



METRO SOUTH RECYCLING AND TRANSFER CENTER

# Siting Area Racial Equity Analysis

## Introduction

Metro is working to build a new facility to complement and expand the garbage and recycling services currently offered at the Metro South Transfer Station in Oregon City. The new facility will become the Metro South Recycling and Transfer Center. To find a suitable location for the new facility, Metro is following a process to look at potential sites in the main industrial and commercial areas in and around north Clackamas County and small portions of southeast Multnomah County.

The process to build the new facility is guided by a core set of Metro plans aimed at advancing racial equity, diversity and inclusion in the greater Portland metropolitan region:

### Policy Guidance

#### **Metro's Strategic Plan to Advance Racial Equity, Diversity and Inclusion**

Adopted in 2016 by the Metro Council, this plan sets five goals focused on eliminating the disparities that people of color experience, especially in those areas related to Metro's policies, programs, services and destinations.

#### **2030 Regional Waste Plan**

Adopted in 2019 by the Metro Council, is the blueprint that sets direction for the Metro region's garbage and recycling system. The plan's goals and actions aim at reducing the environmental and health impacts of products and advancing racial equity when it comes to sharing of the costs and benefits of the regional garbage and recycling system.

#### **Waste Prevention and Environmental Services Department – Diversity, Racial Equity and Inclusion (DEI) Work Plan (2018-2022)**

This plan is the department-specific tool that supports implementation of Metro's broader plans to advance racial equity. The plan centers around nine strategies that cover the department's various roles in solid waste reduction, regulation, management, planning and policy.

In particular, three of the goals set in the Strategic Plan to Advance Racial Equity, Diversity and Inclusion direct Metro staff and leaders to meaningfully engage communities of color (Goal B), to create safe and welcoming services, programs and destinations (Goal C) and to apply equity decision-making tools to ensure Metro resources and investments advance racial equity (Goal E).

The 2030 Regional Waste Plan's principles specifically call for action to repair past harms and disproportionate impacts caused by the regional solid waste system (Community restoration principle), for developing authentic partnerships and community trust to advance the plan's vision (Community partnerships principle) and to emphasize resource allocation to communities of color and historically marginalized communities (Community investment principle).

Among its many objectives, the Waste Prevention and Environmental Services Department's DEI Work Plan directs staff to meaningfully engage communities of color and partner with community-based organizations to advance racial equity (Strategy 2) and to apply racial equity analysis tools to the department's work with the goal of providing services equitably, with a priority on communities of color (Strategy 3).

Based on this guidance, Metro staff conducted a racial equity analysis of the siting area for the Metro South Recycling and Transfer Center. The purposes of the analysis is:

- To better understand the demographic characteristics of the communities in the siting area, particularly people of color
- To inform the project team's efforts to meaningfully engage communities of color in the siting area
- To help identify potential disproportionate impacts on communities of color and low income populations from the siting of the new facility
- To help identify outcomes, strategies and accountability mechanisms that ensure communities of color benefit from the new facility

### **Structure of the report**

The analysis summarized in this report is divided into two sections. Section I presents an overview of the siting area in terms of the concentration of people of color and people with low incomes. To help in the analysis, the siting area is broken down into five subareas based roughly on the location of major industrial corridors and population centers.

Section II provides more detailed profiles of each of the five subareas with the siting area in terms of five demographic indicators, population density and the distribution of industrial and commercial land. The subarea profiles focus on potential disproportionate impacts on communities of color and people with low income living near industrial and commercial areas. In instances in which building a solid waste facility in areas adjacent to or near residential areas cannot be avoided, the report offers some recommendations to help mitigate any potential impacts, particularly if they disproportionately burden communities of color and low income populations.

These sections are followed by a description of the methodology used and its limitations, and two appendices with full maps of the siting area showing areas of land zoned for industrial and commercial purposes and population density.

## **Section I**

### **Race and income in the siting area**

## People of color

Figure 1 shows a map with the estimated percentage of people of color in each census tract within the siting area and its five subareas. The map uses US Census Bureau statistics and the definition of people of color is based on the race and ethnicity categories the agency uses to collect the data. People of color are those who identify with one or more of the following categories:

- American Indian and Alaska Native
- Asian
- Black or African American
- Hispanic or Latino
- Native Hawaiian and Other Pacific Islander
- Other race (other than “White alone”)
- Two or more races

The map shows the census tracts with higher concentrations of people of color are in the:

- Springwater subarea around the Lents neighborhood and along Southeast 82<sup>nd</sup> Avenue (Highway 213) between Southeast Flavel Street and Southeast Sunnyside Road,
- 212/224 subarea in Clackamas County.

In most of the census tracts in these two subareas, people of color make up between 27 and 55 percent of the population.

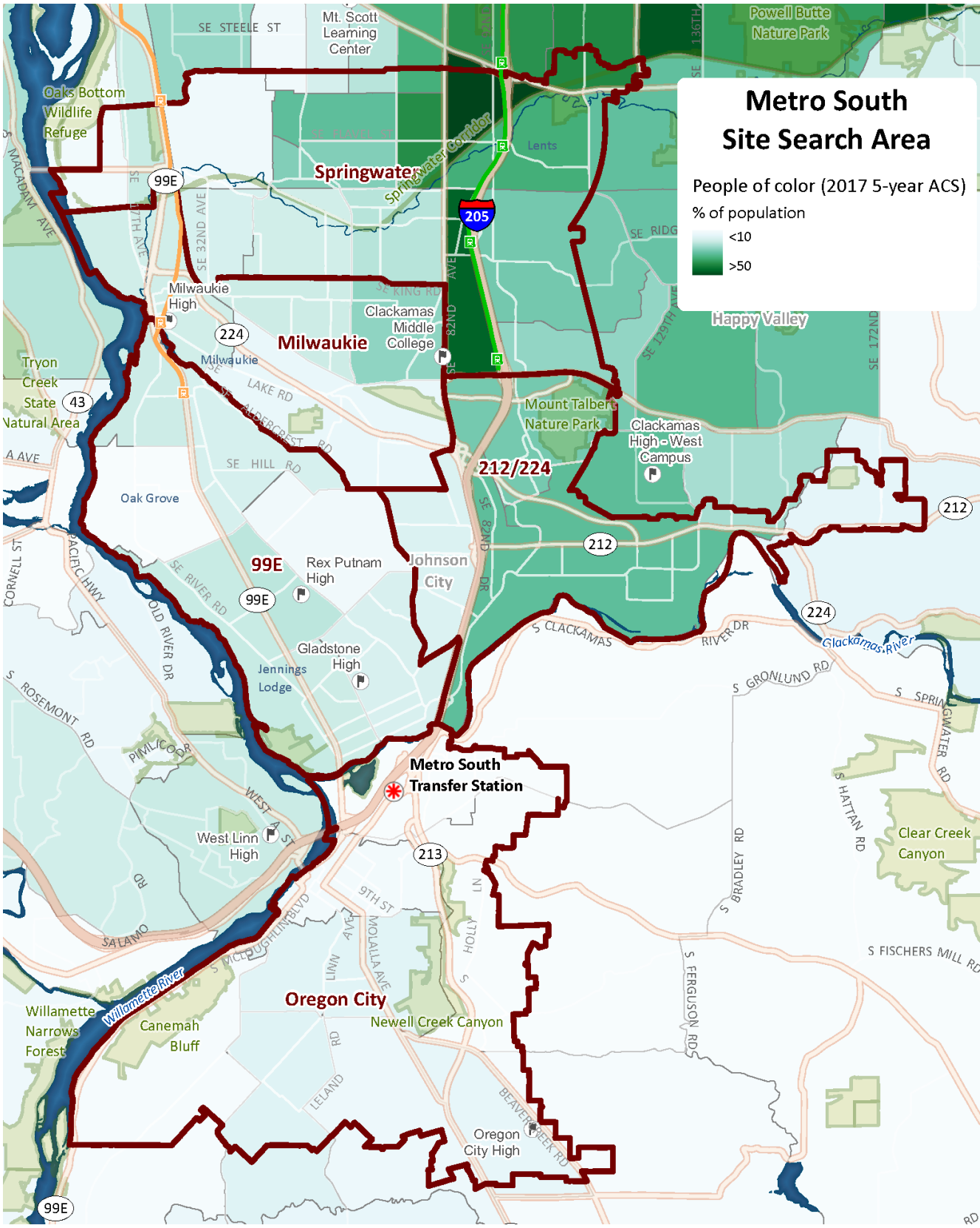
For comparison, the percentage of people of color in Clackamas County is 17 percent, 20 percent in the overall siting area and 28 percent in the Metro region, which includes 24 cities and some urban unincorporated areas in Clackamas, Multnomah and Washington counties.

As Table 1 shows, on average, the three largest communities of color in the siting area are people who identify as being of Hispanic, Latino or Spanish origin, as Asian and those who identify with another racial category not listed by the Census or with more than one race.

