JANUARY 2016

# Title VI
## PROGRAM

EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

Board Approved 1/27/2016

*[This Page Intentionally Left Blank]*

# Table of Contents


| Section | | Page |
|---|---|---|
| Executive Summary | | ii |
| *Acronyms* | | *iii* |
| I. | Introduction, Public Outreach & Background | 1 |
| II. | Title VI Policy, Processes & Procedures | 9 |
| III. | Public Involvement & Language Assistance | 12 |
| IV. | Demographic Profile | 15 |
| V. | Mobility Needs & Transportation Planning | 28 |
| VI. | Distribution of Public Transportation Funding | 33 |
| VII. | Pass-Through Funding & Subrecipient Assistance | 36 |

***Appendices****

1 Title VI Assurance
2 Title VI Notice to the Public
3 Title VI Complaint Procedures
4 Public Involvement Plan
5 LEP Plan
6 Committees
7 Board Approval Documents
8 Maps

***Form****

Title VI Nondiscrimination Complaint Form


**Document provided separately on-line at: www.ewgateway.org/titlevi*

*[This Page Intentionally Left Blank]*

## Executive Summary

Federal laws, regulations, and guidance require that federal-aid recipients have a program in place to demonstrate how the recipient is complying with Title VI of the Civil Rights Act of 1964 and related nondiscrimination requirements. This program is referred to as a "Title VI Program" and each federal-aid recipient is required to update its Title VI Program every three years. East-West Gateway Council of Governments (EWGCOG) is the St. Louis metropolitan area's federally designated metropolitan planning organization (MPO) and, as such, EWGCOG is a federal-aid recipient. EWGCOG's 2015 Title VI Program updates, and continues to reflect, EWGCOG's commitment to nondiscrimination in all of its programs and activities. EWGCOG developed this 2015 Title VI Program based upon guidance issued by the Federal Transit Administration (FTA). Certain parts of the Title VI Program (i.e. Section IV and Appendix 5) rely heavily on a data-driven analysis of the Region's population. Based upon FTA's guidance and EWGCOG's data analysis, this 2015 Title VI Program provides the strategies and processes that EWGCOG uses to ensure that its programs and activities are implemented in a nondiscriminatory manner. Specifically, it includes:

- A description of EWGCOG's Title VI assurance and commitment to nondiscrimination
- The processes and procedures that:
    - The public can use to file a complaint with EWGCOG regarding discrimination
    - EWGCOG uses to monitor its activities, programs, subrecipients, and contractors
- EWGCOG's public involvement and language assistance plans
- A demographic profile of the St. Louis metropolitan area
- A description of EWGCOG's planning processes and how EWGCOG addresses the mobility needs of residents, including underserved populations
- An examination of the distribution of public transportation funding
- A description of EWGCOG's procedures for passing through federal funding and providing technical assistance to grant funding applicants

Questions regarding this 2015 Title VI Program may be directed to:

Title VI Coordinator
East-West Gateway Council of Governments
1 S. Memorial Drive, Suite 1600
St. Louis, MO 63102

*Phone:* (314) 421-4220 / (618) 274-2750
*Fax:* (314) 231-6120
*Email:* titlevi@ewgateway.org

*[This Page Intentionally Left Blank]*

## Acronyms

| | |
|---|---|
| ADA | Americans with Disabilities Act of 1990 |
| AQAC | Air Quality Advisory Committee |
| BOD | Board of Directors |
| BPAC | Bicycle and Pedestrian Advisory Committee |
| BSDA | The Bi-State Development Agency of the Missouri-Illinois Metropolitan District |
| CFR | Code of Federal Regulations |
| CHSTP | Coordinated Human Services Transportation Plan |
| DOJ | U.S. Department of Justice |
| DOT | U.S. Department of Transportation |
| EAC | Executive Advisory Committee |
| EJ | Environmental Justice |
| EPA | Environmental Protection Agency |
| EWGCOG | East-West Gateway Council of Governments |
| FHWA | Federal Highway Administration |
| FR | Federal Register |
| FTA | Federal Transit Administration |
| HHS | U.S. Department of Health and Human Services |
| HUD | U.S. Department of Housing and Urban Development |
| IDOT | Illinois Department of Transportation |
| LEP | Limited English Proficient |
| LGB | Local Government Briefings |
| LRTP | Long-Range Transportation Plan |
| MoDOT | Missouri Department of Transportation |
| MPO | Metropolitan Planning Organization |
| MSA | Metropolitan Statistical Area |
| PIP | Public Involvement Plan |
| STARRS | St. Louis Area Regional Response System |
| TIP | Transportation Improvement Program |
| TPC | Transportation Planning Committee |
| UPWP | Unified Planning Work Program |
| USC | United States Code |
| WRC | Water Resources Committee |

*[This Page Intentionally Left Blank]*

# I. Introduction, Public Outreach & Background

## A. Introduction

East-West Gateway Council of Governments (EWGCOG) is dedicated to an inclusive planning process that ensures that residents are informed about and given meaningful opportunities to engage in regional planning efforts and decision making. EWGCOG must be as inclusive as possible so that it is able to serve the widest range of citizens and implement effective planning that uses federal funding to benefit the entire region represented by EWGCOG. In order to accomplish this goal, EWGCOG has developed this Title VI Program in accordance with the federal laws, regulations, and guidance that govern nondiscrimination in its programs and activities. This Title VI Program reflects EWGCOG's commitment to implementing planning processes that are designed to protect against discrimination and to ensuring that it provides fairness and consideration of issues impacting disadvantaged residents.[1] It also provides a clear process that a resident may use if the individual feels that he / she has been discriminated against in one of EWGCOG's programs or activities. Finally, this Title VI Program outlines the strategies and tools that EWGCOG utilizes to reach and involve all of its constituents, including those residents who are historically harder to reach.

## B. Public Outreach

As part of the development of this Title VI Program, EWGCOG conducted outreach to the public to obtain feedback. The draft Title VI Program was open for public comment between December 7, 2015 and January 7, 2016. EWGCOG also held an open house to take comments and answer questions at its office on January 5, 2016.

EWGCOG took steps to ensure that the public was notified about the comment period and open house, including:

- Publishing a notice in three significant St. Louis newspapers: the St. Louis Post Dispatch, the St. Louis American, and the Belleville News Democrat
- Publishing a notice in EWGCOG's Local Government Briefings (LGB) newsletter
- Providing information through EWGCOG's website
- Creating and distributing an announcement card
- Sending the draft Title VI Program to key groups

The information provided in the local newspapers and LGB notified the public that the draft Title VI Program was open for comment, directed the public to the information / feedback page on EWGCOG's website, provided information about how the public could provide its comments (i.e. via email or telephone), and provided information about the open house. Both the print and on-line versions of these newspapers reach tens of thousands of residents in the Missouri and Illinois portions of EWGCOG's service area. EWGCOG's LGB is an electronic newsletter that is distributed weekly and has approximately 1,700 subscribers.

[1] Disadvantaged residents include persons who: are low-income, live in zero-vehicle households (have mobility needs), are members of a minority group (Black, Hispanic / Latino, Asian, etc.), are limited English proficient, are elderly, or have one or more disabilities.

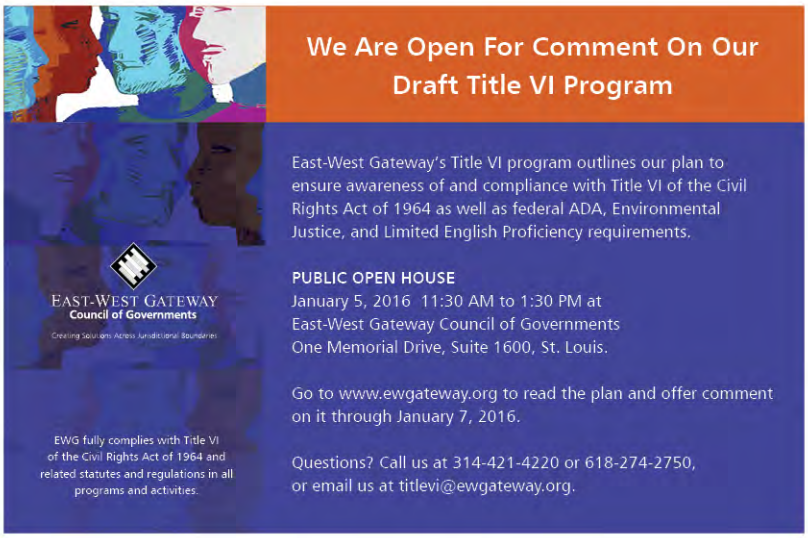
# I. Introduction, Public Outreach & Background

The notice regarding the draft Title VI Program was included in each of the December 3 through December 29, 2015 editions of the LGB. A copy of these LGBs can be found on EWGCOG's website at: www.ewgateway.org/pdffiles/Newsletters/Briefings/CalYr2015/Briefings-2015-4qtr.pdf. The public was also notified when each LGB was available through EWGCOG's Twitter and Facebook pages.

EWGCOG also put information about the draft Title VI Program on its website. The homepage on EWGCOG's website included an announcement about the public comment period and directed visitors to the information / feedback page that EWGCOG created. The information / feedback page included a copy of the announcement card, provided instructions for how the public could provide its comments, and provided a copy of the full Title VI Program and a copy of each component of the document that the public could download.

In addition to the notices described above, EWGCOG staff created an announcement card that requested feedback on the draft Title VI Program and provided information about the open house. EWGCOG staff distributed the announcement card at various community meetings and an electronic version of the announcement card was emailed to local government and community groups. A copy of the announcement card is provided below.

**EWGCOG Announcement Card**




EWGCOG distributed the draft Title VI Program to several specific groups along with a request for feedback. These groups included: EWGCOG's Executive Advisory Committee, EWGCOG's Board of Directors, and the Public Involvement Plan Stakeholder Advisory Group. The Public Involvement Stakeholder Advisory Group is a group comprised of 12 local government and community stakeholders representing a variety of regional interests including hard-to-reach communities.

EWGCOG held an open house in the boardroom at its office on January 5, 2016 from 11:30 a.m. to 1:30 p.m. EWGCOG staff made printed copies of the draft Title VI Program available, as well as a comment form and other Title VI materials (i.e. brochures). EWGCOG staff was available to provide information about the program and answer questions.

EWGCOG did not receive any comments on the draft Title VI Program. The final Title VI Program was presented for approval to EWGCOG's Executive Advisory Committee on January 19, 2016 and the Board of Directors on January 27, 2016.

## C. Background

### *1. East-West Gateway Council of Governments*

(a) History & Background

EWGCOG was formed in 1965 as a regional council of governments serving the eight county, bi-state St. Louis region (the Region). EWGCOG's service area spans approximately 4,500 $mi^2$ and includes the following counties[2]:

| Missouri Counties | Illinois Counties |
|---|---|
| City of St. Louis[3] | Madison |
| Franklin | Monroe |
| Jefferson | St. Clair |
| St. Charles | |
| St. Louis | |

EWGCOG's designation as a council of governments means that the agency has the civic responsibility to set the table for cooperative planning and problem-solving among and between its member local governments in an effort to produce better outcomes by working together. Although much of this cooperative planning takes place among the eight largest jurisdictions in the Region, it is not uncommon to find several smaller cities and towns clustered around a community betterment initiative at EWGCOG. These initiatives address issues as diverse as tax policy, environmental quality, public safety, workforce development, access to jobs, economic development, community planning, and other issues that might be of interest to members of EWGCOG's Board of Directors (the BOD).

EWGCOG is also the federally designated MPO for the Region. As the MPO, EWGCOG is vested with the legal authority to and responsibility for developing and adopting plans for the Region's surface transportation system. Any transportation project within the boundaries of the eight member counties (see above) that will be wholly or partially funded with federal dollars must be contained in plans that are formally adopted by the BOD.

EWGCOG's planning efforts are supported by federal funds that it receives from several sources, including but not limited to: the Department of Transportation (DOT) through the Federal Highway Administration (FHWA) and FTA, the Environmental Protection Agency, the Department of Homeland Security through the Federal Emergency Management Agency, and the Department of Health and Human Services (HHS) through the Assistant Secretary for Preparedness and Response.

[2] A demographic profile of the Region is provided in Section IV.
[3] The City of St. Louis, Missouri is an independent city not within a county; however, for EWGCOG's governance purposes the City of St. Louis is treated the same as the county governments in the Region.

(b) Organizational Structure

***(i) The Board of Directors***

EWGCOG is governed by a 29 member board of directors that is composed of local government representatives and citizens from across the Region. The BOD also includes representatives from the State of Missouri, the Missouri Department of Transportation (MoDOT), the Illinois Department of Transportation (IDOT), and the Region's transit authority – the Bi-State Development Agency (BSDA). The BOD oversees EWGCOG's planning efforts and selects / approves the initiatives and projects that will receive federal funds from EWGCOG's grant sources and, for capital transportation projects, the BOD selects the federally-funded projects and operation initiatives that will best carry out the framework created by EWGCOG's long-range transportation plan (currently, *Connected2045)*.

The BOD's membership is composed of both voting and non-voting members, as dictated by EWGCOG's bylaws. Of the BOD's 29 members the voting members include: 20 persons who serve by virtue of his / her elected position (i.e. County Executive, Mayor, etc.) and 4 regional citizens that are appointed by an elected official and the non-voting members include 5 people who are appointed by a State government or a transportation authority.[4] EWGCOG encourages BOD members to select appointees that best reflect the diversity of the Region.

A list of current BOD members can be found on EWGCOG's website at: www.ewgateway.org/AboutUs/BOD/bod.htm.

***(ii) Committees***

In addition to EWGCOG's BOD, the agency has an Executive Advisory Committee (EAC) that provides recommendations to the BOD and that has members that are appointed directly by BOD members. EWGCOG also has four "subject-matter" committees that provide information and support to the agency's initiatives on various program areas including: transportation – including bicycle / pedestrian planning, the environment – including air quality and water resources, and public safety / emergency management. The membership on these committees is composed of appointees who are experts in various fields such as: transportation planning, engineering, environmental planning, public safety / emergency management, and many others. The persons appointed to these subject-matter committees are chosen by a combination of local elected official and local / state organizations that deal with issues that are pertinent to the committee's subject matter (i.e. bicycle / pedestrian, water resource management, etc.).

