



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE

Marc Elrich
County Executive

Tiffany Ward
Director

MEMORANDUM

April 8, 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 #22-72
Flood Control Study

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation #22-72 Flood Control Study is likely to advance racial equity and social justice in the County, as it funds a study that is likely to give the County tangible information for planning and responding to flood-related challenges in a way that reduces inequities in process and disparities in outcomes that disproportionately burden communities of color and low-income communities with climate risk. In its assessment, ORESJ also noted consistent overlap between the Department of Environmental Protection's (DEP) proposed approach and best practices for addressing the disproportionate burden of climate change on communities of color and other communities experiencing identity-based marginalization.
- II. **BACKGROUND:** The purpose of Supplemental Appropriation #22-72 is to provide funding for the development of a Comprehensive Flood Management Strategy and watershed/sub-watershed specific Flood Management Plans for the County. The flood control study will include:¹

¹ Flood Control Study (P802202). Project Description.

- gathering data on historic flooding in the County, including input from affected communities;
- examining the potential impacts of climate change and other significant factors that can cause flooding in the County, including the effect of updated rainfall predictions;
- providing recommendations for regulatory, policy, and organizational changes necessary for the County to comprehensively plan for, respond to, and recover from flooding events;
- identifying the process for undertaking detailed hydrologic and hydraulic modeling, vulnerability assessments, and developing adaptation/mitigation design; and
- planning, including identifying needed data and an approach to prioritizing the order in which such studies should be done.

Available information also indicates that the study may include evaluating impacts to disadvantaged² communities.

The focus of this assessment is to determine the extent to which the flood control study addresses identified inequities in accessing government resources. It also looks at the extent to which the study will support the county in mitigating the disproportionate effects of climate change on communities of color and low-income residents.

The Department of Environmental Protection provided a robust racial equity and social justice analysis in the proposal of the supplemental appropriation for the Flood Control Study. There is specific evidence (in materials accompanying the request) that DEP applied a racial equity lens to its project justification. First, DEP discussed the County's response to flooding events. It recognized the numerous activities the County undertakes in response to flooding across the county and added: "the County's short-term response is often driven by interaction with residents that are familiar with the county government, and who have direct connections with elected officials or senior level staff. As a result, residents and communities that do not typically interact with the County government may not receive the same consideration as those that do."³

These inequities related to process typically entail barriers or inequitable access to government services. Often this is created by unexamined systems or practices that benefit those with existing power or access to decisionmakers. In the case of climate change, this means that those with more political access have more opportunities to influence which

² This is language from the project description. Because "Disadvantaged" implies a deficit-based frame and could include a number of different groups depending on the racial disparity or inequity being described, ORESJ prefers to use specific language about who is experiencing the impacts of racial and social inequities—for example, communities of color, people with disabilities, immigrant communities, low-income residents.

³ ORESJ noted this practice in a previous REIA; it is clear that DEP has incorporated this concern into its planning for the study. For information about issues with this current practice, please see:

<https://www.montgomerycountymd.gov/ore/Resources/Files/CBG850.pdf>

areas of a jurisdiction receive government attention to address things like water pollution, sediment and erosion, and flooding damage. This is inherently inequitable. The Georgetown Climate Center suggests that disparate outcomes during climate disaster recovery is related to lack of political clout and access to information and outreach regarding recovery programs, lack of financial resources⁴. In addition, a lack of transparency and long-term community engagement prevents the public from understanding the mechanisms they can use to report issues and monitor progress, which over time diminishes the public's trust in government.

Second, in this supplemental request DEP demonstrated understanding of the link between climate change risk, particularly flooding, and disproportionate impacts on communities of color and low-income people across the US: "There are numerous articles and studies that discuss how flooding affects social inequality, including those from the Center for Social Solutions at the University of Michigan⁵, the Public Policy Institute of California⁶, and Scientific American⁷. These sources highlight how disadvantaged populations suffer disproportionate effects of flooding due to historical inequities that have affected home ownership and the ability to accumulate wealth, access to government services, and lack of influence over government response to flooding."

The ORESJ tends to be more specific in its analyses about the role of structural racism in producing the policies and practices that create and contribute to climate risk, but DEP's explanation of social inequalities, using the above-mentioned cited sources demonstrates DEP's understanding of the complex relationship between race, income, housing, and climate change risks in society. Together, DEP's analysis of the County's flood response and application of a racial equity lens to this proposed flood control study, highlight DEP's understanding of inequities in process and disparities in outcomes that disproportionately burden communities of color and low-income communities with climate risk.

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

⁴ Georgetown Climate Center: A Leading Resource for State and Federal Policy. Equitable Adaptation Legal & Policy Toolkit. "Equitable Disaster Preparedness, Response & Recovery". Available at:

<https://www.georgetownclimate.org/adaptation/toolkits/equitable-adaptation-toolkit/equitable-disaster-preparedness-response-recovery.html>

⁵ University of Michigan. Center for Social Solutions. "Case Study: Floods and Socioeconomic Inequality". October 30, 2020. Available at: <https://lsa.umich.edu/social-solutions/news-events/news/insights-and-solutions/case-studies/case-study--floods-and-socioeconomic-inequality.html>

⁶ Lori Pottinger. Public Policy Institute of California. "Addressing Inequity in Flood Risks". November 13, 2019. Available at: <https://www.ppic.org/blog/addressing-inequality-in-flood-risk/>

⁷ John Fialka. E&E News. Scientific American. April 1, 2019. Available at: <https://www.scientificamerican.com/article/when-storms-hit-cities-poor-areas-suffer-most/>