**TABLE 1**  
**People of color in the siting area**

Total population	184,500	100%
<b>People of color</b>	<b>37,300</b>	<b>20%</b>
American Indian and Alaska Native	1,200	< 1%
Asian	7,800	4%
Black or African American	3,000	2%
Hispanic or Latino	18,600	10%
Native Hawaiian and Other Pacific Islander	413	< 1%
Other race/Two or more races	6,200	3%

**FIGURE 1**  
**Metro South Recycling and Transfer Center project – Siting area**  
 % people of color, by census tract



## People with low incomes

To identify where people with low incomes are likely located in the siting area, this report uses Census data on the percentage of people who live in households with incomes below two times the federal poverty level. This definition includes people who are considered to be living in poverty according to the definition of poverty used by federal government agencies, as well as those whose incomes are somewhat higher.

The report uses this broader measure of low income populations because the federal poverty level is typically very low compared to the cost of living in the Metro region. In 2020, for example, a family of three in Oregon is considered to be poor if it has an annual income of less than \$21,720, according to the federal poverty level issued by the US Department of Health and Human Services. By comparison, according to data reported in Metro's Regional Barometer, the median rent for a two-bedroom unit ranged between \$17,460 and \$19,090 per year in Clackamas County.<sup>1</sup> The high cost of rent alone means families with incomes as high as two times the federal poverty level often pay more than 30% of their income on housing, which is a common standard for a family to be considered "housing cost-burdened."

Figure 2 below shows a map of the estimated percentage of people with low incomes in the siting area by census tract and subarea. The map shows higher concentrations of people with low incomes in some parts of the Springwater and the 212/224 subareas, largely coinciding with areas with high concentrations of people of color, as discussed in the previous section (see Figure 1). The percentage of people with low income in some tracts within these areas range between 40 and 53 percent. This result aligns with many researchers' findings that people of color, on average, tend to have lower incomes.

At the same time, the map in Figure 2 shows there are pockets of relatively high concentrations of low income populations in the other subareas too, in the range of 20 to 30 percent, including the:

- Milwaukie subarea, along Southeast 82<sup>nd</sup> Avenue
- 99E subarea, along McLoughlin Boulevard (Highway 99E) south of the Oak Lodge Library
- Oregon City subarea, along Molalla Avenue south of Division Street and the McLoughlin Historic Conservation District

On average, the siting area has a similar concentration of people with low income as the Metro region (30 percent) and higher than for Clackamas County (23 percent).

---

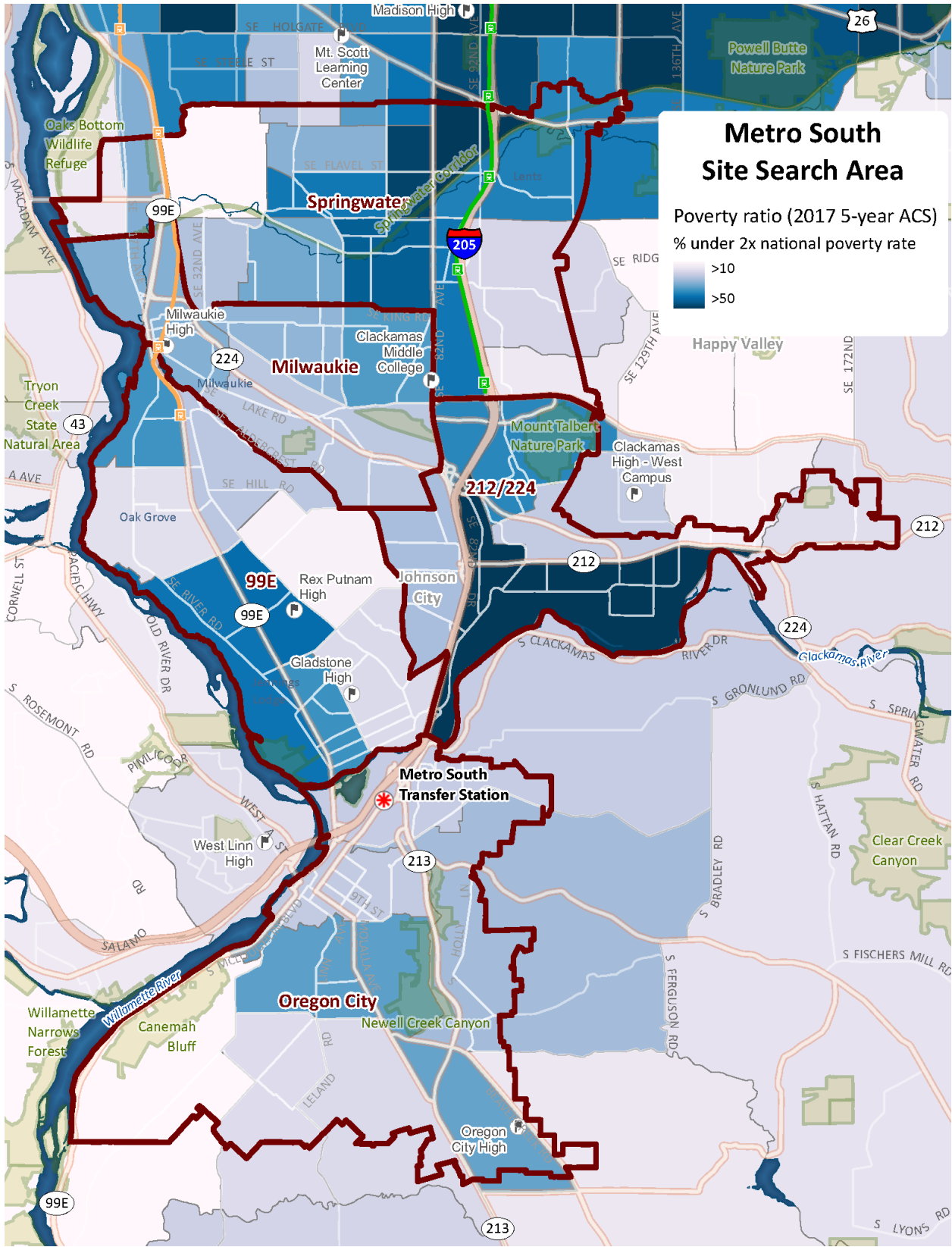
<sup>1</sup> Metro. Regional Barometer. Last accessed online on 10/29/2020 at: <https://regionalbarometer.oregonmetro.gov/pages/communities-housing>.



**FIGURE 2**

**Metro South Recycling and Transfer Center project – Siting area**

% population with household income under two times the federal poverty level, by census tract





## **Section II**

### Subarea profiles



## Springwater subarea

The Springwater subarea sits on the northernmost part of the siting area and includes communities in both Clackamas and Multnomah counties. The subarea extends from the Sellwood Bridge and the Sellwood-Moreland neighborhoods on the west, to the intersection of Southeast Foster Road and Southeast 111<sup>th</sup> Avenue in the Lents neighborhood in the northeast corner and Clackamas Town Center on the southeast.

The Springwater Corridor Trail for pedestrians and bicycles runs through the subarea, from the Oaks Bottom Wildlife Refuge to the Lents neighborhood, continuing outside the siting area on to Gresham and Boring. The Springwater corridor also includes the industrial corridor along Southeast Johnson Creek Boulevard and a significant portion of the Southeast 82<sup>nd</sup> Avenue transportation corridor.

### Demographic indicators

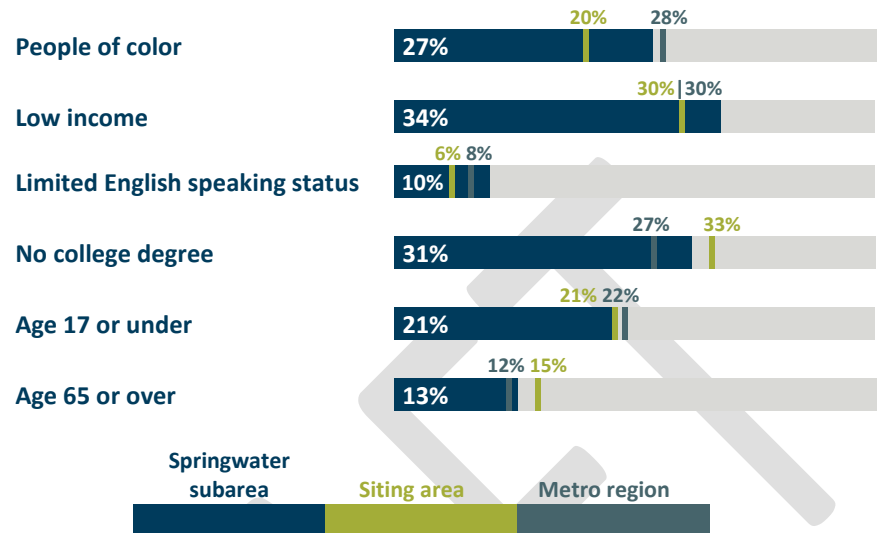
The Springwater subarea has an estimated population of 69,600 and is the largest of the five subareas, accounting for 38 percent of the total population in the siting area. The subarea also has the highest concentration of people of color (27 percent) of all five subareas, but in line with the Metro region average of 28 percent. In absolute terms, the Springwater subarea also has the highest total number of people of color (an estimated 18,700 people). Communities of color in this subarea are more highly concentrated in and around the Lents neighborhood and the Southeast 82<sup>nd</sup> Avenue area.

