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Interstate Bridge Replacement Program Equity Framework

Updated February 2024

Interstate Bridge Replacement Program Equity Framework

Prepared for:



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1. INTRODUCTION

1.1 Why an Equity Framework?

Transportation projects and other government actions have excluded and directly harmed Black, Indigenous, and People of Color (BIPOC) communities, low-income neighborhoods, people with disabilities, and other communities across the country and in the Portland-Vancouver region. The Oregon Department of Transportation and Washington State Department of Transportation are among the agencies responsible for this legacy: the construction of I-5 in the 1950s, for example, displaced thousands of households in Oregon and Washington and decimated the thriving African American community in North and Northeast Portland.

Other historical harms include forced removal of Native peoples from their homelands, the Oregon Constitution’s prohibition of Black people from entering or residing in the state, termination of Tribal governments, and the later exclusion of Chinese Americans from basic rights including property ownership and voting. Reservations, Redlining, and other housing discrimination in Oregon and Washington segregated communities of color and prevented investment from reaching these communities.

These harms have contributed to many social, economic, and health disparities in the Portland-Vancouver region. Differences in homeownership exemplify this; while 65 percent of White Non-Hispanic households in the region own their homes, only 33 percent of Black households, 41 percent of Hispanic/Latino households, and 48 percent of BIPOC households as a whole own rather than rent.¹ The generational impacts of these disparities cannot be overstated.

Note on Terminology

This document uses the terms “historically underserved” and “Equity Priority Communities” to describe the populations who have been excluded from transportation decision-making or systematically discriminated against in transportation projects.

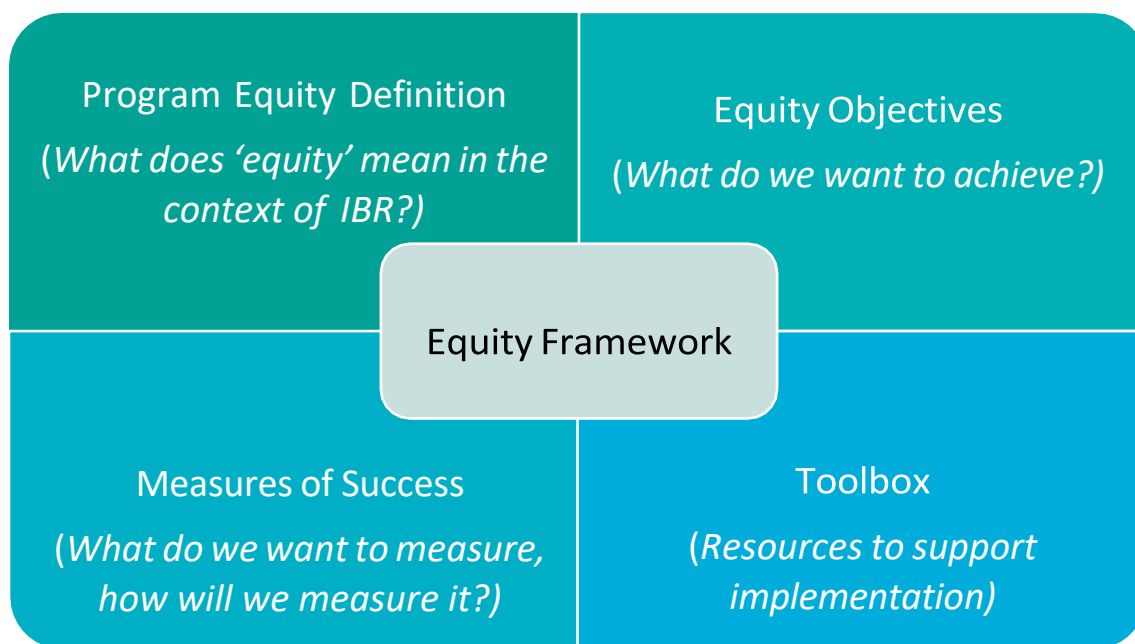
It is important to note that broad terms such as these change over time, by geography, and perspective. Given that the IBR program spans two states, two state departments of transportation, and multiple communities, we acknowledge that there is no right answer and that these terms may evolve over the course of the program.

