

# Equity, Planning & Prioritization

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# Title VI of Civil Rights Act

- Prohibits discrimination on the basis of race/color/national origin by recipients of federal funding
- Title VI regulations prohibit “criteria or methods of administration” that have a discriminatory *effect*, not just intentional discrimination
- Metropolitan Planning Organizations (MPOs) like SEWRPC are covered by Title VI
- Similar rules (under the Rehabilitation Act) cover persons with disabilities

# Environmental Justice Order

- 1994 Executive Order instructing federal agencies to ensure that “minority and low income” communities are not subjected to disproportionately high and adverse effects
- US Dept. of Transportation policy: “. . .to promote the principles of environmental justice . . . by fully considering environmental justice principles throughout planning and decision-making processes in the development of programs, policies, and activities . . . .”

# Disparate Impact

- Much research, including Vision 2050, makes clear that Black and Latinx persons in this region are much more likely than white persons to lack cars, driver's licenses, or both
  - Lack of vehicles, especially as transit declines, make disparities in things like unemployment worse
    - Even makes it harder to vote - people without vehicles often can't get to DMV to get the ID they need to vote
- Vision 2050 and earlier SEWRPC reports have repeatedly emphasized the need to increase transit services in the region, but instead about 25-30% of transit services have been lost over the past 20 years.

# Disparate Impact

- Making driving easier while transit declines will have the discriminatory effect of *worsening* these disparities
- SEWRPC knows this. From Vision 2050: “[S]hould the reasonably available and expected funding for implementing the public transit element of VISION 2050 continue as estimated under the FCTS, *a disparate impact on the Region’s minority populations, low-income populations, and people with disabilities is likely to occur.*”

# TIP Requirements

- Under federal law, MPO must develop a “Transportation Improvement Program” (TIP) identifying all transportation projects within the MPO’s area to be built with federal \$, with a financial plan showing how those projects will be paid for
- Identifies the criteria and process for prioritizing implementation of transportation plan elements (including multimodal trade-offs)
- TIP must conform to Clean Air Act requirements. For areas which fail (or have failed) to comply with air quality standards (Milwaukee, Ozaukee, and parts of Kenosha, Racine, Washington, & Waukesha Counties), the TIP must demonstrate how compliance will be achieved, which often includes public transit.

# Funding

- Starting point: There are MANY more projects than \$ to support them in the region.
- Much federal funding is earmarked. ESPECIALLY for highways.

Table D.1

Assessment of Available Funding for the 2021 Through 2024 Transportation Improvement Program

Agency	Funding Source	Programmed Expenditures (\$1,000,000) <sup>a</sup>				Estimated Funding Available (\$1,000,000) <sup>b</sup>			
		2021	2022	2023	2024	2021	2022	2023	2024
Federal Highway Administration	National Highway Performance Program (NHPP)	346	239	200	162	453	462	471	481
	Surface Transportation Program (STP)-Milwaukee Urbanized Area	14	39	18	36	27	28	28	29
	Surface Transportation Program (STP)-Other	21	36	55	18	160	163	166	169
	Surface Transportation Program (STP)-Bridge	7	8	4	4	24	25	25	26
	Highway Safety Improvement Program (HSIP)	10	13	14	11	44	44	45	46
	Congestion Mitigation and Air Quality Improvement Program (CMAQ)	15	14	11	5	11	11	11	11
	Metropolitan Planning Funds	4	4	4	4	4	4	4	4
	Better Utilizing Investments to Leverage Development (BUILD)	<0.5	1	--	--	--	1	--	--
	Transportation Alternatives Program (TAP)-Milwaukee Urbanized Area	5	1	1	1	2	2	2	2
	Transportation Alternatives Program (TAP)-Other	<0.5	--	--	1	4	4	4	5
Federal Transit Administration	Urbanized Area Formula Grants (5307)-Milwaukee Urbanized Area	28	23	22	23	22	22	22	23
	Urbanized Area Formula Grants (5307)-Kenosha/Racine/West Bend Urbanized Area	7	7	7	8	6	7	7	7
	Enhanced Mobility of Seniors and Individuals with Disabilities (5310) – Milwaukee UA	<0.5	<0.5	<0.5	<0.5	1	1	1	1
	Enhanced Mobility of Seniors and Individuals with Disabilities (5310) – Other	<0.5	<0.5	<0.5	<0.5	3	3	3	3
	Rural Area Formula Grants (5311)	2	2	2	2	<0.5	<0.5	<0.5	<0.5
	State of Good Repair Grants (5337) – Milwaukee and Kenosha Urbanized Areas	<0.5	<0.5	1	<0.5	<0.5	<0.5	<0.5	<0.5
	Bus and Bus Facilities Program (5339) – Milwaukee Urbanized Area	5	3	3	3	3	3	3	3
	Bus and Bus Facilities Program (5339) – Other	4	4	2	3	2	2	2	2
State of Wisconsin	Fixed Guideway Capital Investment Grants (5309)	41	--	--	--	41	--	--	--
	Highway	125	120	194	51	252	257	263	268
County and Local	Transit	82	86	83	84	81	82	84	86
	Kenosha	5	6	5	6	7	7	7	7
	Milwaukee	86	63	55	48	71	58	60	61
	Ozaukee	2	2	2	2	4	4	4	5
	Racine	7	3	4	5	10	10	10	10
	Walworth	1	2	3	2	5	5	5	5
	Washington	3	4	5	2	4	4	4	4
	Waukesha	15	13	16	7	17	17	18	18