EWGCOG does not select the membership for the EAC or the four subject-matter committees; however, EWGCOG encourages any BOD member, staff person, or organization to select appointees that best reflect the diversity of the Region and the constituents that a represented organization serves.

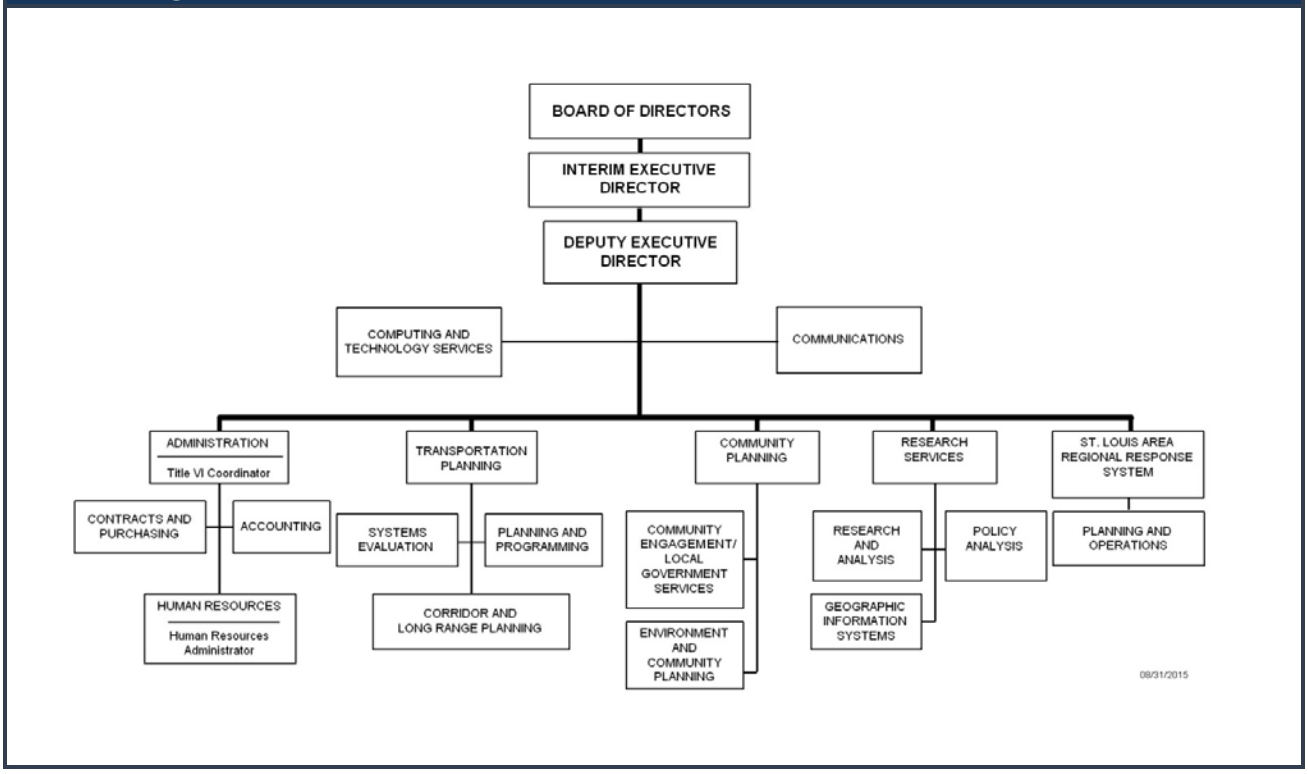
A current list of committee members can be found on-line at: www.ewgateway.org/AboutUs/Committees/committees.htm and www.stl-starrs.org/AboutUs/BOD/bod.htm. A description of each committee and its membership is also provided in Appendix 6.

[4] FTA's Circular 4702.1B, Chapter III, Part 10 does not apply to elected boards / committees.

(c) Staff Responsibilities

EWGCOG has a staff of 55 that is supervised by an Executive Director. EWGCOG's staff includes many types of professionals including, but not limited to: planners, accountants, and engineers. An organizational chart that reflects EWGCOG's departments is provided below.

**EWGCOG Organization Chart**




Each EWGCOG staff person that is involved in the agency's various planning processes is, in some way, responsible for ensuring that the processes and principles described in this Title VI Program are implemented. The two primary staff persons who are responsible for the agency's Title VI Program are the Executive Director and the Title VI Coordinator. The Executive Director is responsible for implementing the Title VI Program. The Executive Director oversees the development of the Title VI Program, signs the Title VI Assurance, and works with the Title VI Coordinator to ensure that the agency is meeting its Title VI obligations. The Title VI Coordinator is responsible for initiating and monitoring Title VI related activities, collecting information and documentation from staff regarding Title VI compliance, preparing required reports, overseeing / coordinating the complaint process, and any other responsibilities that may be required. The Title VI Coordinator also works closely with EWGCOG staff to ensure that each staff member is aware of the agency's nondiscrimination policy, the requirements expressed in this Title VI Program, and that the Title VI Program requirements are incorporated into staff's planning efforts (these planning efforts are described in more detail in Section V).

*2. Statutory & Regulatory Framework*

Federal law, regulations, executive orders, and guidance require that EWGCOG have policies and procedures in place to ensure that EWGCOG's programs and activities are conducted in a

nondiscriminatory manner. Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d – 2000e) (Title VI) is the primary statute that governs EWGCOG's Title VI Program. Title VI provides that:

*No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.*

Other statutes, regulations, executive orders, and guidance, have expanded Title VI's nondiscrimination protections to include: persons with limited English proficiency (LEP), religion, gender, disability, and age. In addition to Title VI, the statutes, regulations, executive orders, and guidance described below govern EWGCOG's Title VI Program.

- ***The Civil Rights Restoration Act of 1987*** (*Pub. L. 100-259*) – Expands Title VI's applicability to federal-aid recipients' programs and activities. The statute makes it clear that Title VI's requirements are not limited to only those particular programs or activities that are federally funded; rather Title VI governs an agency's *whole* operation if the agency receives any federal funds. This statute also clarified that Title VI's protections are applicable to a federal-aid recipient *and* its sub-recipients and contractors.
- ***The Americans with Disabilities Act of 1990***, as amended (the ADA) (*42 U.S.C. § 12101 et seq.*) – Prohibits discrimination against persons with disabilities and, in relevant part, ensures that people with disabilities are provided equal access to State and local government programs and services, places of public accommodation, transportation, and telecommunications. The ADA mandates that telephone companies establish telecommunications relay services (TTY/TDD). It also requires that "newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be accessible to and usable by individuals with disabilities."[5]
- ***The Rehabilitation Act of 1973*** (*29 U.S.C. § 794*) – Protects individuals with disabilities from discrimination in the provision of benefits or services from programs receiving federal financial assistance.[6]
- ***The Age Discrimination Act of 1975*** (*42 U.S.C. §§ 6101 – 6107*) – Prohibits discrimination on the basis of age in any program or activity that receives federal financial assistance.
- ***The Moving Ahead for Progress in the 21st Century transportation authorization (MAP-21)*** (*Pub. L. 112-141*) – Authorizes DOT to operate various transportation related programs and amended 49 U.S.C. § 5332 which prohibits discrimination on the basis of race, color, religion, national origin, sex (gender), disability, or age.
- ***Section 162 (a) of the Federal-Aid Highway Act of 1973***, as amended (*23 U.S.C. § 324*) – Authorizes DOT to construct highways under the provisions of Title 23 of the United States Code and prohibits discrimination on the basis of sex (gender).
- ***49 CFR Part 21 – Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights of 1964*** – These are the implementing regulations for Title VI for those programs that receive federal funding through FTA.

[5] More information about the ADA can be found at: www.ada.gov. The ADA has a specific definition of "disability" and defines to whom the statute applies. Refer to: www.ada.gov/pubs/adastatute08.htm to read the definition and find out more about who is covered by the ADA.
[6] More information about the Rehabilitation Act can be found at: www.ada.gov/cguide.htm#anchor65610. Similar to the ADA, the Rehabilitation Act has a specific definition of "disability" and defines to whom the statute applies.

- ***23 CFR Part 200 – Title VI Program and Related Statutes – Implementation and Review Procedures*** – These are the implementing regulations for Title VI for those programs that receive funding through FHWA.
- ***28 CFR Part 35 – Nondiscrimination on the Basis of Disability in State and Local Government Services*** – These are the implementing regulations for Title II of the ADA which governs State and local government services.
- ***Executive Order 12250 – U.S. Department of Justice – Leadership and Coordination of Nondiscrimination Laws*** (dated November 2, 1980, issued at 45 FR 72995) – Vests the U.S. Attorney General with the authority to ensure the "consistent and effective implementation of various laws prohibiting discriminatory practices on the basis of race, color, national origin, sex, disability, or religion in programs and activities receiving federal financial assistance."[7]
- ***Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency*** (dated August 11, 2000, issued at 65 FR 50121) – Directs federal agencies to "examine the services it provides and develop and implement a system by which [those with limited English proficiency (LEP)] can meaningfully access those services consistent with, and without unduly burdening, the fundamental mission of the agency." The order also requires that federal agencies ensure that recipients of federal funding "provide meaningful access to their LEP applicants and beneficiaries," clarifies that federal-aid recipients "must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons" in order to prevent discrimination on the basis of national origin, and directs the Department of Justice (DOJ) to issue guidance regarding LEP compliance.[8]
- ***Executive Order 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations*** (dated February 11, 1994, issued at 59 FR 7626) – Directs federal agencies to identify and address "disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."[9]
- ***DOJ Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons*** (dated June 18, 2002, issued at 67 FR 41455) – Provides guidance to federal-aid recipients on how to ensure that LEP persons are providing meaningful access to the recipient's programs and activities. Specifically, this guidance "clarifies existing legal requirements for LEP persons by providing a description of the factors recipients should consider in fulfilling their responsibilities to LEP persons."[10]
- ***DOT Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*** (dated December 14, 2005, issued at 70 FR 74087) – Updates DOT's previously issued guidance and adheres to the directives issued by the DOJ expressed in 67 FR 41455. This document provides guidance to DOT funding recipients on how to ensure that they are providing LEP persons meaningful access to the recipients' programs and activities.[11]
- ***DOT Order 5610.2(a) – Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*** (dated May 10, 2012, issued at 77 FR 27534) – Updates and clarifies DOT's environmental justice procedures that were originally expressed in DOT's Environmental

[7] Read the full text at: www.archives.gov/federal-register/codification/executive-order/12250.html.
[8] Read the full text at: www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20938.pdf.
[9] Read the full text at: www.archives.gov/federal-register/executive-orders/pdf/12898.pdf.
[10] Read the full text at: www.gpo.gov/fdsys/pkg/FR-2002-06-18/pdf/02-15207.pdf.
[11] Read the full text at: www.gpo.gov/fdsys/pkg/FR-2005-12-14/pdf/05-23972.pdf.

Justice Order dated April 15, 1997. This 2012 DOT order describes DOT's policy to "consider environmental principles in all (DOT) programs, policies, and activities." This order also underscores that Title VI is broader in scope than environmental justice (EJ) and that, while Title VI and EJ analyses may overlap, one analysis may not fully satisfy the requirements of the other.[12]

- ***FTA Circular 4702.1B – Title VI Requirements and Guidelines for Federal Transit Administration Recipients*** (dated October 1, 2012) – Sets forth how recipients of FTA funding can comply with Title VI's requirements and providing meaningful access to LEP persons as expressed in DOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons (dated Dec. 14, 2005, issued at 70 FR 74087).[13]
- ***FTA Circular 4703.1 – Environmental Justice Policy Guidance for Federal Transit Administration Recipients*** (dated August 15, 2012) – Provides guidance that recipients of FTA funding on how to incorporate environmental justice principles into the recipients' plans, projects, and activities.[14]

[12] A full description can be found at: www.fhwa.dot.gov/environment/environmental_justice/ej_at_dot/order_56102a/.
[13] The circular can be found on FTA's website at: www.fta.dot.gov/documents/FTA_Title_VI_FINAL.pdf.
[14] The circular can be found on FTA's website at: www.fta.dot.gov/documents/FTA_EJ_Circular_7.14-12_FINAL.pdf.

# II. Title VI Policy, Processes & Procedures

## A. Title VI Assurance

As required by federal regulations, EWGCOG provides its assurance that it will comply with the nondiscrimination requirements of Title VI and related statutes, regulations, executive orders, and guidance. The full text, signed version of EWGCOG's Title VI Assurance is provided in Appendix 1.

## B. Nondiscrimination Policy Statement

As provided by Title VI of the Civil Rights Act of 1964 (as expanded by the Civil Rights Restoration Act of 1987) (Title VI), the Americans with Disabilities Act (ADA), and other related nondiscrimination statutes and regulations, EWGCOG assures that no person, on the grounds of race, color, national origin, religion, gender, disability, or age, shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any EWGCOG program or activity. EWGCOG further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. EWGCOG includes nondiscrimination language in all written agreements with its subrecipients, contractors, and consultants and will monitor programs and activities for compliance. EWGCOG's Title VI Coordinator is responsible for initiating and monitoring Title VI and ADA activities, preparing required reports, and other responsibilities as required by law.

## C. Informing the Public

In compliance with the statutes and regulations that govern Title VI, EWGCOG and its subrecipients provide information to the public regarding Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. EWGCOG ensures this compliance through the actions described below.

### *1. Title VI Notification*

EWGCOG has developed a Title VI "Notice to the Public" in both a full text and an abbreviated form. EWGCOG inserts its notice in all significant publications that are distributed to the public. EWGCOG also posts this notice in the agency's lobby. The full text of the notice, along with an abbreviated version, is provided in Appendix 2.