People who identify as Hispanic or Latino (12 percent) and those who identify as Asian (8 percent) make up the two largest communities of color in the Springwater subarea. Compared to the siting area averages, the subarea also has higher percentages of people in the Other race/Two or more races category (4 percent) and people who identify Black or African American (2 percent). The percentage of people who identify as American Indian and Alaska Native and those who identify as Native Hawaiian and Other Pacific Islander (less than 1 percent) are more or less in line with the averages for the siting area as a whole.

#### RACE/ETHNICITY

Total population	69,600	100%
<b>People of color</b>	<b>18,700</b>	<b>27%</b>
American Indian and Alaska Native	400	< 1%
Asian	5,400	8%
Black or African American	1,400	2%
Hispanic or Latino	8,300	12%
Native Hawaiian and Other Pacific Islander	200	< 1%
Other race/Two or more races	3,000	4%

Compared to the siting area and Metro region averages, the Springwater subarea has a higher percentage of people with low income (34 percent) and this figure tends to be higher in census tracts along Southeast 82<sup>nd</sup> Avenue – more than 38 percent and up to 53 percent. The other indicators in the table below are more or less similar to the siting area and Metro region averages.



**Facility siting opportunities**

A majority of the properties zoned for commercial and industrial uses in the Springwater subarea are concentrated along three major corridors: the Johnson Creek Boulevard Industrial Area, Southeast 82<sup>nd</sup> Avenue and the Southeast Foster Road.

The Johnson Creek Boulevard industrial corridor has a mix of properties zoned for commercial and industrial uses. Some properties within this industrial corridor are within Milwaukie and Portland city limits, while others are in unincorporated Clackamas County. Some of the properties in this corridor would be suitable for siting a full-size transfer station because of their size (more than 7 acres) and designated use for heavy industrial/manufacturing uses. Some of these properties are buffered from residential areas by other commercial and industrial properties and by green spaces such as the Tideman Johnson Natural Area, but the rest are adjacent or in close proximity to mostly single family homes, the Springwater Corridor Trail and other community assets.

The cluster of properties along Southeast 82<sup>nd</sup> Avenue consists mostly of smaller properties zoned for commercial and mixed uses. The subarea has some larger commercial properties near the southern portion around the intersection with Johnson Creek Boulevard and a few small properties zoned for industrial uses to the north, around the intersection with Flavel Street. Due to their size and zoning, most of the properties in this corridor are not likely to be well suited for the proposed Metro South Recycling and Transfer Center. Most, if not all, of these properties are located next to residential areas with higher density than other parts of the siting area.

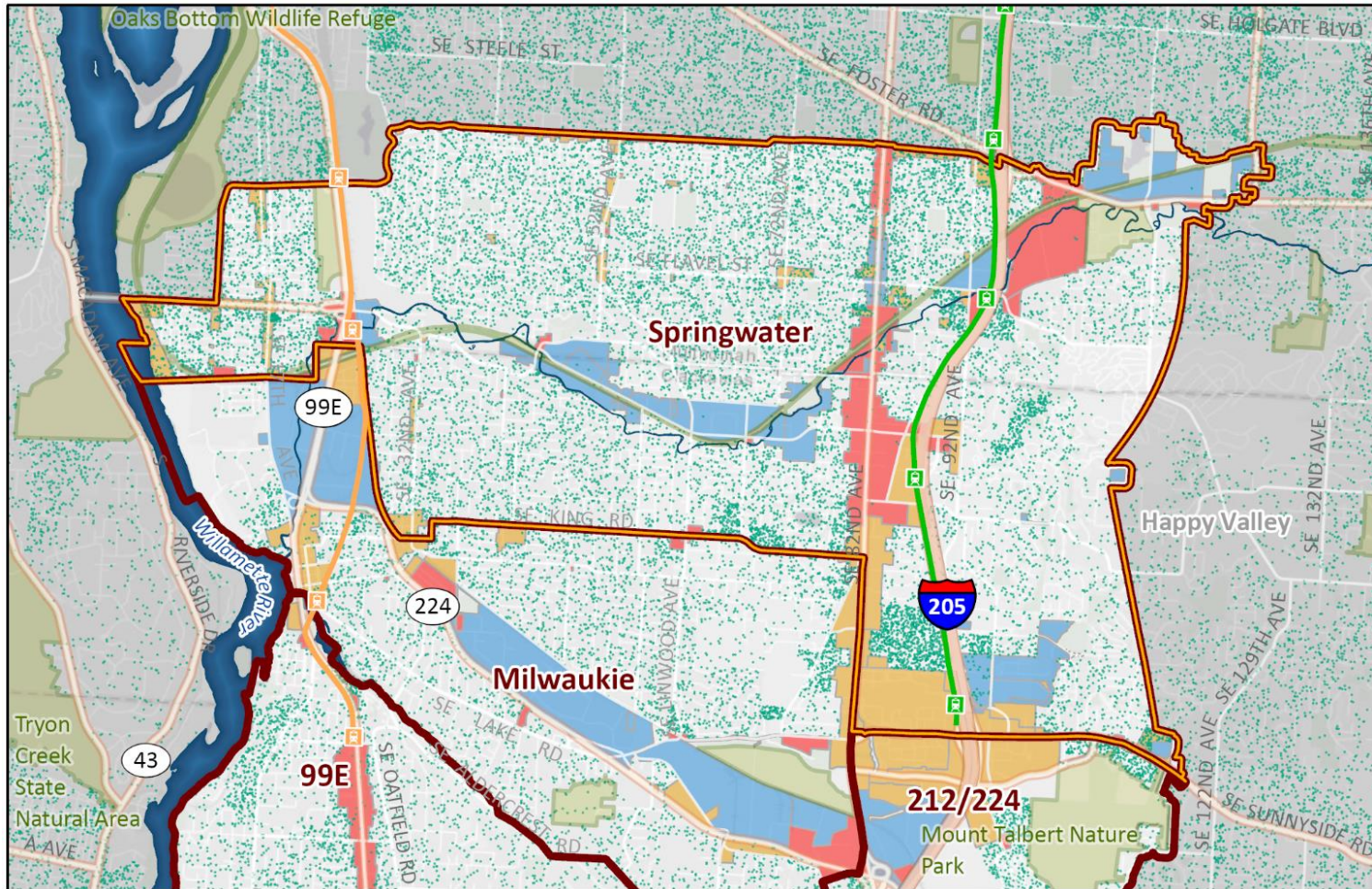
The third cluster of commercial and industrial properties in the Springwater subarea is located along Southeast Foster Road in the Lents neighborhood between I-205 and Southeast 122<sup>nd</sup> Avenue. This corridor has a small number of commercial and industrial properties, with a few that are over 15 acres in size. Some of the properties in this area are partially or fully buffered from residential areas by wetlands, Johnson Creek and natural areas such as the Beggars Tick Wildlife Refuge. Other properties, however, are directly adjacent or near residential neighborhoods and churches.

In terms of environmental justice concerns, the Springwater subarea has the highest risk in the siting area of disproportionately burdening communities of color and households with low incomes. Most of the commercial and industrial properties that are likely to be suitable for a full-size transfer station tend to be located in census tracts with the highest concentration of people of color and with low income, both as a percent of the population in those census tracts and total number of people. The subarea also offers few opportunities to find a large property that is located away from residential areas, daycare and elderly care centers, churches, schools and other community assets. If building the new facility in the Springwater subarea adjacent to or near residential areas cannot be avoided, some recommendations based on the environmental justice literature include:

- Actively involve residents who live in areas adjacent to the proposed facility in the decisions about facility design and operation and the establishment of a community enhancement program.
- Incorporate buffer spaces between the facility and the affected residential areas, such as open spaces, natural areas, fences, sound walls, trees, berms and landscaping.
- Incorporate other planning, design, engineering and operating practices and technologies to help minimize negative environmental and health impacts on the surrounding communities.
- Consider having separate, more isolated sites for the most impactful activities, such as for delivery of waste by commercial haulers, to store transfer trailers or for material recovery operations – especially if these operations occur outside regular business hours.
- Work with the affected communities to develop a good neighbor and community benefit agreements, in line with goal 13 of the 2030 Regional Waste Plan.
- Dedicate a significant portion of the community enhancement fee revenue associated with the new facility to projects in the affected communities.
- Reserve positions for representatives of the affected communities in the community enhancement grants committee for the new facility.
- Implement a program that gives priority to job applicants from affected areas such as Metro's First Opportunity program created to provide first opportunity to apply for employment at the Oregon Convention Center, Portland Expo Center and Portland's Centers for the Arts to economically disadvantaged residents who live near those facilities.
- Implement workforce development programs that include internships, apprenticeships and other job training opportunities.
- Fund college scholarship programs for residents in the affected areas, particularly for youth.



