

Environmental Justice and CRCOG's Transportation Planning Program

EXECUTIVE SUMMARY



ENVIRONMENTAL JUSTICE & TITLE VI
CHALLENGE GRANT

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1. INTRODUCTION

In early 2001, the Capitol Region Council of Governments (CRCOG) was one of four agencies from across the nation selected to participate in a federal Environmental Justice Challenge Grant program. The purpose of the challenge grant was to allow each planning agency to thoroughly assess how well its transportation planning program met the goals and requirements of Title VI and environmental justice, and to identify ways to improve how its planning program involves minority communities and addresses the needs of those communities. Over the course of a year, CRCOG conducted that evaluation and developed an Action Plan for improving its transportation planning process.

THE CAPITOL REGION - CONNECTICUT

29 municipalities,
including the capital city of Hartford
760 square miles
700,000 + population
440,000 jobs
27.5% minority population
9.0% at or below poverty level
14.2% at or below 150% of poverty level
11% without access to automobile

CRCOG'S CHALLENGE GRANT PROJECT

The ultimate goal of CRCOG's Challenge Grant project was to improve its transportation planning process by assuring that full and fair consideration is given to the needs of minority and low-income residents. To accomplish this goal, CRCOG set two objectives:

- 1. Community Involvement.** The primary objective of the project was to identify ways to increase low-income and minority community involvement in all phases of CRCOG's transportation planning process - including core decision-making functions. CRCOG wanted to move beyond the community outreach efforts used in its transportation studies, and develop ways of involving minority community representatives directly in the decision-making process.

Through a series of workshops, CRCOG asked minority and low-income communities to evaluate the Region's transportation planning process. By working with these community members, CRCOG was able to develop recommendations for increasing low-income and minority community involvement in all phases of the planning process. The result was an **Action Plan** that recommended significant changes to CRCOG's organizational structure and planning and review procedures to assure that the voices of all the Capitol Region's communities are heard, and that future decisions include fair consideration of all social and economic issues in all the affected communities.

COMMUNITY INVOLVEMENT AS PRIMARY OBJECTIVE

... move beyond the community outreach efforts ... and develop ways of involving minority community representatives directly in the decision-making process.

- 2. Equity Assessment Methods.** The second objective of the project was to determine whether minority and low-income communities were receiving a fair share of benefits, or a disproportionate share of burdens. CRCOG first determined which areas were target minority and low-income communities in the Region, and then developed quantitative methods to assess the distribution of transportation benefits relative to those target communities. These methods were used to evaluate CRCOG's short-range plan (TIP), and will also be used to evaluate its 20-year plan.

EQUITY ASSESSMENT AS SECOND OBJECTIVE

... determined which areas were target minority and low-income communities, and then developed quantitative methods to assess the distribution of benefits. . .

2. INVOLVING MINORITY & LOW-INCOME COMMUNITIES IN CRCOG'S TRANSPORTATION PLANNING PROCESS

CRCOG has a good history of involving low-income and minority communities in its planning projects and programs. Initiatives like the Jobs Access Transportation Program have improved and expanded the transit system's ability to serve the needs of low-income workers. CRCOG has also been successful in getting the active participation of minority communities in its special transportation studies. However, this is still a limited cross section of CRCOG's full program of transportation planning activities. The *first objective* of the Challenge Grant project was to identify ways to allow more minority community involvement in core decision-making activities such as adoption of the Transportation Improvement Program, project selection, and development of the long-range Regional Transportation Plan.

EVALUATING CRCOG'S PROGRAM THROUGH COMMUNITY WORKSHOPS

CRCOG originally intended to conduct its program evaluation with a special committee composed of representatives of the minority and low-income communities as well as representatives of other agencies involved in transportation decision-making. This strategy was to work with a select group over the course of a year to review the full range of transportation planning and programming activities. However, based on the response to the first meeting, CRCOG determined that it would be impractical to expect a single group of individuals to sustain their interest in this review process over the course of a year. CRCOG then decided that a more practical approach was to reach out to a greater number of people through a series of workshops designed to accomplish the same comprehensive review process. A summary of each workshop is presented below along with conclusions reached regarding how to improve the planning program.

WORKSHOP 1: GETTING STARTED

This workshop was the first and only meeting of the Environmental Justice Challenge Grant Steering Committee. The Committee meeting was held on April 3, 2001 from 10:00 AM to 12:00 noon. The meeting was held in a central location (in the central business district), with good transit access.



The Steering Committee itself was selected to include a cross section of minority and low-income communities in the Region as well as to assure good geographic coverage of the City of Hartford. Some of the persons invited had no prior involvement with CRCOG. Initially this was considered an advantage since persons not affiliated with CRCOG might be able to provide a more objective evaluation of the transportation program. In hindsight, this lack of affiliation with CRCOG was probably one of the reasons attendance was poor at the first workshop. Since most of the people invited were community leaders with busy schedules, there

was little incentive for them to attend a meeting when they did not have any prior relationship with CRCOG.

The meeting itself was intended to be an introductory meeting that reviewed the purpose and scope of the Challenge Grant project and established time and place for future meetings. However, the poor attendance at the meeting led to a reassessment of this approach. CRCOG staff conducted a post-meeting critique and reached some conclusions regarding the reasons for poor attendance. They are presented below as lessons learned.

Lessons Learned

- Early Evening Meetings More Convenient. While the midday meeting time was convenient for representatives of transportation agencies or social service agencies who could attend the meeting as part of their job, it was not convenient for most of the community leaders invited. It was decided that future meetings would be held in the early evening.
- Neighborhood Meeting Places Preferred. The downtown location was central and easily accessible by transit, so this was probably not the primary reason for poor attendance. However, CRCOG still concluded that there was a better chance of having community leaders attend if the meeting was held in one of the neighborhoods. The risk in this approach is that attendance from neighborhoods across town might be discouraged.
- Work with Persons Who Have a Stake in the Process. Perhaps the most important lesson learned is that it is extremely hard to get persons with no affiliation with CRCOG to commit to a series of meetings that are focused on evaluating CRCOG programs. They have no stake in CRCOG and find it difficult to see how their attendance can benefit them or their community. CRCOG decided that it needed to focus more on individuals, neighborhoods, and organizations that had some prior or current involvement with the agency. They were more likely to see some potential benefit to themselves, or at least feel a sense of responsibility to attend.
- Workshops Might Draw Broader Audience. The poor attendance at the first meeting gave CRCOG reason to reconsider whether conducting the evaluation with a single committee with fixed membership was best. CRCOG decided to discontinue the committee approach in favor of a workshop approach that allowed them to reach a larger audience. The disadvantage of the workshop approach is the potential lack of continuity of participants throughout the process.

