff engaged with focus groups of historically underrepresented community members, facilitated by community-based organizations, to understand their priorities, vet existing strategies and identify new strategies, especially for a post-COVID era. Staff also collaborated with transportation project sponsors to identify mitigations and strategy commitments for projects that were flagged for not advancing equity during Horizon.

- Summer 2020: Staff shared outcomes of the Draft Blueprint, which included an analysis of the proposed investments as well as several metrics to highlight performance and disparities. Staff then further engaged REWG and other stakeholders to refine existing strategies and identify new ones for the Final Blueprint.

This process has been pivotal in ensuring that strategies included Plan Bay Area 2050 are centered on equity and justice. Staff is now looking to focus the next few months on analyzing the disparities in outcomes of the Final Blueprint and completing the Equity Analysis Report for the Draft Plan. The next section provides an update on the methodology to measure disparities, followed by the framework that staff proposes to use for the Equity Analysis Report.

Methodology to Measure Disparities

Communities of Concern: Recap of Definition and Underlying Data Update

MTC/ABAG has used the “Communities of Concern” (CoC) framework to identify disparate impacts for the last five long-range plans since 1999. While MTC’s land use model predicts where people may locate in the future by income level, staff is not able to predict where people of color, people with disabilities, or other underserved populations would locate in the future. The CoC framework provides a methodology to determine disparities by identifying geographies (census tracts) that currently have high concentrations of underserved populations. For the purpose of the Equity Analysis, staff assumes that locations of CoC tracts within the Bay Area are similar to today in 2050, while acknowledging that staff cannot meaningfully determine whether the composition of these areas would change in 2050.

MTC/ABAG updated its definition of Communities of Concern during Plan Bay Area 2040 in collaboration with the REWG, detailed in MTC Resolution No.4217-Equity Framework for Plan Bay Area 2040 in **Attachment 1**. Staff has recalculated concentration thresholds using the latest available American Community Survey (ACS) data (2014-2018), as shown in **Table 1**. Thresholds are calculated as the mean of concentrations across census tracts plus half a standard deviation. Staff has also updated the CoC designations using the new thresholds, and has shared the [documentation](#) of the methodology and the [map layer](#) online.

Impacts and Implications of Data Update

With this data refresh, there are three main observed shifts in CoCs that validate known demographic trends:

1. The total number of CoC designated tracts has declined from 365 (in Plan Bay Area 2040) to 339, driven by a reduction in the share of households with income below 200% of Federal Poverty Level (FPL).
2. The share of population experiencing disadvantages that resides within CoC tracts has declined across 7 of the 8 disadvantage factors, with the overall share declining from 23% to 21%, indicative of lowered geographic concentration of disadvantage.
3. There are substantial shifts in the locations of CoC tracts that are indicative of recent displacement trends and align with Bay Area displacement research.

Table 1: Concentration Thresholds of Disadvantage Factors in Communities of Concern Framework - Plan Bay Area 2040 vs. Plan Bay Area 2050

<i>Disadvantage Factor</i>	Adopted Thresholds Plan Bay Area 2040 (ACS 2009-13)		Updated Thresholds Plan Bay Area 2050 (ACS 2014-18)	
	<i>% Regional Population</i>	<i>Concentration Threshold</i>	<i>% Regional Population</i>	<i>Concentration Threshold</i>
1. People of Color	58%	70%	60%	70%
2. Low Income (<200% Federal Poverty Level - FPL)	25%	30%	21%	28%
3. Limited English Proficiency	9%	20%	8%	12%
4. Zero-Vehicle Household	10%	10%	9%	15%
5. Seniors 75 Years and Over	6%	10%	6%	8%
6. People with Disability	9%	25%	10%	12%
7. Single-Parent Family	14%	20%	13%	18%
8. Severely Rent-Burdened Household	11%	15%	10%	14%
<i>Definition</i> - Census tracts that have a concentration of BOTH people of color AND low-income households, OR that have a concentration of 3 or more of the remaining 6 factors (#3 to #8) but only IF they also have a concentration of low-income households.				

Maps that depict the CoCs in Plan Bay Area 2040, the current designations of CoCs for Plan Bay Area 2050 and a comparison between the two can be found in **Attachment 2**. A detailed internal memorandum that discusses the change in CoCs, along with demographic data and shifts at the county level, can be found in **Attachment 3**.

Given these demographic shifts and a relatively more dispersed concentration of disadvantaged populations, staff acknowledges that the CoC framework may be becoming a less effective framework to measure disparities over time. Further, the framework may be overemphasizing concentrated poverty and potentially feeding into a deficit-based narrative that problematizes the underserved. As previously noted, staff is recommending a closer re-examination of the CoC framework that includes meaningful engagement with communities, advocates and partner agencies in the upcoming years as part of the agency's Equity Platform initiative. Given this is not feasible within the Plan Bay Area 2050 timeline, staff is proposing to augment the CoC methodology in the Equity Analysis by:

1. Measuring disparities not only between CoCs and rest of the region, but also High-Resource Areas.
2. Measuring disparities based on income status where feasible and appropriate.

