

Regional Mobility Pricing Project

Memorandum

Date	March 25, 2022
To	Garet Prior, ODOT Toll Policy Manager, EMAC Coordinator
From	RMPP Consultant Team
Subject	RMPP Equity Framework Step 1 Planning Phase Memorandum
CC	Chris Lepe, Mariposa Planning Solutions

1 Introduction

The [Equity Framework](#) is the orienting document through which the [Oregon Toll Program](#) centers equity and integrates it into the decision-making process. The Equity Framework uses a five-step process to encourage decision-makers to critically address health, racial, social, and economic disparities and historic disinvestment and transportation decisions that have harmed communities. The five steps consist of the following:

- Step 1: Identify Who, What, and Where
- Step 2: Define Equity Outcomes and Performance Measures
- Step 3: Determine Benefits and Burdens
- Step 4: Choose Options that Advance Equity
- Step 5: Provide Accountable Feedback and Evaluation

This first Equity Framework memorandum and memorandums for subsequent steps will provide greater clarity on how each of the above steps will be applied to the [Regional Mobility Pricing Project](#) (RMPP). The RMPP would apply congestion pricing on all lanes of I-5 and I-205 in the Portland metro area to manage traffic congestion and raise revenue for priority transportation projects.

The five steps outlined in the Equity Framework will be completed in two phases:

- Planning Phase – These memorandums will be completed during the planning phase of the project development process, which is anticipated to continue until Summer 2022.
- National Environmental Policy Act (NEPA) Phase – These memorandums will build on the planning phase memorandums beginning in Fall 2022.

The planning phase memorandums, including this one, apply the Equity Framework using available data, provide recommendations on next steps, and will be made available for stakeholders review and feedback. Any feedback provided during the planning phase will be used to inform and influence the NEPA phase memorandums.

2 Planning and Environmental Linkages

A collaborative and integrated approach to transportation decision-making that considers environmental, community, and economic goals in the RMPP planning phase is underway. In the subsequent NEPA phase, the project team will conduct more detailed analysis. Developing projects in this way allows for early involvement from project partners, members of the public, and environmental resource and permitting agencies who historically are not engaged until the NEPA phase. The planning process is consistent with [Federal Highway Administration's guidance](#), which aims to streamline the RMPP development and environmental review processes by improving coordination among stakeholders.

The planning process will conclude with the following elements that are relevant to the Equity Framework:

- A statement that identifies the project **Purpose, Need, Goals and Objectives**.
- Documentation of the **proposed action and no-action alternatives** to be evaluated in the NEPA process.

Equity Framework Communities (EFCs)

The Oregon Toll Program recognizes that past land-use and transportation investments in the Portland metro area—including ODOT's own highway investments—have resulted in negative cultural, health, economic, and relational impacts to local communities and populations. These projects have resulted in displacement and segregation and have disproportionately affected:

- People experiencing low-income or economic disadvantage
- Black, indigenous and people of color (BIPOC)
- Older adults and children
- Persons who speak non-English languages, especially those with limited English proficiency
- Persons living with a disability
- Other populations and communities historically excluded and underserved by transportation projects

ODOT is committed to intentionally seek out voices and communities who have been left out of processes to empower and support them at all stages, especially from the beginning, to help programs and projects lead to equitable outcomes.

ODOT refers to the communities identified above as Equity Framework Communities.

Source: Adapted from: Oregon Toll Projects' Equity Framework, dated December 3, 2020

3 Equity Framework – Step 1: Identify Who, What, and Where

3.1 Methodology

This memorandum details the Step 1 process, which is to identify who, what, and where are the individuals and communities who may be adversely or beneficially affected by the RMPP's Area of Potential Impact (API). The Equity Framework delineates the following Step 1 actions, on which this memo seeks to provide further clarity:

- **Identify historically excluded and underserved communities and small businesses** the toll projects may disproportionately affect, including presenting the context of how and why these communities have been excluded and underserved in the past through prior transportation and land use planning and investment.
- **Document the travel patterns of historically excluded and underserved communities** who may be affected by the toll projects and anticipate potential changes to them.
- **Develop a range of potential pricing strategies and related policy proposals** that directly address community-identified mobility and equity priorities.

3.1.1 Area of Potential Impact – Geography

The API is the geographic boundary within which adverse and/or beneficial effects to Equity Framework Communities (EFCs) could occur from the application of tolls and/or from changes in traffic patterns resulting from the RMPP. For the purpose of this initial analysis, corridor users and communities within the API are defined below:

- **Corridor Users** are vehicle users who will pay a toll to use I-5 and I-205.
- **Communities affected by diversion** are those neighborhoods and communities who may experience effects from anticipated changes in traffic patterns related to the toll.

The yellow area in Figure 1 illustrates the API within a two-mile buffer¹ of roadway segments aggregated from the following outputs from the Metro Regional Travel Demand Model (RTDM):

- 2015 and 2045 Select Links analysis were used to identify those who use I-5 and I-205 in the Toll Evaluation area (represented in blue) and who may have to pay once the toll is established. 2045 No Action Select Links Analysis forecasts the same information for the year 2045.

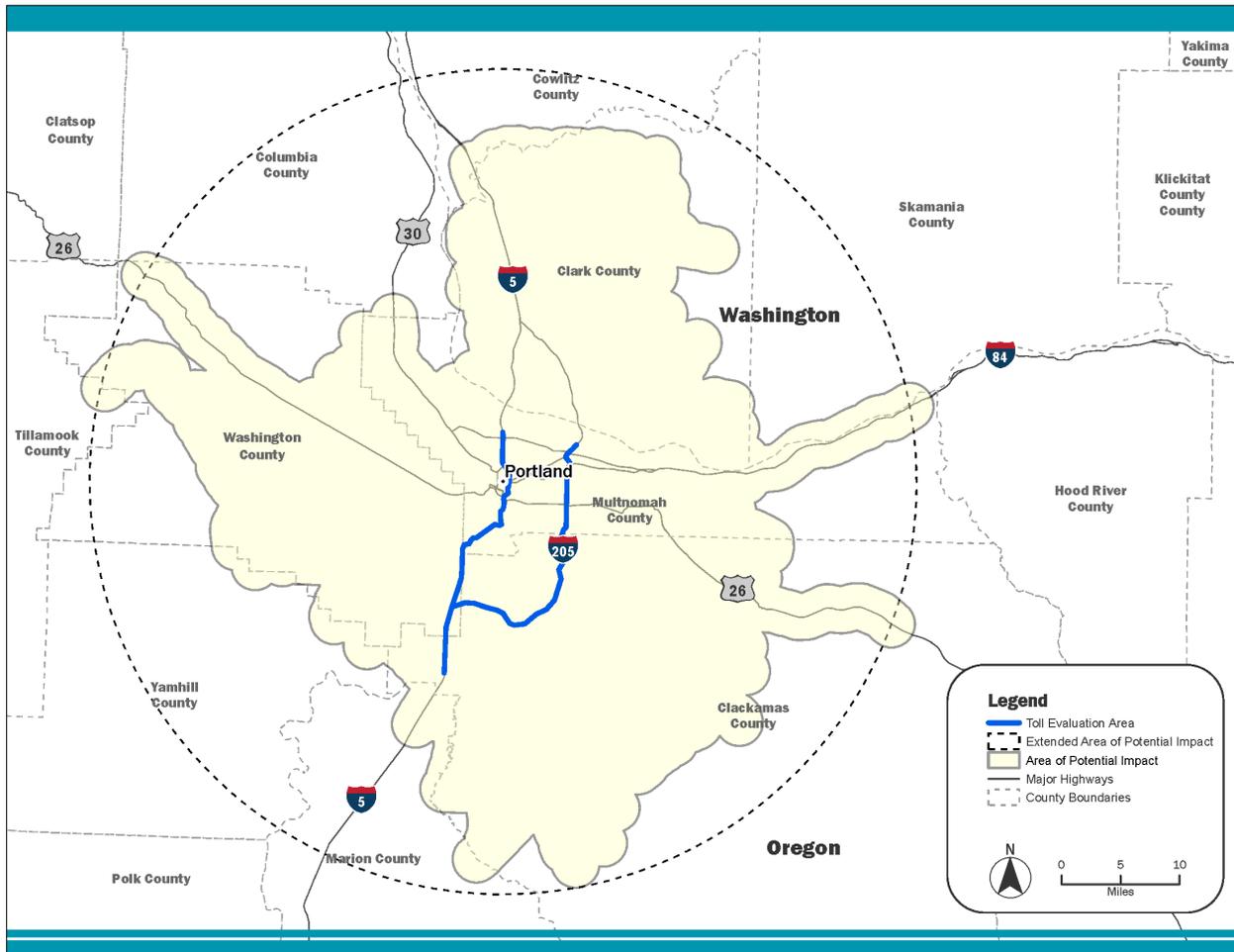
¹ A two-mile buffer around the arterials and freeways where traffic leads to the toll evaluation area represents the traffic capture area or “travelshed” of the toll evaluation area.

RMPP Equity Framework Step 1 Planning Phase Memorandum / March 25, 2022

The API geographic reach is constrained by the limits of Metro's RTDM. A regional transportation model uses current travel behavior to predict future travel patterns from a sample of travel behavior data. For more information, see [Metro's Modeling Services](#).

The Extended API was also defined within a 35-mile radius from the city center of downtown Portland. This Extended API is intended to capture communities that are within a larger radius, but outside the limits of the RTDM. The Extended API is not limited by the extents of the model and includes other communities and user groups who may be affected by the RMPP.