## Springwater subarea



### Legend

Relevant zoning classes

- Commercial
- Industrial
- Mixed-use

Population density

1 dot = 5 people

Springwater

Other subareas

Parks and/or Natural Areas

## Milwaukie subarea

The Milwaukie subarea includes most of the area within the City of Milwaukie's jurisdictional boundary and adjacent unincorporated areas of Clackamas County. The subarea extends from the Willamette River and McLoughlin Boulevard (Highway 99E) in the northwest to Southeast 82<sup>nd</sup> Avenue (Highway 213) and the 3-Creeks Natural Area on the east. The Milwaukie subarea includes the communities along Southeast Lake Road and Southeast Railroad Avenue and landmarks such as the North Clackamas Park, Milwaukie downtown and Milwaukie High.

### Demographic indicators

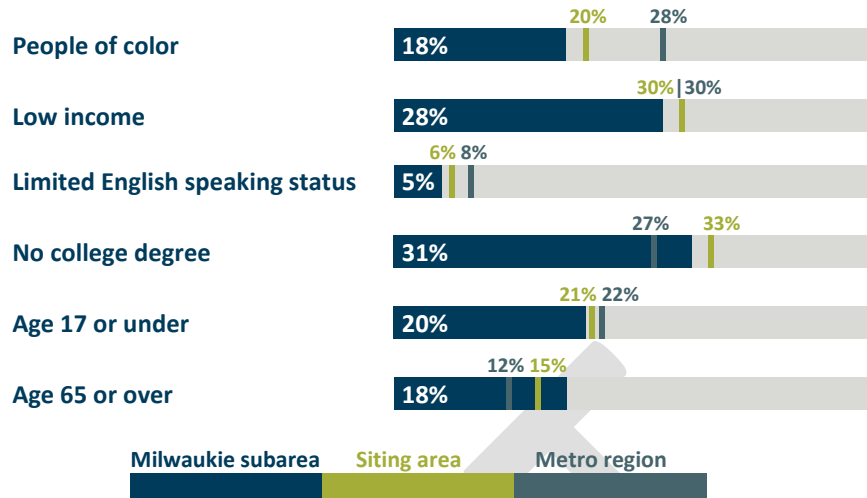
The Milwaukie subarea has an estimated population of 20,200, the second smallest population size in the siting area. People of color represent around 18 percent of the total population. This percentage is lower compared to the averages for the siting area (20%) and the Metro region (28%).

People who identify as Hispanic or Latino make up 8 percent of the total population and represent the Milwaukie subarea's largest community of color. The subarea also has the second largest community of people who identify as Asian in the siting area (5 percent). The percentages of people in the Milwaukie subarea who identify with the remaining race/ethnicity categories below are more or less similar to the siting area as a whole.

#### RACE/ETHNICITY

Total population	20,200	100%
<b>People of color</b>	<b>3,600</b>	<b>18%</b>
American Indian and Alaska Native	100	< 1%
Asian	900	5%
Black or African American	300	2%
Hispanic or Latino	1,600	8%
Native Hawaiian and Other Pacific Islander	< 100	< 1%
Other race/Two or more races	600	3%

In terms of other demographic indicators, the Milwaukie subarea has lower percentages of people with low income (28 percent), with limited English speaking status (5 percent) and of age 17 or under (20 percent) than the siting area and Metro region as a whole. On the other hand, the subarea has a higher concentration of people without a college degree (31 percent) than the Metro region (but slightly lower than the average for siting area), and a higher percentage of older adults age 65 and over than both the siting area and the Metro region.



## Facility siting opportunities

The Milwaukie subarea has a large number of properties zoned for commercial and industrial uses in two main areas. To the north, the North Milwaukie Industrial Area along McLoughlin Boulevard (Highway 99E) contains various commercial and industrial properties, including some that are currently owned and in use by public agencies such as the Oregon Department of Transportation and the Oregon Liquor Control Commission. Properties in this area tend to be large enough to accommodate a full-size transfer station and are well connected to TriMet's MAX Orange Line stops and bus routes.

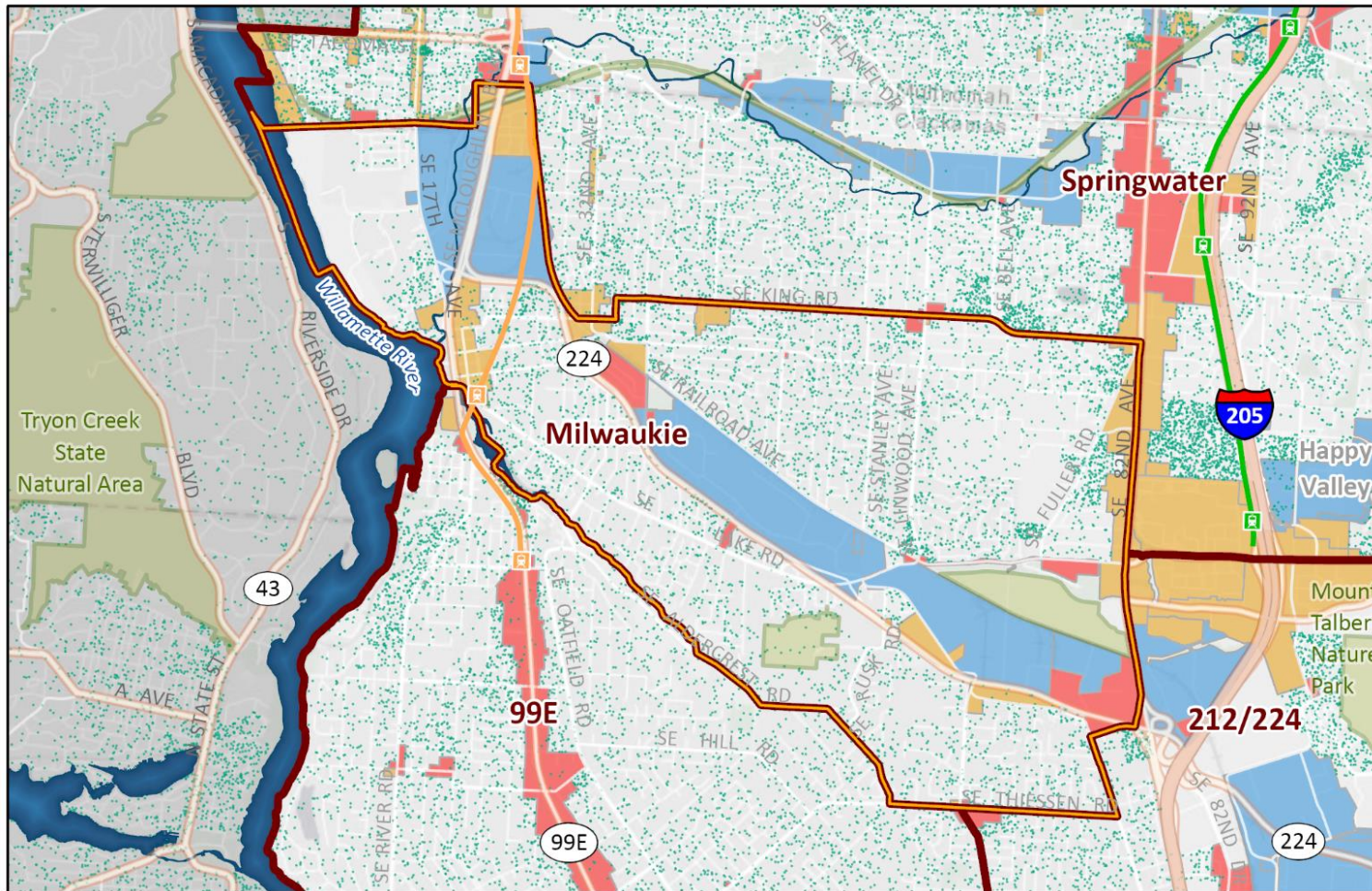
A larger cluster of commercial and industrial properties in the Milwaukie subarea is concentrated along the Milwaukie Expressway (Highway 224) in the International Way Industrial Area. This industrial area contains a significant number of large properties (more than 7 acres) that are currently zoned and used for heavy industrial activities.

Both the North Milwaukie and International Way industrial areas have a mix of properties that are buffered from residential areas by other commercial and industrial properties or by green spaces and natural areas, and other properties that are adjacent or near residential areas, schools, churches, parks, and other community assets.

In terms of environmental justice concerns, the Milwaukie subarea has a relatively lower risk of disproportionately burdening communities of color and low income groups than other parts of the siting area. The main risk factor is the potential for impacting a larger number of older adults who, in general, tend to be more susceptible to the adverse effects of exposure to pollution.



## Milwaukie subarea



### Legend

Relevant zoning classes

- Commercial
- Industrial
- Mixed-use

Population density

1 dot = 5 people

Milwaukie

Other subareas

Parks and/or Natural Areas



## Highway 212/224 subarea

The Highway 212/224 subarea includes communities around Interstate 205 (I-205) between Gladstone and Happy Valley. The main portion of the 212/224 area is the Clackamas Industrial Area along highways 212 and 224, as well as landmarks such as Camp Withycombe and the Mount Talbert Nature Park to the north. The 212/224 area also includes the City of Johnson City and unincorporated areas of Clackamas County west of I-205.