WORKSHOP 2: COMMUNITY CRITIQUE OF PRIOR PLANNING PROJECT

The second workshop was held on June 25, 2001 from 5:30 PM to 7:30 PM. The committee met at the Artist Collective, a well-known institution in the northwest neighborhood of Hartford. A light supper was served. The purpose of the workshop was to evaluate how CRCOG conducted its special studies. In this case, the Albany Avenue Corridor Study completed several years earlier would be evaluated. Suggestions would also be sought on how to organize community

involvement in the current Griffin Busway Feasibility Study, which involves many of the same neighborhoods as the Albany Avenue study.

The time and location of the meeting were selected in response to the lessons learned in the first workshop. The start time of 5:30 pm was used since many neighborhood residents could stop on their way home from work. The adjournment time was set at 7:30 pm to allow participants to still be able to enjoy most of the evening at home.

Since the Albany Avenue study was the focus of the meeting, it made sense to hold the meeting in the Upper Albany neighborhood. The Artist Collective offered new and comfortable meeting facilities, convenient parking, and good transit access.

Invited Participants & Efforts to Increase Attendance

CRCOG's goal at this meeting was to get a representation of minority and low-income neighborhoods represented, but it also recognized that this workshop was focused on a study that involved several African American neighborhoods in the northwest section of Hartford. Therefore, in addition to the mailing list used for the first workshop, names of individuals or organizations from the affected neighborhoods were added. Some of these persons participated in the original study, but many did not.

In advertising this workshop, the need to evaluate the work previously done in the Albany Avenue neighborhoods and the opportunity for early input to the upcoming Griffin study was stressed. CRCOG was attempting to show the relevance of the workshop in order to encourage better attendance. Personal phone calls were made to everyone on the mailing list.

Presentation and Discussion

There was a 20-minute presentation on the Route 44 corridor study and CRCOG's efforts to involve the neighborhoods along Albany Avenue. A CRCOG staff member explained that the project's early efforts relied on a 'regional' approach to public involvement. He then explained how CRCOG modified its approach and adopted a neighborhood-level approach to achieve more effective community involvement.



An outside facilitator was brought in to lead the group in critiquing CRCOG's efforts and suggesting ways to improve the community outreach effort.

Lessons Learned

- Adopt a Neighborhood Approach to Public Involvement. CRCOG's initial approach in the Albany Avenue (Route 44) study was to use a regional approach since it was a multi-town study. Early public meetings were set up to serve two or more towns and proved to be ineffective. CRCOG switched its approach to focus on individual towns, and in Hartford, the focus was on individual neighborhoods.

The workshop participants commended CRCOG for recognizing its initial mistake and changing to a neighborhood approach. They suggested that any future studies in Hartford should be neighborhood based.

- Involve All Neighborhoods. In the Albany Avenue study, CRCOG worked primarily with the two neighborhoods most affected by the study. Workshop participants pointed out that CRCOG should have involved any study area neighborhood, even if only a small portion of the neighborhood falls within the study area.
- Add Neighborhoods to Advisory Committee. Workshop participants suggested that when setting up a local advisory committee in Hartford, CRCOG should include representatives from the neighborhoods, not just City leaders and City staff.
- Suggestions for More Effective Outreach.
 - *Advertise Through Neighborhood Organizations.* Neighborhood and church groups can be effective at publicizing meetings and building community interest.
 - *Small Group Meetings.* Regularly scheduled meetings of neighborhood and church organizations can be good opportunities to reach the public since an audience is guaranteed, and is typically one with strong civic interests.
- Build Trust. There is no formula for this, but workshop participants emphasized the issue of building community trust. In the Albany Avenue study, that trust was eventually won because CRCOG was able to show that they had incorporated the community's input from previous meetings. This was one way to show good faith. It demonstrated that CRCOG was truly listening to community input.

WORKSHOP 3: CONVERSATIONS ON PLANNING PROCESS & COMMUNITY NEEDS

The third workshop was held on February 20, 2002 from 5:30 PM to 8:00 PM. The meeting was held at the Connecticut Puerto Rican Forum on Hartford's south side. The time of the meeting was similar to the second workshop since that was successful.

The location was shifted from the north side of Hartford to the south side of Hartford in an attempt to encourage greater participation from Hartford's Hispanic community, which is concentrated on the south side. CRCOG also chose the Puerto Rican Forum as the meeting place since it is a well-known institution in the Hispanic community, and was accessible by bus. The same mailing list as the previous workshop was used, and the Puerto Rican Forum suggested additional persons from the Hispanic community.



Presentation and Discussion

The meeting began with an overview of CRCOG's transportation planning program. To make the presentation relevant to participants, lots of Hartford projects familiar to them were included. The process of how projects originate, how they are selected for funding, and the various steps involved such as corridor studies, the Transportation Improvement Program, and the Regional Transportation Plan were all explained. The role of the Regional Transportation Plan was emphasized as the key starting point where transportation needs and issues are often first identified.

A CRCOG staff member acted as facilitator for a critique of CRCOG's planning program and a discussion of the community's transportation needs.