Figure 1. Area of Potential Impact and Extended Area of Potential Impact



3.1.2 Area of Potential Impact - Effects on Communities

The API is the geographic boundary within which adverse and/or beneficial effects to EFCs could occur from changes in traffic patterns resulting from the RMPP. Within the API, the project team performed the following analysis:

- **Identify locations of EFCs**, building on the understanding of people (and where they live), resources (jobs, services, and other places EFCs need to access), and methodologies for analysis in the I-205 Toll Project (e.g., identified through American Community Survey census data).
- **Identify travel patterns of EFCs** (the routes that EFC populations take when accessing resources/destinations) using preliminary transportation modeling from the RTDM, and a Corridor User Analysis.
- **Identify locations and types of small businesses** through development of 8 to 10 small-business user profiles. The profiles include a description of the type of business user, business sector, number of employees, and example trips representative of small businesses in the API. These business profiles will be refined with input from the EMAC and have been informed by data from business associations.

3.1.3 Residential Locations of Equity Framework Communities

The Oregon Toll Program recognizes that past land use and transportation investments in the Portland metro area—including ODOT’s own highway investments—have resulted in negative cultural, health, economic, and relational impacts to local communities and populations. These projects have resulted in displacement and segregation and have disproportionately affected communities. ODOT is committed to intentionally seek out voices and communities who have been left out of processes to empower and support them at all stages, especially from the beginning, to help programs and projects lead to equitable outcomes.

Data Sources

As a first step to identifying historically excluded and underserved communities and small businesses, the RMPP project team created demographic maps, displayed at the census tract level, within the API and Extended API geographies. The data used for the analysis is from the U.S. Census Bureau, American Community Survey (ACS), 2015 to 2019.

The Oregon Toll Projects’ Equity Framework, dated December 3, 2020, identifies the following disproportionately affected communities:

- People experiencing low income or economic disadvantage
- Black, indigenous and people of color (BIPOC)
- Older adults and children
- Persons who speak non-English languages, especially those with limited English proficiency
- Persons living with a disability
- Other populations and communities historically excluded and underserved by transportation projects

RMPP Equity Framework Step 1 Planning Phase Memorandum / March 25, 2022

Data Limitations

There are known limitations to U.S. Census Bureau data. Substantial limitations include sampling and data collection errors, as well as inconsistent time periods for which data are available. The data also relies on residential patterns and may not adequately capture the many places of employment, service, commerce, or congregations in the API.

To account for these limitations, the project team will supplement the analysis outlined in this memorandum with qualitative data, including information gathered during public engagement activities, and best professional practices from subject matter experts to provide a more complete understanding of where EFCs are located.

Data Approach

No Threshold

This memorandum uses a no threshold approach in its demographic analysis. A no threshold approach means that the identification of EFCs is not limited to census tracts that have a defined threshold percentage of a particular EFC demographic, such as low-income and/or minority persons. A no threshold approach minimizes the possibility of inadvertently missing concentrations of certain EFCs within census tracts, where the threshold percentage does not meet a pre-defined level but where there are EFCs. For example, if a threshold was set for census tracts to be included in the analysis that have higher than 20 percent people experiencing poverty, the analysis would not include census tracts with 19 percent low-income population or areas with known concentrations of regulated affordable housing. Removing a threshold allows for greater flexibility and broader inclusion of EFCs in the analysis.

Geography

Demographic maps created for this analysis provide a visual representation of the EFCs at the census tract level that intersect or fall within RMPP's API and Extended API in both Oregon and Washington states. The geographies where EFCs are identified may be refined as the RMPP continues to analyze current travel patterns or potential impacts in these areas.

The RMPP API and Extended API includes areas of these counties in Oregon:

- Clackamas County
- Columbia County
- Marion County
- Multnomah County
- Tillamook County
- Washington County
- Yamhill County

The RMPP API and Extended API includes areas of these counties in Washington state:

- Clark County
- Cowlitz County
- Skamania County

3.1.4 Identify Location and Type of Small Businesses

For the RMPP, this analysis is intended to show a representative sample of where small businesses are located and to describe sample trips that could be made or taken by small businesses within the API and Extended API. Small businesses are defined as entities with 50 employees or less that are organized for profit, are independently owned and operated, and are not dominant in their field on a national basis (US Small Business Administration 2021).

3.2 “Who” – Population in the Area of Potential Impact

The total population in the API and Extended API is about 2 million and 4 million, respectively. The Portland Metropolitan Statistical Area (MSA) is about 3 million people. Table 1 displays the population totals by geography and the corresponding percentages of EFCs.

Table 1. Populations in the Area of Potential Impact & Extended Area of Potential Impact

Demographic (U.S. Census Bureau Classifications)	Area of Potential Impact	Extended Area of Potential Impact	Oregon	Washington	MSA*
Total Population	2,179,00	3,808,000	4,130,000	7,404,000	2,907,000
Percentage of Equity Framework Communities					
Low Income	24.9%	25.1%	30.8%	25.6%	30.8%
Poverty	5.9%	5.8%	13.1%	10.8%	13.1%
Racial Minority	20.0%	19.4%	11.3%	18.8%	24.3%
Ethnic Minority	12.2%	12.8%	13.0%	12.7%	
Children (Under 18)	21.6%	21.9%	21.0%	22.2%	21.0%
Older Adults (65+)	14.1%	14.3%	17.2%	15.1%	17.2%
Person Experiencing a Disability	11.7%	11.7%	14.4%	12.7%	14.4%
Limited English Proficiency	3.6%	3.6%	2.9%	3.6%	2.9%
Households with No Vehicle Access	8.3%	8.1%	7.4%	6.8%	7.4%

Source: U.S. Census Bureau, American Community Survey, 2015 to 2019

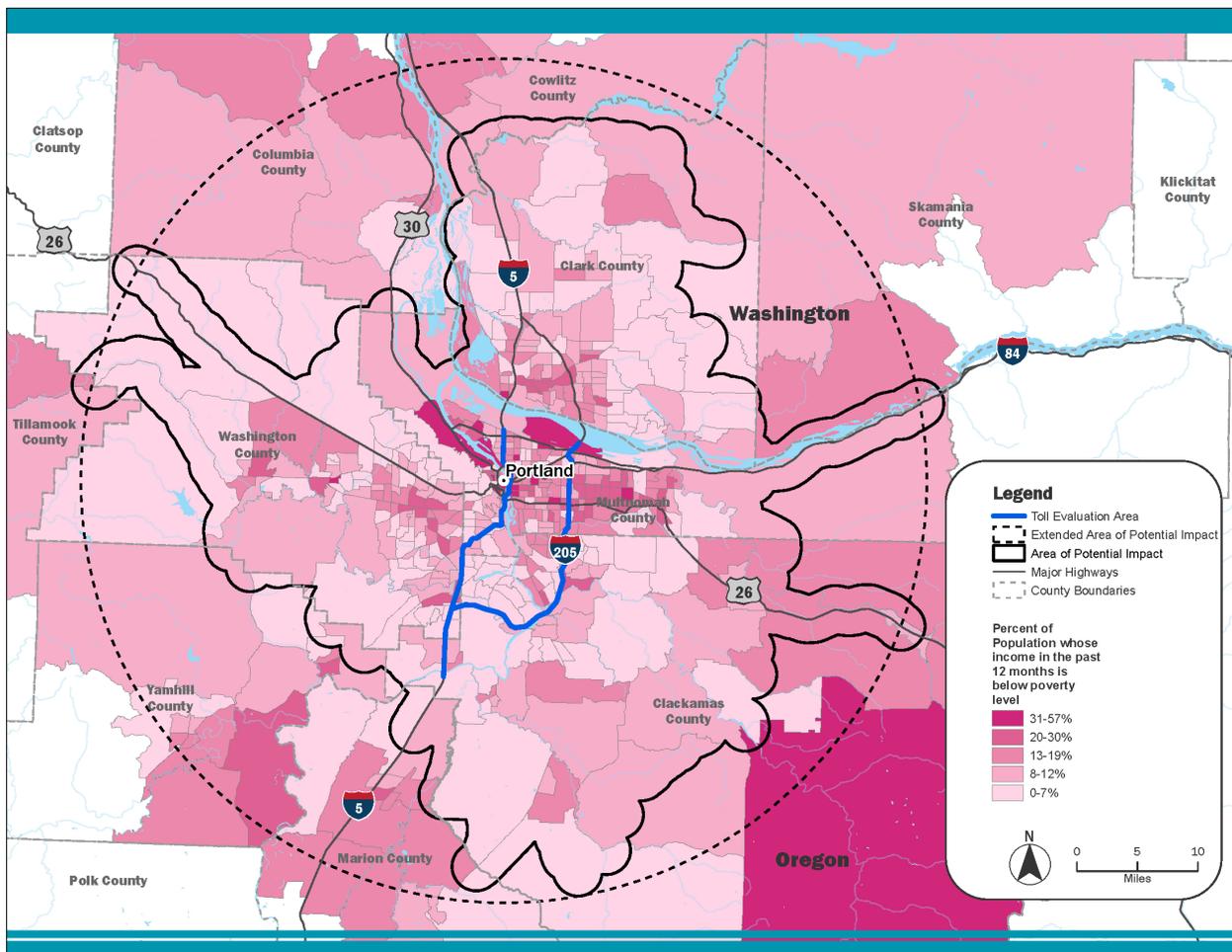
* Metropolitan Statistical Area = Portland-Vancouver-Hillsboro, OR-WA Metro Area

3.2.1 Poverty

The U.S. Department of Health and Human Service provides poverty guidelines each year. These guidelines relate to household income and assigns a threshold for poverty status. For example, the current 2021 poverty guideline for a family or household of four persons is \$26,500 per year. In determining the poverty status of families or households, the U.S. Census Bureau uses income guidelines, which are defined here as 100 percent of the federal poverty level.

