

Metropolitan Transportation Commission

Policy Advisory Council

October 22, 2024

Agenda Item 7a

Equity Priority Communities (EPCs): 2024 EPCs and Re-Envisioning for the Future

Subject:

Summary of feedback received on 2024 EPCs prior to finalization for use in Plan Bay Area 2050+, while also introducing the EPC Re-Envisioning effort slated to commence in early 2025.

Background:

In April 2024, MTC/ABAG released the Draft 2024 EPC Update intended for use in Plan Bay Area 2050+ and related efforts. The methodology for the Draft 2024 EPC Update remains consistent with past updates, with EPC concentration thresholds recalculated using the most recent American Community Survey data (ACS 2018-2022). Since the last update to EPC maps, census tract boundaries were updated by the U.S. Census Bureau due to population shifts, increasing the number of tracts identified. Though the number of EPCs in the nine-county region increased, there has been a modest decline in the share of Bay Area census tracts identified as EPCs since the previous plan, mainly due to a continued decline in low-income households.

The materials in this item present a summary of feedback received during the comment period for the calendar year 2024 update to the MTC/ABAG Equity Priority Communities (EPCs), as well as responses to key questions and concerns posed by stakeholders prior to finalization.

Summary of Feedback and Supplemental Analysis:

In spring 2024, staff released the Draft 2024 EPC Update, initiating a 30-day comment period. Staff also convened targeted discussions with county transportation agencies and presented the update's findings to the MTC Policy Advisory Council during the April 26th meeting.

Stakeholder feedback mostly focused on two broad topic areas: data concerns and potential impacts on planning and funding processes. Across all themes was the core concern that the loss of EPC designation for a given census tract would yield adverse effects on impacted communities and planning, project, and program outcomes. Most of the recommendations posed by stakeholders requested that MTC/ABAG consider methodology changes to address data concerns, utilize previous census data, or otherwise modify the approach for identifying EPCs.

After exploring several approaches to address comment feedback areas, MTC/ABAG staff recommend proceeding with the 2024 Draft EPCs as identified using ACS 2018-2022 data. More information regarding key findings and recommendations is included in the table below.

Staff Exploration		
Area	Key Findings	Staff Recommendation
#1 Census Data Accuracy	<ul style="list-style-type: none"> The United States Census Bureau (USCB) endorses the accuracy of the 2018-2022 ACS and 2020 Decennial Census. Margin of error is a normal outcome in any large data set. The latest Census/ACS data more accurately reflects Covid-era demographics for the region compared to older data from 2010 and 2014-2018. 	Use the latest available data to address federal and state planning requirements.
#2 Standard Deviation Adjustments	<ul style="list-style-type: none"> Staff evaluated alternatives to the standard deviation that is used to calculate EPC concentration thresholds. A change from 0.5 to 0.25 standard deviation yielded too broad a result. Greatly expanding the number of EPCs is contrary to the goal of identifying populations with moderately above-average equity needs. 	Maintain the 0.5 standard deviation threshold.

Staff Exploration		
Area	Key Findings	Staff Recommendation
	<ul style="list-style-type: none"> This methodology change did not bring back several notable tracts that lost EPC status. 	
#3 Alternative Data Tools	<ul style="list-style-type: none"> Staff reviewed various federal, state, and regional equity tools as potential alternatives to MTC/ABAG’s EPC framework. Equity tools vary greatly, and each come with their own pros and cons; no single tool solved the concerns on its own. Introducing a new tool and associated methodology as part of the plan update could result in unintended consequences. 	<p>Continue using the existing board-approved EPC methodology for Plan Bay Area 2050+;</p> <p>comprehensively evaluate additional data types and alternative tools as part of forthcoming EPC Re-Envisioning.</p>
#4 Funding Program Flexibility	<ul style="list-style-type: none"> Staff found that these programs generally offer substantial flexibility for defining project benefits, allowing applicants to provide alternative justifications of disadvantage and/or priority in addition to a project’s relationship to EPCs. <ul style="list-style-type: none"> Notably, no programs identified by staff required projects to be within an EPC to be eligible for funding. 	<p>Staff will assess how regional funding programs can best identify and prioritize the needs of priority populations. Staff will also consider input received to date during the development of future grant programs and recommend policy changes, as appropriate.</p>

Staff Exploration		
Area	Key Findings	Staff Recommendation
#5 Community Based Transportation Plans (CBTPs) ¹	<ul style="list-style-type: none"> Under the current CBTP guidelines, new plan areas must contain EPCs or locally-designated transportation disadvantaged areas (TDAs). MTC continues to recognize previously completed or approved CBTPs, even if the plan area no longer contains current EPCs. 	Staff will continue to recognize the importance of prior CBTP efforts and further explore how to best support the implementation of existing CBTPs.

It is also important to note that the 2024 Draft EPC Update leverages the existing, board-approved EPC methodology that was developed in close collaboration with stakeholders during the Plan Bay Area 2040 process (2017); changing this methodology on an ad-hoc basis would run counter to a collaborative framework development process. Additional modifications could impact on the agency’s ability to use the latest planning data and focus on areas that have moderately above-average concentrations of EPC disadvantage factors. Moving forward there will be opportunities to comprehensively engage on these and related topics as part of the EPC Re-Envisioning process, described further below.

Attachment A provides further details on the Draft 2024 EPC Update comment feedback and staff response. For reference purposes, the detailed Draft 2024 EPC Update maps at the regional and county scales that were shared with Policy Advisory Council this past April are included in **Attachment B**.

¹ MTC’s Community-Based Transportation Plans (CBTPs) bring residents, community organizations and transportation agencies together to improve mobility options for low-income communities. These community-led plans identify the most important transportation challenges in low-income neighborhoods and develop strategies to overcome them. Findings help MTC and local policymakers make decisions on planning, funding and implementation. To learn more about the program go to the MTCs CBTP webpage, <https://mtc.ca.gov/planning/transportation/access-equity-mobility/community-based-transportation-plans-cbtps>.

EPC Re-Envisioning and Next Steps:

Early next year, MTC/ABAG will kick off a multi-year re-envisioning of the EPC framework. Recognizing the concerns expressed by partner agencies regarding the 2024 EPC update, staff are committed to re-examining how future long-range planning efforts recognize and elevate the needs of priority populations. This re-envisioning will conduct a complete examination of the current framework and its limitations, build on the collaboration from past planning efforts, partner with key stakeholders (e.g., MTC's Policy Advisory Council, community-based organizations, historically underserved communities), and seek to address known gaps in the existing EPC methodology.

Staff will provide an update on the 2024 EPCs to the MTC Planning Committee and ABAG Administrative Committee in December and formally respond to all comments received over the remainder of the fall. In early 2025, the MTC Commission and ABAG Executive Board are anticipated to consider approval of Plan Bay Area 2050+ Final Blueprint, including 2024 EPCs, to support further modeling and analysis of the benefits and burdens of the long-range plan, including on priority populations.

Issues:

None identified.

Recommendations:

Information.

Attachments:

- Attachment A: Presentation
- Attachment B: Draft 2024 Equity Priority Communities Maps