Lessons Learned

- Better Ways to Communicate. Workshop participants offered several suggestions for improving the way CRCOG communicates with the public. Besides neighborhood associations, CRCOG can reach out to communities as follows:
 - Place meeting announcements on buses and at bus shelters. Residents felt that using bus shelters to post public meetings would increase attendance.
 - Create problem-solving groups.
 - Televisе meetings on local access cable TV stations.
 - Post meeting notices on local access cable TV stations.
- Re-examine Committee Structure & Funding Allocation. Workshop participants questioned whether CRCOG's structure allowed for adequate representation of Hartford and whether or not Hartford got its fair share of projects. Subsequent to this workshop, CRCOG recognized that the issue is probably better framed as whether or not minority groups have adequate representation on CRCOG committees and whether or not they get a fair share of transportation 'benefits.'
- Invite Environmental Justice Organizations. This workshop benefited from the participation of the Hartford Environmental Justice Network (HEJN). The Capitol Region is fortunate to have an existing group in the area that was formed to address environmental justice issues. Members of the HEJN were important contributors to the discussion at this third workshop.
- Transportation Needs. A list of the community's transportation needs was developed and will be incorporated into the next Regional Transportation Plan.

WORKSHOP 4: PREPARING AN ACTION PLAN FOR IMPROVING THE PLANNING PROCESS

The fourth workshop was held on May 14, 2002 from 12:00 noon to 1:30 p.m. at the South Congregational Church in downtown Hartford. The church is centrally located, has convenient parking and is accessible by bus.

The midday meeting and central location reflects the change in emphasis at this late stage in the evaluation of the planning program. CRCOG staff felt they had learned enough from the previous workshops that they were able to draw conclusions on what parts of the planning

process were most in need of improvement, and to draft some preliminary recommendations on how to address them. A core group of participants was needed to finalize the recommendations. It was also CRCOG's intention to make this core group the basic membership of the permanent Environmental Justice Advisory Board that was proposed as one of the recommendations.

With this in mind, CRCOG invited persons who had indicated both an interest in the process as well as a commitment to devote the time for 2-3 board meetings per year. Most participants were selected from the list of attendees at the prior three workshops. A few members of CRCOG's Transportation Committee and Policy Board were also invited.

Presentation and Discussion

A CRCOG staff member gave an overview of the Challenge Grant project to date with special emphasis on previous workshops and lessons learned. A preliminary Action Plan for improving CRCOG's transportation planning process was presented.

A special presentation was made on the TIP and the proposed method for assessing benefits of the programmed projects. This presentation also included a proposal on how to define the target areas to be used for assessment of benefits.

Since most of the participants had taken part in prior workshops, they understood the rationale behind the key elements of the Action Plan. The group readily endorsed all of the recommendations, and made the following suggestions for assessing the TIP:

- Target Area Definition - The group agreed that the target area for assessment purposes should be defined as encompassing those areas in which the minority population exceeded 50 percent.
- Define 'Positive' Impact – The group asked that CRCOG provide a clear explanation of how it determines if a project is apt to have a positive impact on low-income or minority communities.
- Better TIP Format - A suggestion was made to produce the TIP in a format that is easier for the layman to understand.

Lessons Learned

Since the purpose of this meeting was to adopt the Action Plan, CRCOG was not actively seeking ideas for improving its planning program. However, two conclusions can be drawn from this meeting.

- Better TIP Format. If CRCOG really wants to have more community response to the TIP, it needs to develop a document format that is more understandable to lay persons. The title itself could be more descriptive, such as 'Transportation Projects in the Hartford Area.'
- Midday Meetings Can Work for Some Groups. Whereas midday meetings proved unsuccessful when CRCOG was trying to attract the general public, this midday meeting was successful. In this case, the persons invited were all people who had some affiliation with CRCOG or who had already demonstrated a commitment to the environmental justice project through their attendance at previous meetings. Furthermore, prior to setting the meeting time, the participants were polled as to the most convenient meeting time. Most participants preferred a lunchtime meeting.

A note of caution is needed here. While the midday meeting was successful in this case, it succeeded in part because many of the participants were already involved in the project and understood its value to the community as well as to CRCOG. There was not the same degree of understanding and commitment earlier in the project.

CONCLUSIONS: How to Better Involve Minority & Low-Income Communities

1. More Effective Outreach to Title VI/Environmental Justice Target Populations

Expanded Outreach Efforts for Special Studies

- *Local Advisory Committees.* Include neighborhood representation on local advisory committees.
- *Neighborhood Groups.* Work with established groups in areas affected by particular studies or plans.
- *Community Meetings.* Make presentations at regularly scheduled meetings of community groups.
- *Small Group Meetings.* Do not limit outreach to large formal meetings. Make use of small, informal meetings or focus groups – especially early in a study.

Expanded Outreach Efforts for Basic Planning Activities

- *Environmental Justice Mailing List.* Maintain special environmental justice mailing list.
- *Newspapers.* Use appropriate community newspapers for posting of public notices.
- *Spanish Language.* Provide notices in Spanish language format.
- *Community Access TV.* Make more use of community access TV.

2. More Effective Input to Core Decision-Making

Create Environmental Justice Advisory Board

A special Environmental Justice Advisory Board was created and provided with a direct role in basic transportation decision-making at CRCOG.

Membership Sources

- *Challenge Grant Participants*
- *Jobs Access Transportation Program*
- *Participants in Prior CRCOG Studies*
- *Environmental Justice Organizations*
- *CRCOG Transportation Committee*

Advisory Board Functions

- *Advise CRCOG on Outreach Efforts*
- *Review Annual Work Program*
- *Review Annual Transportation Improvement Program Update*
- *Participate in Update of Regional Transportation Plan*
- *Update Environmental Justice Mailing List*

Appoint Representative to Transportation Committee

Minority community representatives, selected at the Challenge Grant's fourth workshop, were appointed to CRCOG's Transportation Committee. Two representatives – one African American and one Hispanic – now serve on the Transportation Committee. Since all transportation issues pass through the Transportation Committee, the minority community representatives will have the opportunity to influence all transportation decisions at CRCOG, including the core activities such as project selection, the transportation plan, and the TIP.

3. EQUITY ASSESSMENT METHODS FOR TRANSPORTATION PLANNING

The *second effort* of CRCOG's Challenge Grant project was to develop quantitative methods for assessing the relative distribution of transportation benefits among target and non-target communities.

These assessment methods will be used, first, to analyze the final results of the transportation process, whether the sum of all the recommended programs and projects results in a fair and equitable distribution of benefits.

