EQUITY ASSESSMENT

1. INTRODUCTION

The following memo summarizes the equity assessment conducted for the City of Milpitas Citywide Travel Safety Plan (Safety Plan). The Safety Plan aims to enhance roadway safety conditions by proposing potential projects to reduce the risk of collisions.

The purpose of this memo is to report on the equity analysis to identify programs and infrastructure investments for the City of Milpitas to support transportation and safety policies. The memo first provides the equity framework used to guide the analysis followed by a summary of the methodology. The memo then provides an equity analysis of demographics and collisions, followed by general takeaways related to the equity and safety data. The analysis seeks to inform policy and program recommendations for the City to equitably improve safety in accordance with state and federal equity goals.
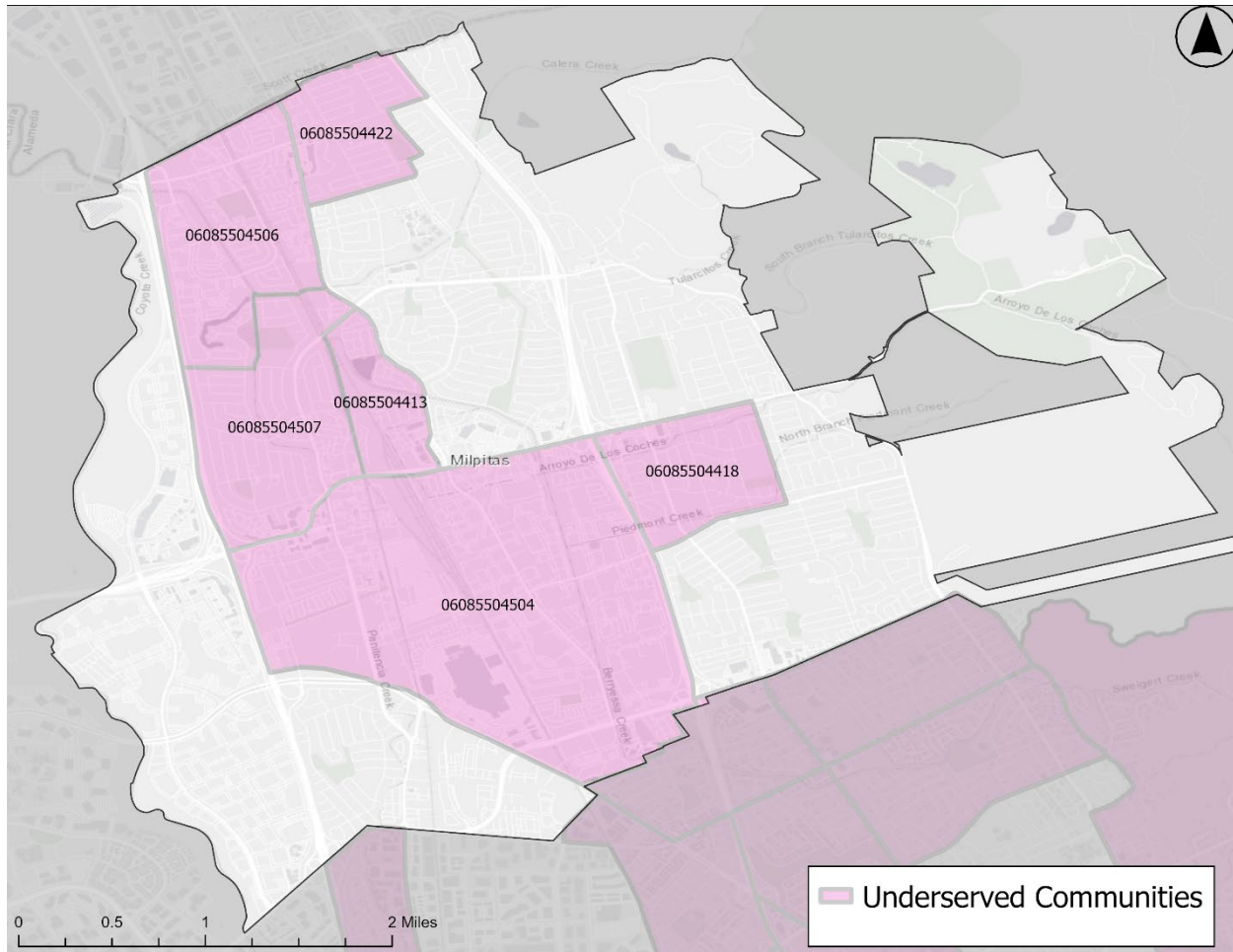
1.1. Equity Framework