### *2. Brochures & Cards*

EWGCOG has developed a series of brochures and cards that inform people about their rights under Title VI, ADA, and other related nondiscrimination statutes, as follows:

| |
|---|
| Your Rights Under Title VI of the Civil Rights Act of 1964* |
| Commitment to Limited English Proficient (LEP) Persons* |
| Environmental Justice – What it Means |
| American with Disabilities Act (ADA) |
| Title VI Complaint Form* |
| Just the Facts on Title VI (in card format) |
| Just the Facts on Environmental Justice (in card format) |

**Document available in English and Spanish*

EWGCOG makes these brochures available in print at public meetings and in the agency's lobby. These brochures can be found on EWGCOG's website at: www.ewgateway.org/titlevi.

### D. Complaint Procedures

EWGCOG has implemented Title VI Complaint Procedures which outline the process by which a person can file a written complaint if the person believes that he / she has been excluded from or denied the benefits of or subjected to discrimination by EWGCOG in relation to any program or activity administered by EWGCOG or its subrecipients, consultants, or contractors. EWGCOG's complaint procedures apply to matters related to Title VI, ADA, or the regulations / rules that govern providing meaningful access to LEP persons. A copy of the Title VI Complaint Procedures is provided in Appendix 3. EWGCOG also has a Title VI Nondiscrimination Complaint Form available in fillable *.pdf and printed format. Both the Title VI Complaint Procedures and the Title VI Nondiscrimination Complaint Form are available on EWGCOG's website at: www.ewgateway.org/titlevi.

### E. Complaints, Investigations & Lawsuits

EWGCOG's Title VI Coordinator maintains a list of complaints, investigations, and lawsuits that are filed alleging discrimination on the basis of race, color, national origin, religion, gender, disability, or age. This list includes each of:

- The date the complaint, investigation, or lawsuit was filed.
- A summary of the allegation(s).
- The status of the complaint, investigation, or lawsuit.
- Actions taken in response to the complaint, investigation, or lawsuit.

EWGCOG has had no Title VI complaints, investigations, or lawsuits filed since the date that EWGCOG's previous Title VI Program was approved (in 2011).

### F. Subrecipients, Consultants & Contractors

EWGCOG issues sub-grant awards to subrecipients and uses third-party contracts to hire consultants or contractors to perform services for or provide goods to the agency. Each subrecipient, consultant, and contractor is required to comply with the nondiscrimination requirements described in this Title VI Program. In order to ensure compliance, EWGCOG's Title VI Coordinator monitors the agency's subrecipients, consultants, and contractors by using the process described below. For each sub-grant award or third-party contract, the Title VI Coordinator, with the assistance of the appropriate grant and contracts staff:

- Provides the Title VI requirements to all subrecipients, consultants, and contractors as part of the contracting process. An example of the language that is included in each sub-grant agreement and third-party contract is provided in Appendix 1.
- Conducts a desk review for Title VI compliance of subrecipients, consultants, and contractors by using a Title VI Questionnaire.
- Reviews the completed Title VI Questionnaire for evidence of adequate procedures to ensure compliance with the Title VI provisions in the sub-grant agreement or third-party contract.

- If a subrecipient, consultant, or contractor is not complying with the Title VI, the Title VI Coordinator and assigned staff will work with the subrecipient, consultant, or contractor to correct the deficiency, which may include providing technical assistance and guidance available from EWGCOG staff. If the subrecipient, consultant, or contractor does not correct the deficiency, the Title VI Coordinator may take corrective action or implement other remedies as provided in the sub-grant agreement or third-party contract.

### G. Facility Construction

EWGCOG has not undertaken any facility construction (i.e. vehicle storage facility, maintenance facility, operation center, etc.).

# III. Public Involvement & Language Assistance

## A. Public Involvement

EWGCOG works diligently to ensure that residents in the Region are provided an opportunity to participate in the agency's programs and activities, including EWGCOG's planning processes. EWGCOG's public involvement efforts include surveys, focus groups, open houses, workshops, and the use of social media, and the use of new meeting technologies such as keypad polling, all of which are geared towards eliciting public comment and creating discussion about the issues and challenges facing the Region's residents. EWGCOG's public involvement process includes measures to target underrepresented populations[15] through notifications and requests to participate sent specifically to organizations serving these communities. Additionally, EWGCOG schedules open houses and focus groups in coordination with these organizations in an effort to provide disadvantaged persons accessible opportunities to be involved in EWGCOG's processes and express their needs.

EWGCOG has developed and utilizes a Public Involvement Plan (PIP). A description of EWGCOG's PIP along with a summary of EWGCOG's outreach activities is provided below.

### *1. Public Involvement Plan (PIP)*

EWGCOG's PIP (currently *Community Connections*) is designed to ensure a regional public involvement process that is proactive in providing the public complete information and timely notice. The PIP utilizes diverse techniques to give residents full public access to key EWGCOG decisions and encourage residents' continual involvement in EWGCOG's planning and community building programs. *Community Connections* was developed with broad input from the community and EWGCOG staff. The PIP includes strategies and goals that EWGCOG uses to maximize public involvement. Goal 4 in the PIP specifically addresses how EWGCOG will ensure Title VI compliance in its public outreach efforts.

EWGCOG's BOD adopted the PIP in May 2014. A copy of the PIP is provided in Appendix 4 and can be found on EWGCOG's website at:
www.ewgateway.org/pdffiles/library/citizenengagement/publicinvolvementplan-April2014.pdf.

[15] Underrepresented populations include disadvantaged persons, which are those persons who: are low-income, live in zero-vehicle households (have mobility needs), are members of a minority group (Black, Hispanic / Latino, Asian, etc.), are limited English proficient, are elderly, or have one or disabilities.

*2. Outreach Efforts*

Since EWGCOG's last Title VI Program was approved (in 2011), EWGCOG has engaged in numerous outreach efforts[16] as part of its planning processes, including:

| Project | Outreach Type(s) |
|---|---|
| *Community Connections* (PIP) | Committee meetings (4)<br>Focus groups (8 – 10)<br>Surveys<br>On-line comments |
| *Connected2045* (Long-Range Transportation Plan) | Public workshops (4)<br>Open houses (2)<br>Stakeholder meetings (2)<br>On-line chat (2)<br>On-line comments |
| Great Streets | Open houses / public meetings (10)<br>Focus groups (2) |
| OneSTL (Regional Plan for Sustainable Development) | Public meetings (32)<br>Open houses (10) |
| Pathway to Public Office | Public workshop (1) |
| Regional Transportation Plan | Technical workshop (1) |
| St. Louis Transit Oriented Development Study | Public meetings (17) |
| TIP / Air Quality Conformity | Open houses (24)<br>On-line chat (1)<br>On-line comments |
| All Hazard Mitigation Plan | Public meetings (14) |
| Other Outreach* | |
| ITS Architecture Update | Local govt. meetings (9) |
| Title VI | Local govt. workshop (1) |
| *Where We Stand*, 7th Edition | Presentations (1)<br>On-line survey (1) |

**Event listed was not a meeting for the general public / residents but it was an opportunity for EWGCOG to reach out to its governmental / organizational constituents so EWGCOG included it on this list.*

For each of EWGCOG's public events, the agency notifies the public by utilizing any one or combination of: local TV / radio news channels and newspapers, the agency's website and social media pages, mailed postcards / meeting announcements, the Local Government Briefings, and email blasts to people and

[16] The outreach efforts described above are current through September 15, 2015.

organizations on EWGCOG's various email lists. The locations that EWGCOG utilizes for public events are accessible and EWGCOG notifies the public about the EWGCOG staff person that an individual may contact if he / she needs an accommodation. EWGCOG chooses public event locations based upon centrality of location, access to public transit, and relationship / familiarity with the community served. To the extent possible, EWGCOG holds public events in the late afternoon / early evening in an effort to avoid work conflicts and maximize the number of residents that EWGCOG is able to reach.

### B. Language Assistance

EWGCOG promotes a positive and cooperative understanding of the importance of providing language assistance so that limited English proficient (LEP) persons[17] can have meaningful access to EWGCOG's programs and activities. Under federal law, individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are considered to be LEP. This language barrier may prevent individuals from accessing services and benefits and these individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. As a federal-aid recipient and in accordance with applicable federal requirements, EWGCOG is responsible for ensuring that its LEP constituents have meaningful access to EWGCOG's programs and activities. To ensure compliance, EWGCOG has implemented an LEP Plan, which is described in detail in Appendix 5.

While a demographic analysis demonstrates that the LEP population, as a percentage of the total population in the Region, is relatively small (at 1.3 percent of households and 2.3 percent of persons), EWGCOG is mindful of the LEP persons in the Region and recognizes that the concentration of LEP residents varies across EWGCOG's service area. Certain areas in the Region have a high concentration of LEP persons (e.g. City of St. Louis) while other areas have very low numbers of LEP residents (i.e. Monroe County). EWGCOG is prepared to meet any language need that arises and to respond appropriately to any requests that EWGCOG receives for language assistance. EWGCOG is also prepared to provide oral interpretation and written translation of documents, as well as oral interpreters for public outreach events. EWGCOG's website includes a Google Translate feature that enables LEP residents to access the agency's on-line information. As described in Section II, Part C #2, EWGCOG makes Spanish-language documents available on-line and in printed format; these documents include: Title VI brochure, LEP brochure, Title VI Complaint Procedures, and Title VI Nondiscrimination Complaint Form. Additionally, EWGCOG actively seeks input from the LEP population to ensure that LEP persons' needs are recognized in the planning process.

[17] The Federal Transit Administration also defines LEP persons as those who reported to the U.S. Census that they do not speak English "very well." This includes those who speak English "well," "not well," and "not at all" (see FTA Circular 4702.1B, Chapter I, Part 5(l)). This definition is used by EWGCOG in its data analysis.

# IV. Demographic Profile of the St. Louis Region

## A. Background

EWGCOG maintains and analyzes statistical data on the demographic characteristics of the Region. This information is used throughout EWGCOG's program areas and planning processes to inform the research conducted by the agency, the recommendations made to EWGCOG's BOD, and EWGCOG's planning decisions. Every three years as part of the Title VI Program update, EWGCOG reviews its demographic data to determine if there have been any changes in the population that necessitate an adjustment to EWGCOG's strategies in order to provide meaningful access to agency programs and activities to any new or growing demographic groups. EWGCOG's strategies may include identifying additional local partners that serve a new demographic group to ensure that these persons are notified about public meetings and given the opportunity to be involved in the planning process.

## B. The Data

A detailed profile of the Region's demographic characteristics is provided in Part C below. EWGCOG staff conducted both a data analysis and a spatial analysis[18] of the data for each of the following demographic characteristics: population, low-income[19], zero-vehicle households (mobility needs),[20] minorities,[21] LEP persons,[22] elderly persons,[23] and persons with a disability.[24] The data used for these analyses were drawn from 2013 5-Year American Community Survey (ACS) (2009 – 2013) conducted by the U.S. Census Bureau (Census).[25] The level of data used for each characteristic is presented below.

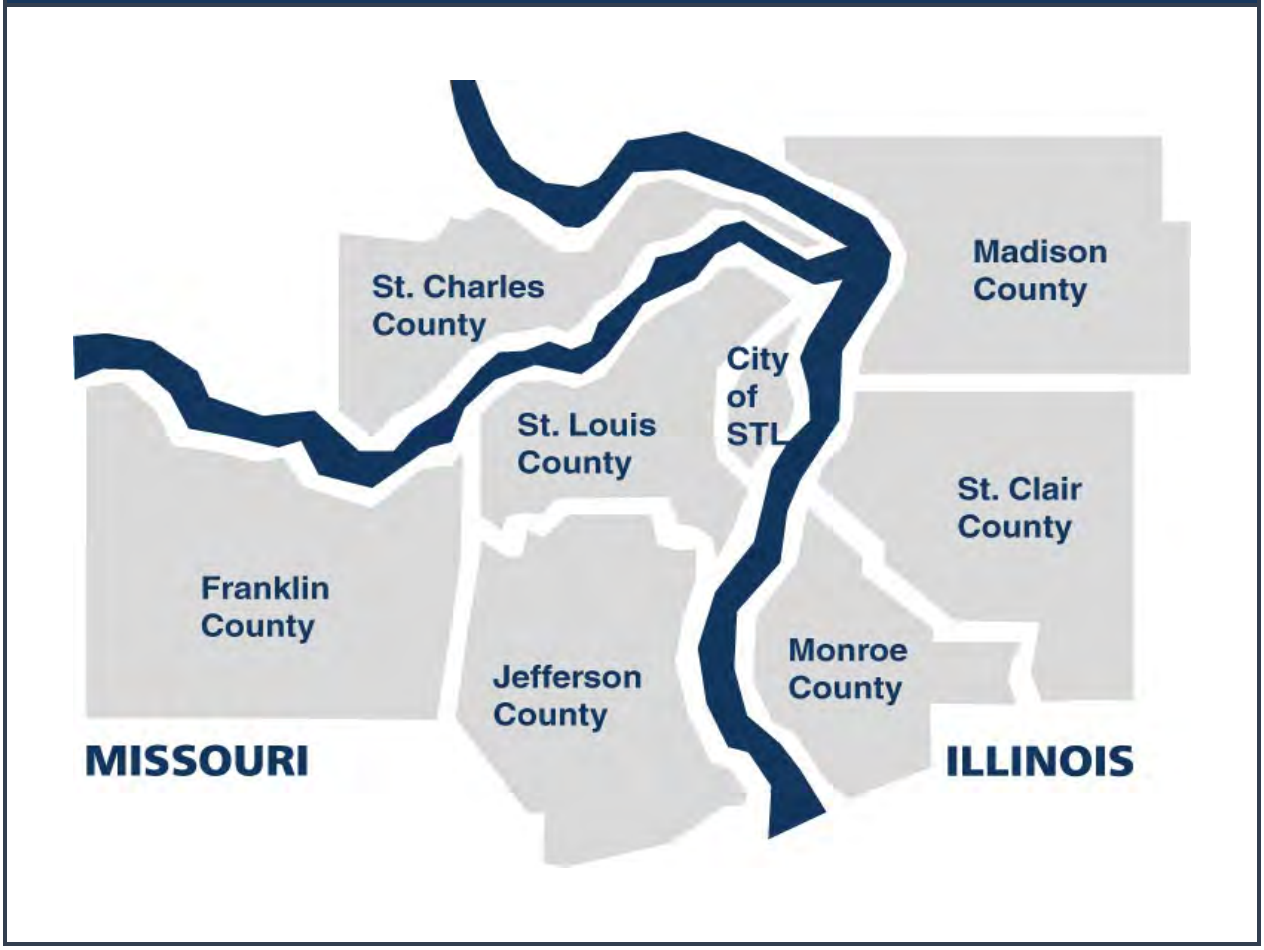
| Demographic Characteristic | Data Level |
|---|---|
| Low-income (poverty) | Census block group |
| Zero-Vehicle Households (mobility needs) | Census block group |
| Minorities | Census block group |
| LEP Persons | Census block group |
| Elderly | Census block group |
| Persons with a Disability | Census tract level (*data not available at block group*) |

