



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE

Marc Elrich  
*County Executive*

Tiffany Ward  
*Director*

MEMORANDUM

April 7, 2022

To: Jennifer Bryant, Director  
Office of Management and Budget

cc: Gabe Albornoz, President  
County Council

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

Re: Racial Equity Impact Assessment (REIA) for Supplemental Appropriation #22-71  
Amaranth Drive Culvert

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that the Supplemental Appropriation #22-71 Amaranth Drive Culvert is likely to advance racial equity and social justice in the County. The proposed culvert repair on Amaranth Drive will not directly impact a residential area, however its existence in a census tract that includes a disproportionate percentage of people of color and low-income residents means that a failure to repair the culvert is likely to burden residents (with road closures and possible other storm water system stress) who have fewer resources to deal with negative impacts. It is also possible that repairing the culvert will prevent disruptions to two businesses on Amaranth Drive, however, to understand the effect of those disruptions on racial disparities in employment and business ownership in the County, ORESJ would need additional details about the demographics and practices of both businesses in question. Finally, ORESJ notes an absence of information about how measures of climate-related social vulnerability were included in the routine maintenance that led to the discovery of the failing culvert.
- II. **BACKGROUND:** The purpose of Supplemental Appropriation #22-71 is to fund emergency repairs to the Amaranth Drive culvert to ensure safe transportation and stormwater management in the Germantown area. Deterioration of the culvert was discovered during a routine inspection, and while there is no apparent roadway settlement nor sinkholes, there is significant loss of roadway fill during every rain event.

To assess the extent to which this culvert repair advances racial equity and social justice in the County, ORESJ looked at how racial equity principles were applied to the process determining the funding request as well as who—based on location—would be most impacted by failures in transportation infrastructure or storm water management.

Aligning the administration of government services with racial equity principles requires leaders and departments to practice high degrees of public transparency and accountability. Transparency and accountability are necessary for building trust with communities and ensuring equitable distribution of opportunities and resources. At the time of this assessment, information about how routine inspections are planned and conducted was not available online. Therefore, it is unclear to what extent routine processes currently apply a racial equity lens—for example, how are tools like the Centers for Disease Control and Prevention (CDC) Social Vulnerability Index incorporated into the planning and implementation of routine maintenance?

Failures of transportation or storm water infrastructure have many consequences—affecting the environment, transportation, and housing of those in and around impacted areas. In the case of the culvert on Amaranth Drive, we considered the potential for roadway flooding in the immediate area and disruptions to traffic and safety of motorists using the road and pedestrians who may be present. We also considered those affected downstream by any unintended consequences<sup>1</sup> of the repairs.

While it is clear that Amaranth Drive is not a residential roadway, we think it's important to consider the resource allocation for this maintenance within the context of overall distribution of opportunities and burdens in the County. To that end, to understand (more broadly) who would be impacted if the culvert was not repaired, we looked at the racial demographics and income characteristics of those living in the census tract (7008.18) in which Criswell Honda is located. The estimated median household income in 2020 for this census tract was \$63,655<sup>2</sup>.

#### Census Population Information—7008.18

Total Population	7,069	
	Number	Percentage
Non-Hispanic White Population	1,393	19.7%
American Indian Population	0	
Asian/Hawaiian/Pacific Islander Population	786	11.1%
Black Population	2,719	38.4%

<sup>1</sup> The Government Alliance on Race and Equity. Racial Equity Toolkit: An Opportunity to Operationalize Equity. December 2016. Available at: [https://racialequityalliance.org/wp-content/uploads/2015/10/GARE-Racial\\_Equity\\_Toolkit.pdf](https://racialequityalliance.org/wp-content/uploads/2015/10/GARE-Racial_Equity_Toolkit.pdf)

<sup>2</sup> 2020 FFIEC Geocode Census Report. State: 24—Maryland; County: 031—Montgomery County; and Tract Code: 7008.18. Available at: <https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>

Total Population	7,069	
	Number	Percentage
Hispanic Population	1,909	27%
Other/Two or More Races Population	262	3.7%

**Source:** Author’s calculations of 2020 FFIEC Geocode Census Report. State: 24—Maryland; County: 031—Montgomery County; and Tract Code: 7008.18. Available at: <https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>

In 2020, compared to the County overall, this area had a lower median income and higher representation of people of color. Based on the factors that inform the CDC Social Vulnerability Index, and what is known about racial inequities shaping disproportionate climate impacts, it is likely that residents in this area have fewer resources to deal with consequences of not repairing the culvert. For example, a flooding event on Amaranth Drive (while not residential) could stress stormwater management in the surrounding area, impact adjacent roadways, create disruptions to traffic, and potential property damage if not swiftly resolved. Because of racial inequities shaping employment and economic opportunity more generally, these disruptions could have a disproportionate impact on low-wage workers who often have unpredictable schedules and fewer options and resources for getting to work<sup>3</sup>. Research about the intersection of climate change and work, suggests that “risks and hazards associated with environmental degradation tend to affect vulnerable workers the most”<sup>4</sup>.

In addition, we know that two businesses are likely to be negatively impacted if the culvert is not repaired. To understand the impact this would have on racial disparities in business ownership and employment in the County, we would need to analyze demographic information about employees and owners of these firms. Data necessary to perform this analysis was not available at the time of this assessment.

Regarding unintended consequences, the specifics of the culvert deterioration and the planned maintenance activity are beyond the scope of this analysis, however using a racial equity lens calls us to consider any potential benefits or burdens that may affect residents nearby. Will the repairs, for example, help to increase the adaptive capacity of the system and thus reduce storm water management stresses in other areas? Are there anticipated disruptions to transportation that could negatively impact the travel or commutes of residents? If so, how will the community be informed and what mitigation measures will be taken?

cc: Ken Hartman, Director, Office of Strategic Partnerships, Office of the County Executive

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<sup>3</sup> Adwela Maye, Asha Banerjee. The Center for Law and Social Policy. “The Struggles of Low-wage work”. June 16, 2021. Available at: <https://www.clasp.org/publications/fact-sheet/struggles-low-wage-work-0>.

<sup>4</sup> The Employment Impact of Climate Change Adaptation. International Labour Organization (ILO) for the G20 Climate Sustainability Working Group (CSWG) under the Argentine G20 Presidency. 2018. Available at: [https://www.ilo.org/wcmsp5/groups/public/---ed\\_emp/documents/publication/wcms\\_645572.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_emp/documents/publication/wcms_645572.pdf)