### Demographic indicators

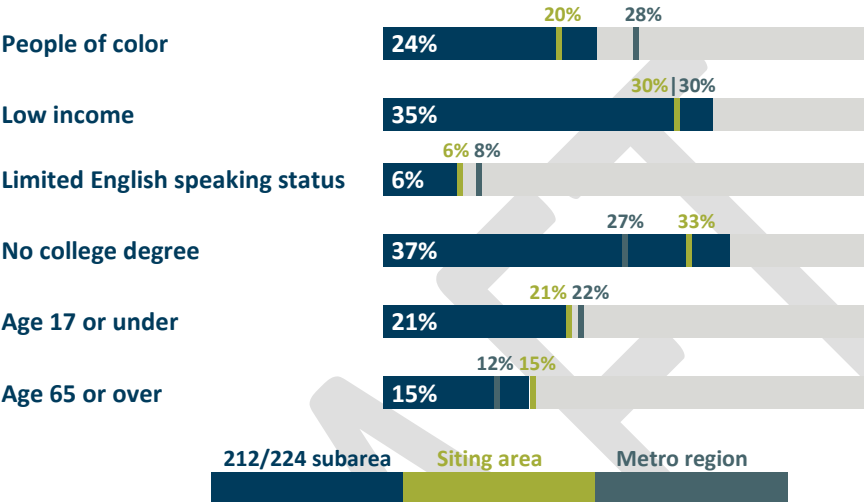
With an estimated 15,200 residents, the 212/224 subarea has the smallest population of the five subareas, while being the subarea with the second highest percentage of people of color (about 24 percent). In absolute numbers, however, the 212/224 subarea has fewer people of color than all other five subareas: an estimated 3,600 individuals.

People who identify as Hispanic or Latino are the largest group (15 percent), followed by those who identify with other races and with two or more races (4 percent) and as Asian or Black or African American (2 percent each). The 212/224 subarea has the lowest percentage of people who identify as American Indian and Alaska Native of the five subareas, while the concentration of those who identify as Native Hawaiian and Other Pacific Islander is in line with the siting area average.

#### RACE/ETHNICITY

Total population	15,200	100%
<b>People of color</b>	<b>3,600</b>	<b>24%</b>
American Indian and Alaska Native	< 100	< 1%
Asian	400	2%
Black or African American	400	2%
Hispanic or Latino	2,200	15%
Native Hawaiian and Other Pacific Islander	< 100	< 1%
Other race/Two or more races	600	4%

Compared to averages for the siting area and the Metro region, the 212/224 subarea has a higher concentration of people with low income (35%) and without a college degree (37%). The subarea has a lower percentage of people with limited English speaking status (6%) and a higher percentage of older adults age 65 and over (15%) than the Metro region, but the same as the siting area average. The percentage of youth age 17 or under (21%) in the 212/224 subarea is in line with the Metro region and the overall siting area.



### Facility siting opportunities

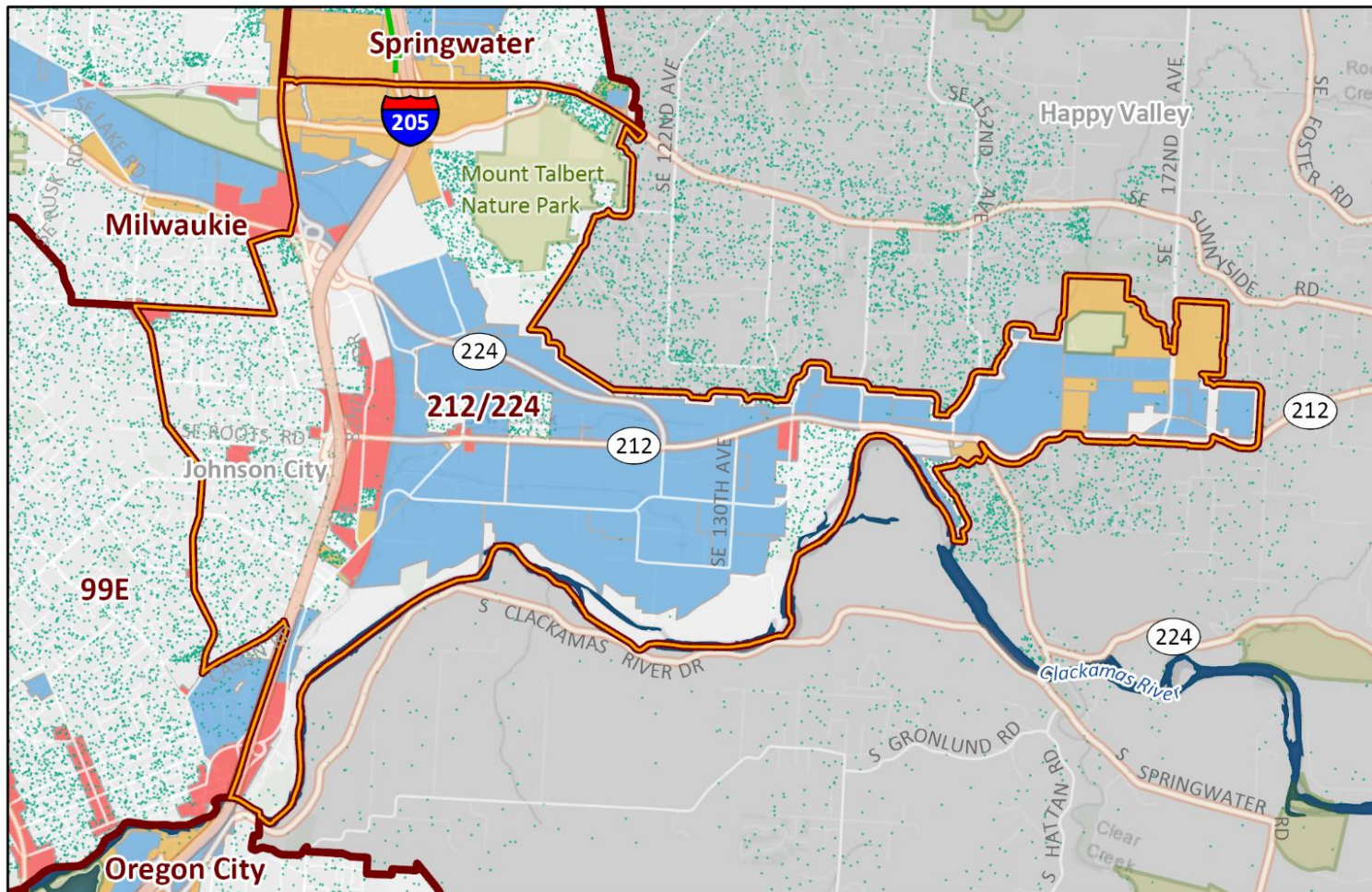
The 212/224 subarea has the largest number of properties zoned for industrial and commercial uses in the siting area. The subarea also has the highest concentration of properties that are large enough to accommodate the proposed facility (7 acres or more). Therefore, the likelihood of finding suitable properties available for sale is higher in the 212/224 than in most other subareas.

At the same time, the 212/224 subarea has higher concentrations of people of color and with low incomes. Together, these factors pose environmental justice concerns due to the risk of disproportionately burdening communities of color and low income populations with the siting of a transfer station in an area that has cumulative environmental and health impacts from historical industrial activity.

On the other hand, because of its smaller population and lower population density – especially in the Clackamas Industrial Area – the 212/224 subarea provides more opportunities to find a site that is located away from residential areas, sensitive receptors such as children and older adults, and community assets such as schools, daycare centers, parks, churches and hospitals. If building the new facility in an area adjacent or near residential areas cannot be avoided, some recommendations based on the environmental justice literature include:

- Actively involve residents who live in areas adjacent to the proposed facility in the decisions about facility design and operation and the establishment of a community enhancement program.
- Incorporate buffer spaces between the facility and the affected residential areas, such as open spaces, natural areas, fences, sound walls, trees, berms and landscaping.
- Incorporate other planning, design, engineering and operating practices and technologies to help minimize negative environmental and health impacts on the surrounding communities.
- Consider having separate, more isolated sites for the most impactful activities, such as for delivery of waste by commercial haulers, to store transfer trailers or for material recovery operations – especially if these operations occur outside regular business hours.
- Work with the affected communities to develop a good neighbor and community benefit agreements, in line with goal 13 of the 2030 Regional Waste Plan.
- Dedicate a significant portion of the community enhancement fee revenue associated with the new facility to projects in the affected communities.
- Reserve positions for representatives of the affected communities in the community enhancement grants committee for the new facility.
- Implement a program that gives priority to job applicants from affected areas such as Metro's First Opportunity program created to provide first opportunity to apply for employment at the Oregon Convention Center, Portland Expo Center and Portland's Centers for the Arts to economically disadvantaged residents who live near those facilities.
- Implement workforce development programs that include internships, apprenticeships and other job training opportunities.
- Fund college scholarship programs for residents in the affected areas, particularly for youth.