[18] Full-page versions of the maps that are described in Section IV can be found in Appendix 8.
[19] In this analysis, low-income is defined using the Census' poverty thresholds, which vary based on family size and age of family members. In DOT's Order 5612(a), implementing Executive Order 12898, low-income is defined using the HHS poverty guidelines. The HHS poverty guidelines are a simplified version of the Census' poverty thresholds (see aspe.hhs.gov/poverty-guidelines for more information about poverty guidelines).
[20] Zero-vehicle households are measured by the Census. The measure represents the answer to a question about the number of vehicles that are kept at a home and are available for use by household members. Read the full definition here: www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2013_ACSSubjectDefinitions.pdf.
[21] Minorities, as defined in DOT's Order 5612(a), include: Black, Hispanic or Latino, Asian American, American Indian and Alaskan Native, and Native Hawaiian or Other Pacific Islander (see: www.fhwa.dot.gov/environment/environmental_justice/ej_at_dot/order_56102a/ for the full definitions). EWGCOG used Census data on each of these groups to report on the proportion of the Region's population that is a member of a minority group.
[22] LEP is defined as those persons who indicated to the Census that they speak English less than very well, not well, or not at all.
[23] Elderly is defined as those persons aged 65 years and older.
[24] EWGCOG used the Census' definition of disability. More information about this definition can be found at: www.census.gov/people/disability/methodology/acs.html. This is the most recent Census data available.
[25] More information about the ACS can be found here: www.census.gov/programs-surveys/acs/.

## C. The Region's Profile

The Region is comprised of an eight-county, bi-state geographical area that spans approximately 4,500 $mi^2$ in the St. Louis metropolitan area (see Figure 1). The Region has 2,589,599 residents, which represents a 0.7 percent increase in residents since 2010. St. Louis County has the largest population (more than 1,000,000 people), while Monroe County has the lowest population of the Region's eight counties (less than 34,000 people). Table 1 and Graphs 1 and 2 show the level of population change experienced by each of the eight counties in the Region for the period 2010 – 2014.

**Figure 1. St. Louis Region**



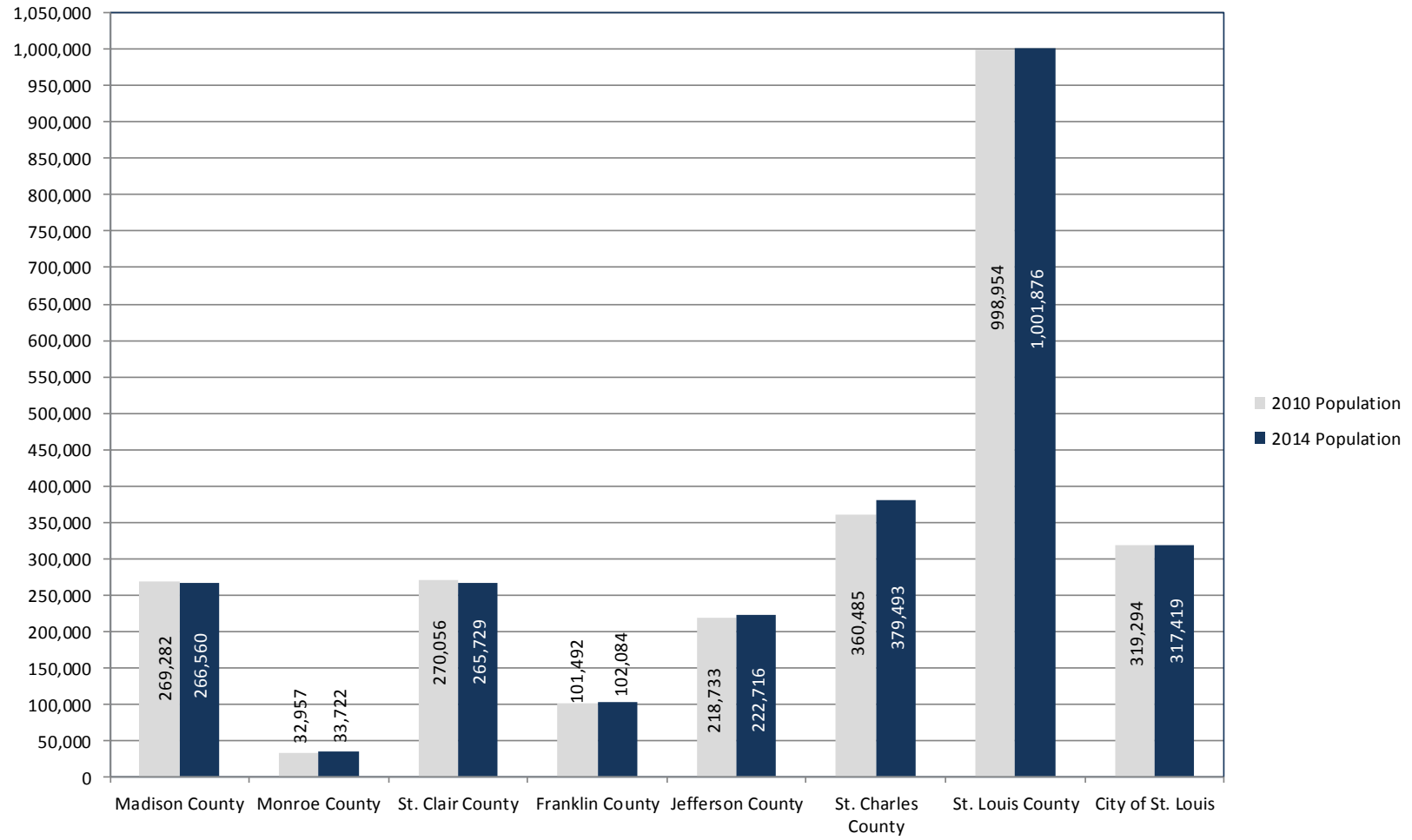
# IV. Demographic Profile of the St. Louis Region

**Table 1. St. Louis Region's Population and Population Change Between 2010 and 2014**

| | | 2010 Population | 2014 Population | Population Change | Percent Change |
|---|---|---|---|---|---|
| **St. Louis Region** | | **2,571,253** | **2,589,599** | **18,346** | **0.7** |
| ILLINOIS | Madison County | 269,282 | 266,560 | -2,722 | -1.0 |
| | Monroe County | 32,957 | 33,722 | 765 | 2.3 |
| | St. Clair County | 270,056 | 265,729 | -4,327 | -1.6 |
| MISSOURI | City of St. Louis | 319,294 | 317,419 | -1,875 | -0.6 |
| | Franklin County | 101,492 | 102,084 | 592 | 0.6 |
| | Jefferson County | 218,733 | 222,716 | 3,983 | 1.8 |
| | St. Charles County | 360,485 | 379,493 | 19,008 | 5.3 |
| | St. Louis County | 998,954 | 1,001,876 | 2,922 | 0.3 |

*Source: U.S. Census 2010; U.S. Census Population Estimates, 2014. Persons of all ages.*

**Graph 1. Population Change in the St. Louis Region, 2010 -2014 (Number of Residents)**




*Source: U.S. Census 2010; U.S. Census Population Estimates, 2014. Persons of all ages.*

# IV. Demographic Profile of the St. Louis Region

Table 2 summarizes the demographic characteristics of the Region on six measures: low-income, zero-vehicle households (mobility needs), minorities, LEP persons, elderly persons, and persons with a disability.

The data show that most residents in the Region: live in households that have incomes above the poverty line (86.8 percent) and access to a vehicle (91.7 percent), are Caucasian (73.2 percent), are proficient in English (98.7 percent), are not elderly (86.4 percent), and are not disabled (88 percent); however, this region-level examination does not tell the whole story. When the data is examined at a county-level, patterns emerge that reveal certain areas within the Region that have higher concentrations of persons that fall within one or more of these demographic groups.

**Table 2. St. Louis Region's Demographic Characteristics[1]**

| | | Total Population | Low-Income | | Zero-Vehicle Households | | Minorities | | LEP | | Elderly | | Disabled | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | # | % | # | % | # | % | # | % | # | % | # | % |
| **St. Louis Region** | | **2,589,599** | **334,261** | ***13.2*** | **85,347** | ***8.3*** | **690,491** | ***26.8*** | **56,098** | ***2.3*** | **350,731** | ***13.6*** | **304,027** | ***12.0*** |
| ILLINOIS | Madison County | 266,560 | 36,554 | *14.0* | 6,161 | *5.7* | 36,249 | *13.5* | 2,645 | *1.0* | 39,301 | *14.6* | 31,319 | *11.8* |
| | Monroe County | 33,722 | 1,780 | *5.4* | 438 | *3.5* | 1,019 | *3.1* | 152 | *0.5* | 4,836 | *14.6* | 3,433 | *10.4* |
| | St. Clair County | 265,729 | 46,561 | *17.6* | 8,980 | *8.7* | 99,928 | *37.2* | 3,427 | *1.4* | 34,554 | *12.8* | 35,669 | *13.6* |
| MISSOURI | City of St. Louis | 317,419 | 84,785 | *27.4* | 31,050 | *22.1* | 182,867 | *57.3* | 12,885 | *4.3* | 35,271 | *11.1* | 45,982 | *14.6* |
| | Franklin County | 102,084 | 12,495 | *12.5* | 1,944 | *5.0* | 4,293 | *4.2* | 626 | *0.7* | 14,459 | *14.2* | 11,687 | *11.6* |
| | Jefferson County | 222,716 | 24,520 | *11.3* | 3,395 | *4.2* | 10,437 | *4.8* | 1,902 | *0.9* | 25,779 | *11.7* | 29,249 | *13.4* |
| | St. Charles County | 379,493 | 20,842 | *5.8* | 4,851 | *3.6* | 40,971 | *11.2* | 5,472 | *1.6* | 43,082 | *11.8* | 35,137 | *9.7* |
| | St. Louis County | 1,001,876 | 106,724 | *10.9* | 28,528 | *7.1* | 314,727 | *31.5* | 28,989 | *3.1* | 153,449 | *15.3* | 111,551 | *11.3* |

*Source: U.S. Census Population Estimates, 2014; 2013 5-Year American Community Survey.*

[1]All data reflects persons / individuals, except for zero-vehicle households which reflects household level data.

# IV. Demographic Profile of the St. Louis Region

Based on a county-level analysis, the largest concentration of low-income persons, zero-vehicle households, and minorities are found in the same urban core areas, specifically: North St. Louis City, Southeast St. Louis City, Northeast St. Louis County, and Northwest St. Clair County. More than half of low-income households are located in the City of St. Louis and St. Louis County (57 percent or 191,149 households). Similarly, the largest number of residents who live in zero-vehicle households and who are members of a minority group are located in the City of St. Louis and St. Louis County (59,578 residents and 821,086 residents, respectively). When examined as a proportion of a county's population, the City of St. Louis has more low-income persons (27.4 percent), more zero-vehicle households (22.1 percent), and more minority residents (57.3 percent) than any other county. By contrast, of the eight counties, Monroe County has the lowest proportion of its population living in low-income households (5.4 percent) and living in zero-vehicle households (3.5 percent) and the lowest proportion of minority residents (3.1 percent) (see Table 3).

**Table 3. St. Louis Region, Low-Income Persons, Zero-Vehicle Households & Minorities**

| | | Total Population | Low-Income | | Zero-Vehicle Households | | Minorities | |
|---|---|---|---|---|---|---|---|---|
| | | | # | % | # | % | # | % |
| **St. Louis Region** | | **2,589,599** | **334,261** | ***13.2*** | **85,347** | ***8.3*** | **690,491** | ***26.8*** |
| ILLINOIS | Madison County | 266,560 | 36,554 | *14.0* | 6,161 | *5.7* | 36,249 | *13.5* |
| | Monroe County | 33,722 | 1,780 | *5.4* | 438 | *3.5* | 1,019 | *3.1* |
| | ***St. Clair County*** | ***265,729*** | ***46,561*** | ***17.6*** | ***8,980*** | ***8.7*** | ***99,928*** | ***37.2*** |
| MISSOURI | ***City of St. Louis*** | ***317,419*** | ***84,785*** | ***27.4*** | ***31,050*** | ***22.1*** | ***182,867*** | ***57.3*** |
| | Franklin County | 102,084 | 12,495 | *12.5* | 1,944 | *5.0* | 4,293 | *4.2* |
| | Jefferson County | 222,716 | 24,520 | *11.3* | 3,395 | *4.2* | 10,437 | *4.8* |
| | St. Charles County | 379,493 | 20,842 | *5.8* | 4,851 | *3.6* | 40,971 | *11.2* |
| | ***St. Louis County*** | ***1,001,876*** | ***106,724*** | ***10.9*** | ***28,528*** | ***7.1*** | ***314,727*** | ***31.5*** |

*Source: U.S. Census Population Estimates, 2014; 2013 5-Year American Community Survey.*

Figures 2 through 4 show the spatial analysis of this data.