This memo applies an equity approach to the safety analysis for the Safety Plan. The equity analysis supplements technical collision data analysis by identifying any correlations between equity and safety data, in accordance with federal and state guidelines. A comparative analysis between demographic and collision data provides insights on equity that can be addressed through safety improvements and infrastructure. This ensures that vulnerable and disadvantaged populations can benefit from additional safety considerations. Meeting the needs of equity populations is a critical step in equitable distribution of resources and outcomes. As such, the equity analysis aims to summarize key safety and equity findings.

1.1.1. Federal Policies

Equity analysis in transportation planning became solidified by two key federal policies: Title VI of the Civil Rights Act of 1964 and Executive Order (EO) 12898 in 1994. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Executive Order (EO) 12898 directs all federal agencies to develop an Environmental Justice strategy that, "identifies and addresses the disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." Both policies mandate transportation agencies to identify, address and serve disadvantaged communities through their work.

More recently in 2021, Executive Order 12008 was signed establishing Justice 40 with the goal that 40 percent of the overall benefits of certain Federal investments flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. Justice 40 Tract Maps and tools were utilized in the equity analysis, as well as data from the Council on Environmental Quality, as made available in the Climate and Economic Justice Screening Tool. The Climate and Economic Justice Screening Tool, shown in **Figure 1**, identifies tracts in the City that are considered disadvantaged communities.

Figure 1—Milpitas Underserved Communities

1.1.2. State Policies

California SB 535 (2012) directs investments of cap-and-trade funds towards "Disadvantaged Communities" (DACs). The SB 535 Disadvantaged Communities map (2022) was established to identify DACs throughout the state of California.

The equity analysis conducted as part of the memo initiated with an analysis of the 2022 California Environmental Protection Agency (CalEPA) SB 535 Disadvantaged Communities Map, 2022 Justice 40 Tracts Map, and the Climate and Economic Justice Screening Tool to determine if any tracts within the city were considered disadvantaged communities.

1.2. Methodology

For the purpose of this memo, equity demographics and collision data were analyzed. The equity analysis builds on the crash data analysis from the Citywide Travel Safety Plan drafted by Kimley-Horn as part of the Safety Plan development process. This analysis forms the basis for equity policy and program recommendations provided in this memo.

Demographic data for the city's population was collected from the United States Census American Community Survey (US ACS) 5-year estimates for 2022 for total population by race/ethnicity, age, and income to identify equity communities within the city. Age was included in the demographic data to capture the city's young and aging populations.

2.   UNDERSERVED COMMUNITIES

Milpitas is located within an urbanized area with a population of approximately 80,273[1] as of 2020. The US DOT Underserved Communities map[2] demonstrates that the City includes a historically disadvantaged census tract in the heart of the City. This census tract is disadvantaged in terms of health, economics, equity, and resiliency, and is located along established school routes for Curtner elementary school. The Safety Plan proposes improvements at the intersection of Abel Rd and N Milpitas Blvd along this school route.

The City of Milpitas contains numerous census tracts that are identified as disadvantaged in the Climate and Economic Screening Tool[3]. According to the screening tool, approximately 45% of the City's population lives in disadvantaged census tracts. **Table 1** below presents a description disadvantaged census tracts located in Milpitas. The locations of the census tracts identified in the table are presented in **Figure 1**.