¹ 2015-19 American Community Survey tables B25003 A-I

Such inequities and others cannot be fixed by a single project, initiative, or institution. Still, the Interstate Bridge Replacement (IBR) program provides an opportunity for significant and intentional action to begin addressing impacts of past decision-making. For this reason, the IBR program has committed to centering equity by maximizing benefits and minimizing burdens for Equity Priority Communities. By focusing benefits on the populations and communities where there is the greatest need and where the greatest harm has been done, the program will also be able to achieve the greatest overall benefits for the region.

An essential step of the IBR program’s commitment to centering equity is to develop a shared understanding of what the program seeks to achieve and how it will be achieved. The IBR Equity Framework is meant to serve this purpose by outlining the program’s approach and tools it will use to advance equity. It includes the program’s Equity Definition and Principles, Equity Objectives, Measures of Success, and a Toolbox to assist in putting the Framework into action.

Figure 1. Equity Framework Components



The Framework is informed by the Equity Advisory Group (EAG), community input, program staff insight, and best practices and language from other projects, equity frameworks, and equity toolkits in the Pacific Northwest. It is intended to guide every element of the program from planning and design to environmental review and community engagement.

The existence of this Framework alone does not guarantee that it will move the IBR program towards equity. Responsibility for honoring and implementing it is a collective endeavor that includes program leadership, staff, partners, and advisory groups. It must be applied within each of the programmatic areas and at all critical decisions and actions.

2. EQUITY DEFINITION, PRINCIPLES, AND OBJECTIVES

“Equity” is defined in myriad ways depending on who is defining it and the context in which it is being defined. For the IBR program to honor its commitment to centering equity it must clearly articulate to the community what this commitment means beginning by establishing a program-specific definition and building upon this definition to articulate principles and objectives. To this end, program staff worked with the EAG to develop an equity definition that serves as the foundation for this Framework.

2.1 Equity Definition

The IBR program defines equity in terms of both *process* and *outcomes*. Together, process equity and outcome equity contribute to addressing the harmful impacts of and removing longstanding injustices experienced by historically underserved communities.

Process Equity means that the program centers and prioritizes access, influence, and decision-making power for historically underserved communities throughout the program in establishing objectives, design, implementation, and evaluation of success.

Outcome Equity is the result of successful Process Equity and is demonstrated by tangible transportation, community, and economic benefits for historically underserved communities.

Historically underserved communities are those who experience and/or have experienced discrimination and exclusion based on identity or status, such as:

- Black, Indigenous, and People of Color
- Tribal governments (Federally Recognized Tribes)
- People with disabilities
- Communities with limited English proficiency
- Persons with lower incomes
- Individuals and families experiencing houselessness
- Immigrants and refugees
- Young people
- Older adults

2.2 Equity Principles

Building upon the program’s equity definition is a series of principles that provide a greater layer of specificity and concreteness to support equity throughout the course of the program. These principles draw from EAG input and the Oregon Department of Transportation Toll Projects’ Equity Framework, which was developed by its Equity and Mobility Advisory Committee.

- **Acknowledge, honor, and apply lessons learned from history.** The program will ensure the analysis of project impacts, decisions around community benefits, and other processes, actions, and decisions are placed in the context of historical harm from transportation projects on individuals, communities, and the environment. The program will actively mitigate current and past harms to the greatest extent possible.
- **Be explicit about race and systemic racism.** Doing so will help ensure that race will not be ignored or diminished.
- **Identify and address disparities.** Integrate an equity lens into assessments and studies for the program to daylight benefits and burdens to equity priority communities in relation to the general population. Program benefits – both those within the program timeline as well as in the longer term – should attempt to ameliorate existing inequities rather than maintaining the status quo.
- **When legally permissible, use existing laws and regulations as the floor, rather than the ceiling.** Go above and beyond the compliance, legal minimums, and the traditional confines of the typical transportation infrastructure project (i.e., NEPA,² Title VI,³ and ADA⁴) to deliver on community needs and priorities and to make measurable strides in reducing inequities.
- **Prioritize contract equity and economic justice.** The program will strive to go beyond minimum requirements to provide contracting opportunities for minority-owned businesses.
- **Amplify the voices of historically impacted and underserved communities and ensure that a diverse range of community members meaningfully shapes program decisions and activities.**
 - Opportunities for input will be clearly, consistently, and regularly communicated including when and how the public, program committees, and other community members can weigh in on important decisions, as well as the degree to which this input will be able to influence decision-making and policy direction.
 - Engagement will be accessible for community members of varying abilities, languages, and cultures. Spaces will be created where the most vulnerable can engage in a meaningful way and influence decision-making and policy direction.
 - Community input will be translated into intentional, strategic, consistent, and reliable action. Decisions will be made in consultation with historically impacted and underserved communities.
 - The needs and priorities of historically impacted and underserved communities will be elevated by recognizing, understanding, and shifting existing power dynamics within the lead agencies, program teams, partner agencies, groups, and the community.

