PROGRAM FOR ADDRESSING DISCRIMINATION

The Corpus Christi MPO is committed to ensuring that its plans and programs equitably meet the needs of people while explicitly avoiding disproportionately high and adverse human health or environmental effects on disadvantaged populations. The Corpus Christi MPO has identified areas that contain higher than average concentrations of disadvantaged or underserved populations. The goal adopted in the 2045 long range transportation plan is providing an equitable transportation system for all, regardless of age, ability, race, ethnicity, or income. This requires identifying transportation needs of disadvantaged populations and funding projects that meet their needs at least as satisfactorily as the most advantaged populations have their needs met, while remembering that proximity does not equal benefit. A system that uses both quantitative and qualitative analyses is under development.

METHODOLOGY

The Areas of Disadvantaged Populations (ADP) analysis identifies areas within multiple population groups under Title VI and Environmental Justice (EJ) using U.S. Census American Community Survey (ACS) five-year estimates data. These populations are mapped in each of the Census block groups or tracts within the region. The following population groups were included in the analysis: Ethnic Minority, Limited English Proficiency, Female, Over Age 64, Under Age 18, Disability*, National Origin*, Low Income, Minority, and Zero Car Households.

* Population groups captured at the tract level are not included in the ADP composite score calculation.

The ADP analysis generates an “ADP score”, which is used to meet the nondiscrimination requirements and recommendations of Title VI and EJ for the MPO’s plans and programs. This methodology is supported by both FHWA’s and FTA’s Title VI recommendations to simply identify the protected classes using demographic data from the US Census Bureau as the first step in conducting equity analyses. Additionally, FTA’s EJ guidance cautions recipients of federal funds to not be too reliant on population thresholds to determine the impact of a program, plan, or policy to a population group, but rather design a meaningful measure to identify the presence of all protected and considered population groups and then calculate the possibility of discrimination or disproportionately high and adverse effect on these populations.

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PROJECT DOCUMENT: https://www.corpuschristi-mpo.org/02_about_ppp.html
Traditionally Underserved Populations

“The traditionally underserved can be defined as those specifically identified in the Executive Order 12898 on Environmental Justice—that is, low-income populations and minority populations including Hispanics/Latinos, African Americans/Blacks, Asian Americans, Native American/Alaskan Natives and Native Hawaiians, and Pacific Islanders—as well as other populations recognized in Title VI and other civil rights legislation, executive orders, and transportation legislation, including those with limited English proficiency such as the foreign-born, low-literacy populations, seniors, persons with disabilities, and transit-dependent populations.”

NCHRP Report 710 – Practical Approaches for Involving Traditionally Underserved Populations in Transportation Decisionmaking

Utilizing 2010 Census Block Groups, 2009-2013 American Community Survey data and the NCHRP definition above, the Palm Beach MPO creates values to represent Traditionally Underserved populations to inform its equitable decision making process of its discretionary funding programs (Local Initiatives and Transportation Alternatives.) Income is purposefully left out, as it is has its own scoring criteria in each program. The calculation steps below use available block group attributes to compute a final value.

Traditionally Underserved = (0.2 X Minority index) + (0.2 X Limited English Proficiency index) + (0.2 X Disability index) + (0.2 X Transit Dependent index) + (0.2 X Senior index)
The MPO strives to ensure that its projects improve transportation outcomes for all people, regardless of their background, prioritizing projects that do so for the MPO’s equity populations. In support of this effort, the new criteria integrate equity into every MPO goal area. Projects now receive progressively more points based on

- the share of equity populations in the project area (within one-half mile of the project), and
- the expected impacts of the project, as evaluated in the other five goal areas.

The new criteria measures a project’s impact on the people living in the project area rather than solely on the number of people who live nearby. For example, if a project reduces air pollution, it receives more points if the project has a higher share of people who belong to equity populations within the project area.

This new approach applies an equity multiplier to criteria that the MPO has identified through public outreach and data analysis as critical transportation needs or where there exist disparities for equity populations. Each project’s multiplier is based on the percentage of the population in the project area that belongs to the MPO’s equity populations relative to their region-wide averages—the higher the percentage, the higher the multiplier.

**Equity populations include people with low incomes, people of color, people who identify as Hispanic, people with limited English proficiency, people with disabilities, older adults (age 75 and older), and young people (age 17 and younger).**

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**Transportation Improvement Program Project Evaluation Criteria: Transportation Equity**

Staff contact: Betsy Harvey | eharvey@ctps.org
The Wilmington Area Planning Council (WILMAPCO) is a long-time national leader in measuring and addressing transportation inequities. WILMAPCO is a bi-state MPO covering New Castle County, Delaware and Cecil County, Maryland. The agency’s Transportation Justice (TJ) Plan exceeds several federal statutes and initiatives: Title VI of the Civil Rights Act, Environmental Justice, Language Assistance, and the Americans with Disability Act. Other efforts, such as a Social Determinants of Health index and an Urban Technology Desert index, further supplement WILMAPCO’s equity efforts.

Key Transportation Equity Indicators

- Transportation Access (in General)
- Neighborhood Transportation/Housing Costs
- Neighborhood Connectivity
- Travel Time from Neighborhoods
- Travel Time on Public Transit (in general)
- Traffic Volumes
- All Vehicle Crashes
- Pedestrian and Bike Crashes
- Bike Level of Traffic Stress
- Public Electric Vehicle Stations
- Community Transportation Project Funding
- WILMAPCO Community Planning
- Knowledge of WILMAPCO

WILMAPCO’s Bill Swiatek points to a map showing the high cost of transportation and housing for those living in high poverty areas. (Mark Eichmann/WHYY)
Measuring Environmental Justice at NCTCOG

North Central Texas Region

7.25 million residents
12 counties
9,400+ square miles

Environmental Justice Index

2 environmental justice indicators
15 additional layers relevant to equity and transportation disadvantage
2019 American Community Survey 5-Year Estimates
1 publicly available online mapping tool with GIS data available for download at www.nctcog.org/EJ

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Lessons Learned

Indexing demographic groups to produce a final score can fail to protect smaller groups who may still be affected by a disproportionate impact

Use of a threshold discourages staff from doing a more nuanced analysis, even when more detailed data is provided

Dot density layers can help overcome threshold shortcomings