<sup>a</sup> Inflation was applied to years 2022 through 2024 estimates of programmed expenditures at a rate of 1.8 percent. The cost estimates shown in Appendix H, as provided by project sponsors, were treated as

# Funding

- There are federal funding sources that can be “flexed” or used for highways or transit
  - “Surface Transportation Program” – STP
    - STP-M is for the Milwaukee region of SEWRPC (Milwaukee & WOW counties)
    - STP-O is for the other urbanized areas in the region
  - “Congestion Mitigation Air Quality” – CMAQ
- There are separate procedures for STP-M and CMAQ (and no prioritization procedures for STP-O)



# Major Decisions Made *Before* Prioritization

- Vast majority of overall funding is for highways and dwarfs overall funding for transit.
- Vision 2050 says that transit has 43% of regional capital project needs.
- We know transit is way behind where it should be to achieve equity.
- BUT instead of giving transit (at least) 43% of STP-M funds, SEWRPC adds the discretionary STP-M funds and the transit-specific FTA Section 5307 funds together first.
  - The FTA Sec. 5307 dollars equal about 42.7% of the total! This is money that would go to transit anyway. So why is it being rolled into discretionary funding formulas?

## From TIP Prioritization Memo (Jan. 2020)

The first step in applying these procedures is the consideration of the allocation of STP-M funds for the years 2023-2025 between highway and transit projects. The Milwaukee TIP Committee had recommended during the development of the procedures that Milwaukee area FHWA STP funds and FTA Section 5307 funds should be combined and allocated between highway and transit needs based upon their relative capital project needs as set forth in VISION 2050—the year 2050 regional land use and transportation plan. In that plan, Milwaukee area county and local arterial highway capital project needs represent an estimated 57 percent of total area capital project needs, and Milwaukee area local public transit capital project needs represent 43 percent of total area capital project needs. While it is unknown at this time how much Federal funding the U.S. Congress will authorize and appropriate in Federal Fiscal Years (FY) 2023-2025 with respect to FTA Section 5307 and FHWA STP funds allocated to the Milwaukee urbanized area, it is necessary to estimate those authorizations and appropriations, recognizing that the actual appropriations may be more or less than the estimate, and that the quantitative analysis set forth herein may need to be revised. Based on recent annual authorized and appropriated funding levels, the Federal funding for the Milwaukee urbanized area for the years 2023-2025 is estimated to include \$28,480,106 annually of FHWA STP funds and \$21,344,961 annually of FTA Section 5307 funds (based on year 2019 FTA funding), for an annual total of \$49,825,067 of Federal funds.