## Highway 212/224 subarea



### Legend

- Relevant zoning classes
- Commercial
  - Industrial
  - Mixed-use
- Population density
- 1 dot = 5 people
  - 212/224
  - Other subareas
  - Parks and/or Natural Areas

## Highway 99E subarea

The Highway 99E subarea covers the communities around Southeast McLoughlin Boulevard (State Highway 99E) between the cities of Milwaukie and Oregon City. The 99E subarea has an estimated population of 41,080 people and includes the City of Gladstone and the unincorporated areas of Oak Grove and Jennings Lodge.

According to a recent transportation analysis, McLoughlin Boulevard connects communities in Clackamas and Multnomah counties to jobs, housing, and transit. The corridor serves as an alternative to I-205 and other routes between Portland and Clackamas County, and has been identified by TriMet as a key corridor to increase ridership.<sup>2</sup>

### Demographic indicators

The 99E subarea has the second largest population (41,100 residents) of the five subareas. People of color represent around 15 percent of the total 99E subarea population, which is lower than the averages for Clackamas County (17 percent), the siting area (20 percent) and the Metro region (28 percent). In absolute terms, however, the 99E subarea has the second highest number of people of color (6,300) in the siting area due to its large population.

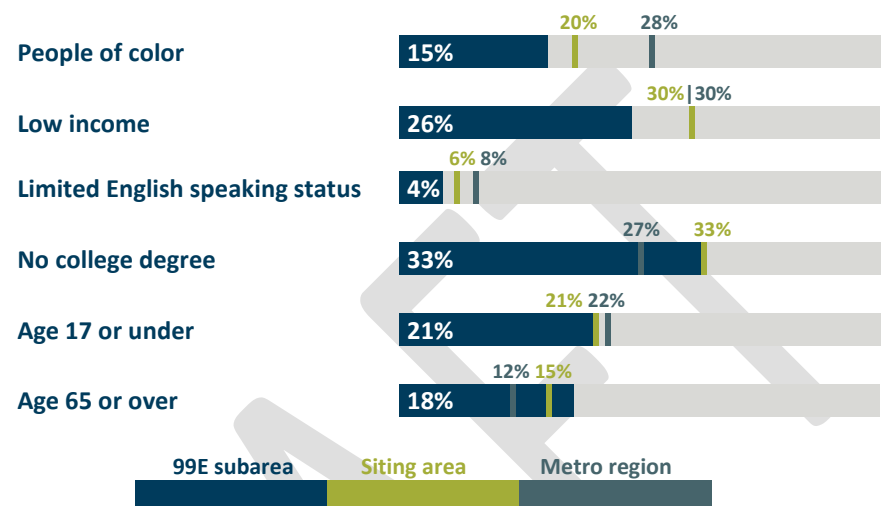
With an estimated 3,831 people identifying as Hispanic or Latino, the 99E subarea has one of the largest Latino communities in Clackamas County and the second largest in the siting area, after the Springwater subarea. Relative to the siting area as a whole, the 99E subarea has lower percentages of people who identify with each of the race/ethnicity categories below.

RACE/ETHNICITY		
Total population	41,100	100%
<b>People of color</b>	<b>6,300</b>	<b>15%</b>
American Indian and Alaska Native	300	< 1%
Asian	700	2%
Black or African American	600	1%
Hispanic or Latino	3,800	9%
Native Hawaiian and Other Pacific Islander	< 100	< 1%
Other race/Two or more races	900	2%

<sup>2</sup> Metro (2020). 2020 Transportation Funding Measure. Racial Equity Analysis: Investment Corridor Profiles. Available online at [https://www.oregonmetro.gov/sites/default/files/2020/07/08/Get\\_Moving\\_2020\\_Racial\\_Equity\\_Analysis\\_Corridors.pdf](https://www.oregonmetro.gov/sites/default/files/2020/07/08/Get_Moving_2020_Racial_Equity_Analysis_Corridors.pdf).



Compared to the siting area and the Metro region, the 99E subarea tends to have lower percentages of people with low income (26%) and with limited English speaking status (4%), and a higher concentration of older adults age 65 and over (18%). In terms of the share of adults age 25 and over without a college degree, the 99E subarea is in line with the siting area average and higher than the Metro region.



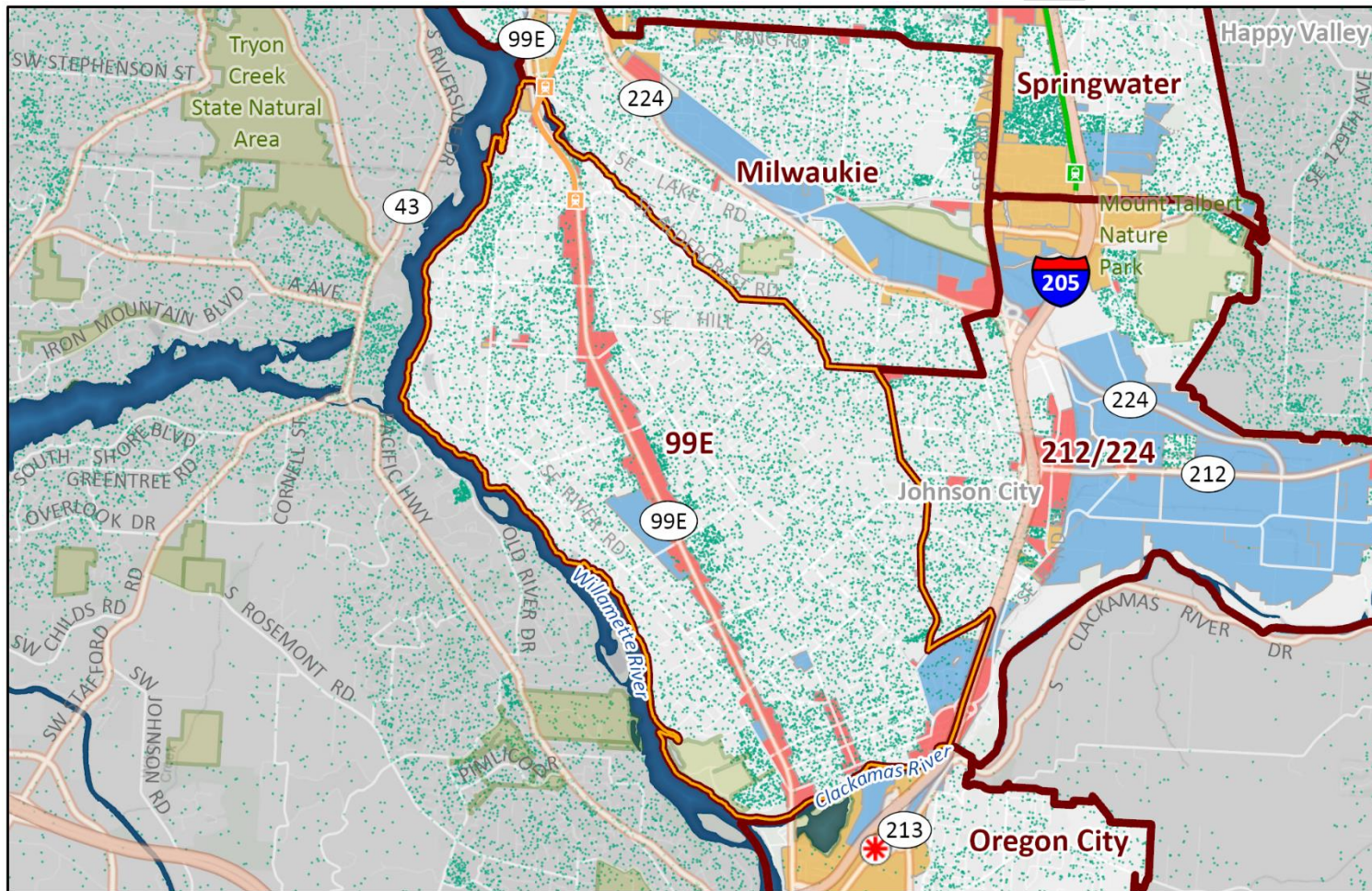
**Facility siting opportunities**

Most of the land zoned for industrial and commercial uses in the 99E subarea is located along McLoughlin Boulevard and has good access to public transit options. However, very few of these properties are large enough to accommodate the proposed facility (7 acres or more). The commercial and industrial areas are also typically adjacent to residential areas and community assets such as schools, daycare centers and churches on either side of McLoughlin Boulevard and Gladstone. This makes it difficult to find properties that have natural buffer spaces or that can be buffered with design and engineering elements such as sound walls, trees and landscaping.

Due to the limited availability of large properties and the proximity of commercial and industrial zones to residential areas, the prospects for finding a suitable site for the proposed transfer station in the 99E subarea are low.

From an environmental justice perspective, the risk of disproportionately burdening communities of color and low income populations in the 99E subarea is generally moderate, when compared to other subareas. The main risk factors in the 99E subarea are the relatively large number of people of color and a higher concentration of older adults, who tend to be more susceptible to the adverse effects of exposure to pollution.