Table 1: Disadvantaged Census Tracts

Census Tract	Population	Disadvantaged Description
06085504422	3,849	Linguistic isolation, High school education, Projected wildfire risk, PM2.5 in the air, Traffic proximity and volume,
06085504506	7,088	Projected flood risk, PM2.5 in the air, Lack of green space, Traffic proximity and volume, Linguistic isolation, High school education
06085504507	6,459	Projected flood risk, PM2.5 in the air, Proximity to hazardous waste facilities, Traffic proximity and volume, Linguistic isolation, High school education
06085504413	1,981	Projected flood risk, PM2.5 in the air, Proximity to hazardous waste facilities, Linguistic isolation, High school education
06085504504	12,367	PM2.5 in the air, Lack of green space, Proximity to hazardous waste facilities, Linguistic isolation, High school education
06085504418	5,115	PM2.5 in the air, Proximity to hazardous waste facilities, Traffic proximity and volume, Linguistic isolation, High school education
Total	36,859	

---

[1] SS4A Underserved Communities Census Tracts (Historically Disadvantaged Communities), US DOT, Accessed January 2024
[2] SS4A Underserved Communities Census Tracts (Historically Disadvantaged Communities), US DOT, Accessed January 2024
[3] Climate and Economic Screening Tool, US DOT, Accessed January 2024

3.   DEMOGRAPHIC AND SOCIOECONOMIC ASSESSMENT

The City of Milpitas is home to a notably diverse population. This section reports on demographics data collected from the US Census Bureau. In terms of race and ethnicity, Asian people make up the largest segment of the population at 69.9%, followed by persons of Hispanic or Latino descent at 13.5% and White people at 13.3%[4].

The foreign-born population of Milpitas is 57.9%, significantly higher than the 26.7% Statewide level. More than half of the foreign-born population are naturalized US Citizens. Seventy-four percent of households speak a language other than English at home—thirty-percent higher than the 44% Statewide level. Given the diversity of languages spoken by its residents, the City should consider translating its traffic safety materials so that they are more accessible to community members.

According to census data accessed from MTC's Bay Area Vision Zero System (BAYVIZ), only 0.7% of workers in Milpitas walk to work, and 0.3% commute by bike[5]. The City aims to increase the mode share for these active modes of transportation by making the City's roadway network safer through both infrastructure improvements, education, and engagement. The improvements to the City's roadway network identified in the Safety Plan will benefit residents, students, and individuals who travel across the City to access destinations. The safety improvements included in this project will serve to mitigate disparity by increasing the safety for residents that commute via active transportation.

4.   SCHOOL EQUITY ASSESSMENT

The Milpitas Unified School District contains 11 public elementary and middle schools, as well as the Milpitas High School. Student safety is a top priority for the school district, which drafted a Safe Routes to School Plan in 2011 and coordinates with PD for crossing guards to be stationed at each school. The City collected pedestrian counts at school intersections in 2022 and also performed field observations regarding traffic safety at each of the schools. Improvements were then developed for each of these locations. The City also coordinated with the school district for feedback, and incorporated these suggestions into the set of improvements. **Figure 2** presents the locations of the schools and the project locations as they intersect the City's underserved communities and the existing routes to school. Approximately 58% of the school safety improvements identified by the City during the School Safety Study are located in disadvantaged communities.