Applying the foregoing principles, which would allocate the available funding between transit and highways based upon the funding needs established in the year 2050 regional transportation plan, the following allocation to the two modes results:

Transit:	$\$49,825,067 \times 43 \text{ percent} = \$21,424,779$ annual funding
Highways:	$\$49,825,067 \times 57 \text{ percent} = \$28,400,288$ annual funding

This potential allocation of Federal funds would entail the transfer of \$79,818 annually of STP-M funds to transit capital projects. Given the modest amount of funding that would be transferred to transit projects and the continued limited amount of Federal funding available to transit capital projects under current transportation law, 10 percent of the available STP-M funding is suggested to be transferred to transit capital projects consistent with previous recommendations of the Committee. Based on this, \$2,848,011 annually,

# Major Decisions Made Before Prioritization

- Since some non-discretionary *transit* funding is being included in the total before it's divided into the 57/43% shares, why not include *all* funding (including *all* non-discretionary funding)?
  - In 2023 the TIP anticipates about \$795 million in total federal funding available (Slide 7).
  - 43% of that is \$342 million - but at least 65% of the \$795 million is for highways.
  - So why isn't most/all of the discretionary funding going to transit?
    - Instead, only 10% of STP-M funds (about \$2.8 million per year) go to transit, while another \$25.6 million per year in STP-M funds go to highways.

At least do an equity analysis *first*.

# Major Decisions Made Before Prioritization

- Critical decisions about road/highway funding are also made “up front” – before any prioritization and without an equity analysis
  - This includes allocating 90% of STP-M funding for highways.
    - *Within* STP-M money for highways, there’s a set aside for capacity expansion projects.
    - Also within STP-M money for highways, 10% is set aside for “small communities.”

# SEWRPC Prioritization Process

- After all those decisions made, you get to prioritization.
- That process itself doesn't include much in the way of "equity" criteria – and to the extent it does, for STP-M it only applies to projects that expand highway capacity.
- It also doesn't look at who does or doesn't benefit from specific road projects.
  - For example, are they repairing streets in an underserved neighborhood or building new roads in a high end exurb? Are they building a road that splits a community of color (as I-43 did in the past) or really serving residents who live there.

# SEWRPC Prioritization Process

STP-M

**Table 2**  
**Evaluation Criteria to Measure Areawide Significance and**  
**Maximum Points Potentially Received For Candidate Highway Projects**

Evaluation Criteria	Maximum Points Received	
	Resurfacing/Reconditioning/ Reconstruction (to same capacity)	Capacity Expansion Projects
	Projects	
Measure of Pavement Condition	50	20
Measure of Use – Average Weekday Traffic Volume per Lane	20	5
Measure of Connectivity – Length of Route	10	10
Measure of Function – Current Functional Classification	15	10
Measure of Safety – Crash Rate	5	15
Measure of Congestion – Volume-to-Capacity Ratio	- -	40
Subtotal	100	100
Bonus Points:		
– Implementation of Transit, Bicycle, and Pedestrian Measures	5	5
– Projects in Communities Having:	- -	5
o Job/Housing Balance		
o Transit Accessibility	- -	5

# SEWRPC Prioritization Process

## CMAQ

- Implementation of Regional Plan

- 1.0 Implements regional plan
- 0.8 Consistent with regional plan
- 0.0 Inconsistent, or in conflict, with regional plan

- Degree to Which Project May Be Expected to Deliver Benefits

- 1.0 Project construction/ implementation
- 0.9 Promotion/marketing on a collaborative/regional basis to encourage change
- 0.8 Promotion/marketing to encourage change
- 0.6 Planning/engineering/research/study

- Extent of Benefit

- 1.0 Daily or average weekday benefit
- 0.9 Seasonal or weekend benefit
- 0.8 Special event travel benefit

- Provision of Alternative to Automobile Travel

- 1.0 Alternative for daily utilitarian travel
- 0.9 Alternative for recreational or special event travel
- 0.8 Does not provide alternative

- Bicycle Facilities

- 1.0 Facility is recommended in the bicycle element of the regional plan – off-street trail or surface arterial street
- 0.90 Facility is an off-street trail, and not recommended in the bicycle element of the regional plan
- 0.50 Facility is on collector/land access street

- Pedestrian Facilities

- 0.0 Use of Congestion Mitigation and Air Quality Improvement Program funds for sidewalk facilities is considered an extremely low priority

For projects which do not provide an alternative to the automobile for daily utilitarian travel, the following additional multipliers would be applied:

- 0.95 Communities with a job/housing imbalance: moderate cost, lower cost, or both
- 0.95 to 0.99 Communities with no or limited public transit service



# Prioritization Process Inadequate

- When you look at the project rankings, these limited points don't seem to be making a meaningful (if any) difference in what gets built

Table 8

Ranking of Candidate Capacity Expansion Projects for Years 2023-2025 STP-M Funding Based on the Application of the Evaluation Criteria