## Highway 99E subarea



## Legend

Relevant zoning classes

- Commercial
- Industrial
- Mixed-use

Population density

- 1 dot = 5 people

■ 99E

■ Other subareas

■ Parks and/or Natural Areas



## Oregon City subarea

This subarea encompasses most of the City of Oregon City and adjacent unincorporated areas located within the Metro jurisdictional boundary. The subarea excludes some portions of Oregon City that are outside the Metro boundary, mainly along the City's southern border. The subarea includes landmarks such as downtown Oregon City, Willamette Falls and the End of the Oregon Trail Interpretive Center. The Oregon City subarea is also home to the existing Metro South transfer station, located next to the intersection of Interstate 205 (I-205) and Highway 213.

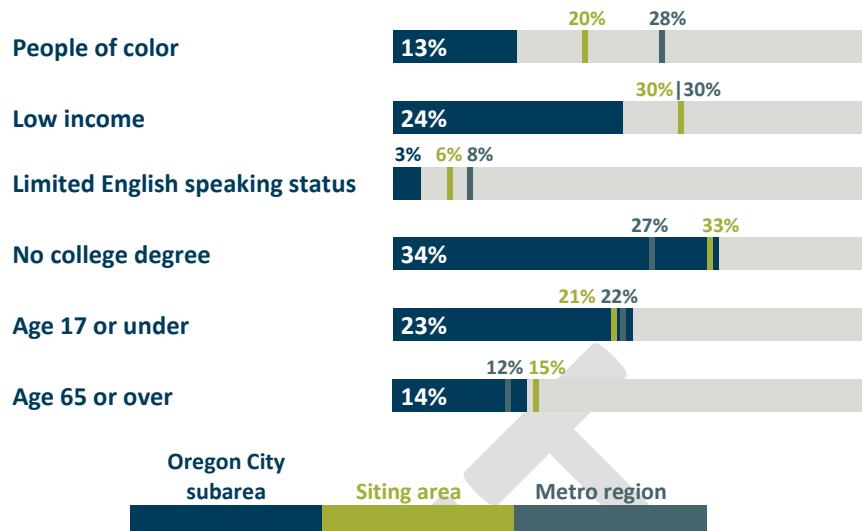
### Demographic indicators

The Oregon City subarea is the third most populated in the siting area, with an estimated 38,300 residents. Compared to the other five subareas, the Oregon City subarea has the lowest percentage of people of color (13 percent), but due to its relatively large population, the subarea has a higher total number of people of color (5,100) than the 212/224 and Milwaukie subareas.

People who identify as Hispanic or Latino (7 percent) represent the largest community of color in the subarea, followed by those who identify with the Other race and Two or more races categories (3 percent). The subarea has the highest proportion of people who identify as American Indian and Alaska native (1 percent) in the siting area. For all other race/ethnicity categories in the table below, the Oregon City subarea has lower percentages than the siting area as a whole.

RACE/ETHNICITY		
Total population	38,300	100%
<b>People of color</b>	<b>5,100</b>	<b>13%</b>
American Indian and Alaska Native	400	1%
Asian	400	1%
Black or African American	300	< 1%
Hispanic or Latino	2,700	7%
Native Hawaiian and Other Pacific Islander	< 100	< 1%
Other race/Two or more races	1,200	3%

In terms of other demographic characteristics, the Oregon City subarea has lower percentages of people with low income (24 percent) and with limited English speaking status (3 percent) than the siting area and the Metro region. The percentage of people without a college degree (34 percent) is higher than the Metro region, but similar to the siting area average. The percentages of young people age 17 or under and older adults age 65 and over (14 percent) in the Oregon City subarea are within two percentage points from the averages for the siting area and the Metro region.



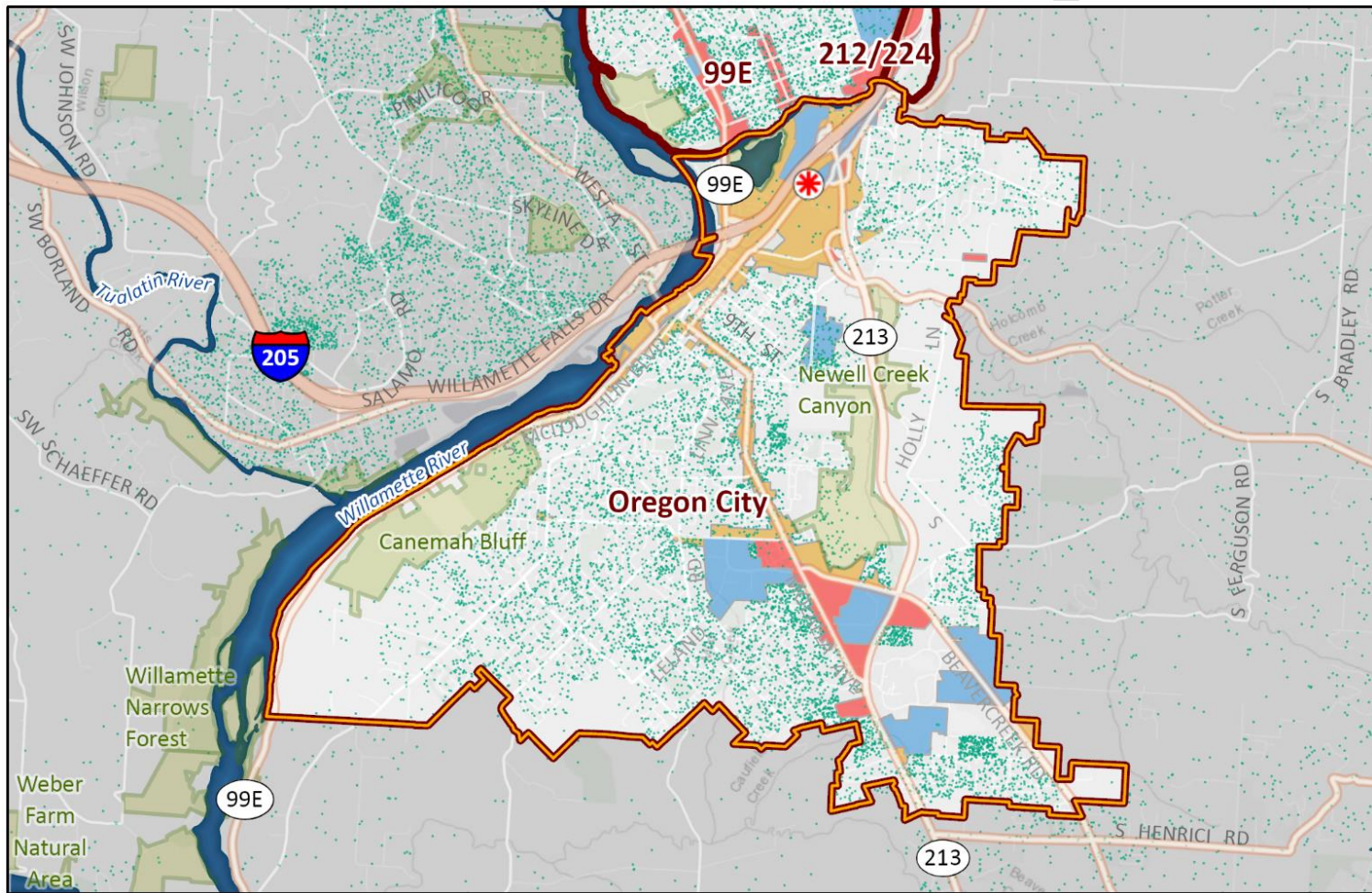
## Facility siting opportunities

The Oregon City subarea has a mix of commercial and industrial properties concentrated in three main clusters. The Molalla Avenue-Beavercreek Road corridor is characterized by smaller properties zoned for mixed uses near Oregon City Hall and south along Molalla Avenue, followed by larger, mostly commercial and industrial properties between the Clackamas County Red Soils Campus and the Hilltop Mall and the Oregon City High School. The subarea also has a mix of small and large properties zoned for mixed uses that extends from Main Street in downtown Oregon City until the area around the intersection of I-205 and Highway 213, where the existing Metro South transfer station is located. A smaller cluster of commercial and industrial properties is located to the north of Newell Creek Canyon, including the Providence Willamette Falls Medical Center.

Many of the commercial and industrial properties in the Oregon City subarea are large enough for a full-size transfer station (7 acres or more). Some of the properties are well buffered from residential areas by other commercial and industrial properties or by major highways and by the Newell Creek Canyon natural area. Other large commercial and industrial properties are adjacent or in close proximity to residential neighborhoods and community assets, including a major hospital (Providence) and schools such as Oregon City High School and Clackamas Community College.

From an environmental justice perspective, the risk of disproportionately burdening communities of color and people with low income in the Oregon City subarea is low, when compared to other parts of the siting area. The subarea has relatively lower concentrations of people of color, with low income and with limited English speaking status, and is in line with the siting area averages in terms of the education and age indicators.

