



CITY/COUNTY ASSOCIATION OF GOVERNMENTS
OF SAN MATEO COUNTY

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May 15, 2024

To: MTC Staff

RE: Draft 2024 Equity Priority Communities Update

Thank you for the opportunity to provide feedback on MTC's proposed changes to Equity Priority Communities, intended for use in the Plan Bay Area 2050 Plus update. As noted, since 2001, MTC has been using data from the American Community Survey to identify communities (census tracts) that may have historically faced disadvantage and underinvestment due to their background or socioeconomic status. The EPC framework is intended to be used by MTC to guide investments that meaningfully reverse the disparities in access to transportation, housing, and other community services.

C/CAG staff has reviewed the materials and offers the following comments and recommendations.

- The proposal includes significant changes to previously identified EPCs within San Mateo County. Many census tracts that have previously been identified as EPCs in PBA 2035, 2040 and/or 2050 have been excluded in this draft. (See attachment for a comparison of how tracts have been identified for various PBA updates.) Beginning in 2006, these EPCs have been incorporated into various Community Based Transportation Plans in San Mateo County.

While we understand that there is a need to utilize current data in the PBA2050 + update, we are concerned that shifting the boundaries of communities that have been identified as EPCs, and therefore deserving of prioritized investment, sends a confusing and discouraging message to these communities, many of which have endured longstanding historical disadvantages. There is no data provided to suggest that there have been subsequent investments in these communities such that they are no longer in need of prioritized investment, only an indication that a percentage of incomes may have risen above the very low threshold of 200% of the Federal Poverty Level. C/CAG strongly advocates for retaining these areas within the EPC designation until sufficient improvements to transportation, housing, and/or other community services justify removal. We therefore recommend that all Census Tracts previously identified as EPCs (or COCs) retain the designation and that any new tracts identified through this update be added to that base. For San Mateo County, this would entail adding back Census Tracts 600200, 601502, 602300, 604101, 606000, 610500, 610900, 611700 & adding back the previous boundaries of Census Tracts 605900, 606200, 612000, 612100 and 611900. Alternatively, former EPC's that have been removed of their designation can still be highlighted and categorized through a tiered system with current EPCs.

- There is acknowledgement in the 2024 EOC Update Memo that there needs to be a broad re-envisioning of the EPC framework to address broader shifting demographic trends, and that this effort is proposed to begin later this year for utilization in the PBA 2060. Given this approach, it seems appropriate to retain all existing EPCs identified in previous PBA efforts, add those newly identified in PBA 2050+, and reserve significant changes until the revised EPC framework has been drafted, vetted and adopted.
- Additionally, at the April 5th meeting of the Planning Directors of Bay Area County Transportation Agencies (BACTA), BACTA staff also expressed the same concerns and provided a similar response:

CTA Planning Directors Coordinated Response to MTC's EPC Designation Changes

MTC is required to use updated information to develop its long-range planning and should consider new census data to make informed decisions related to long range planning. Use of this new data in PBA 2050+ update should be additive, reflecting new community needs that reach the established MTC's EPC designation. MTC should maintain all existing EPCs identified in the previous PBA 2050, as many of these communities have longstanding historical disparities that still remain, and the CTAs are working through CBTP process to many of these communities, supporting a consistent approach towards addressing our regions equity populations.

Thank you again for the opportunity to provide feedback on the proposed changes related to Equity Priority Areas for the Plan Bay Area 2050+ update. Please contact me at: scharpentier@smcgov.org if you have any questions.

Sincerely,



Sean Charpentier
Executive Director

Attachment

- Equity Priority Communities (EPCs) in San Mateo County by Census Tract

Equity Priority Communities (EPCs) in San Mateo County by Census Tract

Census Tract No	PBA 2035	PBA 2040	PBA 2050	PBA 2050+
600800	X	X	X	X
600700	X	X		X
600200	X	X		
601300	X	X		X
601502	X	X	X	
602100	X	X	X	X
602200	X	X	X	X
602300	X	X	X	
604101			X	
606000			X	
606100			X	X
605900	X	X		
605902 ¹				X
606200	X	X	X	
606201 ²				X
607701	X	X	X	X
606100			X	X
607200				X
610900			X	
610800	X	X	X	X
610203	X	X	X	X
610601	X	X	X	X
610201	X	X	X	X
610500	X	X	X	
610400	X	X	X	X
611700	X	X	X	
611800	X	X	X	X
612000	X	X	X	
612002				X ³
612100	X	X	X	
612102				X ⁴
611900	X	X	X	
611901				X ⁵

Lt Blue – Recommend census tracts continue as EPCs in PBA 2050+

Orange – Recommend balance of former census tracts also continue as EPCs in PBA 2050+

¹ A portion of former tract 605900

² A portion of former tract 606200

³ A portion of former tract 612000

⁴ A portion of former tract 612100

⁵ A portion of former tract 611900