Second, the same methods will be used in a more proactive way to guide the decision-making process to assure more equitable results. If decision makers have better information about the potential equity impacts, they can make better choices that do not unfairly benefit some populations at the expense of others.

There were three assessment tasks undertaken as part of this project:

1. **Define Target Areas.** The geographic 'target areas' were defined. These areas, where there are large concentrations of low-income or minority populations, will provide a base for the more specific assessments listed below.
2. **TIP Assessment Tools.** Tools to evaluate the distribution of benefits of projects in the TIP, CRCOG's short-term programming document, were developed.
3. **Plan Assessment Tools.** Tools to evaluate the distribution of benefits of projects in the long-range Regional Transportation Plan were and continue to be developed.

TASK 1 - DEFINE TARGET AREAS

For certain types of benefit assessments, it is necessary to define a geographic area that constitutes a 'target area' for environmental justice assessment purposes. Target areas are districts where there is a concentration of one or more of the population groups under study.

Minority Target Area

The minority target area is intended to include all the neighborhoods in the Capitol Region in which the minority populations compose a large or disproportionate segment of the residents in the neighborhood. A key step in defining the minority target area was deciding what threshold level to use to classify a locale as a minority area. While a variety of different thresholds have been used in other places in the country, the most common are:

1. **Simple Majority Threshold (50%):** The first threshold option is based on the premise that if a majority of the residents (50 percent) in a district are members of a minority group, the district should be classified as a 'minority district.'

GOALS IN DEVELOPING ASSESSMENT TOOLS:

Easy to Apply. To assure that assessments are done for as many decisions as possible, tools must be readily applied by existing staff with available data and software.

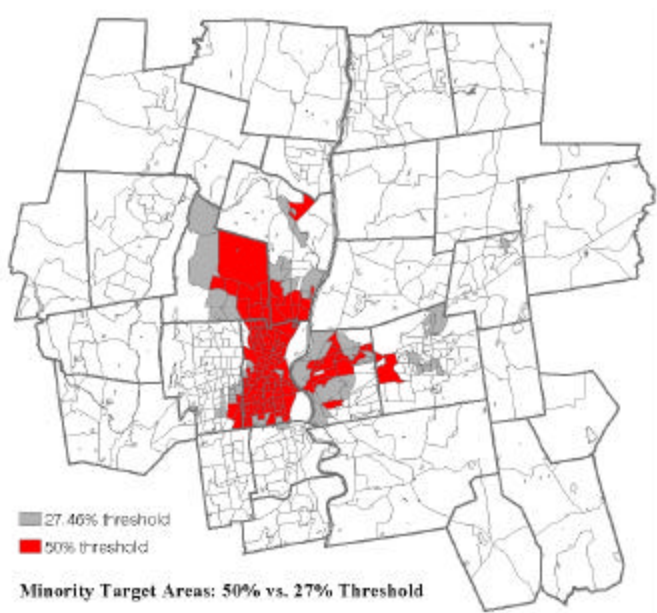
Easy to Understand. Measures must be less abstract than most techniques currently in use, and they must be easily understood by the lay members of the decision-making bodies.

Helpful to Decision-Makers. Methods must be useful in guiding decision-makers in the process of choosing alternatives, developing policies, evaluating program performance, & appropriate to the decisions being made.

- 2. Regional Proportion Threshold (27%):** In the Capitol Region as a whole, 27 percent of the residents are members of a minority group. The second option is to use this lower threshold level, and classify a district as a minority district if at least 27 percent of its residents are minorities.

Of the two options, the simple majority threshold was selected for use in defining the target area for minority populations in the Capitol Region, after consultation with the participants in the fourth environmental justice workshop (described above.)

The primary rationale for selecting the 50-percent threshold is that it is a smaller, more focused area. As such, it creates a more rigorous test when comparing the distribution of transportation investments between minority and non-minority areas. As is illustrated in the figure to the right, the target area for the 50-percent threshold is significantly smaller than the target area for the 27-percent threshold. The larger area encompassed by the 27-percent threshold includes more suburban neighborhoods with a high proportion of white, middle income families. CRCOG decided to focus its assessment efforts on the area defined by the 50-percent threshold where the greatest concentration of minority families exists. There is a strong desire to assure that this core area receives its fair share of transportation investments, and that it is not unfairly burdened by the negative impacts associated transportation facilities can sometimes bring.



Low-Income Target Area

At the end of the Environmental Challenge Grant project, the low-income target area was not yet defined due to the fact that the income data from the 2000 Census was not available until late in the project schedule. When the data did become available in the summer of 2002, CRCOG conducted a number of mapping analyses to evaluate possible variables and thresholds that might be used, but there was no opportunity to discuss the finding with participants at the environmental justice workshops. This discussion will be held when CRCOG convenes the new Environmental Justice Advisory Board early in 2003. At that time, the results of the mapping exercises conducted with the low-income data will be presented. They are summarized below.

Defining the low-income target area involves one additional step beyond what was done for the minority target area. In addition to determining a threshold level, the most appropriate income level to use must be determined. That is, what income level can be considered ‘low-income.’

Income Level

The 2000 Census provides a lot of income data that makes it possible to select a wide range of measures to define low income. Perhaps the most useful data provided is the data on the number

of persons who have household incomes at or below the federally defined ‘poverty’ level. Under federal guidelines, the income level considered to be poverty level varies by size of the household.

While a variety of different thresholds have been used in other places in the country, most have used either poverty level or 150 percent of poverty level.

1. **Poverty Level:** A very simple option for defining low-income is to use the federally defined poverty levels. The data is readily available in the Census and it is an officially recognized measure of poverty. The disadvantage is that it excludes many households that have incomes above the poverty level, but still struggle to achieve comfortable lifestyles. It also excludes many whose income is still too low to afford car ownership.