## Oregon City subarea



### Legend

- Relevant zoning classes
- Commercial
  - Industrial
  - Mixed-use
- Population density
- 1 dot = 5 people
- Oregon City
- Other subareas
- Parks and/or Natural Areas

## Methodology

The analysis in this report uses data from the American Community Survey – conducted annually by the U.S. Census Bureau – to look at the concentration of people of color, income levels and other demographic characteristics of communities in the siting area. In particular, the data used is from the American Community Survey 2013-2017 5-year estimates and processed by Metro’s Data Resource Center staff to generate statistics at the regional, siting area and subarea levels.

The analysis is done at the census tract level within five subareas in the proposed siting area for the Metro South Recycling and Transfer Center. Census tracts are small geographic areas within counties that encompass populations of between 1,200 and 8,000 people. Some of the census tracts used in the analysis extend outside the siting area boundary. For these census tracts, Metro staff estimated values of the race and ethnicity, income and other demographic variables for the portions of the tracts within the siting area based on a model that uses residential land use patterns to estimate the location of known housing. The model cannot account for differences in demographic characteristics within individual census tracts, but can account for the uneven distribution of housing within partial tracts included in the area of interest.

The report also uses Geographic Information Systems (GIS) data collected, processed and maintained by Metro’s Data Resource Center to map the industrial and commercial land and population density in the siting area. Staff from the Data Resource Center also produced the maps shown in the report and provided analytical support.

The analysis in this report has important limitations in terms of the sources of data used and the geographic scope of the analysis.

### Data source limitations

Similar to other surveys, the American Community Survey (ACS) is used to generate estimates based on data collected from samples of the total population. As such, the estimates have a degree of uncertainty or error associated with them. This uncertainty is called sampling error. For each estimate based on ACS data, the Census Bureau publishes a margin of error, which is a measure of the magnitude of sampling error provided with all published ACS estimates. This report, however, does not include the margins of error because the estimates of demographic variables for custom geographic areas – namely, the siting area and subareas – are based on modeling conducted by Metro staff that is not equipped to calculate margins of error for custom geographies.

Apart from sampling issues, there are other potential sources of error that can bias these estimates, such as mistakes in how the data are collected by the Census or reported by people responding to the survey. This type of error is called non-sampling bias or error.

Another limitation of using Census data is related to the way the agency collects data on race and ethnicity. As highlighted in Metro’s Racial Equity Strategy, the racial categories used by the US Census and others are too broad and can misrepresent the actual circumstances of specific



communities. Individual communities within each category, for example, may experience large disparities in terms of poverty, unemployment and other factors that other communities in the same category do not face. In such cases, the Census categories fail to highlight the disparities that may prevent certain communities from receiving the attention they need.

The definition of people of color used in this report and based on Census racial categories also tends to be narrow, compared to the definition in Metro's Racial Equity Strategy shown below.

**People of color and communities of color**

"For the purposes of this plan, communities of color are Native Americans, African Americans, Asian Americans and Pacific Islanders, Latinos or Hispanics, and immigrants and refugees who do not speak English well, including African immigrants, Slavic and Russian speaking communities, and people from the Middle East."

*Metro's Strategic Plan to Advance Racial Equity, Diversity and Inclusion*

To address some of the limitations with Census data, Metro's Racial Equity Strategy recommends disaggregating race and ethnicity categories as much as possible. In line with this recommendation, the report includes more detailed subarea profiles below that show both the total number and percentage of people of color by racial category. However, the report relies on Census data and therefore cannot disaggregate beyond the level of detail provided by the Census racial categories.

The report also does not implement a second recommendation in Metro's Racial Equity Strategy to use various forms of data – including qualitative data such as stories – to assess whether the conditions of the communities in the siting area are appropriately represented. This is expected to be a part of Metro's engagement work going forward, including hosting focus groups with vulnerable groups in the siting area, including people of color and people with low incomes, to hear about their experiences and stories.

The American Community Survey is also limited in the scope of the population it includes. The sample of people interviewed for the survey includes people living in housing units like single family homes and apartment buildings, as well as in group quarters such as college residence halls, nursing facilities, group homes, correctional facilities, military barracks and facilities for people experiencing homelessness. The survey, however, does not include responses from people experiencing homelessness who are not in shelters or other facilities. Additionally, the information collected in the survey cannot be used to determine the poverty status of people in institutional group quarters (including prisons and nursing homes), college dormitories, military barracks and anyone without conventional housing living situations such as people experiencing homelessness and who are not in shelters or other facilities.

**Scope limitations**

The geographic scope of the analysis is restricted to the siting area defined for the project. This is an important limitation because it does not take into account people living in communities next to or near

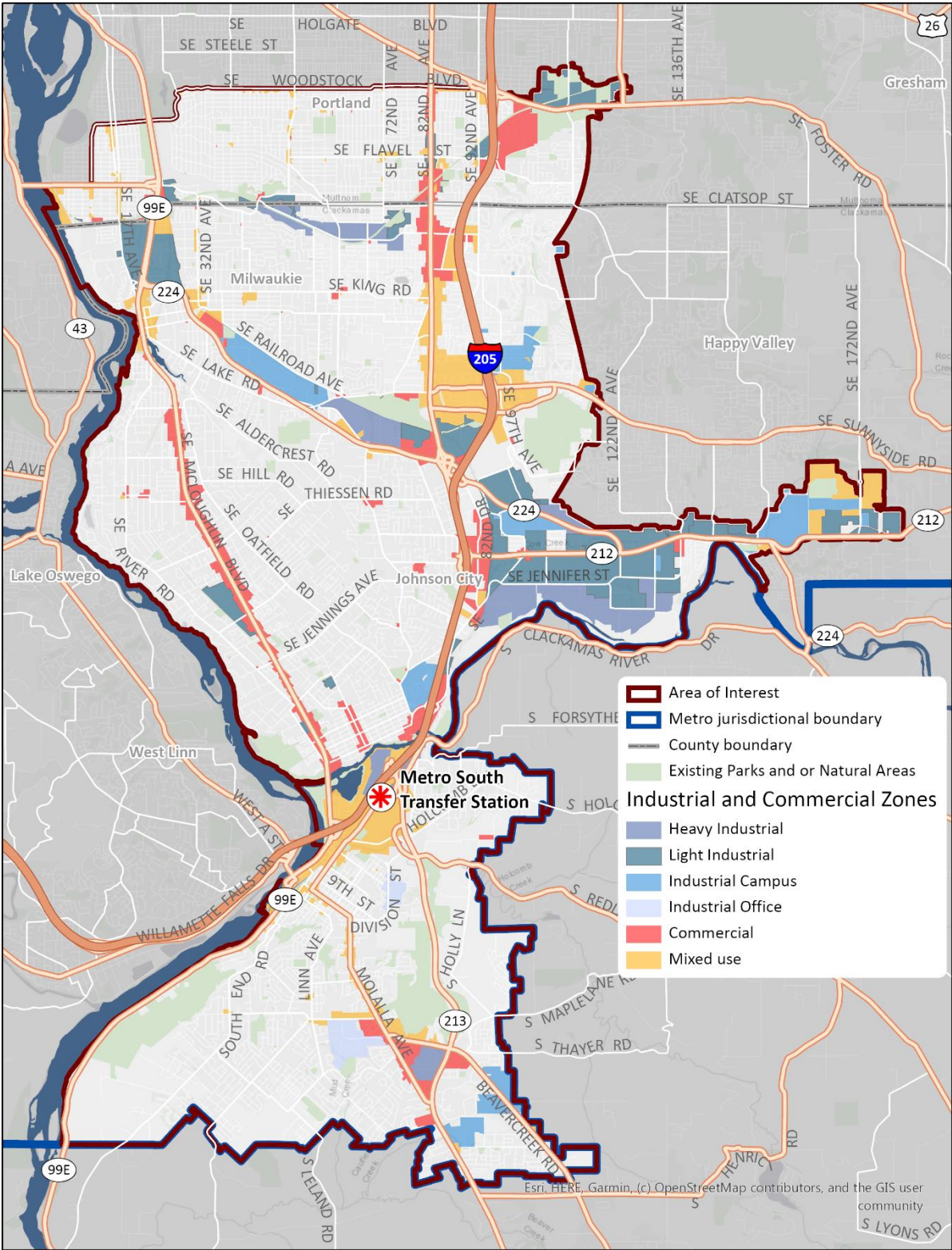
the five subareas within the siting area. Some characteristics of the communities adjacent to the siting area are partially captured in the maps showing people of color and low income people by census tracts (Figures 1 and 2). Overall, however, the report does not discuss any potential impacts to those communities.

Limiting the geographic focus of the siting area is mainly due to the need to simplify the analysis given that at this stage in the project, Metro has not found a specific location for the proposed facility. Without a location, it is difficult to identify the communities that would be most impacted, either directly or indirectly.

DRAFT

Appendix

Metro South Recycling and Transfer Center project  
Industrial and commercial zoning in siting area





## Metro South Recycling and Transfer Center project

### Population density in siting area