² National Environmental Policy Act of 1969

³ Title VI of the Civil Rights of 1964

⁴ Americans with Disabilities Act of 1990

- **Maintain a learning orientation.** A focus on advancing equity, rather than simply mitigating harm, is new for state departments of transportation. The program will strive for continuous improvement and to create brave spaces conducive to growth and collective learning.

2.3 Equity Objectives

Layered on top of the Equity Definition and Principles are six overarching Equity Objectives:

1. **Mobility and accessibility:** Improve mobility, accessibility, and connectivity, especially for lower income travelers, people with disabilities, and historically underserved communities who experience transportation barriers.
2. **Physical design:** Integrate equity, area history, and culture into the physical design elements of the program including bridge aesthetics, artwork, amenities, and impacts to adjacent land uses.
3. **Community benefits:** Find opportunities for and implement local community improvements in addition to required mitigations.
4. **Workforce equity and economic opportunity:** Ensure that economic opportunities generated by the program benefit minority and women owned firms, BIPOC workers, workers with disabilities, and young people.
5. **Decision-making processes:** Prioritize access, influence, and decision-making power for Equity Priority Communities throughout the program in establishing objectives, design, implementation, and evaluation of success.
6. **Avoid further harm:** Actively seek out options with a harm-reduction priority rather than simply mitigate disproportionate impacts on historically impacted and underserved communities and populations.

3. OPERATIONALIZING EQUITY

What does equity look like for this project and how will we know that we've achieved it? What outcomes do we want to see?

3.1 Measurable and Actionable Outcomes

A vital step to setting forth a clear path towards advancing equity is to translate the Framework's foundational elements – the Definition, Principles, and Objectives – into tangible outcomes. Program staff and the EAG work together on this endeavor with community partners, using the following step-by-step approach:

Step 1: Identify desired **Outcomes:** What are the results we want to see in the program area and the region with respect to equity?

Step 2: Establish clear **Performance Measures:** How will we know if we've achieved equitable outcomes?

Step 3: Lay out a set of **Strategies:** How do we plan on working towards equitable outcomes?

Step 4: Plan specific **Actions:** What do we need to do to implement our strategies, who is responsible, and when will the various activities occur?

This process will be used to inform several elements of the IBR program, including an agreement to implement community enhancements, such as ancillary development opportunities, access to neighborhood land uses, environmental justice measures, parks/open space, active transportation, safety, cultural amenities, air quality, hiring strategies, job training, and others.