Reconsidering the Nomenclature of "Communities of Concern"

Staff acknowledges the power of language and recognizes that the current MTC terminology “Communities of Concern” may be perceived as paternalistic, evoke empathy or conjure negative perceptions. Various MPOs and other public agencies use terminology that are more descriptive or action-oriented, generally falling into three typologies:

- “Environmental Justice” focus - easily understood, but limited definition; e.g. EJ Areas (SCAG).
- “Disadvantage” focus - emphasizes disadvantage, but feeds deficit-based narrative; e.g. Areas of Concentrated Poverty (Met Council), Historically Marginalized Communities (Oregon Metro).
- “Equity” focus - holistic and inclusive, but potentially vague; e.g. Equity Focused Communities (LA Metro), and Equity Emphasis Areas (MWCOC).

Staff has deliberated internally and is proposing to revise the nomenclature for use in Plan Bay Area 2050 to a term that highlights the opportunity and prioritization of these communities. Internally developed suggestions include Equity Prioritized Opportunity Communities (EPOCs), Equity Prioritized Investment Communities (EPICs), Equity Focus Communities (EFCs) and Equity and Access Zones (EAZs). Staff is seeking suggestions from the REWG and is also looking to engage with underserved communities on this topic prior to spring 2020. While acknowledging that the methodology itself would evolve in future efforts, the updated Communities of Concern geographies, along with the new terminology and the short-term proposals described above to mitigate existing shortcomings, will be the basis for the Equity Analysis Report framework described in the next section.

Proposed Equity Analysis Report Framework for Plan Bay Area 2050

Over the next few months, staff will develop the Equity Analysis Report for the Draft Plan Bay Area 2050, set for release in April 2021. This section provides an overview of the three components of the framework that staff is proposing to use for the Equity Analysis Report.

1. Equity Lens on Strategies

As noted above, relative to previous Plan Bay Area efforts, staff has devoted considerably more time to identify revisions to all strategies that advance equity and justice, and develop new equity-focused strategies during the Draft and Final Blueprint phases. Through multiple rounds of feedback from the Regional Equity Working Group and the Policy Advisory Council, as well as engagement with community-based organizations, Plan Bay Area 2050 strategies were refined to include components that would improve outcomes for underserved communities. Since some of these components cannot be modeled within the scope of the Blueprint due to limitations of the models (and would hence not be reflected in Plan outcomes metrics), the first component of the Equity Analysis Report will detail how equity is woven into each strategy. Specific to major transportation projects that are part of the fiscally constrained project list of Plan Bay Area 2050, this section will also highlight equity mitigations and commitments to equity-focused policies that were developed in collaboration with the project sponsors.

2. Investment Analysis

This component of the Equity Analysis Report will estimate the share of Plan funding in all four topic areas (Transportation, Housing, Economy and Environment) that is allocated

towards investments benefiting underserved communities. Specific to transportation investments, disparities will be identified through a use-based analysis that allocates funding to population subgroups based on their typical use of the investments, thus constituting “benefit” to that subgroup. In the case of public transit investments, this analysis would comply with the federal laws and regulations related to Title VI of the Civil Rights Act of 1964. Further, the analysis will map all roadway and transit projects to show the spatial distribution of projects relative to census tracts with a concentration of people of color (represented by Communities of Concern).

3. Plan Outcomes Analysis

Staff will identify disparities in outcomes of Plan Bay Area 2050 between population subgroups through a set of metrics that align with the Plan’s Guiding Principles. The analysis will calculate:

- a) Existing disparities
- b) Forecasted horizon year (2050) disparities without Draft Plan implementation (No Project Alternative, i.e. a scenario where the Draft Plan is not adopted)
- c) Forecasted horizon year (2050) disparities with Draft Plan implementation

This analysis will be used to determine if the Plan has disproportionately high and adverse human health and environmental effects, including social and economic effects, on environmental justice populations, complying with the Executive Order 12898 and the associated DOT Order on Environmental Justice. Metrics that will be used to determine disparities will be sourced from the more extensive list of performance and equity metrics that was used to describe [outcomes of the Draft Blueprint](#), also found in **Attachment 4**.

Next Steps

Staff is currently seeking input from the Regional Equity Working Group on the:

- Methodology to determine disparities in Plan Bay Area 2050
- Proposal to change the “Communities of Concern” nomenclature and name suggestions
- Scoping of future re-examination of the CoC methodology as part of Equity Platform
- Framework for the Equity Analysis Report

Further next steps include:

- December 2020: Staff to share outcomes of the Final Blueprint with the MTC/ABAG Joint Planning Committee and Policy Advisory Council.
- February 2021: Staff to share a first draft of the Equity Analysis Report along with a proposal for the revised nomenclature of Communities of Concern.
- April 2021: Staff to release the final draft of the Equity Analysis Report, along with the Draft Plan and the federally required Title VI and EJ analysis.