Students at these Milpitas schools are racially and ethnically diverse, introducing opportunities for meaningful outreach and education. According to the Milpitas School Accountability Report Card (SARC), the schools in Milpitas have a high concentration of students belonging to minorities. For example, the student population at Randall Elementary is approximately 73.6% Hispanic or Latino, followed by 11.3% Asian and 8.8% Filipino[6]. Milpitas High School, which has the largest enrollment of any school in the City at 3,026, has a student body that is 51.8% Asian, 19.7% Hispanic or Latino, and 17.2% Filipino[7]. These populations will benefit from the improvements identified in Safety Plan and the supplemental school safety improvements.
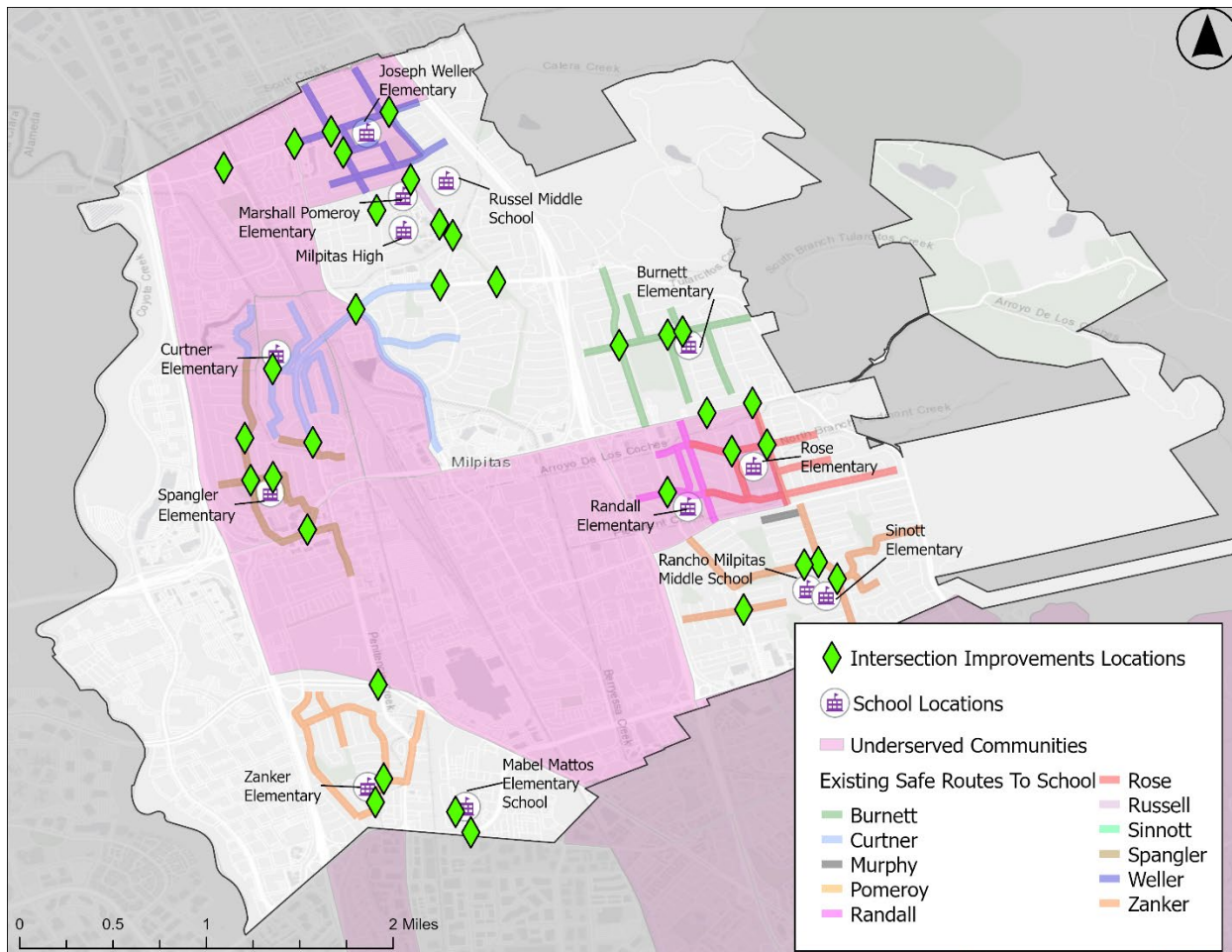
---