**Figure 2. St. Louis Region, Low-Income Persons, 2009 – 2013**

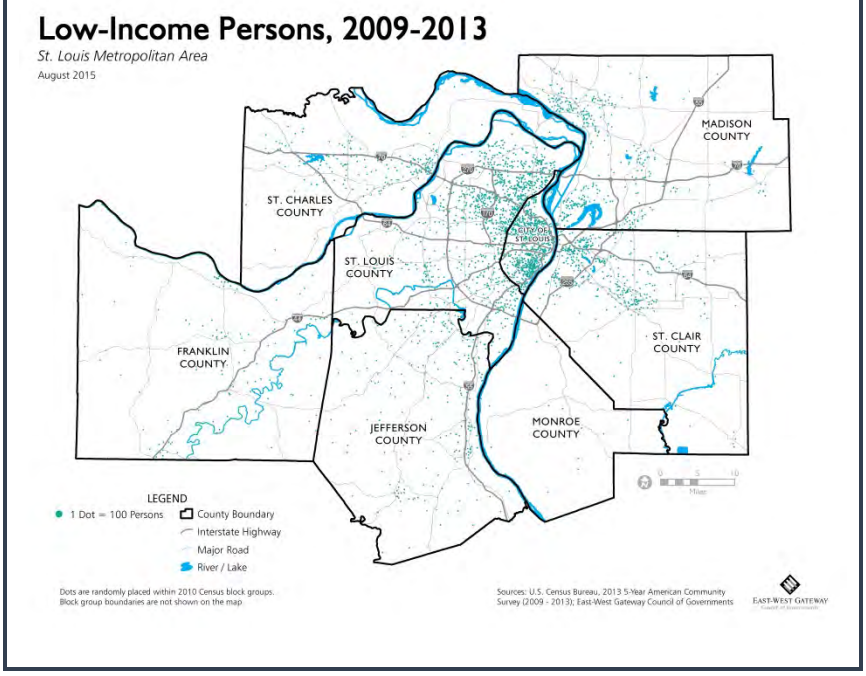



**Figure 3. St. Louis Region, Zero-Vehicle Households, 2009 – 2013**

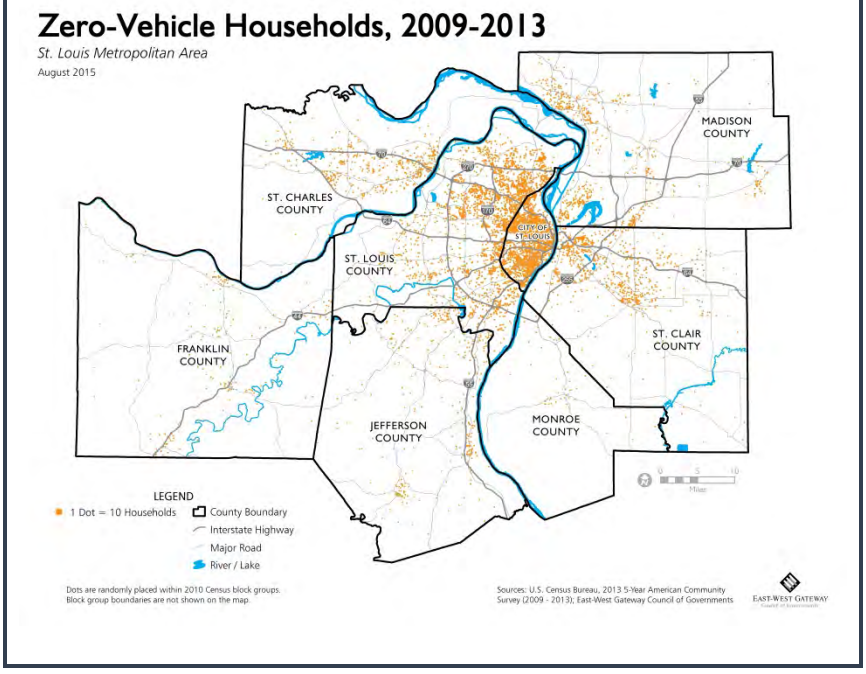
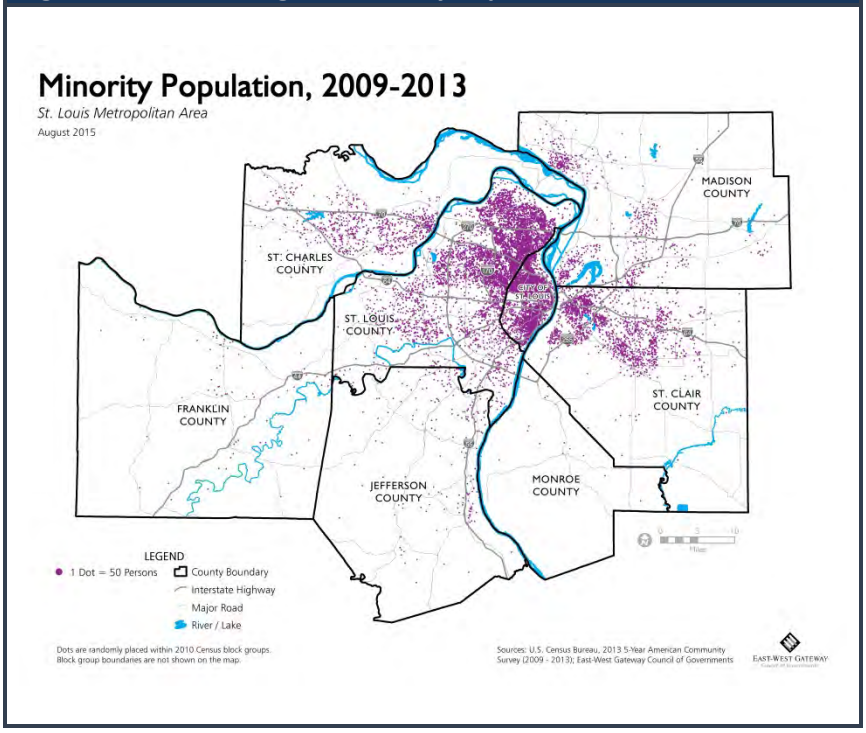


**Figure 4. St. Louis Region, Minority Population, 2009 – 2013**



Interestingly, when the minority groups are specifically examined, another pattern emerges for the Region. Unlike other large metropolitan areas, the Region has relatively few persons of Asian origin and Hispanic or Latino origin. As shown in Table 4, 93 percent of the Region's residents are either non-Hispanic White or non-Hispanic Black, while persons of Asian origin and Hispanic or Latino origin each make up about two percent of the Region's population. When the Region is compared to the other 49 largest metropolitan areas in the U.S., the Region ranks 43rd out of 50 for its Asian population and 49th out of 50 for its Hispanic or Latino population.[26] Table 5 and Table 6 show the 50 largest metropolitan areas in the U.S., ranked according to Asian population and Hispanic or Latino population.[27]

**Table 4. St. Louis Region Percentage of Persons Belonging to Minority Groups**

| | | Total Population | Non-Hispanic White | Minority Groups | | | | |
|---|---|---|---|---|---|---|---|---|
| | | | | Non-Hispanic Black | Hispanic or Latino | Asian American | Other[1] | Total Minority |
| **St. Louis Region** | | **2,589,599** | **73.2** | **19.6** | **2.7** | **2.3** | **2.2** | **26.8** |
| ILLINOIS | Madison County | 266,560 | 86.5 | 7.9 | 2.8 | 0.8 | 2.0 | 13.5 |
| | Monroe County | 33,722 | 96.9 | 0.0 | 1.5 | 0.4 | 1.2 | 3.1 |
| | St. Clair County | 265,729 | 62.8 | 29.9 | 3.4 | 1.2 | 2.6 | 37.1 |
| MISSOURI | City of St. Louis | 317,419 | 42.7 | 48.4 | 3.6 | 2.8 | 2.5 | 57.3 |
| | Franklin County | 102,084 | 95.8 | 1.2 | 1.4 | 0.5 | 1.1 | 4.2 |
| | Jefferson County | 222,716 | 95.2 | 0.7 | 1.6 | 0.6 | 1.9 | 4.8 |
| | St. Charles County | 379,493 | 88.8 | 4.4 | 2.9 | 2.2 | 1.7 | 11.2 |
| | St. Louis County | 1,001,876 | 68.5 | 23.1 | 2.5 | 3.5 | 2.4 | 31.5 |

*Source: U.S. Census Population Estimates, 2014; 2013 5-Year American Community Survey.*

[1] Other includes: American Indian, Alaskan Native, Native Hawaiian, Other Pacific Islander, and Multi-Racial. The Region has very few persons who belong to each of these minority groups; therefore, the data for these groups was combined.

[26] More information about this data can be found in the 7th Edition of *Where We Stand – The Strategic Assessment of the St. Louis Region* which is available on EWGCOG's website at: www.ewgateway.org/wws/.

[27] These tables present data at the Metropolitan Statistical Area (MSA) level. The St. Louis MSA includes counties that are not part of EWGCOG's service area. Over 90 percent of the MSA's population and employment are located within the EWGCOG service area.

**Table 5. Asian Population (Percent of Total Population)**

| | | |
|---|---|---|
| **1** | **San Jose** | **32.3** |
| 2 | San Francisco | 23.9 |
| 3 | Los Angeles | 15.0 |
| 4 | Sacramento | 12.2 |
| 5 | Seattle | 12.0 |
| 6 | San Diego | 11.1 |
| 7 | New York | 10.3 |
| 8 | Washington D.C. | 9.5 |
| 9 | Las Vegas | 9.1 |
| 10 | Boston | 7.0 |
| 11 | Houston | 6.9 |
| 12 | Riverside | 6.2 |
| 13 | Chicago | 6.0 |
| 14 | Minneapolis | 6.0 |
| 15 | Portland | 5.8 |
| 16 | Dallas | 5.7 |
| 17 | Philadelphia | 5.3 |
| 18 | Atlanta | 5.2 |
| **United States** | | **5.0** |
| 19 | Baltimore | 5.0 |
| 20 | Raleigh | 5.0 |
| 21 | Austin | 4.9 |
| 22 | Hartford | 4.3 |
| 23 | Orlando | 4.1 |
| 24 | Detroit | 3.8 |
| 25 | Denver | 3.7 |
| 26 | Virginia Beach | 3.6 |
| 27 | Jacksonville | 3.6 |
| 28 | Richmond | 3.5 |
| 29 | Phoenix | 3.4 |
| 30 | Salt Lake City | 3.4 |
| 31 | Columbus | 3.2 |
| 32 | Milwaukee | 3.2 |
| 33 | Tampa | 3.1 |
| 34 | Charlotte | 3.0 |
| 35 | Oklahoma City | 3.0 |
| 36 | New Orleans | 2.8 |
| 37 | Providence | 2.7 |
| 38 | Buffalo | 2.6 |
| 39 | Kansas City | 2.5 |
| 40 | Indianapolis | 2.5 |
| 41 | Nashville | 2.4 |
| 42 | Miami | 2.3 |
| **43** | **St. Louis** | **2.3** |
| 44 | Cincinnati | 2.1 |
| 45 | San Antonio | 2.1 |
| 46 | Cleveland | 2.1 |
| 47 | Pittsburgh | 2.0 |
| 48 | Memphis | 1.9 |
| 49 | Louisville | 1.6 |
| **50** | **Birmingham** | **1.2** |

*Source: U.S. Census Bureau, American Community Survey 1-Year Estimates*

**Table 6. Hispanic & Latino Population (Percent of Total Population)**

| | | |
|---|---|---|
| **1** | **San Antonio** | **54.5** |
| 2 | Riverside | 48.9 |
| 3 | Los Angeles | 44.9 |
| 4 | Miami | 42.7 |
| 5 | Houston | 36.1 |
| 6 | San Diego | 32.9 |
| 7 | Austin | 31.9 |
| 8 | Las Vegas | 30.0 |
| 9 | Phoenix | 29.9 |
| 10 | Dallas | 28.0 |
| 11 | San Jose | 27.7 |
| 12 | Orlando | 27.3 |
| 13 | New York | 23.5 |
| 14 | Denver | 22.7 |
| 15 | San Francisco | 21.9 |
| 16 | Chicago | 21.4 |
| 17 | Sacramento | 20.8 |
| 18 | Tampa | 17.3 |
| 19 | Salt Lake City | 17.3 |
| **United States** | | **17.1** |
| 20 | Washington D.C. | 14.7 |
| 21 | Hartford | 13.6 |
| 22 | Oklahoma City | 12.1 |
| 23 | Portland | 11.3 |
| 24 | Providence | 11.2 |
| 25 | Atlanta | 10.5 |
| 26 | Raleigh | 10.3 |
| 27 | Milwaukee | 10.1 |
| 28 | Boston | 9.9 |
| 29 | Charlotte | 9.6 |
| 30 | Seattle | 9.5 |
| 31 | Kansas City | 8.6 |
| 32 | Philadelphia | 8.5 |
| 33 | New Orleans | 8.3 |
| 34 | Jacksonville | 7.7 |
| 35 | Nashville | 6.7 |
| 36 | Indianapolis | 6.3 |
| 37 | Virginia Beach | 6.1 |
| 38 | Richmond | 5.6 |
| 39 | Minneapolis | 5.6 |
| 40 | Memphis | 5.2 |
| 41 | Baltimore | 5.1 |
| 42 | Cleveland | 5.1 |
| 43 | Buffalo | 4.5 |
| 44 | Birmingham | 4.4 |
| 45 | Louisville | 4.3 |
| 46 | Detroit | 4.1 |
| 47 | Columbus | 3.7 |
| 48 | Cincinnati | 2.8 |
| **49** | **St. Louis** | **2.8** |
| **50** | **Pittsburgh** | **1.5** |

*Source: U.S. Census Bureau, American Community Survey 1-Year Estimates*

Similar to the measures described above, while the number of LEP persons in the Region is very low (approximately 56,000 residents or 2.3 percent), there are certain areas within the Region that have a higher number of LEP residents. Table 2 and Figure 5 show that most of the Region's LEP residents live in the City of St. Louis and St. Louis County (approximately 41,874 persons or 75 percent). Of the languages spoken by the Region's LEP residents, Spanish is the most common at 30.7 percent of the Region's LEP population. The next two most common languages spoken by LEP persons are Serbo-Croatian (Bosnian) and Chinese, both of which have a much lower prevalence than Spanish, at 10.6 percent and 9.7 percent of the Region's total LEP population, respectively (see Table 10 in Appendix 5). Although these three language groups represent the largest number of LEP residents, all of these groups make up a very low proportion of the Region's total population – 0.7 percent for Spanish speaking LEP persons and 0.2 percent for both Bosnian speaking and Chinese speaking LEP persons (see Table 12 in Appendix 5). A more in-depth analysis of the Region's LEP population is provided in EWGCOG's LEP Plan in Appendix 5.