Figure 2 illustrates where people experiencing poverty are located. They are predominantly concentrated around east Portland, western Gresham, and in the greater Vancouver area in Washington state.

Figure 2. Poverty within the Area of Potential Impact and Extended Area of Potential Impact



3.2.2 Low Income

The RMPP Equity Framework defines low income as populations at 200 percent or below of the federal poverty level based on questions related to a person’s income in the past 12 months. This definition of low income is unique to this Equity Framework analysis and may differ from definitions or related policies on low income for other RMPP studies.

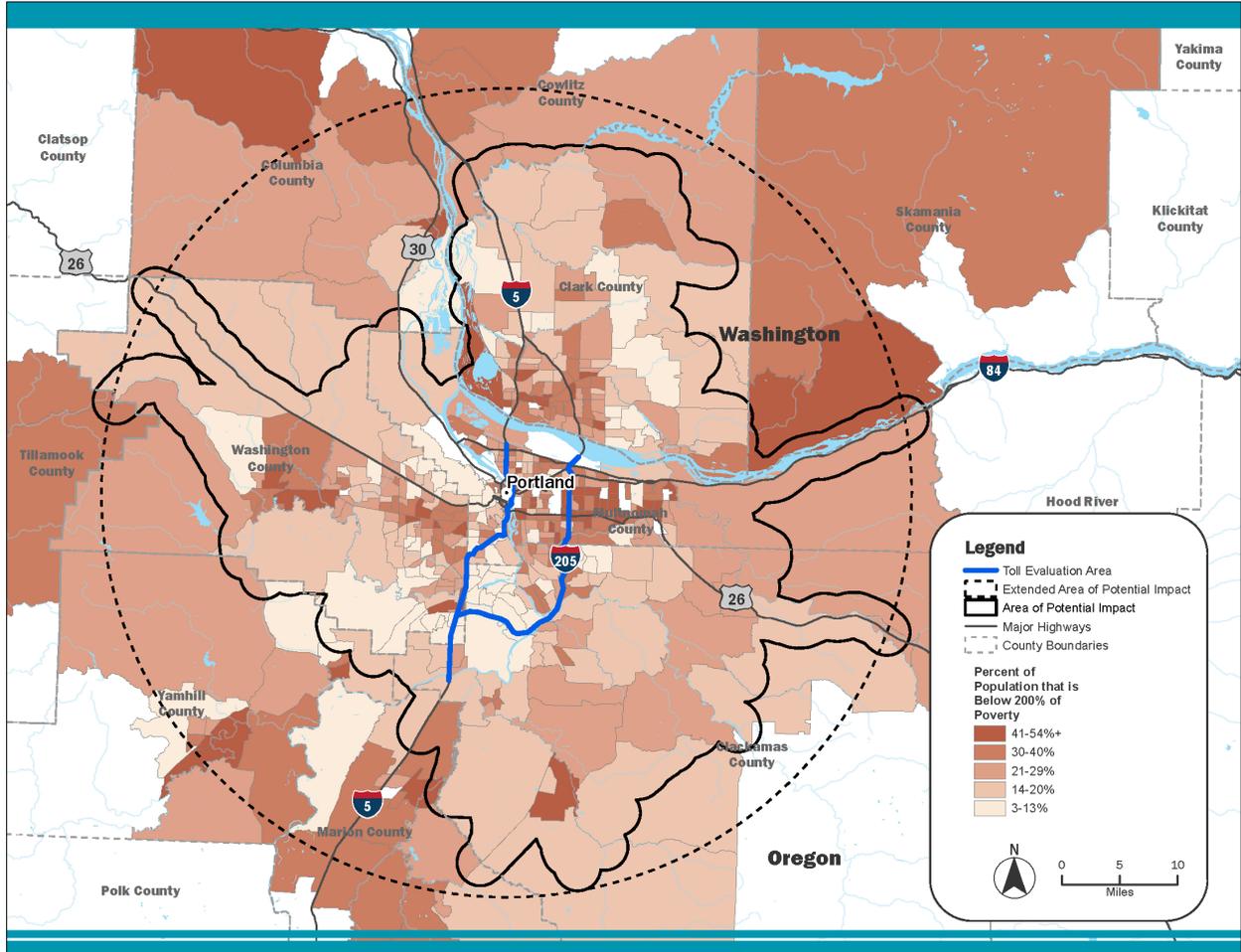
For the populations within the API and Extended API, about 25 percent of the total population is experiencing low income (Table 2).

Table 2. Low-Income Populations within the Area of Potential Impact and Extended Area of Potential Impact

Geography	Total				Total below 200% (Below Federal Poverty Line)	Total over 200% (Above Federal Poverty Line)
	100% to 124%	125% to 149%	150% to 184%	185% to 199%		
Area of Potential Impact	3.5%	3.2%	5.1%	2.5%	24.9%	75.1%
Extended Area of Potential Impact	3.5%	3.3%	5.1%	2.5%	25.1%	74.9%

Figure 3 illustrates that the concentration of people experiencing low income are predominantly in the east end of Portland’s downtown, eastern Gresham in Multnomah County, along Route 26 just west of Portland’s city center in Oregon, and in the greater Vancouver area and Skamania County in Washington state.

Figure 3. Low-Income Populations within the Area of Potential Impact and Extended Area of Potential Impact



3.2.3 Minority Populations

For RMPP, racial minority and ethnic minority are identified as two separate categories (Table 3).

Table 3. Racial or Ethnicity Minority Populations within the Area of Potential Impact and Extended Area of Potential Impact

Geography	White Alone	Racial Minorities						Total Racial Minority	Ethnic Minorities (Hispanic/Latino)
		Black or African American Alone	American Indian/Alaska Native Alone	Asian Alone	Native Hawaiian and other Pacific Islander Alone	Other Race	Two or More Races		
Area of Potential Impact	80.0%	3.1%	0.7%	7.3%	0.6%	3.1%	5.2%	20.0%	12.2%
Extended Area of Potential Impact	80.6%	2.9%	0.7%	6.9%	0.5%	3.3%	5.1%	19.4%	12.8%

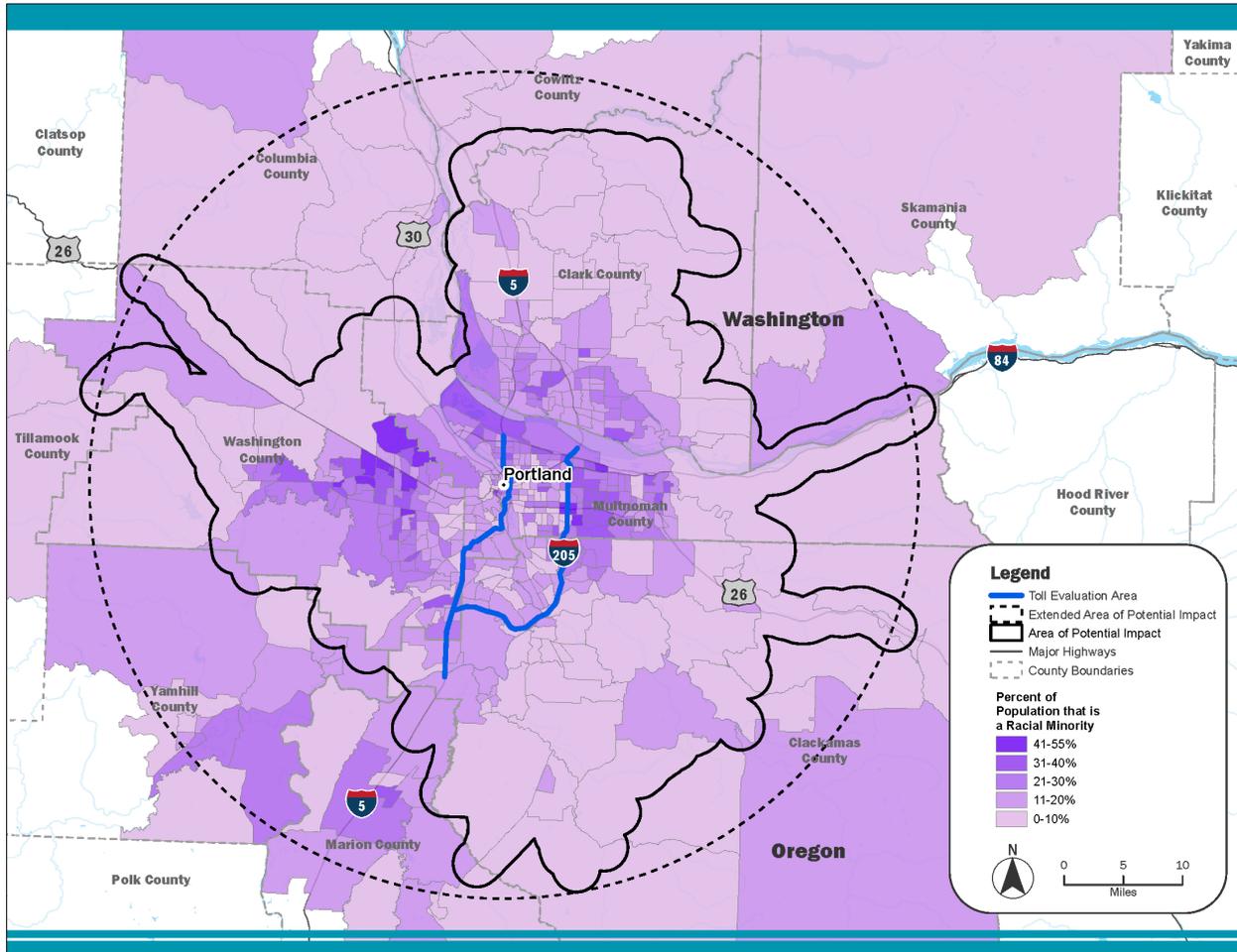
Racial Minorities

Racial minorities are defined as a person who identifies as the following:

- Black or African American alone
- American Indian and Alaska Native alone
- Asian alone
- Native Hawaiian and Other Pacific Islander alone
- Some other race alone
- Two or more races

About 80 percent of the population in the API and Extended API are white alone and 20 percent are racial minorities. The largest concentration of racial minorities is in areas along Route 26 west of Portland's city center, along I-205 in east Portland, eastern Gresham in Multnomah County, along the I-5 in Marion County, and the greater Vancouver area in Washington state.