[4] City of Milpitas, US Census Bureau, July 1, 2023
[5] City of Milpitas BAYVIZ Dashboard, MTC, Accessed 2023
[6] Robert Randall World Languages School, 2022-2023 School Accountability Report Card, Milpitas Unified School District, 2023
[7] Milpitas High School, 2022-2023 School Accountability Report Card, Milpitas Unified School District, 2023

Figure 2—Underserved Communities and Milpitas Unified School District

Data from the California School Dashboard reports that 22.2% of students at Milpitas schools are English learners[8]. The School District can better serve these student groups by offering educational and outreach materials in additional languages; materials translated into Chinese, Filipino, and Spanish would be beneficial to reach the widest possible student body.

Free or Reduced-Price Meal (FRPM) Data from the California Department of Education was reviewed for the public schools in Milpitas. Approximately 28% of students at Milpitas public schools are eligible for free or reduced price lunches[9]. To provide some specific examples, fifty-nine percent of the students at Robert Randall Elementary School being eligible for free or reduced price lunches, and 44% are eligible at Alexander Rose Elementary. School safety improvements have been developed for both of these schools with the objective of prioritizing these socioeconomically disadvantaged students.

Data from the California School Dashboard also reported that chronic absenteeism is high among students in the Milpitas Unified School District[8]. Thirteen percent of students were marked as

---

[8] District Performance Overview, California School Dashboard, Accessed April 2024
[9] Free and Reduced Price Meal Eligibility Data, California Department of Education, December 2023

chronically absent, meaning they were absent for 10% or more of the instructional days for which they were enrolled. The absenteeism rate is highest among students of Hispanic race/ethnicity, unhoused students, socioeconomically disadvantaged students, and students with disabilities. For numerous potential reasons, school attendance is either not feasible for these students or not a priority for their families. Providing these students with safer routes to school or engaging with their families in an equitable manner may improve this rate of chronic absenteeism at Milpitas schools.

5.   PUBLIC ENGAGEMENT SUMMARY

The City reached a broad cross-section of the community via online and in-person outreach during the development of the Safety Plan. The plan included two main rounds of engagement, the first of which focused on identifying corridor and intersection safety needs and opportunities. An online public meeting held on March 15, 2023 through Zoom, launching the first round of online public input (March 15, 2023 through April 28, 2023). A project website was developed to host a survey and an interactive map, through which residents could submit their feedback and concerns regarding public safety. A second in-person public meeting was held at the Milpitas Library in the evening of May 17, 2023, allowing community members to review priority locations and the City's countermeasure toolbox.

With over 1,000 total page visits, the online engagement resulted in a total of 98 survey respondents. Approximately 300 unique users visited the interactive website and 80 site-specific comments were recorded. Sixteen individuals completed the travel survey, 75 left comments on the map, and 13 completed the countermeasure survey. The public meeting and online survey were promoted through the City of Milpitas' various communication channels, including a webpage, Milpitas Matters e-newsletters, Twitter, Next Door, and Facebook.