Project Sponsor	Project Sponsor Priority	Project Description	Pavement Condition Points	Weighted Average Weekday Traffic Volume/Transit Ridership Points	Connectivity Points	Weighted Average Functional Classification Points	Safety Points	Total Transit, Bicycle, and Pedestrian Accommodation Points	Current Congestion Points	Forecast Congestion Points	Job/Housing Balance Points	Transit Accessibility Points	Total Points
Waukesha County	6	Reconstruction with Additional Lanes of CTH O (S. Moorland Rd) between CTH HH (W. College Ave) and W. Grange Ave	15.00	5	10.0	10.00	0.0	1.0	15.00	20.00	0.5	0	76.50
City of Wauwatosa	3/4	Reconstruction with Additional Lanes of N. 124th St between Lisbon Rd and Ruby Ave	20.00	5	4.0	7.00	0.0	2.0	5.00	10.00	3.5	2.5	58.50

Note: Projects above the green line on this table are candidate capacity expansion projects identified as being of statewide significance based on receiving a score of 64.5 points or more with application of the evaluation criteria.

# Prioritization Process Inadequate

CANDIDATE 2020-2024 FEDERAL CONGESTION MITIGATION AND AIR QUALITY PROGRAM PROJECTS

Project ID	Project Title	Implementation of Regional Plan	Degree of Benefits	Extent of Benefits	Provision of Alternative to Automobile Travel	Facility Rehab/Recon or Vehicle Replacement	Job/Housing Balance Criteria	Transit Service Criteria	SEWRPC Project Score
SE_BP1 GreenfieldPowerLine_Rev	Powerline Trail: Phase 1	1	1	0.9	1	N			45
SE_BP2OLT_BenderMilCo	Oak Leaf Trail Connectivity - Bender Park	1	1	0.9	1	N			45
SE_BP3OLT_KohlMilCo	Oak Leaf Trail Extension - Kohl Park Connection	1	1	0.9	1	N			45
SE_BP4WauwTosaTrail_Rev	Tosa Trail Connector Bridge	1	1	0.9	1	N			45
SE_BP5MilCityKinnickinnicConn	Kinnickinnic River Trail Connections	1	1	0.9	1	N			45
SE_BP6MilCitySRTTransit_Rev	Safe Routes to Transit Phase 1	1	1	0.9	1	N			45
SE_BP8MilCityBikeShareExpan_Rev	Milwaukee Bike Share Expansion	1	1	0.9	1	N			45
SE_DR1PortTowBoat	Big Lake Marine Towboat Diesel Retrofits	0.8	1	0.9	0.8	Y			23.04
SE_O1MilCityCNGCentralRepair	CNG Fueling Station at the Central Repair Garage	0.8	1	1	0.8	Y			25.6
SE_O2MilCitySoftwareProcure	Traffic Signal Central Software Procurement	1	1	1	0.8	Y	1	1	32
SE_O4MilCityCNGRefuse_Rev	CNG Refuse Packers	0.8	1	1	0.8	Y			25.6
SE_O5MilCityCentralGarage	Central Repair Garage Service Bay Upgrades	0.8	1	1	0.8	Y			25.6
SE_PT1 WaukMarket	City of Waukesha Transit Commission Marketing	1	0.8	1	1	N			40
SE_PT2OzaukeeMiniBus	Mini-bus Hybrid Conversion	1	1	1	1	Y			40
SE_PT3MilCORideMCTS_AP_Rev	RideMCTS App Expansion and Enhancement Project	1	0.9	1	1	N			45
SE_PT4MilCoMarketing	MCTS Marketing Public Outreach	1	0.8	1	1	N			40
SE_PT5MilCoEWBRT	East-West Bus Rapid Transit Project - Operating Assis	1	1	1	1	N			50
SE_PT6MilCOBusPurchase	Milwaukee County Transit System Replacement Buse	1	1	1	1	Y			40
SE_TF1MilCo76_92_Oak	76th, 92nd, Oklahoma Signal Improvements	1	1	1	0.8	Y	1	1	32
SE_TF2MilCoSilverSpring_Rev	Silver Spring Traffic Signal Improvments	1	1	1	0.8	Y	1	1	32
SE_TF3MilCityATCG3	ATC Controller and Communication Upgrade Grant #	1	1	1	0.8	Y	1	1	32
SE_TF4MilCityFiberLW27	Fiber Optic Interconnect, ATC Controller, and Travel T	1	1	1	0.8	Y	1	1	32
SE_TF5MilCityFiberCN_Rev	Fiber Optic Interconnect, ATC Controller, and Travel T	1	1	1	0.8	Y	1	1	32
SE_TF6MilCityATCG6	ATC Controller and Communication Upgrade Grant #	1	1	1	0.8	Y	1	1	32
SE_TF7MilCityATCG7	ATC Controller and Communication Upgrade Grant #	1	1	1	0.8	Y	1	1	32
SE_TF8MilCityATCG8	ATC Controller and Communication Upgrade Grant #	1	1	1	0.8	Y	1	1	32
SE_TF9MilCityATCG9	ATC Controller and Communication Upgrade Grant #	1	1	1	0.8	Y	1	1	32