Figure 4. Racial Minorities within the Area of Potential Impact and Extended Area of Potential Impact



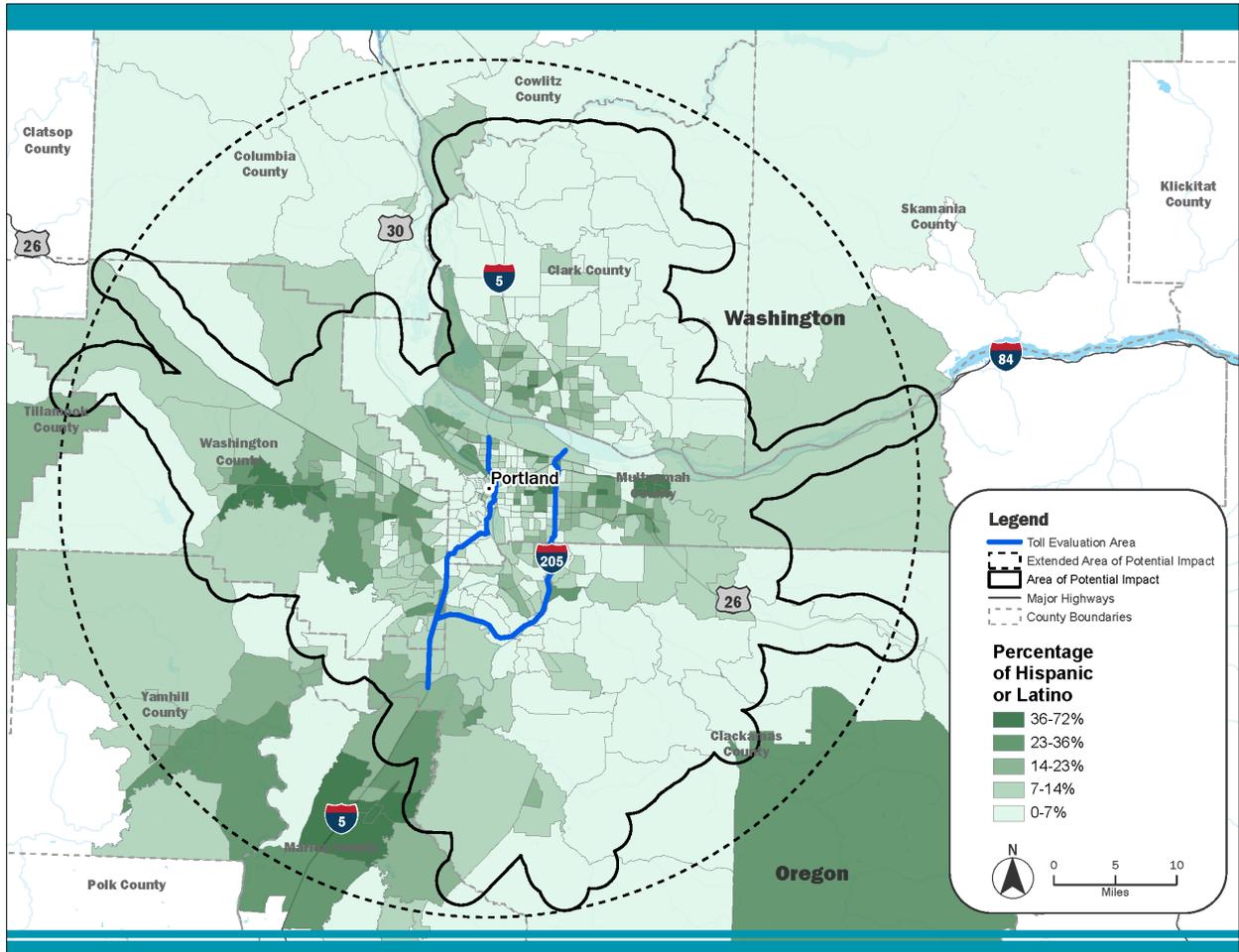
Ethnic Minorities

People who identify as Hispanic or Latino of any race were included in addition to racial minorities for this analysis. Hispanic or Latino ethnicity is specifically documented separately from race because people of Hispanic origin may be of any race or of multiple races.²

About 12 percent of the population within the API and the Extended API identify as Hispanic or Latino. The largest concentration of ethnic minorities is in the east end of Portland’s city center, within the city of Gresham in Multnomah County, south of the Route 26 corridor along the areas of Cedar Hills, Aloha, Hillsboro, along the I-5 in Marion County in Oregon and in Vancouver in Washington state.

² The American Community Survey at www.census.gov provides background on how and why Hispanic and Latino Origin are defined separately from race. www.census.gov/acs/www/about/why-we-ask-each-question/ethnicity/

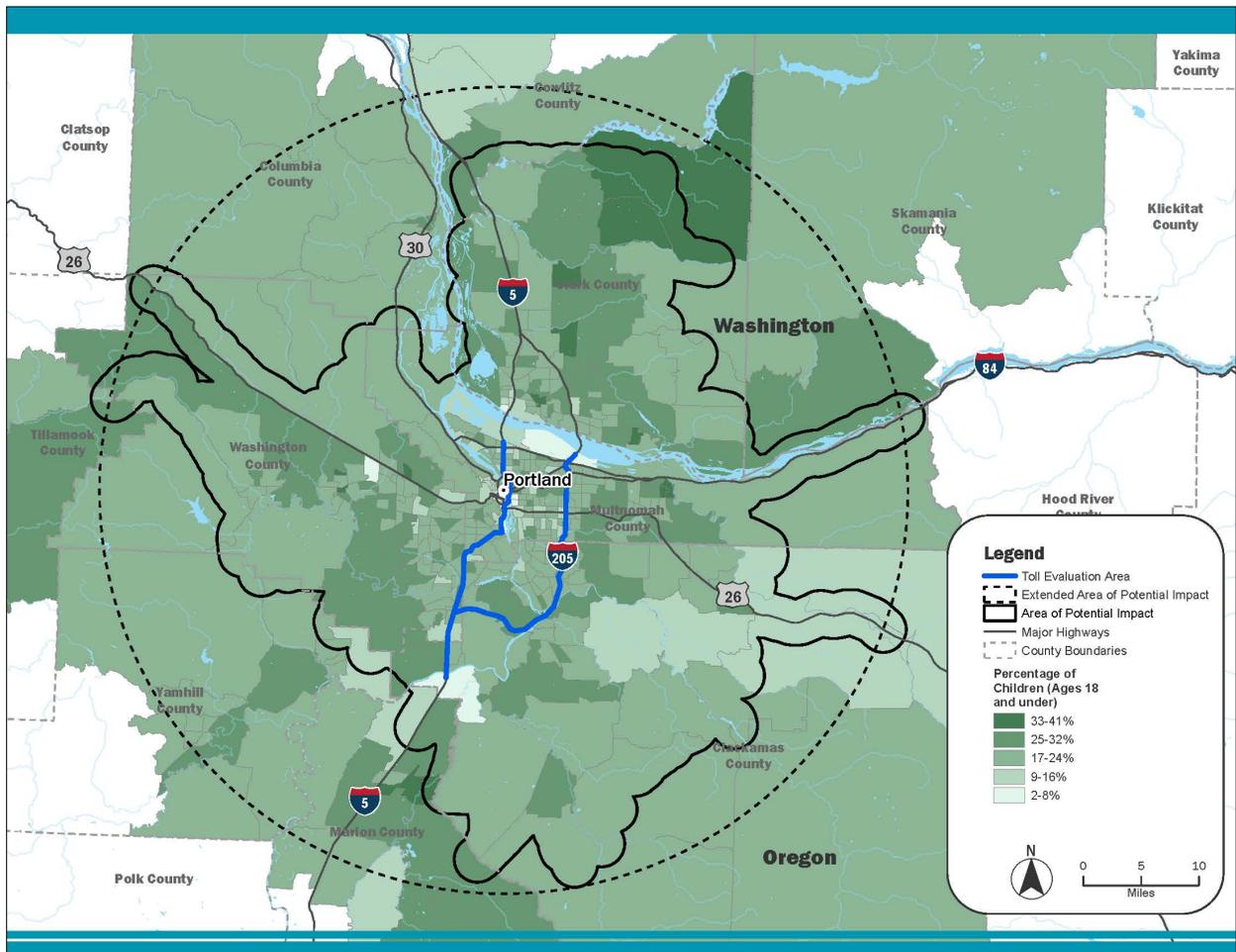
Figure 5. Ethnic Minorities within the Area of Potential Impact and Extended Area of Potential Impact



3.2.4 Children (Under 18)

Children are defined as individuals under 18 years of age. About 21 percent of the population within the API and the Extended API are children. Figure 6 illustrates that the highest concentration of children is in north Clark County in Washington state. Some mid- to high-level concentrations of children are located along the western leg of Route 26 and along I-5 in Marion County in Oregon.