Community members requested improved pedestrian and cyclist infrastructure and reported locations where vehicle speeding had been observed. Traffic calming measures and countermeasures to protect vulnerable road users were strongly supported by the community members. The City received input from a number of residents, each of which was reviewed and assessed in the study. City staff identified locations to analyze and to provide appropriate project recommendations. Field visits along with guidance from City staff provided first-hand insight into the challenges roadway users face throughout the City.
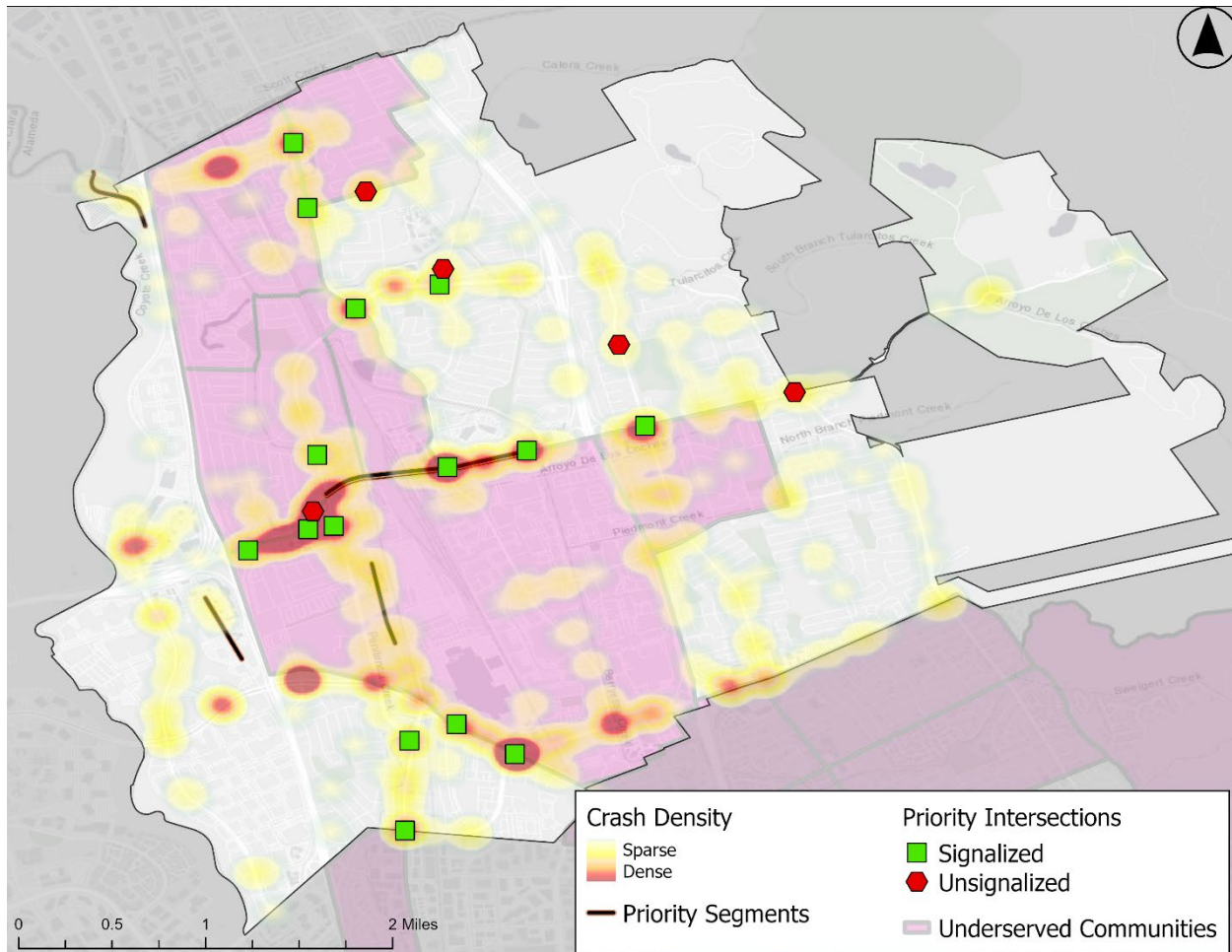
6.   CRASH DATA EQUITY REVIEW

Crash data from UC Berkely's Transportation Injury Mapping System (TIMS) ranging from 2017-2021 was reviewed in the Safety Plan. Approximately 45% of all crashes in the study period occurred within disadvantaged communities. Sixty-percent of fatal crashes occurred within underserved communities; this amount is disproportionately high, given that underserved communities only house 45% of the population and cover 35% of the City's footprint. Residents who live, work in, and travel through these underserved communities are unfairly burdened by injury crashes compared to the rest of the City.