3.2 Responsibility and Structure for Implementation of the Framework

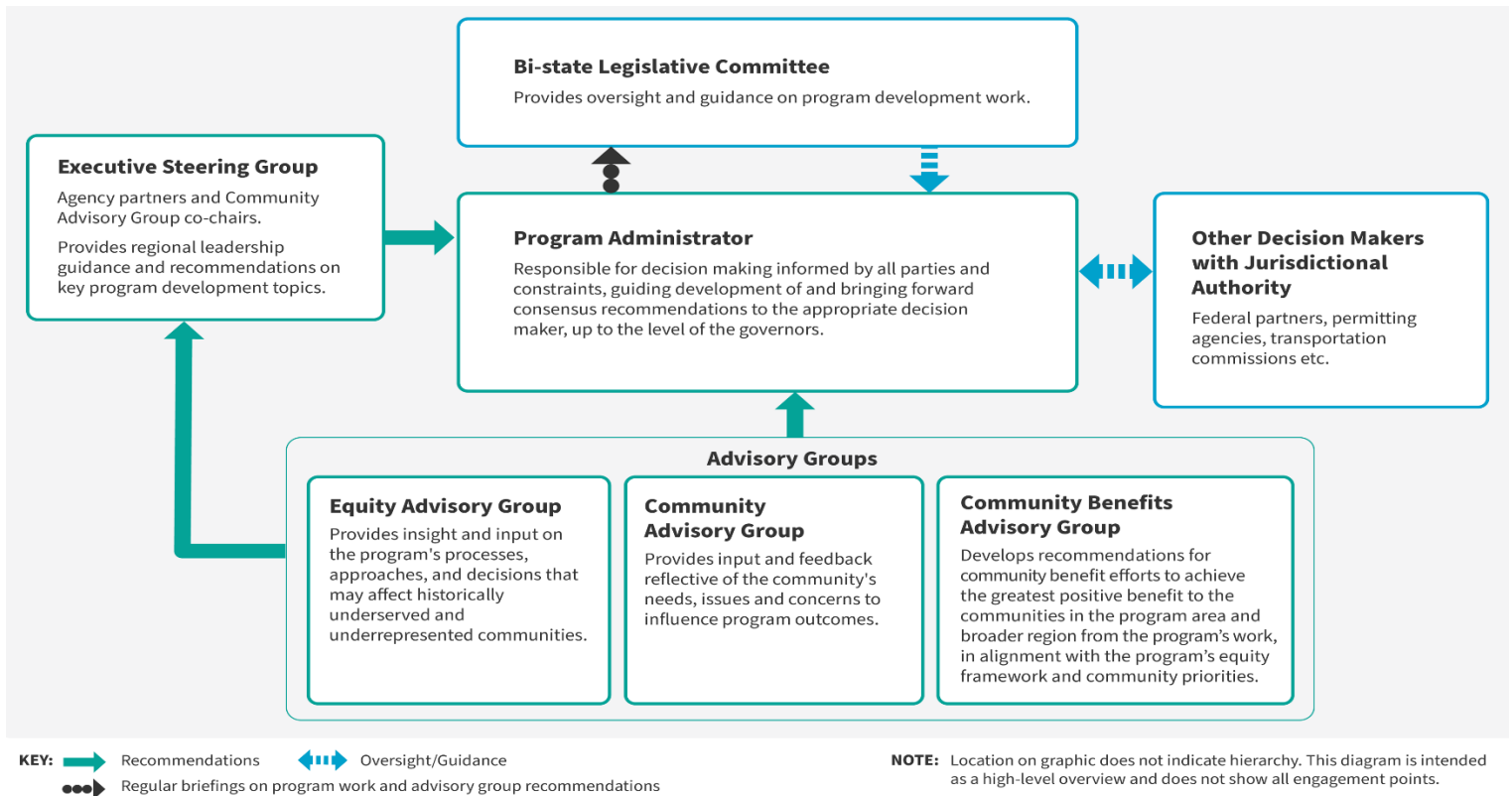
One of the leaders of the IBR program is a principal equity officer who leads a team that supports implementation of the Equity Framework. Ultimately, however, responsibility for honoring and applying the Framework throughout the IBR program process is shared between program staff and all others involved in IBR program decision-making. Program staff are divided into Program Management, Transportation/Planning, Environment, Design Engineering, Major Structures, Public Affairs (includes Government Relations, Communications, and Community Engagement), Transit Planning/Engineering, Financial Structures, Procurement, Climate, DEI, Safety, Third Party Agreements, and Program Controls teams. Program teams and their respective managers apply the Equity Framework to key decisions through open discussions within their teams. Some of these key decisions include:

- Community engagement planning, implementation, and evaluation
- Development and screening of design options
- Development of program-level performance measures
- Procurement and contracting

Since each of the IBR program teams is diverse regarding its level of experience in the application of equity in transportation planning, it is reasonable to expect that each team may have very different strengths, challenges, gaps in experience or understanding, and barriers in its ability to apply the Framework. When gaps arise in meeting the spirit of the Framework, it is the responsibility of program team managers to identify solutions or call out gaps so that they can be addressed, including through engaging the program's Equity Team.

As noted in the diagram below, program decision-making follows a structure that includes multiple players. Each of these players receives regular briefings on public input obtained through the Program's equity-centered community engagement.

Figure 2. Equity-Centered Community Engagement



Bi-State Legislative Committee: The Washington and Oregon Legislatures established this committee of 16 members: eight from each state. The states’ respective Senate majority leaders and minority leaders appointed four members, two from each of the two largest caucuses. The states’ respective House of Representatives speakers and minority leaders appointed four members, two from each of the two largest caucuses.

Program work, including the work of the advisory committees, is shaped by the direction and timelines established by the governors, legislatures, transportation commissions, and/or transportation departments from both states. Direction from the Bi-state Legislative Committee will shape program work by providing initial framework and guidance on the approach to developing key program decisions, reviewing and providing feedback on progress, and evaluating outcomes.