Unlike the other demographic characteristics, elderly persons and persons with disabilities are more evenly dispersed throughout the Region and the data do not reveal any significant concentrations of these two demographic groups in a particular area. As shown in Table 2, elderly persons make up 13.6 percent of the Region's population and each county has a similar proportion of elderly residents. Similarly, Table 2 shows that 12 percent of the Region's residents have one or more disabilities. Figures 6 and 7 depict the geographic dispersion of elderly persons and persons with one or more disabilities.

**Figure 5. St. Louis Region, LEP Persons, 2009 – 2013**

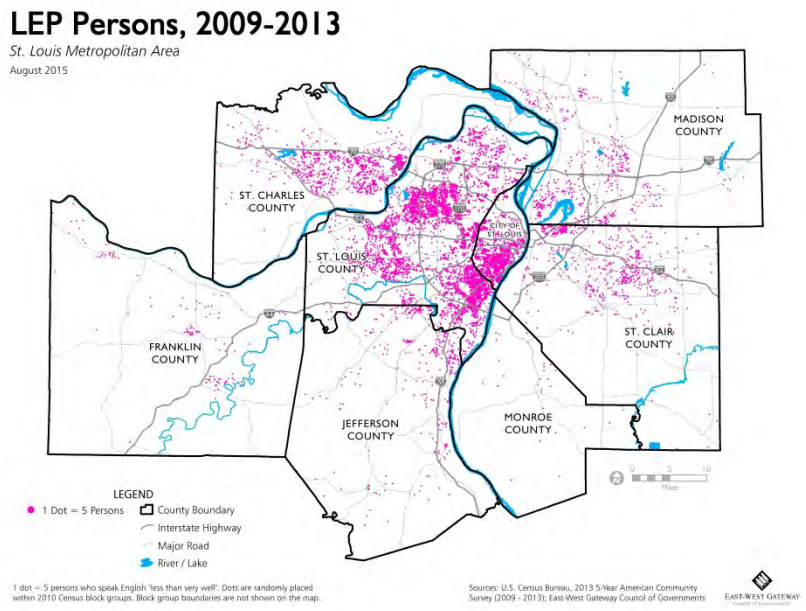



**Figure 6. St. Louis Region, Elderly Persons, 2009 – 2013**

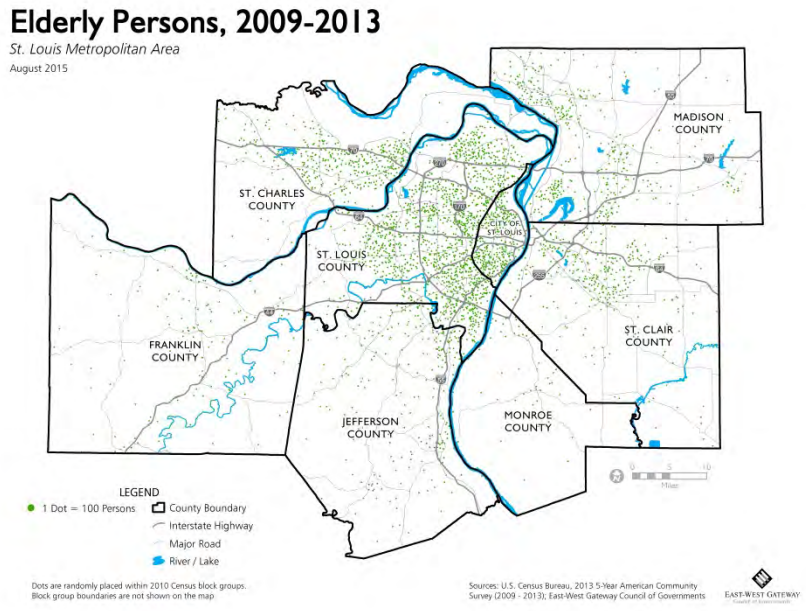
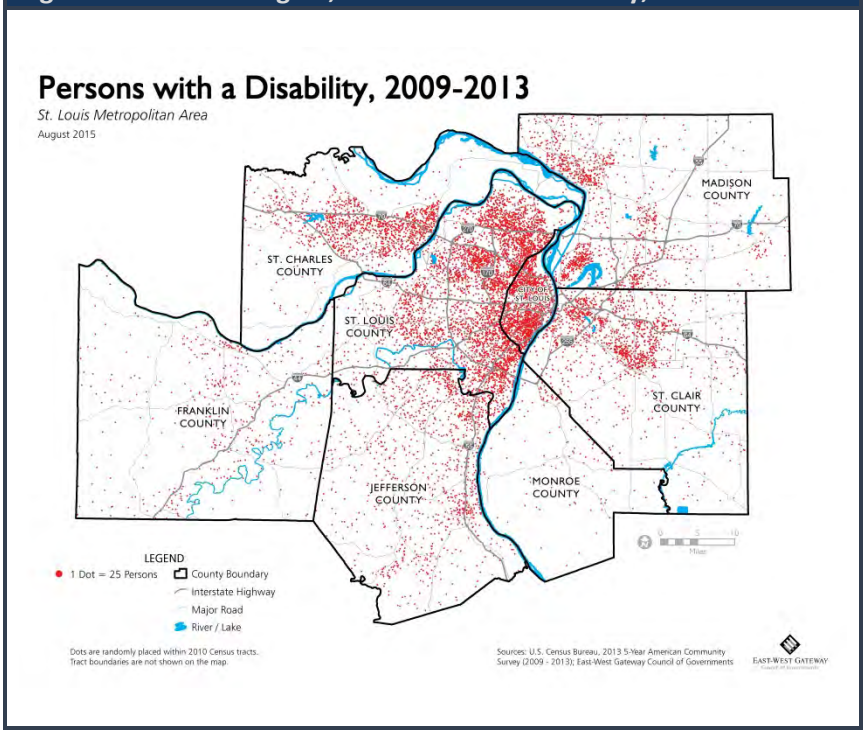


**Figure 7. St. Louis Region, Persons with a Disability, 2009 – 2013**



# V. Mobility Needs & Transportation Planning

## A. Background

As the MPO for the Region, EWGCOG receives federal funds to develop regional transportation plans and programs that examine transportation needs for the Region and provide recommendations about which projects should be funded in order to meet the Region's transportation needs, including improving the mobility of the Region's residents, including residents who live in environmental justice areas (EJ Areas, described in Part B below). Through its planning processes EWGCOG has determined that a well-integrated transportation system that includes multi-modal options, such as transit, walk and bike access, is essential to meeting the mobility needs of the Region's disadvantaged residents. EWGCOG also recognizes that low-income, minority, and other underserved populations would endure an unfair burden if their needs are not considered as part of the transportation planning process. In response, a key part of EWGCOG's transportation planning analysis is incorporating the needs of EJ populations in the planning efforts and examining the likely impacts on these residents. To accomplish this, EWGCOG relies upon a data-driven analytical process, which is described in more detail in Part B below. EWGCOG also utilizes public engagement to ensure its transportation planning process adequately addresses the needs of the Region's EJ residents.

The primary products of the EWGCOG's regional transportation planning that address mobility needs are: the Long-Range Transportation Plan (LRTP) (currently *Connected2045*), the Transportation Improvement Program (TIP) (currently the FY 2016 – 2019), and the Coordinated Human Services Transportation Plan (CHSTP). In addition to these specific planning documents, EWGCOG undertakes other programs and projects that address the mobility needs of all residents in the Region, including those who live in EJ areas. These programs and projects are described in EWGCOG's Unified Planning Work Program (UPWP), which is updated every fiscal year. To ensure that the Region's residents have an opportunity to provide input in EWGCOG's planning process, the LRTP, the TIP, and the CHSTP are presented to the public for review and comment. A description of the public engagement process is described in EWGCOG's PIP in Appendix 4 and in each of the LRTP, the TIP, and the CHSTP. Each of the LRTP, the TIP, the CHSTP, and the UPWP are presented to the EWGCOG BOD for approval and adoption.

## B. Environmental Justice Areas

EWGCOG defines an EJ Area as a geographical area that has a high concentration of one or more of: low-income persons, zero-vehicle households, minorities, elderly, and persons with a disability. In order to identify the Region's EJ Areas, EWGCOG utilized the following:

| Demographic Characteristic | Definition of "High Concentration" | Percentage Used |
|---|---|---|
| Low-income (poverty) | The tract[28] has a poverty rate[29] that is three times the Region's average poverty rate for all tracts | More than 39.7% of the population in the tract are persons who meet the definition of low-income |

[28] Tract refers to Census tract. The definition of tract can be found on the Census' website at: www2.census.gov/geo/pdfs/reference/GARM/Ch10GARM.pdf.

[29] The calculation that EWGCOG used to determine the concentration of poverty is based upon the U.S. Department of Housing and Urban Development's (HUD) definition of Racially Concentrated Area of Poverty. This definition can be found in HUD's Fair Housing Equity Analysis, referenced at: www.prrac.org/pdf/Regional_FH_Equity_Assessment_HUD_Aug_2011.pdf.

| Demographic Characteristic | Definition of "High Concentration" | Percentage Used |
|---|---|---|
| Zero-Vehicle (Mobility Needs) | The tract has a rate of zero-vehicle households that is more than 1.5 standard deviations greater than the mean for all tracts in the Region | More than 26.6% of the population in the tract live in zero-vehicle households |
| Minorities | The tract has a population that is more than half minority[30] | More than 50% of the population in the tract is persons who belong to a minority group |
| Elderly | The tract has a rate of persons 65 years of age and older that is more than 1.5 standard deviations greater than the mean for all tracts in the Region | More than 20.9% of the population in the tract is persons who are aged 65 years or older |
| Persons with a Disability | The tract has a rate of disabled persons that is more than 1.5 standard deviations greater than the mean for all tracts in the Region | More than 19.7% of the population in the tract is persons with one or more disabilities |

As the data pertains to the analysis conducted for the current LRTP and the TIP, EWGCOG used data from the 2012 5-Year ACS (2008 – 2012). Based on this analysis, EWGCOG determined the percentage of each county that is an EJ Area (see Table 7).

**Table 7. Environmental Justice Areas[1]**

| | | Total Tracts | Non-EJ Tracts | EJ Tracts | % EJ Area[2] |
|---|---|---|---|---|---|
| **St. Louis Region** | | **570** | **380** | **190** | **33.3** |
| ILLINOIS | Madison County | 61 | 50 | 11 | 18.0 |
| | Monroe County | 6 | 6 | 0 | 0.0 |
| | St. Clair County | 60 | 37 | 23 | 38.3 |
| MISSOURI | City of St. Louis | 106 | 40 | 66 | 62.3 |
| | Franklin County | 17 | 17 | 0 | 0.0 |
| | Jefferson County | 42 | 40 | 2 | 4.8 |
| | St. Charles County | 79 | 76 | 3 | 3.8 |
| | St. Louis County | 199 | 114 | 85 | 42.7 |

*Source: FY 2016 - 2019 Transportation Improvement Program, U.S. Census, 2012 5-Year American Community Survey.*

[1] Environmental justice areas (EJ Areas) are defined in Section V, Part B.

[2] Percent EJ refers to the proportion of the jurisdiction's Census tracts that are classified as an EJ Area.

[30] The calculation that EWGCOG used to determine the concentration of minority groups is based upon HUD's definition of Racially Concentrated Area of Poverty. This definition can be found in HUD's Fair Housing Equity Analysis, referenced at: www.prrac.org/pdf/Regional_FH_Equity_Assessment_HUD_Aug_2011.pdf.

## C. Metropolitan Transportation Plan (the LRTP)

In accordance with federal law, EWGCOG adopts a metropolitan transportation plan (the LRTP) every four years. EWGCOG's current LRTP, *Connected2045*, includes: a discussion of public engagement activities related to the LRTP development process, principles and strategies to guide transportation system evaluation and decision making over the course of the planning period, an investment plan for major road, bridge, and transit projects using federal transportation funding (both priority projects and illustrative projects), and documentation of Air Quality Conformity. The policies established in the LRTP guide EWGCOG as it prioritizes funding for all modes of transportation – including public transportation, freight, bicycle, pedestrian, and paratransit.

The EWGCOG BOD oversees the development of short- and long-range transportation plans for the Region and selects federally-funded capital projects and operation initiatives that will best carry out the framework created by the LRTP. Project selection is conducted through the TIP (described in Part D below) and, as a condition to be included in the TIP, all federally-funded transportation projects must be consistent with the LRTP's framework.

In order to ensure that EWGCOG's transportation planning and programming addresses mobility needs, EWGCOG developed strategies that are used to evaluate applications for transportation funding and the LRTP outlines strategies that are focused on improving access to transportation for EJ populations. Specifically, EWGCOG examines the percent of jobs that are accessible by transit and the affordability of housing when expanded to include transportation costs; both of which are indicators of the level of access that residents have to transportation. EWGCOG's examination in the LRTP shows that the Region ranks below the national average with respect to residents' access to public transportation and performs better than the national average with respect to a transportation network that efficiently connects its residents to destinations by automobile.

