



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE


Marc Elrich  
County Executive

Tiffany Ward  
Director and Chief Equity Officer

**MEMORANDUM**

November 5, 2021

To: Jennifer Bryant, Director  
Office of Management and Budget

From: Tiffany Ward, Director  
Office of Racial Equity and Social Justice 

Re: Supplemental Appropriation #22-30 260 E. Jefferson Street Property Acquisition

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that there is insufficient information to determine the likely racial equity impacts of Supplemental Appropriation #22-30. There is evidence that collocating transit services in a single facility at 260 E. Jefferson Street may reduce administrative burdens, which is a promising practice for advancing racial equity, but a lack of data about customers and information about the property acquisition process limit ORESJ's ability to draw conclusions about whether Supplemental Appropriation #22-30 is likely to advance racial equity and social justice in the County.
- II. **BACKGROUND:** The purpose of Supplemental Appropriation #22-30 is to fund the acquisition of the property located at 260 E. Jefferson Street, which will be used by the Department of Transportation to house public customer service functions, including: Lost and Found, taxi services, commuter services, Ride On pass and customer service. Information provided in this supplemental request indicate that this acquisition will eliminate the need for customers to pay for parking to access services, and it will also facilitate access to multiple to services in one facility. Other proposed features of the project include reserving some of the parking for taxi, customer, and commuter services as well as for county vehicle parking. The balance of parking will be added to the Rockville Core and surface parking will be utilized to showcase Electric Vehicle charging facilities and other fleet-related climate initiatives.

At the time of this analysis, there was little information available about the process leading to this property acquisition or the demographic and income characteristics of the Montgomery County Department of Transportation customers or those who are likely to access services at this facility. Such details are critical to a racial equity analysis as they help to a) demonstrate the extent to which the public and potential customers were engaged in the proposed plan and b) the racial inequities or barriers experienced by potential customers.

Strong and sustained community engagement is a key pillar of equitable development decision-making. The Government Alliance on Race and Equity (GARE) recommends restructuring decision-making processes so that people of color have real authority in planning and development decisions<sup>1</sup>. While this property acquisition does not appear to be a part of a larger development strategy, a decision like this is likely to affect different communities in different ways, which raises the question of whether this location is most desirable for communities likely to access these services. It is possible that it is the optimal location, but without documented direct engagement, this cannot be confirmed.

Addressing systemic barriers to accessing public services—such as those described in this supplemental appropriation—is an important step towards reducing administrative burdens which is an important step towards advancing racial equity in government. The Center for Law and Social Policy (CLASP) explains the significance of administrative burdens and the ways in which they disproportionately affect communities of color and other marginalized groups. Administrative burdens are the “onerous experiences that individuals and entities can encounter when trying to access a public benefit”<sup>2</sup>. They are the time and energy spent accessing and maintaining enrollment in public benefits<sup>3</sup>. Administrative burdens include time traveling to and between appointments in different locations, time spent waiting in offices, sitting on hold on the phone, tracking down documentation, money spent traveling to appointments, paying for parking, or assistance with filling out forms—all in an effort to access services to which all residents are entitled. In the case of this supplemental appropriation, those public benefits include activities like collecting items from Lost and Found or purchasing Ride On passes (there may also be other services not mentioned in this supplemental).

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<sup>1</sup> Ryan Curren, Nora Liu, and Dwayne Marsh, and Kalima Rose. Local and Regional Government Alliance on Race and Equity. *Equitable Development as a Tool to Advance Racial Equity*. November 2016. Available at:

<https://www.racialequityalliance.org/wp-content/uploads/2016/11/GARE-Equitable-Development.pdf>

<sup>2</sup> Executive Office of the President and Office of Management and Budget. *Study to Identify Methods to Assess Equity: Report to the President*. July 2021. Available at: [https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation\\_508-Compliant-Secure-v1.1.pdf](https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation_508-Compliant-Secure-v1.1.pdf).

<sup>3</sup> Suzanne Wikle. Center for Law and Social Policy. “Administrative Burdens Exacerbate Inequities and Must be Reduced”. August 23, 2021. Available at: <https://www.clasp.org/blog/administrative-burdens-exacerbate-inequities-and-must-be-reduced>

CLASP explains that these administrative burdens are felt most acutely by those who rely on the very services they're attempting to access. In the case of transportation, due to structural inequities in housing and employment, communities of color and people with disabilities in Montgomery County are more likely to use public transportation and accompanying services and are therefore most likely to face administrative burdens when attempting to resolve a transit issue or collect belongings from Lost and Found. Reducing these administrative burdens by collocating services in a single facility is a strength of the 260 E Jefferson Street property acquisition. A July 2021 *Study to Identify Methods to Assess Equity: Report to the President* concludes that "when agencies work to mitigate administrative burden, their efforts can significantly enhance their ability to comprehensively advance equity, meet the needs of underserved communities, and improve operational efficiencies."<sup>4</sup> The potential impact on racial equity in the County hinges upon whether the services located in the facility are of the highest priority to communities of color and whether other aspects of the administrative burden are mitigated. Neither of these factors can be determined within the scope of this analysis but reinforce the recommendation for sustained community engagement.