# Prioritization Process Inadequate

- Prioritization comes too late – after major allocation decisions have been made
- Decisions don't take into account or compensate for years of disinvestment, especially in transit
- Process has inadequate “equity” metrics
- The few prioritization points that *may* relate to equity – such as jobs-housing balance and transit access – aren't enough to meaningfully affect investment decisions
- SEWRPC's prioritization scores are only part of the ranking along with WDNR and WisDOT scores, especially on CMAQ projects.

# What SHOULD Be Done?

“Equity-Oriented Criteria for Project Prioritization in Regional Transportation Planning,” Krapp, Barajas, Wennick, Transportation Research Board Record (2021) (national study)

- “MPOs and other agencies implementing transportation projects should adopt a justice oriented framework for project prioritization that *ensures that projects first affirmatively remedy historical inequities* and *work with affected communities* to adopt appropriate and meaningful solutions.”
- “[MPOs] should clearly assess and prioritize both benefits and burdens of transportation projects in disaggregate with respect to race, income, ability, and geography, and provide clear guidance to project sponsors on evaluation. The contribution to *increasing access to key destinations for traditionally underserved groups should always be assessed for projects, and those with potential negative effects for communities of concern should be penalized with point subtraction* unless they incorporate measures to minimize or avoid them.”
- “Critically, MPOs should *adjust project weighting to more meaningfully target investments toward communities with higher needs*. If equity criteria weights remain low, there is likely to be a minimal effect on the overall regional allocation of resources, thereby sustaining transportation inequities. Agencies should also conduct periodic regional analyses to monitor trends to evaluate whether outcomes for marginalized populations are improving.”

# What SHOULD Be Done?

- Improve Prioritization:
  - Develop and apply a meaningful Equity Analysis
    - Do this at the **beginning**, not the end, of the process, before decisions about what kinds of projects and what communities to support are made
  - Better weighting (*e.g.*, award more points to projects with greater number of projected marginalized users)
  - Subtract a meaningful number of points from projects that increase disparities
  - Apply to all projects
  - Change metrics – including de-emphasizing “congestion” in favor of “accessibility” – the ability of people, especially marginalized persons, to get to locations for employment, education, health, shopping, recreation, etc.

# Some Prioritization Examples

Broward Co., Fla.

- Significant points for Equity (weighting values decided with input from Citizens' Advisory Committee)

The Broward MPO is an example of an MPO that is shifting to multiple equity factors in new proposed project scoring criteria and guidelines, which are comprised of six main planning factors: Mobility, Accessibility, Safety, Equity, Environmental Stewardship, and Economic Vitality. Under the new approach, the Broward MPO will score projects using a cumulative scoring process and multiple equity factors. The scores will then be normalized and weighted for each of the six planning factors based on input from the MPO Board and the advisory committees (Broward MPO, 2018). The scoring and weighting systems relevant to equity are provided in Figure 6 and Table 25.



Figure 6. Broward MPO project selection weighting criteria

Source: Broward MPO, 2018

# Some Possible Prioritization Examples

Atlanta Ga.

## Access to Destinations-Based

- Awards more points to projects that will provide greater increases in access to key destinations for areas with high concentrations of marginalized populations.
  - Acknowledges access to key destinations as the most important benefit of transportation systems.

Example: Change in number of low income and minority workers that can access job centers during peak period via transit

Source: Atlanta Regional Commission  
Transportation Improvement Program framework



# Some Possible Prioritization Examples

## Chicago

- Awards more points to projects with greater number of projected marginalized users.