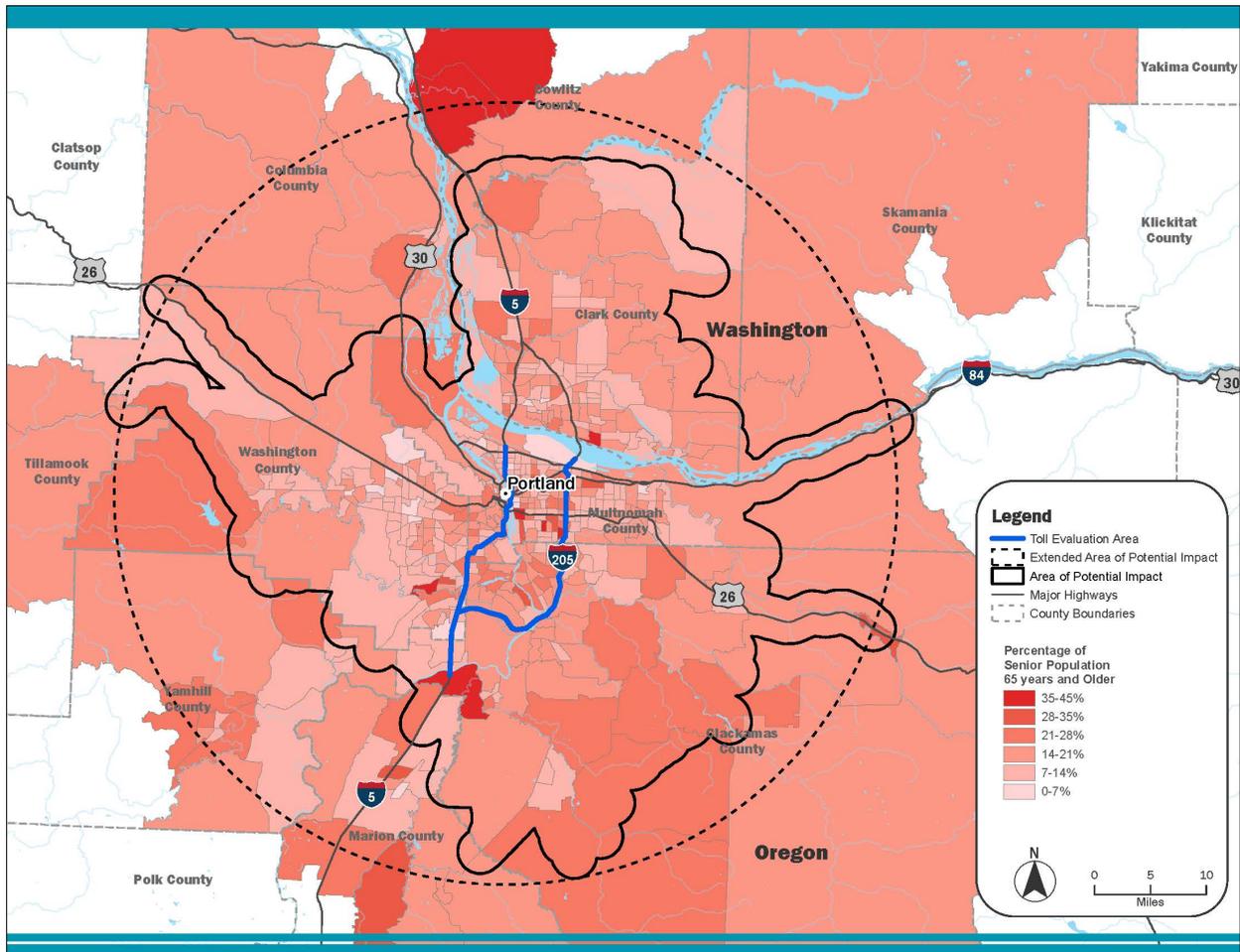
Figure 6. Children (Under 18) within the Area of Potential Impact and Extended Area of Potential Impact



3.2.5 Older Adults (65 and over)

Older adults are defined as individuals 65 years of age or older. The percentage of older adults is similar in the API and the Extended API (14.09% and 14.28%, respectively). Figure 7 illustrates that the highest concentrations of older adults are near Portland’s downtown city center, and around the south portion of the toll evaluation area. Other areas with high concentrations of older adults are dispersed throughout Portland and Beaverton in Oregon and Vancouver in Washington state.

Figure 7. Older Adults (65 and Over) within the Area of Potential Impact and Extended Area of Potential Impact



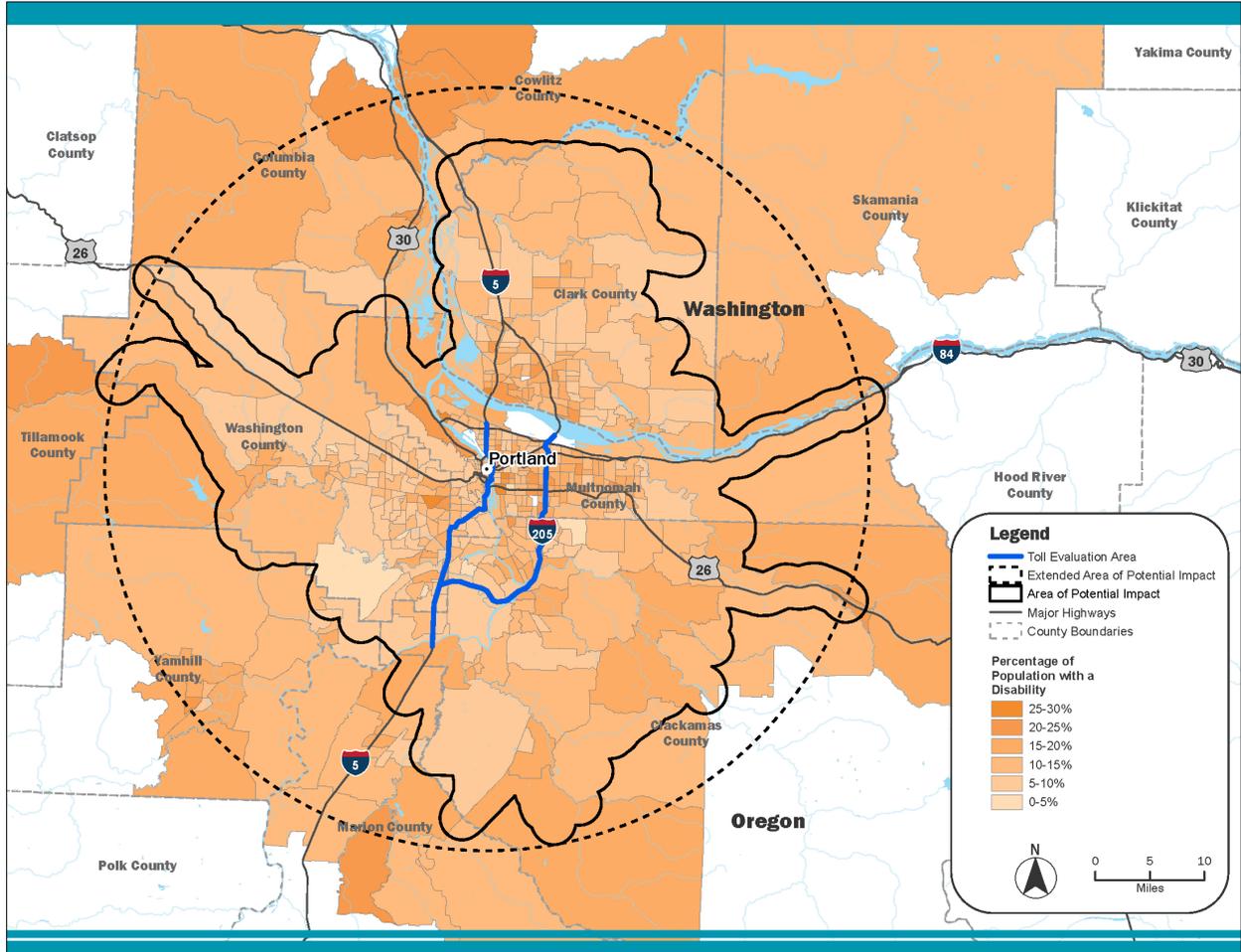
3.2.6 People Experiencing a Disability

The census considers six attributes to determine the number of people experiencing a disability. A person experiencing a disability can have difficulty with one or more of the following:

- Hearing difficulty
- Vision difficulty
- Cognitive difficulty
- Ambulatory difficulty
- Self-care difficulty
- Independent living difficulty

About 11.7 percent of the population within the API and the Extended API are experiencing a disability. Figure 8 illustrates that the highest concentrations of people experiencing a disability are located along Route 30 in Washington County and around western Gresham within Multnomah County in Oregon. Many of the mid-to-high concentrations of people experiencing a disability are within Portland, Oregon, and Vancouver, Washington. There are also mid-to-high concentrations of people experiencing a disability that intersect with the Extended API in Clackamas and Columbia Counties in Oregon and Clark County in Washington.