COMPARISON OF INCOME LEVELS		
Household Size	Poverty Level	150 % Poverty Level
1 person	\$8,500	\$12,750
2 persons	\$10,800	\$16,200
3 persons	\$13,290	\$19,950
4 persons	\$17,000	\$25,500
5 persons	\$20,000	\$30,150

2. **150% of Poverty Level:** CRCOG also considered establishing the low-income cutoff point at a level 50 percent higher than the poverty income level. The 150-percent income cutoffs are still extremely modest. At that level, the car ownership rate is still low. And lack of a car means these families are transportation disadvantaged, even if they are earning incomes above the poverty level.

Threshold Level

CRCOG also had to determine the low-income threshold, or the minimum percentage of a locale’s population that must be low-income for it to be classified as a ‘low-income area.’ This threshold level was more difficult to select than it was when defining the minority target area because of the smaller number of low-income persons, and the more dispersed distribution of that population.

Numerous threshold options were evaluated, and several are discussed below. They are based on the 150-percent poverty level definition of low income.

1. **Simple Majority Threshold (50%):** This option is based on the premise that if a majority of the residents (50 percent) in an area are low-income, the district should be classified as a low-income district and included in the ‘target area.’

In the Capitol Region, this results in such a small target area that it is not a practical threshold to use. The 50-percent threshold encompasses only 27 percent of the Region’s low-income population. This leaves too many low-income individuals outside the target area and unaccounted for in an assessment that is based on target areas.

2. **Regional Proportion Threshold (14.2%):** In the Capitol Region as a whole, 14.2 percent of the residents have household incomes at or below the 150 percent of poverty level. Under this option, the area is classified as a low-income district if at least 14.2 percent of its residents are low-income.

This threshold is simply too low for any practical applications in environmental justice assessments. It is hard to think of a neighborhood as a ‘low-income’ neighborhood if only 14 percent of its residents are low-income. Additionally, the resultant target area is so dispersed that assessment of transportation impacts is likely to be meaningless.

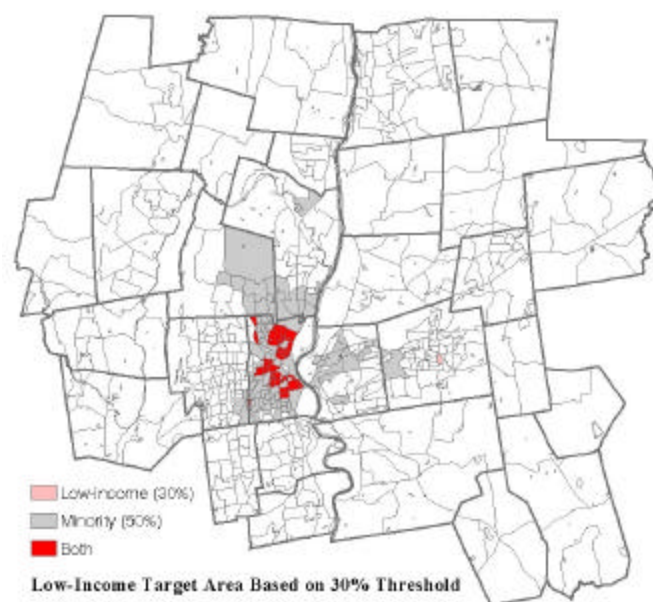
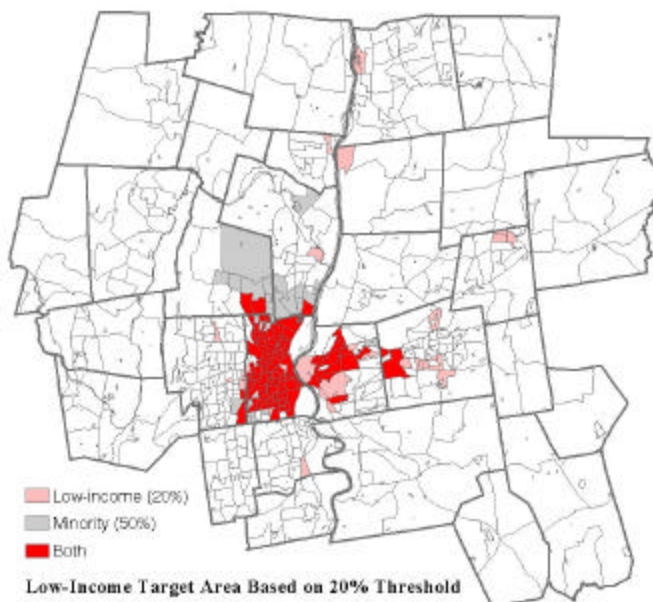
3. Intervening Thresholds (20% or 30%): Given the problems with the simple majority and regional proportion thresholds, it was necessary to also consider threshold levels in between the two extremes. Therefore, thresholds of 20 and 30 percent were evaluated.¹

The target areas based on these thresholds levels are illustrated in the figures to the right. They are overlaid on the minority target area for comparison. In both cases, the minority target area is larger, but there are a few low-income neighborhoods that lie outside the bounds of the minority target area.

The 20- and 30-percent thresholds are more practical options than the simple majority or the regional proportion thresholds. They are much less dispersed than the target area based on regional proportion threshold (14.2%), but they also large enough to include a reasonable proportion of all low-income persons. The 30-percent threshold incorporates 53 percent of all low-income persons in the Region. The 20-percent threshold incorporates 65 percent of all low-income persons in the Region.

Recommendation: Use 20 or 30% Threshold based on 150% Poverty Level.

While no official decision has been made on which income level and threshold to use for purposes of CRCOG’s environmental justice assessments, CRCOG staff will be recommending



¹ The 40-percent threshold was considered, but quickly dismissed as being too restrictive. The size of the 40 percent target area was still small and entirely encompassed within the previously defined minority target area.

use of the 20- or 30-percent threshold in combination with an income cutoff level based on 150 percent of the poverty level.

Combined Target Area

The issue of combining the two target areas (minority and low-income) was not addressed during the Challenge Grant Project since the income data became available very late in the project. However, CRCOG's Environmental Justice Advisory Board will eventually discuss the issue and make a decision. Administratively, there are many advantages to working with a single combined target area, so CRCOG staff will probably recommend combining the two. If the Advisory Board agrees, the combined area would include all of the shaded areas shown in either of the two figures on the previous page.