Figure 3 presents a map of the underserved communities in relation to crash density. Crashes are densely clustered around Calaveras Blvd and N Milpitas Blvd, which meet at the West side of the City within the underserved communities. Dixon Landing Rd and Great Mall Pkwy also have higher concentrations of crashes and are located within and bordering underserved communities. **Figure 3** also presents the priority locations identified in the Safety Plan. Seventeen of the twenty-five priority locations (68%) are located within or bordering disadvantaged communities, with 63%

of the total investment associated with these improvements going to disadvantaged communities. The projects at these locations will benefit the residents of these communities, and also the diverse community that relies on this roadway network daily.

Figure 3—Underserved Communities and Milpitas Unified School District

School safety is a top priority for the City of Milpitas. A review of the crash data reveals that 60% of school route-related crashes occurred in or on the boundary of disadvantaged communities (school route-related crashes including crashes on official school route corridors and at school priority intersections).
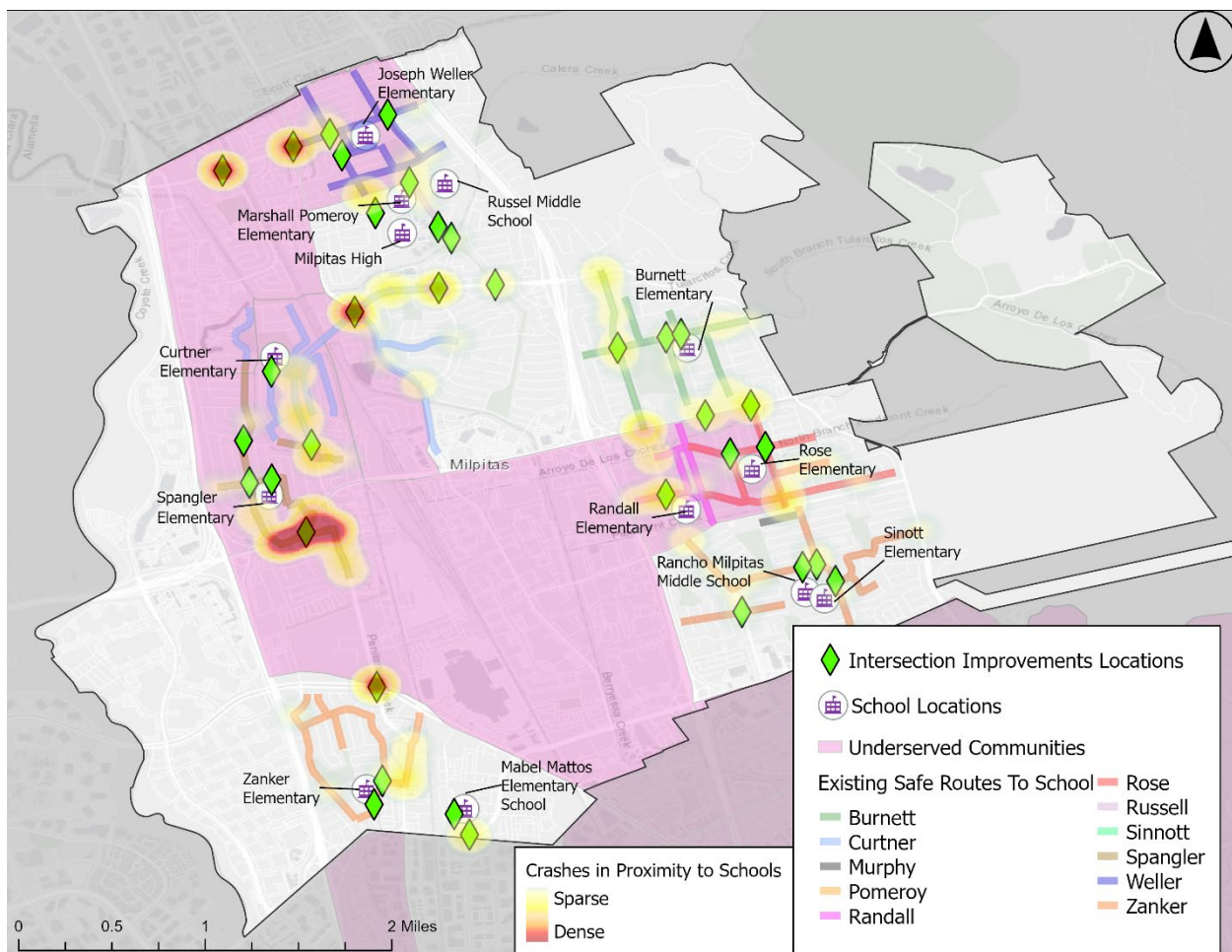
In recent years there have been a number of high-profile bike and pedestrian crashes which have resulted in fatalities and severe injuries on the City's school route network. There was a fatal bicycle crash in 2021 near the Burnett Elementary School regarding a child cycling with his family. Beyond the study period of the Travel Safety Plan (which ended in 2021), there have been a number of fatal and severe injury crashes in the city involving vulnerable road users. In 2022 there was a severe injury crash involving an elderly pedestrian crossing the road near Sinnott Elementary School. In 2023, there was a severe injury crash involving a young driver driving at an unsafe speed outside of Curtner Elementary School. In 2023 on the Weller school route, there were two crashes which resulted in severe injuries for cyclists. A fatal crash involving an elderly pedestrian also occurred in 2023 at the intersection of Abel St and