The technical analysis of accessibility is described in the State of the System report (currently *State of the System2045*). This State of the System report is a technical supplement to the LRTP and describes the analysis that EWGCOG used to develop *Connected2045* and highlights EWGCOG's transportation planning activities. The analysis includes an examination of the job accessibility both by car and by public transit, household access to public transit, zero-vehicle households, employment transit access, and the H+T (Housing + Transportation) index.[31]

## D. Transportation Improvement Program

The TIP is a schedule of transportation improvements planned by various agencies in the Region. In accordance with federal law, the TIP is updated annually and includes a four-year list of projects that will utilize federal funds. The projects identified in the TIP are consistent with and are given priority based on the Region's LRTP. In addition to the federally-funded transportation projects, the TIP also includes any "regionally significant project" funded with non-federal funds. Under federal regulations, the TIP must include all non-exempt, transportation projects that are on a facility that serves regional transportation needs[32] and that would normally be included in the modeling of the Region's transportation network, including, at a minimum, all principal arterial highways and all fixed guideway

[31] The information regarding the strategies related to access / mobility begins on pages 16-19 of the LRTP and pages 26-49 of the State of the System report, both documents can be found on EWGCOG's website at: www.ewgateway.org/trans/longrgplan/longrgplan.htm.

[32] Examples include: access to and from the area outside the Region, major activity centers in the Region, major planned developments such as new retail malls, sports complexes, etc., or transportation terminals as well as most terminals themselves.

transit facilities that offer an alternative to regional highway travel. Federal transportation funding is provided for many different programs that are aimed at improving various components of the transportation system, including roadways, bridges, bicycle / pedestrian facilities, paratransit, and public transportation, as well as addressing concerns about air quality and the environment, mobility, job access, and safety.[33]

EWGCOG's TIP is developed in accordance with federal requirements and, as such, projects are selected primarily on their merits. Funding for projects implemented by the Region's local government entities is provided after a competitive application and selection process. During this process, local entities and agencies submit project applications to EWGCOG and EWGCOG staff evaluates the applications according to six priority areas that include: preservation of existing infrastructure, safety and security in travel, congestion management, access to opportunity, sustainable development, and efficient movement of goods.[34] The six priority areas are based upon the ten guiding principles expressed in EWGCOG's LRTP.[35]

As stated above, EWGCOG ensures that its transportation planning and programming address the mobility needs of EJ populations through the TIP application and project evaluation process. Projects that improve access to opportunity (project addresses the complex mobility needs of persons living in low-income communities[36] and persons with disabilities) are awarded points during the project evaluation process. In particular, the better that a project provides access to opportunity the more points are awarded to the project during the evaluation process. For example, those projects that are located within an EJ census track or block *and* provide direct access to opportunity for disadvantaged individuals (low-income persons, disabled persons, etc.) are awarded the highest number of points for this priority area, whereas, projects that only include measures to eliminate accessibility barriers and bring a non-ADA compliant facility into ADA compliance are awarded lower points and projects that do not improve access to opportunities are not awarded any points with respect to this priority.

## E. Coordinated Human Services Transportation Plan

The CHSTP is a federally required document that describes how the Region will address the needs of human service transportation users and providers. The CHSTP was first developed by EWGCOG in 2008 and is updated at least every four years. The most recent version of the CHSTP was developed and adopted in 2012. This plan serves as the foundation for the Region's transportation programs that are aimed at improving the mobility of disadvantaged individuals such as low-income persons, persons with disabilities, and the elderly. These programs are currently federally-funded through MAP-21, Section 5310 – *Enhanced Mobility for Seniors and Persons with Disabilities* and the funding is provided to governmental or non-profit entities that provide transportation services to seniors and individuals with disabilities.[37] During the development of the 2008 CHSTP, EWGCOG undertook a comprehensive assessment of the transportation needs of disadvantaged individuals and identified unmet

[33] A full list of the programs funded through the TIP can be found in the FY 2016-2019 TIP, on pages 5-9 (printed) / 15-19 (*.pdf), which can be found on EWGCOG's website at: www.ewgateway.org/trans/tip/tip.htm.
[34] A description of each priority can be found on page 10 (printed) / 20 (*.pdf) of the FY 2016-2019 TIP, see www.ewgateway.org/trans/tip/tip.htm.
[35] The guiding principles can be found on page 10 of the LRTP, see www.ewgateway.org/trans/longrgplan/longrgplan.htm.
[36] In the Region, low-income communities and communities with high proportions of minority groups are strongly correlated, see Section IV.
[37] Prior to MAP-21, CHSTP projects included those funded by Section 5316 – Job Access and Reverse Commute and 5317 – New Freedom. MAP-21 repealed the New Freedom and JARC programs. New Freedom activities are now funded under Section 5310 and JARC activities are funded under Section 5307 and Section 5311.

transportation needs.[38] Based on this analysis, the CHSTP's Stakeholder Committee identified several issues with the Region's existing transportation services and developed strategies that will help close gaps and better address the transportation service needs of disadvantaged individuals.

The 5310 projects in the Region must be consistent with the principles expressed in the LRTP and are evaluated, in part, on whether the project meets one of the five strategies outlined in the CHSTP. Funding for 5310 projects is provided after a competitive application and selection process. The highest amount of points that an application can earn during the selection process is for the category "Needs and benefits," which is based upon an assessment of the extent to which the project will overcome barriers and improve access to transportation.

### F. Unified Planning Work Program

EWGCOG's UPWP describes the work that the agency will undertake during the fiscal year. This work includes research and analysis, planning, policy, and community engagement and local government services. The work that EWGCOG undertakes every year is in accordance with the planning factors that are outlined in federal statute; one of which is accessibility and mobility. In addition to the federally mandated factors, EWGCOG's work also addresses the regional planning priorities that are expressed in the LRTP. The UPWP describes EWGCOG's work with respect to the LRTP, the TIP, and the CHSTP, as well as two other work elements that specifically address mobility needs in transportation planning: regional travel demand modeling and system evaluation[39] and multi-modal transportation planning[40]. Regional travel demand modeling and system evaluation informs all of the planning work conducted by EWGCOG and it also focuses on developing analytical methods that better evaluate the performance of the Region's transportation system and individual projects related to mobility, accessibility, land-use, economic growth, and the natural environment. Multi-modal transportation planning examines a variety of transportation modes largely from the perspective of system users: the elderly, persons with disabilities, cyclists and pedestrians, and freight movers. EWGCOG's planning work in this area engages the specific constituencies to define and implement approaches for meeting their special concerns or needs and attempts to address these needs within an integrated regional context. One primary component of EWGCOG's multi-modal work focuses on accessibility and paratransit planning, which includes efforts to develop strategies to create efficiencies in transportation services for the elderly and individuals with disabilities, as well as the preparation of informational materials that address obstacles to access and mobility.

[38] A description of this analysis can be found in the CHSTP on EWGCOG's website at: www.ewgateway.org/ProgProj/CHSTP/chstp.htm.
[39] FY 2016 UPWP Work Element 1.01 addresses regional travel demand modeling and system evaluation. The FY 2016 UPWP can be found on EWGCOG's website at: www.ewgateway.org/pdffiles/library/upwp-FY2016.pdf.
[40] FY 2016 UPWP Work Element 2.11 addresses multi-modal transportation planning.

# VI. Distribution of Public Transportation Funding

In the Region, public transportation funding is distributed to support a number of projects, including: bus / van acquisitions, MetroLink improvements, fixed rail / bus service expansion, equipment / facilities and maintenance, and facility / safety security. These projects are implemented by local transit providers like BSDA, St. Clair County Transit, and Madison County Transit, as well as many paratransit service providers and other organizations that provide transportation to disabled persons and elderly persons like Paraquad, Challenge Unlimited, Independence Center, and others.

As part of the transportation programming and planning process, EWGCOG examines the distribution of public transportation funding throughout the Region in order to identify any disparate impact or disproportionate impact on the Region's EJ populations. This examination reveals that the distribution of public transportation funding in the Region does not have a disparate impact or a disproportionate burden on these residents. A majority of the Region's public transit system serves residents who live in EJ Areas (see Figure 8). Additionally, a majority of the Region's minority residents live in areas that are served by public transit (see Figure 9). As show in Table 8, more than 98 percent of the Region's federal and state public transportation funding is distributed to entities that provide services to EJ Areas.

**Figure 8. St. Louis Region, EJ Areas & Public Transit**

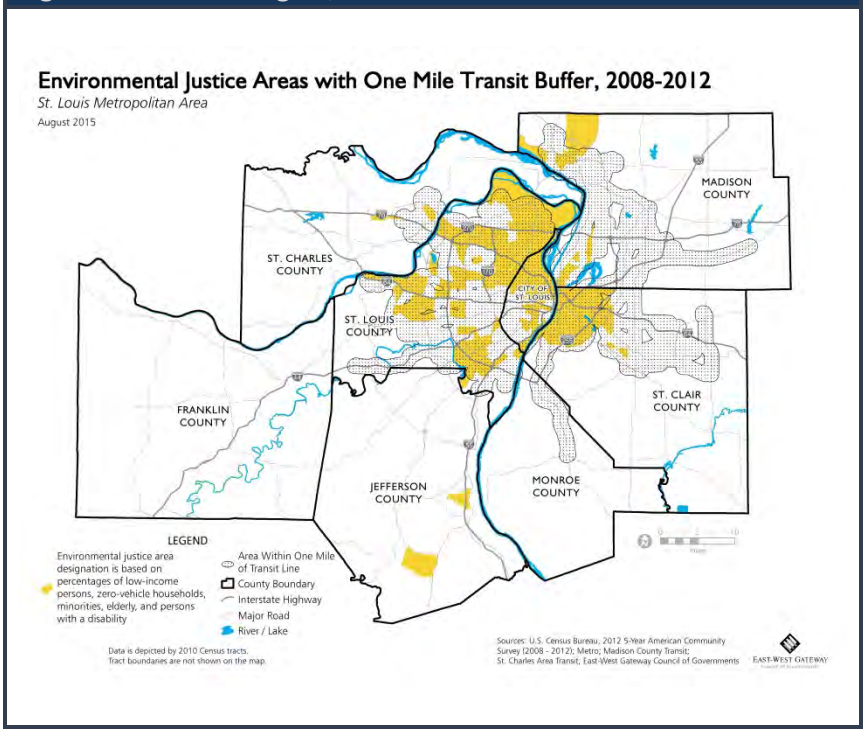
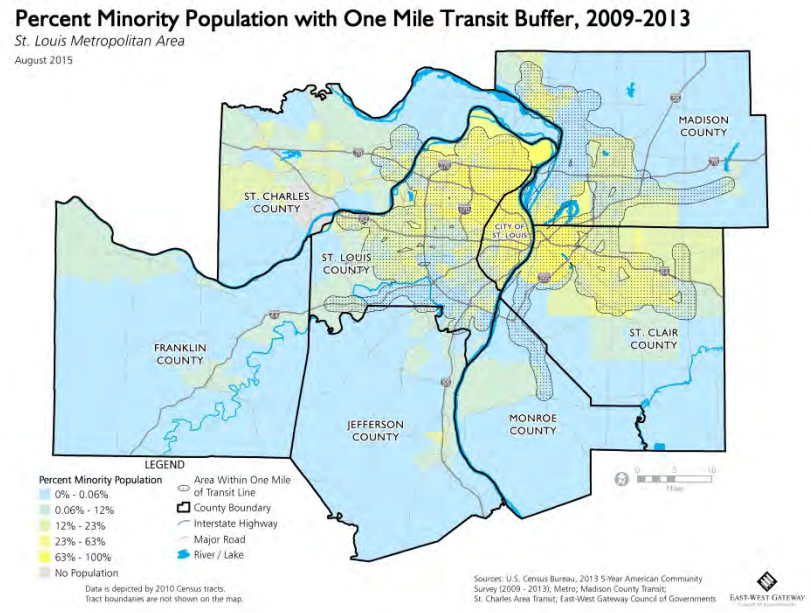


**Figure 9. St. Louis Region, Minorities & Public Transit**



# VI. Distribution of Transportation Funding

**Table 8. St. Louis Region Public Transportation Funding[1] Distribution**

| | % Minority Population[2] | Federal | | State | | Total Funding | |
|---|---|---|---|---|---|---|---|
| | | $ | % | $ | % | $ | % |
| **St. Louis Region** | **100.0** | **$447,570,189** | ***100.0*** | **$20,640,686** | ***100.0*** | **$468,210,875** | ***100.0*** |
| EJ Counties[3] | 91.8 | $441,516,469 | *98.6* | $20,640,686 | 100.0 | $462,157,155 | *98.7* |
| Non-EJ Counties[4] | 8.2 | $1,364,691 | *0.3* | $0 | 0.0 | $1,364,691 | *0.3* |
| Other Counties[5] | N/A | $4,689,029 | *1.0* | $0 | 0.0 | $4,689,029 | *1.0* |

*Source: FY 2016 - 2019 Transportation Improvement Program, U.S. Census, 2013 5-Year American Community Survey.*

[1] Public transportation funding includes funds for: bus/van acquisitions, MetroLink improvements, fixed rail/bus service expansion, equipment/facilities and maintenance, and facility safety/security.

[2] Percent Minority Population refers to the proportion of the Region's minority population that resides in an EJ Area. The percentage was calculated by taking the total minority population in each of the four EJ Counties and dividing it by the total minority population in the Region.

[3] EJ Counties are those four counties that have the highest proportion of EJ Areas (see Table 7) of any of the counties in the Region and include: Madison County, St. Clair County, the City of St. Louis, and St. Louis County. EJ Areas are defined in Section V, Part B. Note that a county's classification as an "EJ County" does not mean that the county's entire geography is an EJ Area.

[4] Non-EJ Counties are those four counties that have the lowest proportion of EJ Areas of any of the counties in the Region and include: Monroe County, Franklin County, Jefferson County, and St. Charles County.

[5] Other Counties refers to funding that benefited all eight counties in the Region or funding that went to multiple counties, but, due to the project type, the exact proportion of funding that benefits any particular county is impossible to determine accurately.

# VII. Pass-Through Funding & Subrecipient Assistance

## A. Background

As a primary recipient[41] of FTA funding, EWGCOG is required to pass through federal financial assistance in a nondiscriminatory manner and is responsible for providing assistance to entities that apply for funding, including those applicants that would serve predominantly minority and other EJ populations. The processes that EWGCOG uses to pass through funding is described in Part B and the process that EWGCOG uses for application review is described in Part C.