The **Program Administrator** makes key decisions informed by all parties with guidance and oversight from the Bi-State Legislative Committee and, therefore, carries a major responsibility in ensuring the program moves towards equitable outcomes. The program administrator receives recommendations from the program’s advisory and steering groups and oversight and guidance from the Bi-State Legislative Committee and other decision-makers with jurisdictional authority, including federal partners.

The **Executive Steering Group** provides regional leadership recommendations on key program issues of importance to the community. Members of the Executive Steering Group include representatives from the 10 bi-state partner agencies with a direct delivery or operational role in the integrated, multimodal transportation system around the Interstate Bridge, as well as a community representative from each state. The two community representatives serve as the co-chairs of the Community Advisory Group. The Executive Steering Group receives direct input from the Program's two advisory groups.

Advisory Groups review key decisions of significance and provide input before the decisions are sent to the program administrator and the Bi-State Legislative Committee. The role of the advisory groups is to center equity, request information, provide input and recommendations, ask critical questions of program staff, and advocate for the effective implementation of the Framework.

Members of these committees were invited to participate with an assumption of a 2-year commitment which is expected to cover the period of environmental assessment and the record of decision. The committees are intended to extend beyond that time to provide oversight and recommendations all the way to project construction. Thus, members may be asked for an additional time commitment beyond the 2-year period. Alternatively, new members may be added if needed.

- The **Equity Advisory Group** makes recommendations to center the IBR program on equity. The group makes recommendations to IBR program leadership regarding processes, policies, and decisions that have the potential to affect historically and currently underrepresented and underserved communities.
- The **Community Advisory Group** represents community members with balanced membership from both Portland, Oregon, and Vancouver, Washington. The Community Advisory Group provides input and feedback to help ensure the program outcomes reflect community needs, issues, priorities, and concerns.
- The **Community Benefits Advisory Group** will develop recommendations for community benefit efforts to achieve the greatest positive benefit to the communities in the program area and broader region from the program's work, in alignment with the program's equity framework.

It is the combination of the Equity Framework, advisory groups, public oversight, and the program staff at all levels that is key to disrupting inequities and harm while maximizing benefits for Equity Priority Communities in the context of the IBR program.

3.3 Accountability Mechanisms

Integral to the successful implementation of the Framework is ensuring that program leaders, staff, and partners are held accountable for its application. This section outlines a set of mechanisms meant to demonstrate that decision-making processes are incorporating the principles and objectives established in this Framework.

Interstate Bridge Replacement Program Equity

Since the roles and internal processes differ between the various IBR program teams, the Equity Team engages each team to determine the best approach to integrating the Framework into its decision-making processes. However, the priorities and goals for accountability are consistent across all facets of the management and development of the program.

Table 1. Accountability Tools and Practices

Accountability Mechanism	Outcome	Responsible Party
Regular progress reports on performance	<p>Program teams will conduct quarterly reviews to assess their respective applications of the Framework. Progress reports based on these assessments are included in the Accountability Dashboard. These reports reflect how strategic planning or project management have been adapted based on performance, challenges, and new considerations for equity that may arise.</p>	Program Teams and Staff
Accountability Dashboard	<p>The existing Accountability Dashboard will be expanded to include a page dedicated to equity reporting. Reports will include data and information related to equity performance measures and decision points to demonstrate how the equity framework has been used, how it impacted the respective decisions/processes, and next steps.</p>	Equity and Web Teams
Regular reporting directly to the EAG	<p>The program administrator’s regular updates at EAG meetings include a report on how the Framework is being applied to program decisions and activities, followed by opportunities for EAG feedback. This ongoing reporting fosters an iterative process where EAG input informs program adjustments, results are reported to the EAG on those changes, and so on.</p>	Program Administrator
Equity Lens adaptations	<p>The equity lens has been adapted in partnership with the various program and technical teams to be used during decision-making processes. Progress on the application of the equity lens will directly inform the reporting on the Accountability Dashboard.</p>	Program Teams and Staff

Accountability Mechanism	Outcome	Responsible Party
Procurement practices	The program will require prospective contractors to demonstrate their commitment to equity including how they will incorporate the Equity Framework into their practices and procedures. Contracts will also specify requirements for contractors to adhere to as guided by the Framework.	Program Teams and Staff
Intergovernmental Agreements and Community Benefits Agreement	The Equity Framework will be formally incorporated as an element of agreements with governmental partners and the community.	Program Leadership and Partners

4. TOOLBOX

In partnership with the EAG, program staff will develop and apply a suite of tools to help advance equity. How these tools are used will be key. Ongoing consultation with the EAG over the course of the program will help ensure effective application.

