Equity Review of Regionally
Driven Capital Projects
(Chittenden County Regional
Planning Commission)



# **Vermont Racial Equity Association**

Transformational • Data-driven • Programmatic • Outcomes-based

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Dear Charlie,

The Vermont Racial Equity Association (VREA) is pleased to submit this Report to the Chittenden County Regional Planning Commission (CCRPC) in response to a request to review the CCRPC *Draft* Transportation Equity Screen. We share your vision in your Regional ECOS Plan of a "healthy, inclusive, and prosperous future for Chittenden County" and agree that it is not achievable without addressing the systemic racism and inequities in our community.

We understand that this CCRPC work is centered in a response to statewide/community desires for transformation within state and agency organizations culminating with the recent Burlington Declaration of Racism as a Public Health Emergency. We applaud your expressed commitment. We recognize this project's potential for becoming a model for Vermont Planning Regions, Regional Councils, Councils of Governments, Regional Planning and Development Agencies, Metropolitan Planning Organizations and other Regional Organizations nationwide to turn to as they respond to public demands for justice and forge anti-racist pathways. Building upon CCRPC's expressed commitment to operationalizing anti-racist practices, VREA has a demonstrated commitment to elevating voices and efforts of leaders, movers and shakers and community members.

We believe together we can move CCRPC forward and our collective desire to intentionally transform the commission into an anti-racist organization will come to fruition. VREA welcomes this opportunity to partner with CCRPC to expand upon this work. Thank you for an opportunity to partner with you in this work.

Sincerely,

Mark A. Hughes Director, Racial Equity Association

# I. PROJECT UNDERSTANDING

The Chittenden County Regional Planning Commission (CCRPC), a municipally developed and State designated regional planning commission and metropolitan planning organization for the Chittenden County region has engaged the Vermont Racial Equity Association (VREA), an interdisciplinary multi-lingual, minority and veteran owned equity consulting firm to provide a targeted review of the CCRPC *Draft* Transportation Equity Screen.

This request is in response to unprecedented national racial reckoning and CCRPC seeks to partner with a consultant to tackle inequities in all facets of their work, learning from those whose stories need to be elevated, and acknowledging, confronting and seeking to dismantle the systemic racism that damages communities. This is a critical time in our country. As our communities engage in a call to action across the country, CCRPC is aligning with these efforts to defeat racism within county and city government. As part of this initiative, CCRPC now seeks a review of some preliminary work CCRPC has initiated internally to add an equity component to their evaluation and prioritization of seventeen (17) potential regional transportation projects for the FY23 VTrans Capital Program.

### Tasks requested included:

- 1. Review the equity scores for projects relative to each other.
- 2. Provide recommendations to any changes in how these projects should be scored in this first round of prioritization.
- 3. Provide advice about how to use the equity score either as a screen or as a number of points added to the project scoring so as to ensure that equity gets proper consideration in this process and influences the ranking properly.

Follow-on work will include the review of background research and providing recommendations for addressing equity in future project prioritization.

# II. EQUITY SCORE REVIEW

# Scope

The equity review provided by VREA is limited to Chittenden County Potential **Regionally Driven** Projects provided within the draft CCRPC *Draft* Transportation Equity Screen. Seventeen (17) projects were identified in the CCRPC *Draft* Transportation Equity Screen. There are twenty-nine (29) projects on the list of Chittenden County Potential Regionally Driven Projects. The evaluation of the criteria for adding to Regionally Driven projects or determining which projects were included in the *Draft* Transportation Equity Screen are beyond the scope of this engagement. VREA reviewed the Metropolitan Transportation Plan to identify equity priorities, project timelines and project statuses.

# Background

The *Draft* Transportation Equity Screen consists of a "general equity" rating using an impact benefits approach derived from the Augustina Krapp Transportation Equity Project Prioritization Criteria. The following framework was created by CCRPC:

- Higher positive ranking: Address safety problems, results in reduced noise, air or pollutant impacts, mitigates community cohesion or other social impacts; mitigates cumulative impacts, or improves accessibility to employment, education, healthcare, and other essential services for Environmental Justice (EJ) communities
- Medium positive ranking: Add/improve vehicle, bicycle, transit, or pedestrian connectivity within EJ communities
- Lower positive ranking: Repair roadways or bridges, or streetscapes unless project would result in permanent negative impacts to traffic conditions in the neighborhood (e.g., by bringing in more vehicle traffic) or would involve significant right-of-way acquisition in EJ communities
- Neutral: neither positive nor negative impacts to EJ communities.

The Opportunity Index (which includes data on poverty rate, school proficiency, homeownership rate, unemployment and job access), a component of the CCRPC ECOS Map Viewer was considered in the development in the *Draft* Equity Screen.

## **Current Equity Ratings**

## Equity rating:

Higher Positive Impact

- 1. Winooski East Allen Street Improvements
- 2. Burlington Colchester Avenue/Riverside Avenue Intersection Improvements
- 3. Burlington Main Street Great Streets
- 4. St George VT2A/VT116 Intersection
- 5. Milton US7/ Racine/ Legion/ Bartlett/ West Milton Road Improvements

### Equity rating:

Medium Positive Impact

- 1. South Burlington US2 Intersection and Roadway Improvements Dorset Street to Garden Street (Williston Rd network study phase II)
- 2. South Burlington US2 Intersection and Roadway Improvements Garden Street to VT116
- 3. Shelburne US7/Harbor Road Improvements
- 4. Williston Exit 12 Stage 3 Diverging Diamond Interchange CIRC ALT PHASE III
- 5. Burlington Colchester Avenue/Prospect Street Intersection Improvements
- 6. Colchester Roundabout at Bayside Park Intersection
- 7. Essex Junction Train Station Access and Circulation Improvements