Figure 8. People Experiencing a Disability within the Area of Potential Impact and Extended Area of Potential Impact

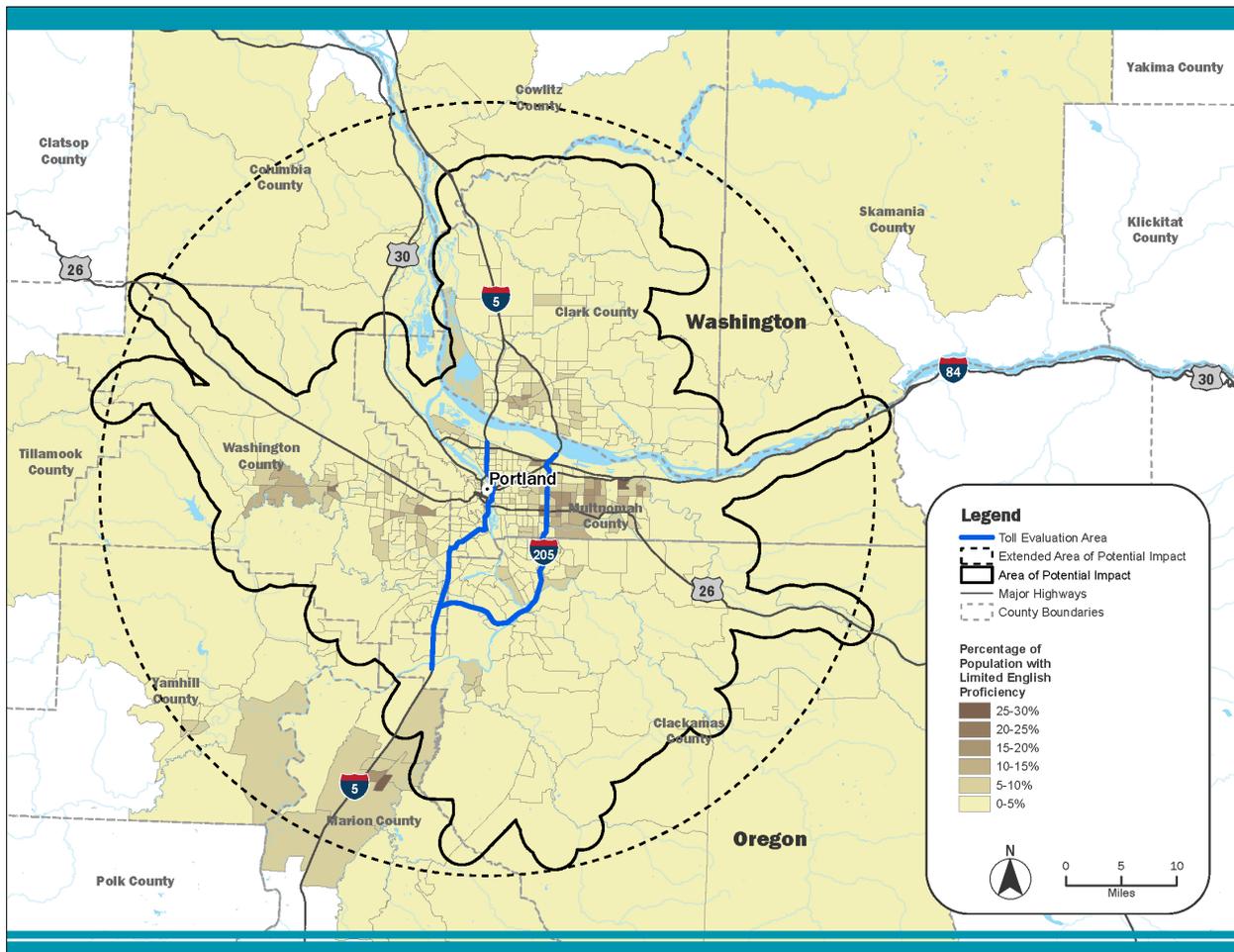


3.2.7 Limited English Proficiency

Limited English Proficiency (LEP) is defined as individuals who responded to the census as persons five years or older who speak a language other than English and identified their English-speaking ability based on the categories of "Not well," or "Not at all."

About 3.6 percent of the population within the API and the Extended API are in the LEP population. Figure 9 illustrates that the highest concentrations of LEP populations are around the downtown Portland city center, and western Gresham in east Multnomah County. There are some concentrations of LEP populations in Vancouver, Washington, areas east of the Portland in Washington County, and in the Extended API along I-5 in Marion County in Oregon.

Figure 9. Limited English Proficiency within the Area of Potential Impact and Extended Area of Potential Impact

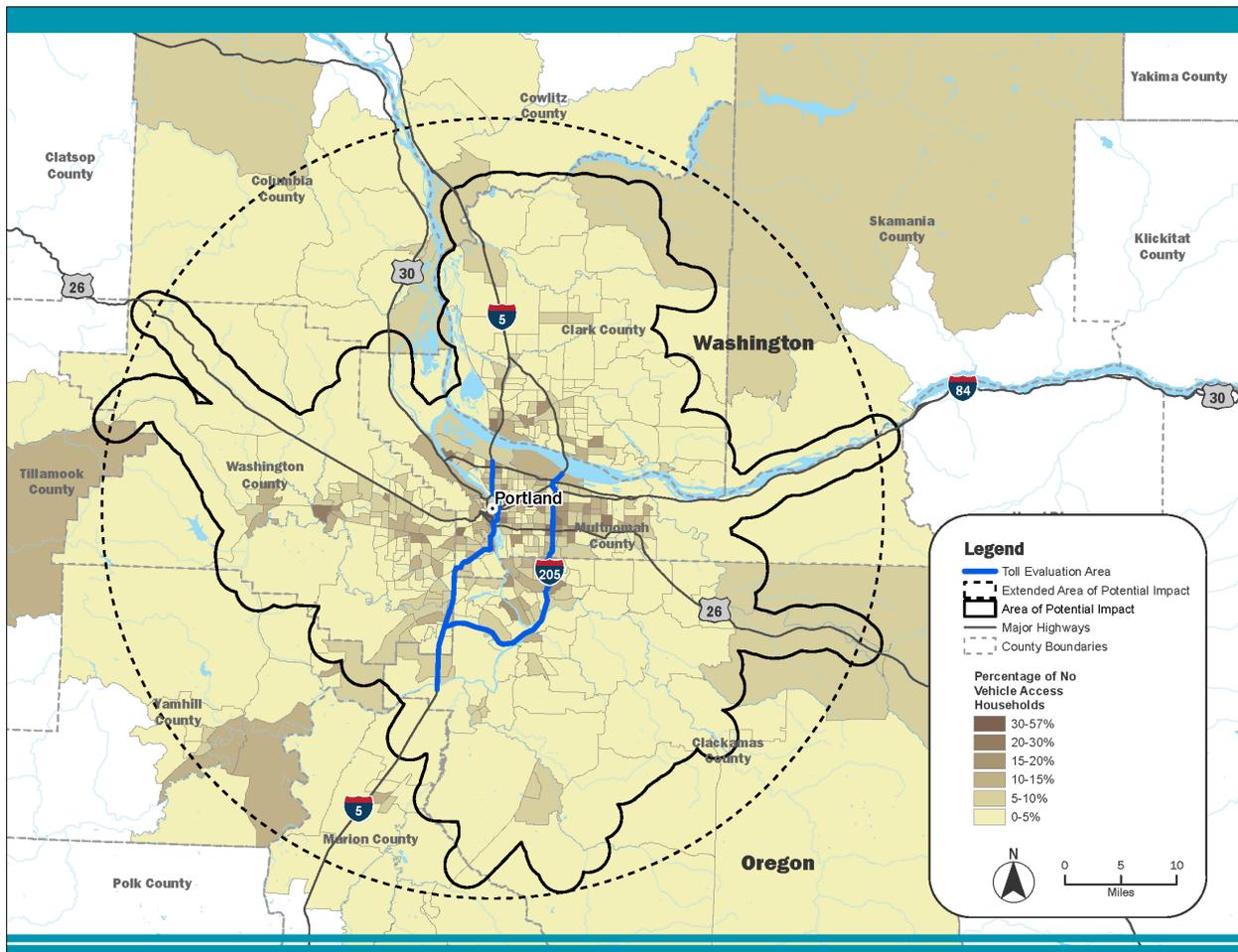


3.2.8 Household with No Vehicle Access

Households with no vehicle access are households in the census that report no availability of cars, vans, and pick up or panel truck of one-ton capacity or less that are kept at home and available for the use of household members. Although not specifically identified in the Equity Framework, households with no vehicle access is another good way to identify people experiencing low income or economic disadvantage and other populations and communities historically excluded and underserved by transportation projects.

About 8 percent of the population within the API and the Extended API are households that have no vehicle access. Figure 10 illustrates that households without vehicle access are concentrated mainly along the I-5 and I-205 corridors. The highest concentration of households without access to vehicles are in central and east Portland with other smaller concentrations in Clackamas County along I-205 and in Washington County along I-5 and south of Route 26.