- EquityLens:** The equity lens provides a set of guiding questions for program staff, advisory groups, and partners to pose along the arch of the program to help ensure the program’s work and decisions steer towards an equitable process and outcomes.
- EquityIndex:** The Equity Index is a map-based tool that combines demographic indicators based on the program’s Equity Definition to identify concentrations priority populations in the program area and vicinity.

4.1 Equity Lens

An equity lens is a tool used to inform planning and decision-making in a way that leads to more equitable outcomes. It usually includes a set of guiding questions to answer as decisions are being made and/or actions are being taken. The following are the types of high-level questions that equity lenses typically include:

- What **decision** is being made?
- **Who** is at the table?
- **How** are decisions being made?

- What **assumptions** are at the foundation of the issue?
- What **data or information** is available, and what is missing?
- How will resulting **benefits and burdens** be distributed?
- What are the **strategies** for advancing equity?

The IBR equity lens provides a more specific set of guiding questions for program staff, advisory groups, and partners to pose along the arch of the program to ensure the program is staying true to its equity principles and meeting its equity objectives. As noted in the Accountability Mechanisms section, the IBR Equity Team will work with program teams to adapt these questions to their particular areas of work.

Table 2. IBR Program Equity Lens Questions

Question	Objective Category Supported
What are the demographics and travel patterns of those living, working, or otherwise accessing the program area?	All
What are known disparities that exist in the project area?	All
What are the limitations of available data in answering key equity questions? How might we fill information gaps?	All
Are the standard regulatory requirements (e.g., Title VI, Environmental Justice) enough to answer essential questions related to the equity implications of the program/action/decision? If not, what other tools/strategies can we use?	All
What can be achieved within the scope of the program/action/decision vs. what will require partnerships and other strategies?	All
Evaluating success: How did we do? What could we do differently moving forward/next time?	All
Are there any equity issues or concerns raised for which the program/action/decision is unable to provide resolution?	Avoiding Further Harm
What actions have the responsible agencies taken in the past that disproportionately harmed Priority Populations in and around the program area?	Avoiding Further Harm

Question	Objective Category Supported
Are there any potential negative impacts or unintended consequences resulting from the action/decision? Have we asked the community what the potential impacts and side-effects might be and how such impacts might be avoided or reduced?	Avoiding Further Harm
What will be done, by whom, and by when? Who is responsible for oversight and determining if the program meets its goals and commitments to priority populations and on what timeline?	Community Benefits
Who needs to be in the conversation? Who is missing? How are affected/impacted community members, particularly historically and currently underserved communities, being actively engaged in the program/action/decision?	Decision-making Processes
What did Priority Populations tell us about their concerns, needs, and priorities? Does the program/action/decision address these concerns, needs, and priorities?	Decision-making Processes
Do any communities need capacity-building to be able to meaningfully participate in the planning process?	Decision-making Processes
What can we do to avoid traditional actions/tactics that result in unequal input/voice/inequitable outcomes?	Decision-making Processes
Is information being distributed to inform the public and Equity Priority Communities of how to influence decision-making at each step in the process?	Decision-making Processes
Who are the right messengers to communicate/reach in the program area? Do those conducting outreach have strong cultural awareness? Are they connected to the communities being engaged?	Decision-making Processes
How will we continue to partner and deepen relationships and trust with equity priority communities over the long term?	Decision-making Processes
What are the existing/historical economic disparities in the program area and greater region? Why do such disparities exist?	Economic Opportunity

Question	Objective Category Supported
How are key community destinations and critical services that are regularly used by being considered?	Mobility and Accessibility and Physical Design
To what extent are design elements human-centered (i.e., responding to the needs of individual users)?	Mobility and Accessibility and Physical Design
How do the existing conditions and historical context inform design options?	Physical Design

4.2 Equity Index

The Equity Index is a map-based tool used to identify concentrations of priority populations in the program area and vicinity, and it is based on the program Equity Definition. It uses information from the most recent American Community Survey data release (2015–2019) and awards points to geographic areas (block groups or census tracts) where there is an above-average percentage of priority populations in comparison to the region as a whole. For example, 25 percent of the region’s households have low-income according to the ACS, so if greater than 25 percent of households in a block group have low incomes, it was awarded a point.