TASK 2 – EQUITY ASSESSMENT OF TIP

The Transportation Improvement Program, or TIP, is CRCOG's short-term programming document and includes a list of projects it expects to fund over a 3-year period. Using GIS tools, CRCOG assessed the distribution of benefits with a rather simple comparison of investment levels between the target area and the non-target area.

Developing an Assessment Methodology for the TIP

The assessment technique proposed for the TIP is less sophisticated than ones to be used for assessment of the long-range Regional Transportation Plan, but this reflects the short-term nature of the TIP. Because it is a 3-year programming document, the projects included can vary significantly from year to year as project phases are completed or as project schedules are modified. This variability means that any single TIP assessment might not yield a good picture of how benefits will be distributed over the longer term. It ignores many major projects that are planned but not yet programmed. It also ignores projects that are already completed - even if they were completed just one or two years earlier.

Given the TIP's variability, one cannot expect to meet a goal of fully proportional funding for any given TIP. Thus, the TIP assessment is only intended to provide a rough indicator of how investments are distributed between target and non-target areas. What is of greater importance is that the distribution

of investments be equitable over the longer term. An important part of the TIP assessment will be to monitor progress over a multi-year period and report how the target/non-target area balance of funding shifts over time.

BENEFITS vs. BURDENS

CRCOG's effort to develop equity assessment measures has focused primarily on assuring an equitable distribution of 'benefits.' This is partly due to the fact that benefits, such as increased accessibility and travel time savings, are easier to measure with 'planning' tools like travel models. More importantly, it is because negative impacts or burdens of transportation projects, such as traffic noise, tend to be localized and affect only those immediately adjacent to the project. These localized impacts are better addressed at the project level where they can be measured and efforts can be made to reduce or mitigate the impacts through design modifications. CRCOG has already demonstrated through its corridor study process that residents' concerns about increased traffic and noise can be resolved at the project level. While concerns about transportation burdens will continue to be addressed at the project level, CRCOG will also search for other ways to assess 'burdens' in its equity assessment process for systems level documents like the TIP and Transportation Plan.

There is also the risk that some might see the assessment as guaranteeing some type of funding entitlement. CRCOG's goal in measuring investments is not to guarantee proportional funding for target areas or to create a sense of entitlement to that funding. Rather, its goal is to assure an equitable process that does not result in a distribution of benefits that is discriminatory.

Initial Assessment Tool as Adopted

An initial environmental justice assessment tool was adopted in order to conduct an evaluation of the 2003-2005 TIP. It is not identified as a final technique since CRCOG recognizes that the methodology will be refined and improved as the Environmental Justice Advisory Board gains experience working with it.

The technique involves several steps using the GIS system to analyze the distribution of projects listed in the TIP.

1. Locate Target Area: The target area was defined (for the 2003-2005 TIP assessment, the 'minority' target area was based on the 50% threshold.)
2. Locate Projects: Each project in the TIP was located on the map using the GIS system.
3. Develop Graphic Symbols for Each Project Type: To aid visual analysis, icons or symbols were developed to represent each major type of project.
4. Identify Projects in Target Area: The GIS system was used to identify projects within the target area.
5. Calculate Investment in Target Area: The GIS system was used to calculate the total investment in projects located in the Target Area.
6. Identify Non-Geographic Projects that Benefit Target Groups: For projects that were not location specific, a determination was made as to whether they benefit target populations. Examples of beneficial projects include operating subsidies for the public transit system, and capital purchases for the public transit system.
7. Calculate Combined Investment for Target Groups: The total investment identified in step 6 was added to the total investment identified in step 5.
8. Compare Target Group Investment to Benchmark: Minority residents make up 27 percent of the population in the Region. This was used as a preliminary benchmark against which to compare the level of investment benefiting minority populations. CRCOG calculated that 26 percent of the total funds in the 2003-2005 TIP were to be spent on projects that were either in the target area or directly benefited the target groups.

Compare TIP Investments to Benchmark	
% of TIP investments benefiting minority populations	26%
% of Region's population that is member of minority group	27%

Conclusions

The adopted TIP assessment methodology is a simple GIS-based comparison of investment levels in the target area. It is easy to apply and easy to understand. Its disadvantages are that it measures investment level rather than benefit level, and could be interpreted as requiring investments to be made proportionate to size of population (regardless of need of actual level of

benefit provided). However, it serves a purpose of providing a rough indication of how investments are distributed between target and non-target areas in the short term. This disadvantage will be offset after several years of assessing TIPs as CRCOG builds a historical record of investments.

TASK 3 – EQUITY ASSESSMENT OF TRANSPORTATION PLAN

The Regional Transportation Plan (RTP), or long-range plan, is the Region’s most important planning document. The RTP outlines the Region’s vision for its entire transportation system, and details the major system improvements and investments needed to achieve that vision over the next 20 years. It is the most important document in defining how the Region will be investing its transportation funds both in the short and long term.

Fortunately, there is already an assessment tool for the RTP that can be adapted for the type of equity analysis that is required for environmental justice purposes. It is CRCOG’s regional travel forecast model, which is the primary analytic tool used to prepare and evaluate the Plan. The model can be modified to produce a variety of accessibility and travel time measures that are very useful for quantitatively assessing the distributions of benefits.

Development of performance measures was deferred until conversion of CRCOG’s travel model to a new software package is complete.

CRCOG proposes to modify the regional travel model to produce new performance measures, which can be used to assess how equitable the distribution of transportation benefits are. New performance measures based on equity will supplement the standard transportation system performance measures such as vehicle miles of travel (VMT) and transit ridership that the model currently produces. The nature of these desired equity measures is discussed below.

POTENTIAL EQUITY PERFORMANCE MEASURES

For purposes of its equity assessment, CRCOG proposes to develop performance measures based on two basic concepts: accessibility and travel time. Both concepts are well suited to measuring the ‘benefits’ residents gain from improved transportation, and both can be calculated using data derived from the travel model.