Figure 10. Households with No Vehicle Access within the Area of Potential Impact and Extended Area of Potential Impact



3.3 “What” – Major Travel Patterns in the Area of Potential Impact and Extended Area of Potential Impact

Understanding the travel patterns within the API and Extended API is an essential first step toward identifying potential benefits and burdens of the RMPP on communities. While some trips by EFCs may not use the tolled segments of I-5 and I-205 and thus may not experience potential benefits or burdens, many EFC trips will certainly involve considerable use of these major interstates.

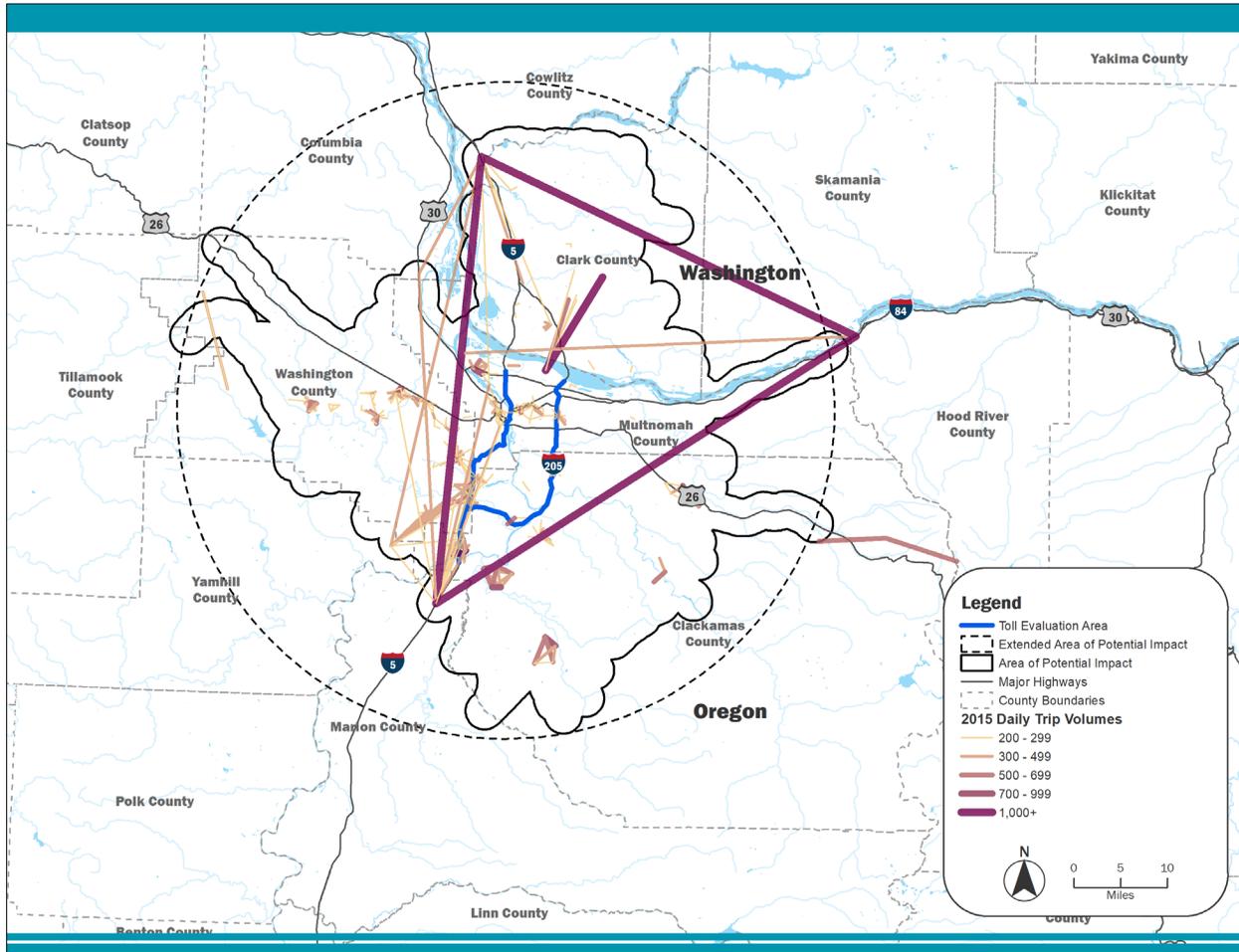
For this analysis, daily trip-volume patterns are displayed for the region from the RTDM for 2015 (existing conditions) and 2045 (future conditions without RMPP). Mapping trip flows provides insight into regional travel trends and highlights which areas could see high volumes of travel. In the NEPA phase, further investigation of trip patterns will be assessed for EFCs and expected EFC trips.

In Figure 11 and Figure 12, each line represents automobile trip flows between different Traffic Analysis Zones (TAZs), which are geographic areas that are used in the RTDM to analyze use and trip patterns. Each trip represented in the figures originates and ends at the center point of the TAZ; the lines thus represent generalized travel patterns between TAZs but do not serve as specific routes or roads taken. Thicker lines and darker colors represent larger trip patterns.

In the existing conditions (Figure 11), the highest trip volumes are for regional trips that originate or end outside of the API and Extended API to the north, south, or east. The highest trip volumes are seen in the north where I-5 and I-205 intersect in Clark County and the south where I-5 and I-205 intersect in Clackamas County, and along I-84 into the Columbia Gorge. Another major trip pattern is between Portland International Airport and Clark County along I-205.

Generally, trip patterns are expected to remain similar in 2045 (Figure 12) when compared to 2015 data. Larger trip volumes are along I-5 and I-205 to the northern and southern extents of the API and on I-84 to the eastern extent of the API. Two areas expected to see increased traffic volume are between Tualatin and southwest Portland and from Portland International Airport to Vancouver and central Clark County in Washington state.

Figure 11. Existing Daily Trip Volumes within the Area of Potential Impact and Extended Area of Potential Impact (2015)



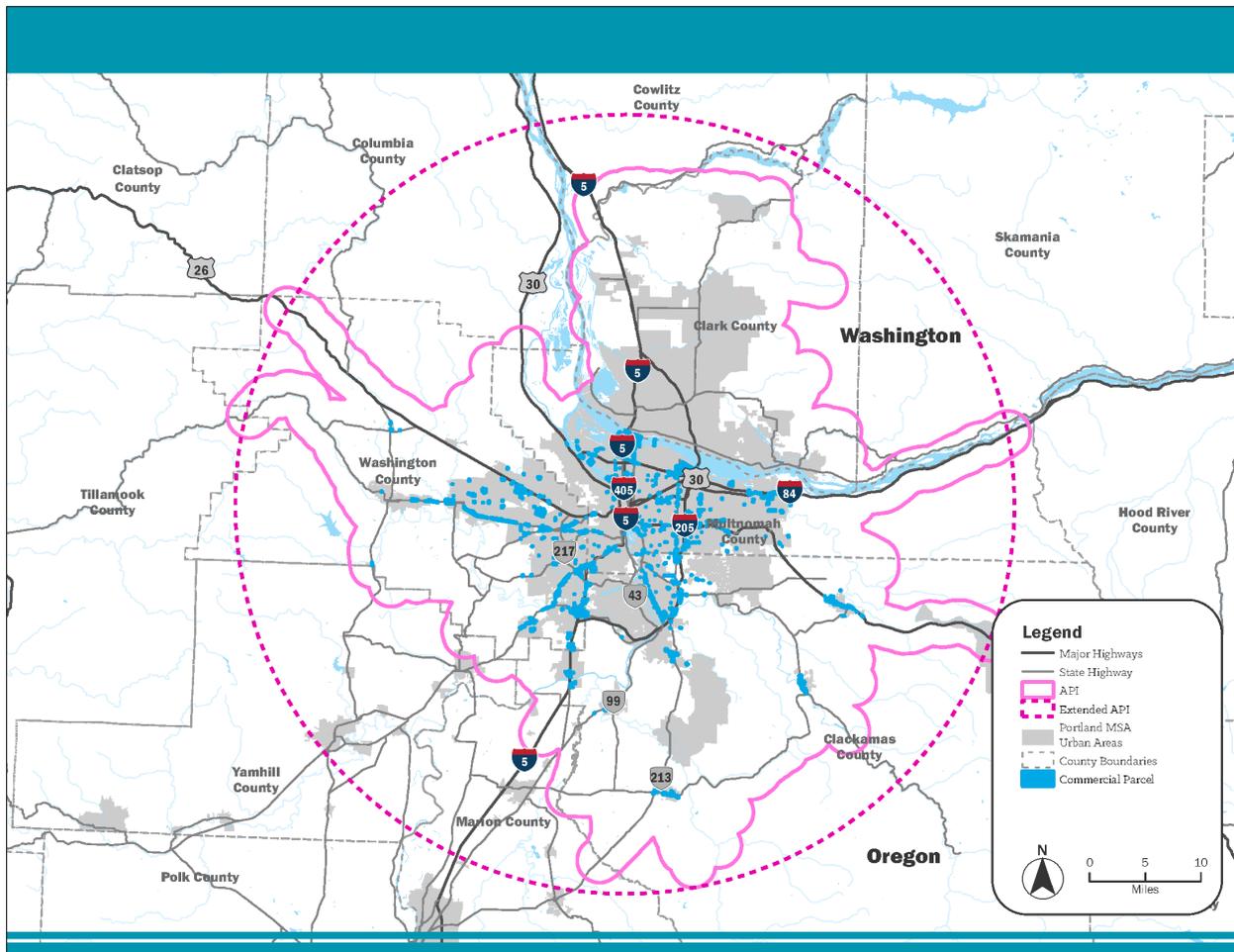
In the future, analysis indicates an increase of short-distance trips along I-5 south of the toll evaluation area and along I-5 in northern Clark County.