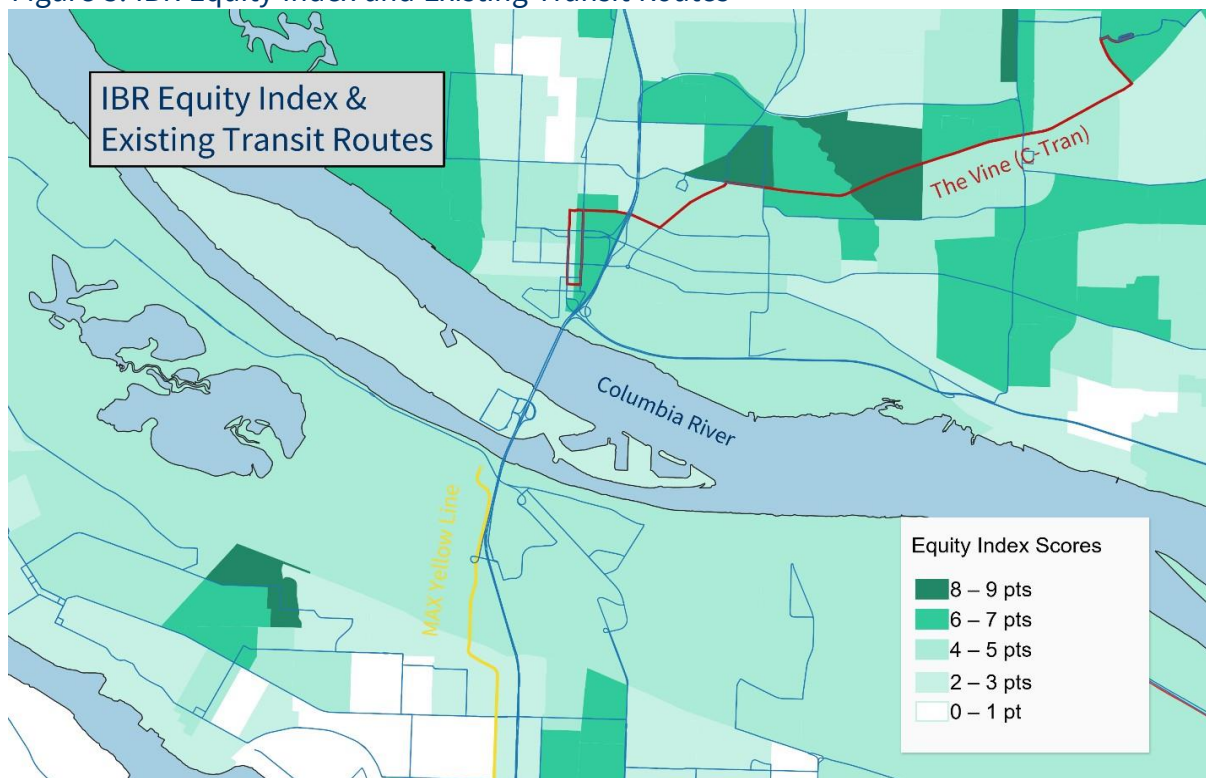
Each demographic indicator and associated point values are listed in Table 3. Note that 2 points are awarded to areas that have an above-average BIPOC population, whereas each of the rest of the indicators are worth 1 point. This is meant to weigh BIPOC communities more heavily to incorporate a race-forward approach.

Figure 3 shows an output of the index, it illustrates how it can help identify priority focus areas in terms of equity.

Table 3. IBR Program Demographic Indicators

Indicator	Point Value (if above regional average)
BIPOC population (all races/ethnicities besides white non-Hispanic)	2
Households w/ low income (at/below 200% federal poverty level)	1
Limited English proficiency households	1
Foreign-born population	1
Population living with a disability	1
Older adults (over 65)	1
Young people (under 25)	1
Zero-vehicle households	1