Calaveras Blvd by Spangler elementary school, and an additional severe injury pedestrian crash occurred at the intersection of Great Mall Pkwy and S Abel St by Zanker Elementary School. These locations were all previously identified in the Safety Plan as locations needing improvements, as a result of the data driven analysis used. The persistent pattern of K+SI crashes occurring at these locations since the completion of the Plan reinforces the need for improvements at these locations.

Figure 4 presents the concentration of crashes along school routes in the City. Many of the high crash locations are in underserved communities. **Figure 4** also presents the locations of the proposed improvements at the school priority locations. Approximately 58% of the school safety improvements are located in disadvantaged communities; accordingly, 59% of the funds for these improvements will be invested in these disadvantaged communities.

Figure 4—Milpitas Underserved Communities and Project Locations

The City is also higher than the statewide average for crashes involving aggressive driving, which includes driving at unsafe speed, following too closely, and disregarding traffic signals and signs. Milpitas is regionally used as a cut-through for drivers travelling to San Jose or other Silicon Valley destinations, and experiences a high concentration of aggressive driving crashes along its major

arterials and expressways. The City bears the brunt of regional cut-through traffic and aggressive driving-related crashes especially along Calaveras Blvd, Great Mall Pkwy and Montague Expy.

In addition to these commute corridors, aggressive driving behavior has also been observed along school routes during field work for the Safety Plan; this is largely related to parents dropping off and picking up their children at schools. Conversations with crossing guards and school staff also reinforced that driver behavior is problematic outside of these schools. It is recommended that the City update its 2011 Safe Routes to School (SRTS) Plan; as part of the update to the SRTS plan, the City can renew its outreach and education efforts to reach both students and their families. Programs such as a walking school bus, cyclist training and yard signs on school routes will be an effective means to reach the public as a supplement to the engineering countermeasures established in the Safety Plan.

All of the improvements identified in the Safety Plan will benefit the underserved communities that rely on Milpitas' transportation network. Beyond that, more than half of the improvements proposed by the Safety Plan will be implemented in census tracts defined as disadvantaged. Key populations that are represented in the City include students, non-English speakers, socioeconomically disadvantaged families, senior citizens, people of color, and persons with disabilities. The high degree of overlap between underserved communities and the proposed improvements at high-crash density locations demonstrates the City's dedication to improving safety and livability for all of its residents.