Type 1: Accessibility as an Equity Performance Measure

Accessibility is a measure of how easy it is for a person to reach a given type of destination such as employment opportunities or shopping centers. Accessibility for a residential neighborhood is determined by two factors: (1) the number and distribution of the opportunities within a reasonable distance, and (2) the availability and quality of transportation connections from the neighborhood to the destinations. Accessibility is a good planning tool because it measures both the pattern of land use (or distribution of activities) and the quality of the transportation system.

There are two types of accessibility measures CRCOG is considering adopting as equity performance indicators. The first is access to job opportunities, and the second is access to an aggregate of all nonwork opportunities.

Job Opportunities Access Indicator

CRCOG has used this type of measure previously and found it to be both useful and relatively easy to calculate. More importantly, improving access to jobs for low-income households is an

important regional goal. It was the primary goal in establishing CRCOG’s Jobs Access Taskforce, which has succeeded in creating several new transit services and helping over 2,800 low-income residents reach job opportunities not previously available.

In March 2001, CRCOG adopted a Regional Transit Strategy (RTS) as part of its Regional Transportation Plan. Improving access to jobs was a goal of the RTS, and a jobs access performance measure was used to answer some of the social equity questions that were raised. CRCOG intends to retain, but improve this equity performance measure for future plan evaluations. It is explained below.

Accessibility Measure Used For Regional Transit Strategy.

The measure used by CRCOG was based on *transit* travel times since transit options were being evaluated. CRCOG also focused the performance measure on the *transit disadvantaged*. The target group in this case was households without an automobile available. The accessibility measure was defined as the number of job opportunities available to zero-car households within a 30-minute transit trip. The results showed that if the RTS were implemented, access to jobs for zero-car households would improve significantly.

REGIONAL TRANSIT STRATEGY – Access to Job Opportunities for Zero-Car Households		
Transit Options	Jobs within 30 Minutes	Increase over No Build
Option 1: No Build or No New Transit Service	132,640	-----
Option 2: Low Capital - More Bus Service	145,857	13,217 (10%)
Option 3: High Capital - New Rapid Transit	188,602	55,962 (42%)

Need to Add Comparative Data for Non-Target Group. Missing from this analysis that would have made it a more useful equity evaluation was a comparison between the accessibility gains for zero-car households and those for households with cars. For future analyses, CRCOG will provide this comparative data.

Need to Add Low-Income & Minority Assessment. CRCOG will also expand the accessibility analysis to include both the low-income population and the minority population. This will require a refinement of the modeling procedures since the income data and minority population data are not directly integrated into the modeling process.

Need to Add Auto Access Measure. The accessibility measure used for the RTS was based exclusively on transit travel times. CRCOG will add a second measure that is based on auto travel times to track changes in accessibility for both modes of travel.

Recommendation. While no official decision has been made on which jobs access performance measure to use, CRCOG staff will be recommending use of the type of accessibility measure used for the RTS with improvements as noted above.

Nonwork Opportunities Access Indicator

CRCOG will also explore options for developing a measure of accessibility to other activities, services, and opportunities other than jobs. The regional travel model produces estimates of nonwork trips as well as work trips so it is possible to develop a similar performance measure for nonwork opportunities. The non-work trip category, however, is a broad one that includes a variety of trip purposes. The performance measure will be more difficult to interpret.

One option is to use a simplified measure focused on access to key services or facilities such as hospitals, grocery stores, and major shopping centers. A measure that has been used elsewhere is the percentage of the target population that lives close to one of these facilities. An example is to calculate the percentage of the Region's low-income population that lives within 20 minutes travel time of a grocery store.

The disadvantage of this measure is that it calculates access only to the single nearest facility of interest, rather than to all potential opportunities within a reasonable distance. Nonetheless, it is an option for measuring access to important services, activities, or facilities.

Recommendation. While no decision has been made on whether or not to develop a nonwork accessibility measure, CRCOG is committed to exploring options further.

Type 2: Travel Time Savings as an Equity Performance Measure

A second type of performance measure that is useful for evaluating the distribution of benefits from transportation improvements is travel time savings. The regional travel model calculates the cumulative travel times for all trips made by persons under different transportation improvement options and compares the options to see which yields the most travel time savings. The goal is to see how large a reduction in travel time can be achieved if the proposed transportation system improvements are built. By comparing the total travel time for the 'build' option to the 'no build' option, one can derive the travel time reduction or savings.

Comparative Assessment for Equity. For use as an equity performance measure, travel time savings need to be calculated separately for the individual groups being compared. For CRCOG's purposes, this means the savings will be calculated for at least two target groups: the low-income population and the minority population. Each will then be compared to their respective comparative group: the moderate-high income population and the non-minority population. A comparative analysis for households without cars to those that have cars can also be undertaken.

Transit versus Auto Savings. Like the accessibility assessment, CRCOG will calculate travel time saving for both modes of travel: transit and automobile. This will allow a comparison of the amount of travel time savings created through transit improvements versus that achieved through highway improvements.

Measure of Opportunity versus Measure of Predicted Behavior. The travel time measures and accessibility measures differ in a significant way. An accessibility indicator measures a person's *potential* for trip making or access to *opportunities*. In contrast, the travel time savings indicator measures travel time to just those locations the model predicts the person will actually choose as destination. By including both types of measures, CRCOG will be better able to understand the potential impacts of a proposed improvement than if it used only one measure.

Adapting FTA's Summit User Benefit Software. CRCOG is investigating the possibility of adapting a new software package developed by the Federal Transit Administration (FTA) for use in the travel time analysis discussed above. This new software package, called *Summit*, is used to measure benefits associated with major transit project proposals. While *Summit* was developed to help FTA evaluate requests for federal funding assistance on proposed transit projects, it is suitable for measuring highway user benefits as well as transit user benefits, and it can be applied to a regional plan that includes multiple projects as well as to just a single project.

CRCOG will work to adapt the *Summit* software to conduct the specific user benefits assessments that are needed for the equity evaluation as discussed above.

Conclusions

Since the RTP is CRCOG's most critical planning document, it is important to develop a good assessment methodology that can be an effective tool for CRCOG's key decision-making groups. These groups need to be able to use data produced from the assessment to help decide which projects to include and what priorities to set.