- III. **DATA ANALYSIS:** To estimate potential customers, it's valuable to look at the demographic and income characteristics of Ride On passengers. The screenshots below, from the July 2020 Ride On Public Participation Plan<sup>5</sup>, indicate that Ride On passengers are more likely to be residents of color and have household incomes below the 2020 Area Median Income which was \$126,000 for a family of four (as of July 1, 2020)<sup>6</sup>.

Ride On Public Participation Plan  
July 2020

Table 3: Ride On Ridership Ethnic Background

| Ethnic Background                  | # of Responses | % of Responses |
|------------------------------------|----------------|----------------|
| White                              | 2,078          | 19.6%          |
| American Indian or Alaskan Native  | 88             | 0.8%           |
| Black or African American Descent  | 3,828          | 36.0%          |
| Asian                              | 973            | 9.2%           |
| Hawaiian or other Pacific Islander | 39             | 0.4%           |
| Hispanic                           | 1,956          | 18.4%          |
| Middle Eastern Descent             | 78             | 0.7%           |
| Two or More Races                  | 622            | 5.9%           |
| Rather not say                     | 958            | 9.0%           |
| Total Responses                    | 10,620         | 100.0%         |
| No response                        | 277            |                |

Source: Ride On On-board Survey – December 2018

Table 4: Ride On Ridership Household Income

| Household Income       | # of Responses | % of Responses |
|------------------------|----------------|----------------|
| Less than \$20,000     | 2,483          | 27.3%          |
| \$20,000 to \$29,999   | 1,760          | 19.4%          |
| \$30,000 to \$49,999   | 1,755          | 19.3%          |
| \$50,000 to \$74,999   | 1,052          | 11.6%          |
| \$75,000 to \$99,999   | 687            | 7.6%           |
| \$100,000 to \$149,999 | 701            | 7.7%           |
| \$150,000 to \$199,999 | 400            | 4.4%           |
| \$200,000 or more      | 249            | 2.7%           |
| Total Responses        | 9,087          | 100.0%         |
| No response            | 1,810          |                |

Source: Ride On On-board Survey – December 2018

In addition to the demographic and income characteristics of Ride On passengers, the following are key data points about transportation disparities in the County in 2017 and illuminate who may experience additional administrative burdens in accessing services

<sup>4</sup> Executive Office of the President and Office of Management and Budget.

<sup>5</sup> Montgomery County Department of Transportation Division of Transit Services. Ride On Montgomery County Transit. *Public Participation Plan*. July 2020. Available at: <https://www.montgomerycountymd.gov/DOT-Transit/Resources/Files/Public%20Participation%20Plan%202020%20Draft%207-23-20.pdf>.

<sup>6</sup> Montgomery County Department of Housing and Community Affairs - 2020 Rent and Income Limits. Available at: [https://montgomerycountymd.gov/DHCA/Resources/Files/housing/multifamily/compliance/rent\\_income\\_limits\\_cur\\_rent.pdf](https://montgomerycountymd.gov/DHCA/Resources/Files/housing/multifamily/compliance/rent_income_limits_cur_rent.pdf)

offered by DOT. In these data, it is important to note that because Latinos are an ethnicity rather than a race, Latinos are included in multiple racial groups. Black residents were more likely than any other group to take public transportation to work and not have a vehicle.

| Racial/Ethnic Group | % who take public transportation to work | % who do not have a vehicle |
|---------------------|--|-----------------------------|
| Asian               | 11.7%                                    | 6.0%                        |
| Black               | 19.8%                                    | 12.8%                       |
| Latino              | 12.8%                                    | 4.1%                        |
| White               | 13.6%                                    | 5.5%                        |
| Other               | 12.1%                                    | 6.4%                        |

**Source:** Montgomery County Racial Equity Profile. Poverty Rates 2010, 2017. Pg. 50-51.  
Available at:

<https://www.montgomerycountymd.gov/OLO/Resources/Files/2019%20Reports/RevisedOLO2019-7.pdf>

cc: Ken Hartman, Director, Strategic Partnership, Office of the County Executive  
Chris Conklin, Director, Department of Transportation  
David Dise, Director, Department of General Services  
Anita Aryeetey, Analyst, Office of Management and Budget