Figure 3. IBR Equity Index and Existing Transit Routes



4.3 Glossary

- **Discrimination:** The unequal treatment of members of various groups based on race, gender, social class, sexual orientation, physical ability, religion and other categories.⁵
- **Equity:** When one’s identity cannot predict the outcome.⁶
 - **Process Equity:** Centers and prioritizes access, influence, and decision-making power for historically underserved communities.
 - **Outcome Equity:** The result of successful Process Equity is demonstrated by tangible transportation, community, and economic benefits for priority populations.
- **Equity Lens:** A critical thinking approach to undoing racial and economic disparities by evaluating burdens, benefits, and outcomes to underserved communities.⁷
- **Disparities:** Avoidable, systematic differences in health and other outcomes adversely affecting economically or socially disadvantaged groups.⁸
- **“Equity Priority Communities” or “historically underserved communities:”** Communities, populations, and individuals who have been historically excluded from transportation decision-making, systematically discriminated against, and experience social, economic, and health disparities. These terms are used interchangeably in this document. It is important to note that broad terms such as these change over time, by geography, and perspective. Given that the IBR program spans two states and diverse populations, we acknowledge that there is no right answer and that these terms may evolve over the course of the program in response to local preferences and other factors. IBR Program Equity Priority Communities include:
 - **BIPOC:** People who identify as Black, Native American and Alaska Native, Native Hawaiian and Pacific Islander, Central and South American Indigenous, Asian, Latin American, Hispanic, and/or one or more non-white races or marginalized ethnic groups.
 - **People living with disabilities:** People who have a physical or mental impairment that substantially limits one or more major life activities, people who have a history or record of such an impairment, or a person who is perceived by others as having such an impairment.
 - **Tribal Governments:** (Federally Recognized Tribes) are sovereign nations as recognized by the United States Government, and consultation with federally recognized tribes occurs through a government-to-government consultation process separate and distinct from public and community outreach and comment.

⁵ Institute for Democratic Renewal and Project Change Anti-Racism Initiative, A Community Builder's Tool Kit, Appendix I (2000). <https://www.racialequitytools.org/glossary>

⁶ <https://www.sanantonio.gov/Portals/0/Files/Equity/Budget%20Equity%20Tool.pdf?ver=2021-03-29-212615-620>

⁷ <https://www.sanantonio.gov/Portals/0/Files/Equity/Budget%20Equity%20Tool.pdf?ver=2021-03-29-212615-620>

⁸ Adapted from <https://www.rwjf.org/en/library/research/2017/05/what-is-health-equity-.html>

- Communities with Limited English Proficiency: Groups with individuals who indicate that they speak English less than “very well” on the census.
- Persons with lower income: Individuals or households with income below 200 percent of the federal poverty level.
- Individuals and families experiencing houselessness: Individuals and families lacking or in need of a house or home.
- Immigrants and refugees: Immigrants are people born outside of the United States, and refugees are people who have left their country of origin due to persecution or fear of persecution due to race, religion, nationality, political opinion, or membership in a particular social group.
- Young people: Individuals 24 years old or younger.
- Older Adults: Individuals 65 years old or older.
- **Inequities:** A particular kind of disparity that is not only of concern for being potentially unfair, but which is believed to reflect injustice.⁹
- **Limited English Proficiency populations:** Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. Federal laws prohibit discrimination based on national origin. Many individual federal programs, states, and localities also have provisions requiring language services for individuals with limited proficiency in English.
- **Race:** A social construct that artificially divides people into distinct groups based on characteristics such as physical appearance (particularly color), ancestral heritage, cultural affiliation, cultural history, ethnic classification, and the social, economic and political needs of a society at a given period of time. Racial categories subsume ethnic groups.¹⁰
- **Systemic Racism:** A system of interrelated policies, practices, and procedures that work to advantage and position white people and communities over people of color. It can result in discrimination in criminal justice, employment, housing, health care, political power, and education, among other issues.¹¹
- **Underserved:** Refers to people and places that historically and currently have not had equitable resources or access to infrastructure, healthy environments, housing choice, etc. Disparities may be recognized in both services and in outcomes.¹²

⁹ Adapted from <https://www.rwjf.org/en/library/research/2017/05/what-is-health-equity-.html>

¹⁰ <https://www.oregonmetro.gov/sites/default/files/2017/10/05/Strategic-plan-advance-racial-equity-diversity-inclusion-16087-20160613.pdf>

¹¹ https://www.oregon.gov/odot/tolling/Documents/Toll_Projects_Equity_Framework_with_AppendixA.pdf

¹² <https://www.sanantonio.gov/Portals/0/Files/Equity/Budget%20Equity%20Tool.pdf?ver=2021-03-29-212615-620>

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