Example: All projects are evaluated based on the percent of travelers using a facility that are people of color below the poverty line as modeled by CMAP travel demand model.

Source: Chicago Metropolitan Agency for Planning  
criteria for regional distribution of Surface  
Transportation Program funds



# Some Possible Prioritization Examples

## San Francisco Bay Area

**Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG)**  
[http://2040.planbayarea.org/sites/default/files/2017-07/Performance%20Assessment%20Report\\_PBA2040\\_7-2017\\_0.pdf](http://2040.planbayarea.org/sites/default/files/2017-07/Performance%20Assessment%20Report_PBA2040_7-2017_0.pdf) p. 10-11

- Decrease the share of lower-income residents' household income consumed by transportation and housing by 10%
- Increase the share of affordable housing in PDAs, TPAs, or high opportunity areas by 15%
- Do not increase the share of low- and moderate-income renter households in PDAs, TPAs or high-opportunity areas that are at risk of displacement
- Increase by 20% the share of jobs accessible within 30 minutes by auto or within 45 minutes by transit in congested conditions
- Increase by 38% the number of jobs in predominantly middle-wage industries
- House 100% of the region's projected growth by income level without displacing current low-income residents and with no increase in commuters over the Plan baseline year

# What Else SHOULD Be Done?

- Decline to approve projects that will increase inequity
- When equity can't be achieved – even if it is because of the decisions of other entities, like the state - rather than claiming to be compliant with civil rights laws the TIP needs to explicitly admit that following that TIP is going to have a discriminatory effect.

# What if ....?

- For example, what if ALL discretionary funds were put into the hopper. What if then a full equity analysis was conducted and it was decided that urban buses need to have priority as a matter of equity?

Beginning in 2022, Milwaukee County will undergo a major bus replacement program. Up to 90 New Flyer buses purchased in 2010 will need to be replaced at an estimated total cost of \$72 million. The \$9.6 million being requested in this STP application will be applied to the replacement of fifteen 40-foot New Flyer diesel buses that will have reached the end of their useful life - thereby increasing service reliability and reducing maintenance costs for MCTS. In addition, the replacement buses will be "alternative fuel" as MCTS initiates a fleet transition away from fossil fuels. The alternative fuel replacement buses will achieve cost savings over the total lifecycle of the vehicles and provide cleaner air and quieter operational benefits to the citizens of Milwaukee County.

# Sources & Resources

- Federal Regulations:
  - 49 CFR Pt 21: NonDiscrimination in Federally-Assisted Programs of the Dept. of Transportation
  - 23 CFR Subch. 3 (Pts 200-230): Civil Rights (Federal Highway Admin.)
  - 23 CFR Pt 450 Subpt C: Metropolitan Transportation Planning and Programming
- Executive Orders and Related Policies:
  - Executive Order 12898 (1994): Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>
  - Advancing Racial Equity and Support for Underserved Communities Through the Federal Government: <https://tinyurl.com/2u7v5ef2>
  - Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis: <https://tinyurl.com/d72sc5jr>
  - US Dept of Transportation Environmental Justice Policy: <https://tinyurl.com/4m2udf9b>

# Sources & Resources

- SEWRPC Documents

- TIP Prioritization Memo (Jan 2020):  
[https://www.sewrpc.org/SEWRPCFiles/Transportation/Files/tip/2023-2025\\_STP-M\\_EvaluationMemorandum\\_00251863.pdf](https://www.sewrpc.org/SEWRPCFiles/Transportation/Files/tip/2023-2025_STP-M_EvaluationMemorandum_00251863.pdf)
- 2021-24 TIP: [https://www.sewrpc.org/SEWRPCFiles/Publications/TIP/21-24\\_TIP.pdf](https://www.sewrpc.org/SEWRPCFiles/Publications/TIP/21-24_TIP.pdf)

- Equity and Prioritization Research:

- Equity-Oriented Criteria for Project Prioritization in Regional Transportation,  
<https://journals.sagepub.com/doi/10.1177/03611981211001072>
- Integrating Equity into MPO Project Prioritization: [https://ctedd.uta.edu/wp-content/uploads/2020/01/kris\\_final.pdf](https://ctedd.uta.edu/wp-content/uploads/2020/01/kris_final.pdf)
- MPO Equity-Oriented Criteria for Project Prioritization: <https://tinyurl.com/chzydvnj>