#### Equity rating:

Lower Positive Impact

- 1. Williston Exit 12 New Grid Streets
- 2. Williston Mountain View Road Bicycle/Pedestrian Facilities
- 3. Essex North Williston Rd Hazard Mitigation CIRC Alt Phase III

#### Equity rating:

Neutral Impact

- 1. South Burlington VT116/Cheesefactory Road
- 2. Jericho VT117/Skunk Hollow Road Improvements

## Methodology

Using the *Draft* Equity Screen, the projects were given further review with emphasis on what we understood to be the presence of EJ communities in the project areas. Additional consideration was given to the reviewer's understanding of the project areas given personal knowledge and the lived experience (EJ communities). We agree that the Screen methodology provides latitude for broad discretion in the evaluation of the proposed Regionally Driven Projects. The structure of the *Draft* Equity Screen evaluation criteria made it difficult to provide an evaluation given the process divided, grouped and ranked various benefits, forcing the evaluator to choose between four rankings, thus **prioritizing the importance of equity in various categories** (i.e., safety over that of the repair of roadways and bridge). These considerations are already addressed at a higher level on the VTrans Asset Driven approach and are difficult to navigate in an equity discussion. Challenges also exist in with the *Draft* Equity Screen model applied given its inability to measure harm or take into consideration that by definition, a neutral ranking necessitates an equity offset. We **subjectively** considered the projects from a location benefits AND burdens based-approach. The outcome of our review is as follows:

## **VREA Equity Ratings**

Equity rating: High Impact

Assigned Points - 20

1. Winooski - East Allen Street Improvements

2. Burlington - Colchester Avenue/Riverside Avenue Intersection Improvements

Equity rating: Medium Impact

Assigned Points – 10

- 1. St George VT2A/VT116 Intersection
- 2. Milton US7/ Racine/ Legion/ Bartlett/ West Milton Road Improvements
- 3. Burlington Main Street Great Streets

Equity rating: Low Impact

Assigned Points - 0

- 1. South Burlington US2 Intersection and Roadway Improvements Dorset Street to Garden Street (Williston Rd network study phase II)
- 2. South Burlington US2 Intersection and Roadway Improvements Garden Street to VT116
- 3. Shelburne US7/Harbor Road Improvements
- 4. Williston Exit 12 Stage 3 Diverging Diamond Interchange CIRC ALT PHASE III
- 5. Burlington Colchester Avenue/Prospect Street Intersection Improvements
- 6. Colchester Roundabout at Bayside Park Intersection
- 7. Williston Exit 12 New Grid Streets
- 8. Essex Junction Train Station Access and Circulation Improvements
- 9. South Burlington VT116/Cheesefactory Road
- 10. Jericho VT117/Skunk Hollow Road Improvements=
- 11. Williston Mountain View Road Bicycle/Pedestrian Facilities
- 12. Essex North Williston Rd Hazard Mitigation CIRC Alt Phase III

# II. RECOMMENDATION

## **Capital Project Equity Scoring**

#### Discussion

Using this model, as a screening tool is problematic in that the discretion, informed by personal biases will consistently produce unreliable and inconsistent outcomes, creating distrust in the process. To avoid placing a heavier priority on any given equity benefit or causing them to offset one another, equal weight should be given to them and a maximum equity score prescribed. It must also be understood that a neutral rating of a project, as a result the project presenting no benefit or burden does not negate the objective to address historic and insidious inequities associated with transportation project prioritization. To adequately address these inequities it is recommended to offset all neutral projects (and any project placing a burden on EJ communities). The following is recommended:

## **Proposed Scoring Model**

A possible approach to leverage invested in the existing *Draft* Equity Screen work would involve using a scoring system as follows: Add an additional two (2) points for each area in which a project benefits an EJ community, up to a total of ten (10) points total. Subtract a one (1) point from any project that is evaluated as being EJ neutral. Subtract four (4) points for each instance where a project places negative (burden) on an EJ community. Subtract three (3) points for each additional instance the project causes a EJ community burden up to a total of minus ten (10) points.

## Location benefits-based criteria for equity project scoring (+2)

- Address safety problems in reduced noise, air or pollutant impacts
- Mitigate community cohesion or other social impacts
- Mitigate cumulative impacts, or improves accessibility to employment, education, healthcare, and other essential services
- Add/improve vehicle, bicycle, transit, or pedestrian connectivity
- Repair roadways or bridges, or streetscapes

Neutral impact scoring (-1)

### Location burden-based criteria for equity project scoring (-4)

- Negative impacts to traffic conditions in the neighborhood
- Significant right-of-way acquisition

# III. CONCLUSIONS

CCRPC's effort to incorporate an equity review into the Regional Capital Project proposal process is a small step in the right direction. VREA views this work as what can be seen as a short-term tactical approach as Vermont begins its first steps towards transportation equity policy. VREA urges the CCRPC to begin the earnest work in investing in the implementation of a Transportation Equity Program. This work will inform the equity component of the Capital Project selection process and lay the groundwork to enable CCRPC to conduct the consistent MPO community engagement required in all activities related to EJ/Title VI and LEP communities.

CCRPC is encouraged to leverage guidance provided by the Center for Urban Transportation Research, Project number 18-03, for the Center for Transportation, Equity, Decisions, and Dollars (CTEDD), Integrating Equity into MPO Project Prioritization.

VREA is honored to partner with CCRPC in developing equity criteria for the Regionally Driven Capital Project selection process. We welcome the opportunity to work with CCRPC to further refine and expand this process across all phases of the Capital Project selection process. It is our hope that this work will ultimately enable us to partner in the development and deployment of a Transportation Equity Program, unparalleled by any Vermont Planning Region, or any other Region, Agency or Organization nationwide.