3.4 Small Businesses

3.4.1 Where are small businesses located?

To understand where small businesses are located, a geospatial display was created to show commercial zoning parcels within the API and Extended API. These parcels are distributed throughout the API and Extended API along mainly arterial and higher capacity roadways. This display does not differentiate the type of business but shows where businesses and thus small businesses could be located relative to the transportation network.

Figure 13. Commercial Zoning Parcels in the Area of Potential Impact and Extended Area of Potential Impact



3.4.2 Who are the small businesses? How and where do they travel?

To understand who small businesses are and how they travel, nine small-business example profiles were created to understand travel patterns of small businesses in the API and Extended API. These profiles

RMPP Equity Framework Step 1 Planning Phase Memorandum / March 25, 2022

were informed by Small Business Administration small-business data and U.S. Census Bureau's Origin-Destination Employment Statistics/Longitudinal Employer-Household Dynamics data.

Table 4. Small-Business Example Trip Profiles

Industry (Type of Business)	Sample Business Objective	Highway Use	Number of Employees	Example Trips and Time of Day
Trucking Company (Goods Movement)	Delivers high quality seafood to restaurants	High	25	Warehouse directly off the highway delivering to restaurants across the region, early morning and midday deliveries
Home Improvement Service Providers (i.e., Plumbing, Lawncare, Roofing, Electrical)	Handles residential and commercial needs throughout region	Medium	15	From base location to home and commercial sites throughout region, throughout the day
Taxi, Transportation Network Company Drivers (Independent Contractors)	Transports clients safely and efficiently	High	50	From base location to airport, from airport to hotels throughout the day
Gig-economy workers (Independent Contractors)	Postmates Delivery Person, delivers goods locally safely and efficiently to clients	Low	1	From restaurant to client homes, can use local roads for most trips throughout the day
Local Retailers (Mom & Pop shops)	Family hardware, provides community with all home improvement DIY tools	Low	30	Receive deliveries from wholesale distributors for inventory bi-weekly
Local Restaurants	Local gastropub serving the neighborhood for over 30 years	High	12	In-coming daily inventory deliveries from multiple wholesalers throughout the day
Non-profit services (medical care, food delivery, transportation)	Non-profit food provider for low-income communities	Medium	20 staff + Volunteers	Sourcing donations inventory from farms, food co-ops, grocers, etc. and three times a week deliveries to senior and low-income housing
Home-based drop-shipping business	Artisan creates bespoke leather belts and accessories for sale online	Low	2	Receives inventory from local wholesalers twice a week
Agricultural, Farming	Organic farm selling fruits and vegetables to local restaurants and direct to customer (farmers' markets)	Medium	9	Weekend trips to farmers' markets and daily deliveries to local restaurants

4 Step 1 Planning Phase Memo Findings

This Step 1 analysis completed during the planning phase has resulted in some key findings that will guide the upcoming analysis to be completed during the NEPA phase and will be updated in the subsequent Step 1 NEPA phase memo.

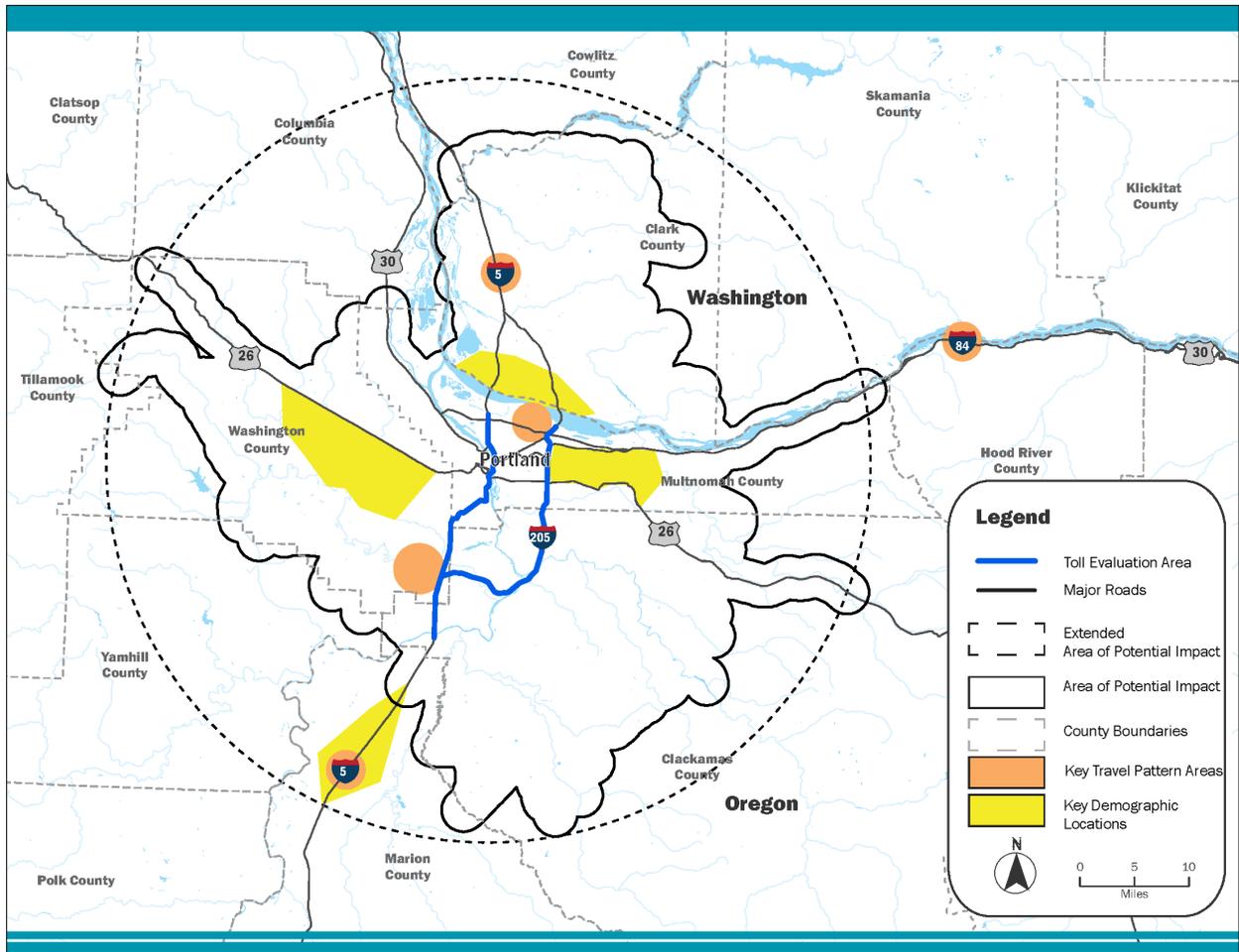
Based on the analysis to date, the approximate residential location of the EFCs are known. Figure 14 shows these locations, which are also listed below:

- East Portland and Multnomah County
- Along Route 26, particularly south of Route 26 west of the Willamette River
- Along Route 30 in Portland
- Along I-5 in the northern portion of Marion County
- In Vancouver and Clark County, Washington

While the travel patterns of the EFCs may show differences when compared to the general public, there will also likely be many similarities. Figure 11 and Figure 12 shows the approximate travel patterns of the general public, which are also listed below:

- Along I-5, I-205 and I-84 (2015 and 2045)
- Between Tualatin and southwest Portland (2045)
- Between the area near the Portland International Airport (PDX) and Vancouver/central Clark County (2045)

Figure 14. Key Locations and Travel Patterns for EFCs



5 Next Steps

Equity Framework Step 1 memo is the first memo for the planning phase of analysis. Additional technical memorandums will be created for subsequent steps in the planning phase. During the NEPA phase, additional analysis will be completed to again work through the five steps of the Equity Framework, with new analysis building on the work completed during the Planning phase.

5.1 Identify EFCs

Figure 14 provides the approximate EFC locations. Once specific information on anticipated changes in traffic patterns is available (during the NEPA phase), additional analysis is recommended to better define the potentially affected EFCs. Additional data will also be required to better understand small-business locations and densities (groupings).

5.2 Document EFC Travel Patterns

The RTDM includes transportation network and land use data for four of the 10 counties included in the Extended API. Although most travel on I-5 and I-205 begin and end within these counties, this limitation poses challenges when trying to understand some travel patterns of EFCs outside the RTDM. A strategy of using a combination of quantitative analysis through the RTDM and qualitative analysis through community engagement to understand EFC travel patterns will be used.

5.3 Pricing Strategies and Policy Proposals

The Equity Framework establishes the goal of developing a range of potential strategies and policy proposals that directly address community-identified mobility and equity priorities. Extensive community engagement has occurred and will continue to occur throughout the life of the RMPP. Some of the community feedback is documented in the *I-205 Toll Project Summer-Fall 2020 Engagement Summary* and the *RMPP Summer 2021 Engagement Report*. Another round of engagement for the RMPP will commence in April 2022. The EMAC has established foundational statements, which were presented to the Oregon Transportation Commission at their November 2021 meeting. These foundational statements and the feedback received from the community engagement efforts will inform and influence the development of the pricing strategies and policy proposals. The pricing strategies and policy proposals will be summarized and effects on communities analyzed during Step 3: Determine Benefits and Burdens of the Equity Framework process.

6 References

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