The approach proposed is to integrate the measurement of benefits directly into the standard RTP development and evaluation process. A number of criteria are already used for RTP evaluation, such as vehicle miles of travel and transit ridership. Now a set of equity measures will be derived from CRCOG's travel model and will be added to the standard performance criteria. Specifically, these equity measures will include:

- Accessibility Measures: Job accessibility will be the primary measure. Other measures might be developed for nonwork trip purposes, but this requires further evaluation.
- Travel Time Savings: A travel time savings measure will be developed using FTA's *Summit* software. CRCOG also will explore the potential for using the same software to create other user benefit measures.

The development of these measures was not completed during the Challenge Grant project due to an ongoing effort to convert CRCOG's travel model to a new software package. However, CRCOG has outlined a series of recommendations on the types of performance measures to be developed. CRCOG staff will undertake this process in the near future, and will do so in consultation with the Environmental Justice Advisory Board.

4. COMMITMENT TO FUTURE TITLE VI-EJ ACTIVITIES

The Capitol Region Council of Governments intends to take the actions necessary to assure that the voices of all of the Capitol Region's communities are heard, and that future decisions include fair consideration of all social and economic issues in all affected communities. CRCOG is committed to fully integrating the basic principles of environmental justice into all of its transportation planning programs and activities. These principles are:

- To ensure public involvement of low-income and minority groups in decision making;
- To prevent "disproportionately high and adverse" impacts of decisions on low-income groups and minority groups; and
- To assure low-income and minority groups receive a proportionate share of benefits.

To this end, the Policy Board of the CRCOG adopted an Action Plan for Improving the CRCOG Transportation Planning Program on June 26, 2002. The elements of the Action Plan and the status of work taken to achieve the recommendations of the Plan are shown in the table on the following pages.

**SUMMARY OF ACTION PLAN
& COMMITMENT TO FUTURE ACTIONS**

	Action Plan Recommendation	Actions to Date	Commitment to Future Actions
1	<p>Environmental Justice Advisory Board</p> <ul style="list-style-type: none"> • Establish an Environmental Justice Advisory Board (EJAB) to review CRCOG's program and products. 	<ul style="list-style-type: none"> • EJAB established June 2002. 	<ul style="list-style-type: none"> • EJAB is key to institutionalizing the entire process for fully involving target communities & addressing their needs. CRCOG is committed to making this group function effectively. • EJAB will meet 2-3 times / year. • EJAB will review key CRCOG documents like TIP & RTP.
2	<p>Transportation Committee Representation</p> <ul style="list-style-type: none"> • Appoint an EJAB member to the Transportation Committee. 	<ul style="list-style-type: none"> • 2 representatives appointed September 2002. 	<ul style="list-style-type: none"> • The 2 EJ Board representatives will be a permanent part of Transportation Committee & will participate in all Transportation Committee decisions.
3	<p>Improve Outreach Efforts</p> <ul style="list-style-type: none"> • Continue & improve outreach efforts used for 'special' studies. • Improve outreach efforts for 'standard' CRCOG tasks such as update of the RTP & TIP. 	<ul style="list-style-type: none"> • Initial EJ mailing list was developed. • 2003-2005 TIP was sent to EJ mailing list. • Small group methods were employed for Griffin BRT Study. 	<ul style="list-style-type: none"> • CRCOG will continue to update EJ mailing list. • CRCOG will schedule future review meetings for evening hours. • CRCOG will continue to use other recommended methods such as Spanish language ads, small group meetings, etc.
4	<p>Improve TIP Review Process</p> <ul style="list-style-type: none"> • Conduct an assessment of transportation burdens & benefits for the annual update of the TIP. • The TIP and assessment of burdens & benefits will be reviewed by the EJAB. • Provide notification of the TIP update process to the full EJ mailing list. • Schedule the public meeting at an appropriate time and place. 	<ul style="list-style-type: none"> • Benefits assessment done for 2003-2005 TIP. • 'Acting' EJAB reviewed 2003-2005 TIP assessment. • 2003-2005 TIP mailed to EJ mailing list. 	<ul style="list-style-type: none"> • Tools for benefit assessment will be refined over time. • Benefit assessment will be standard for all new TIPs & will be reviewed by EJAB. • EJAB will review all new TIPs. • Progress on achieving equity will be monitored over time. • Notice of TIP review will be provided to full EJ mailing list for all new TIPs. • Will schedule future meeting in evenings.

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	Action Plan Recommendation	Actions to Date	Commitment to Future Actions
5	<p>Improve Transportation Plan Review Process</p> <ul style="list-style-type: none"> • Conduct an assessment of transportation burdens & benefits for each update of the TIP. • The Plan and assessment of burdens & benefits will be reviewed by the EJAB. • Provide notification of the Plan update process to the full EJ mailing list. • Conduct a special outreach effort to involve members of minority and low-income groups. • In the next update of the Plan, include a discussion of the substantive transportation issues raised in the last EJ Workshop. 	<ul style="list-style-type: none"> • No actions - no update of the Plan occurred during the course of the Challenge Grant. 	<ul style="list-style-type: none"> • CRCOG has identified a preferred equity assessment approach, & is committed to developing the detailed methodology & using it for the next update. • CRCOG is committed to involving the minority & low-income communities in the development of the next RTP through the EJAB & through special outreach efforts. • The new mailing list & issues identified during workshops for the Challenge Grant will provide a strong base & focus for the outreach effort.
6	<p>STP-Urban Project Selection</p> <ul style="list-style-type: none"> • Continue to use environmental justice as a criterion in the selection of STP-Urban projects. 	<ul style="list-style-type: none"> • Environmental Justice criterion was adopted prior to Challenge Grant. 	<ul style="list-style-type: none"> • CRCOG will continue to give special consideration to projects that benefit low-income & minority communities.
7	<p>Transit Users Advisory Group</p> <ul style="list-style-type: none"> • Form a transit users advisory group or forum to provide more opportunity for transit users to comment on the bus service. 	<ul style="list-style-type: none"> • No actions. 	<ul style="list-style-type: none"> • A Transit Users Advisory Group will be formed & fully functioning by spring 2003.