## B. Pass-Through Funding

EWGCOG sub-grants federal funding to local entities in a non-discriminatory manner. EWGCOG's decision regarding sub-grants is based upon three primary factors: the federally defined program / project requirements, the federal funding eligibility criteria, and consistency with EWGCOG's plans and programs (i.e. LRTP, CHSTP, UPWP, etc.). Federal laws, regulations, and guidance specify which programs / projects are eligible to receive certain funding and define which applicants / subrecipients are eligible to receive federal funding. Prior to awarding any funds through a sub-grant, EWGCOG examines the federal requirements in order to make a baseline determination as to whether a potential subrecipient is eligible to receive federal funding based upon the project to be completed and entity type. Additionally, EWGCOG examines the relevant EWGCOG plan / program to ensure that the subrecipient's work is consistent with these regional requirements. As it pertains to the federal funding that EWGCOG receives through MoDOT and IDOT, EWGCOG submits its sub-awards to MoDOT and IDOT for approval, as required.

## C. Subrecipient Assistance

EWGCOG receives and reviews grant applications for certain TIP and Section 5310 projects. Both the TIP and Section 5310 rely upon a competitive application and selection process. Applications are reviewed and evaluated in a nondiscriminatory manner and project selection is based upon the merits of the application and the eligibility requirements expressed in the application. EWGCOG has developed and disseminates a TIP Application Workbook and a Section 5310 Application Workbook that describes the application process for each program.[42] EWGCOG also conducts extensive outreach with respect to each application process to ensure that applicants are aware of the funding opportunities and have a chance to apply for grant funds. EWGCOG staff provides technical assistance to potential applicants through workshops and one-on-one meetings (if requested). A description of the technical assistance that EWGCOG staff currently provides to applicants is described below.[43]

[41] Primary recipient is defined in FTA Circular 4701.2B, Chapter I, Part 5(x).
[42] The Section 5310 Application process is described in the Program Management Plan for Section 5310 for the St. Louis Urbanized Area, which can be found on EWGCOG's website at: www.ewgateway.org/progproj/chstp/pmp.pdf. The TIP Application process is described in the TIP Application Workbook, the current version can be found on EWGCOG's website at: www.ewgateway.org/tipappinfo/tipappinfo.htm.
[43] These methods may change from year-to-year depending on the needs of applicants.

## VII. Pass-Through Funding & Subrecipient Assistance

| TIP |
| --- |
| • Applicants are allowed to submit a preliminary application to EWGCOG staff for review prior to the final application deadline.<br>• EWGCOG staff will hold one-on-one meetings with applicants to discuss the preliminary application, the project, and answer any questions that the applicant may have.<br>• EWGCOG staff holds workshops to meet with applicants. One workshop provides general information about the TIP application process and project eligibility. The second workshop provides applicants an opportunity to sign-up for a 30-minute time slot to meet with EWGCOG staff, as well as staff from MoDOT, IDOT, and others, to discuss the applicant's project and project application.<br>• EWGCOG staff is available by phone, email, and in-person throughout the year and during the application process to answer applicant's questions and provide assistance that may be needed. |
| **5310** |
| • EWGCOG staff holds an informational workshop to explain the application process, eligible projects, and to answer any questions that potential applicants may have. The workshop includes representatives from BSDA, MoDOT, and IDOT.<br>• EWGCOG staff is available by phone, email, or in-person throughout the application process to answer applicant's questions and provide assistance that may be needed. |

*[This Page Intentionally Left Blank]*

# Appendix 1:
# Title VI Assurance

*[This Page Intentionally Left Blank]*

# Appendix 1: Title VI Assurance

East-West Gateway Council of Governments (hereinafter referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any federal financial assistance from the U.S. Department of Transportation (DOT), it is subject to and will comply with the following:

- Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. §§ 2000d *et seq.* (hereinafter referred to as the "Act"),
- All requirements imposed by or pursuant to the Code of Federal Regulations, Title 49: Transportation, Subtitle A: Office of the Secretary of Transportation, Part 21: *Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964* (hereinafter referred to as the "Regulations"), and
- Other pertinent directives.

In accordance with the Act, Regulations, and other pertinent directives, Recipient hereby gives assurance that:

*No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the U.S. Department of Transportation.*

Specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances in regard to its programs funded by the DOT, including, but not limited to, those programs funded under U.S.C. Title 23 and 49 U.S.C. Chapter 53, as each were amended by the Moving Ahead for Progress in the 21st Century Act (MAP-21), P.L. 112-141.

1. The Recipient agrees that each "program" and each "facility", as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be conducted (with regard to a "program") or will be operated (with regard to a "facility") in compliance with all requirements imposed by, or pursuant to, the Regulations.

2. The Recipient shall insert, modified as necessary, the following notification in all solicitations for bids for work or material and all proposals for negotiated agreements that are subject to the Regulations and are made in connection with DOT assisted projects:

   *The Consultant shall not discriminate on grounds of the race, color, religion, sex, disability, national origin, or ancestry of any individual in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Consultant shall not participate either directly or indirectly in the discrimination prohibited by 49 CFR Subtitle A, Part 21.5 including employment practices.*

3. The Recipient shall insert Part A of this Assurance in every contract subject to the Act and the Regulations.

4. The Recipient shall insert, in adapted form if needed, information contained in Part B of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

5. Where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection with the facility.

6. Where the Recipient received federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over, or under such property.

7. The Recipient shall include the appropriate clauses, in adapted form if needed, set forth in Part C of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved with financial assistance from DOT; and (b) for the construction or use of, or access to space on, over, or under, real property acquired or improved with financial assistance from DOT.

8. This Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

9. The Recipient shall provide for such methods of administration for the program, as are found by the State Secretary of Transportation or the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of, and for the purpose of obtaining, any and all federal grants, loans, contracts, property, discounts, or other federal financial assistance extended after the date hereof to the Recipient by DOT and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, and successors in interest. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Recipient.

J. M. Wild — 1-27-16

**James M. Wild, Executive Director** — **Date**

# Appendix 1: Title VI Assurance

## Part A

Pursuant to #3 above, EWG will include the provisions below, modified as necessary, in all of its DOT-funded contracts.

**Civil Rights.**

- **Non-Discrimination Assurances.**
  - ***[Name of Consultant/Sub-Grantee]*** certifies that it will comply with all applicable federal and state statutes, regulations, executive orders, agency directives, and administrative rules relating to nondiscrimination and equal opportunity, including, but not limited to Title VI and Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000d and 2000e), as well as any applicable titles of the Americans with Disabilities Act and the Rehabilitation Act of 1973 (29 U.S.C. § 790 *et seq.*), and 49 CFR Subtitle A, Part 27.
  - ***[Name of Consultant/Sub-Grantee]*** shall comply will the administrative rules of DOT relative to nondiscrimination in federally-assisted programs of the DOT (49 CFR Subtitle A, Part 21).
  - ***[Name of Consultant/Sub-Grantee]*** shall not discriminate on grounds of race, color, religion, sex, disability, age, national origin, or ancestry of any individual in the selection and retention of subcontractors, including procurement of materials and leases of equipment. ***[Name of Consultant/Sub-Grantee]*** shall not participate either directly or indirectly in the discrimination prohibited by 49 CFR Subtitle A, Part 21. 5 including employment practices.
  - ***[Name of Consultant/Sub-Grantee]*** agrees that it will not discriminate against any employee or applicant for employment because of race, color, religion, sex, disability, age, national origin, or ancestry. ***[Name of Consultant/Sub-Grantee]*** agrees to take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, color, religion, sex, disability, age, national origin, or ancestry. Such action shall include, but not be limited to, employment, upgrading, demotions or transfers, recruitment or recruitment advertising, layoffs or terminations; rates of pay or other forms of compensation; and selection for training, including apprenticeship.
  - These assurances concerning nondiscrimination also apply to subcontractors and suppliers of ***[Name of Consultant/Sub-Grantee]***. These apply to all solicitations either by competitive bidding or negotiation made by ***[Name of Consultant/Sub-Grantee]*** for work to be performed under a subcontract including procurement of materials or equipment. ***[Name of Consultant/Sub-Grantee]*** shall notify each potential subcontractor or supplier of the requirements of this Agreement relative to nondiscrimination on grounds of the race, color, religion, sex, disability, age, national origin, or ancestry of any individual.
  - ***[Name of Consultant/Sub-Grantee]*** assures that, as a condition of receiving payments under this Agreement, it will not discriminate on grounds of race, color, religion, sex, disability, age, national origin, or ancestry of an individual in the performance of any services under this Agreement, including the selection and retention of subcontractors and the procurement of materials and leases of equipment.
  - ***[Name of Consultant/Sub-Grantee]*** shall comply with the data collection and reporting requirements subject to Title VI of the Civil Rights Act of 1964 and the implementing regulations of 28 CFR Part 42, Subpart F and 49 CFR Part 21.

- ***[Name of Consultant/Sub-Grantee]*** shall comply with the terms provided in Appendix IV, which is hereby incorporated by reference and made a part of this Agreement.
- The terms of this Paragraph XX, Part (X)(X) will apply to all of ***[Name of Consultant/Sub-Grantee]***'s solicitations, either by competitive bidding or negotiation, for work to be performed under a subcontract including procurement of materials or equipment, and ***[Name of Consultant/Sub-Grantee]*** shall notify each potential subcontractor, supplier, or lessor of ***[Name of Consultant/Sub-Grantee]***'s obligations under this Agreement.
- Each of the statutes, orders, regulations, or rules, including any later amendments, listed in this Paragraph XX, Part (X)(X) are incorporated by reference and made a part of this Agreement.
- ***[Name of Consultant/Sub-Grantee]*** shall include the provisions of Paragraph XX, Part (X)(X) in every subcontract, including procurement of materials or leases of equipment.
- ***[Name of Consultant/Sub-Grantee]***'s failure to carry out the requirements set forth in this Paragraph XX, Part (X)(X) will constitute a breach of contract and the Council may enforce certain remedies against ***[Name of Consultant/Sub-Grantee]*** including, but not limited to, those remedies expressed in Paragraph XX, Part (X).

EWG will also include the attached "Appendix IV to the EWGCOG & ***[Name of Contractor / Sub-Grantee]*** Agreement, Title VI & DBE Standard Terms and Conditions" as part of its DOT-funded contracts. These terms may be modified as necessary.

**Part B**

EWG will include the following clauses in any and all deeds affecting or recording the transfer of real property, structures, or improvements thereon, or interest therein from the United States.

(Granting Clause)

> NOW, THEREFORE, the Department of Transportation — as authorized by law, and upon the condition that East-West Gateway Council of Governments will accept title to the lands and maintain the project constructed thereon, in accordance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways; the policies and procedures prescribed by the Federal Highway Administration of the Department of Transportation; and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252: 42 USC 2000d to 2000d-4)—does hereby remise, release, quitclaim, and convey unto East-West Gateway Council of Governments all the right, title, and interest of the Department of Transportation in and to said land described in [*Title of Exhibit / Appendix*] attached hereto and made a part thereof.

(Habendum Clause)

> TO HAVE AND TO HOLD said lands and interests therein unto East-West Gateway Council of Governments, and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which the federal financial

assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on East-West Gateway Council of Governments, its successors, and assigns.

East-West Gateway Council of Governments, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree, as a covenant running with the land for itself, its successors and assigns, that: (1) no person shall, on the grounds of race, color, sex, disability, national origin, age, or religion, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed (,) (and)*, (2) that East-West Gateway Council of Governments shall use the lands, and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination of Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended (,) and (3) that in the event of breach of any of the above mentioned nondiscrimination conditions, the agency shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in, and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this instruction.

**Part C**

EWG will include the following clause in all deeds, licenses, leases, permits, or similar instruments entered into by EWG pursuant to the provisions of Assurance 7(a).

The [grantee, licensee, lessee, etc., as appropriate] for himself or herself, his or her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add “as a covenant running with the land”], that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (lease, deed, license, etc.) for a purpose for which a Department of Transportation program or activity is extended, or for another purpose involving the provision of similar services or benefits, the [grantee, licensee, lessee] shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended. That in the event of breach of any of the above nondiscrimination covenants, EWG shall have the right to terminate the [license, lease, etc.], and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

EWG will include the following clause in all deeds, licenses, leases, permits, or similar agreements entered into by EWG pursuant to the provisions of Assurance 7(b).

The [grantee, licensee, lessee, etc., as appropriate], for himself or herself, his or her personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant, and agree [in the case of deeds and leases add “as a covenant running with the land”], that (1) no person, on the grounds of race, color, or national origin, shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land and

furnishing of services thereon, no person on the grounds of race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the [grantee, licensee, lessee, etc., as appropriate] shall use the premises in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation— Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended. That in the event of breach of any of the above nondiscrimination covenants, EWG shall have the right to terminate the lease, and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

## Appendix IV to the EWGCOG & [*Enter Contractor / Sub-Grantee Name*] Agreement
## Title VI & DBE Standard Terms and Conditions
## [*Third Party Contractor or Sub-Grantee*]

***[NAME OF CONSULTANT/SUB-GRANTEE]*** understands and agrees that the following terms and conditions apply to the Agreement entered into between ***[NAME OF CONSULTANT/SUB-GRANTEE]*** and the Council. These terms and conditions are made a part of and are hereby incorporated into the Agreement. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** further understands and agrees that failure to adhere to these terms and conditions constitutes a material breach of its Agreement with the Council, and that the Council may take the appropriate action against ***[NAME OF CONSULTANT/SUB-GRANTEE]*** to ensure compliance with these provisions, up to and including ordering a stoppage of work, suspending payments, or terminating the Agreement.

**1.0 APPLICABLE TITLE VI & OTHER CIVIL RIGHTS LAWS & REGULATIONS.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** agrees to abide by all applicable federal and state laws, regulations, orders, and directives regarding non-discrimination in federally assisted programs. These laws, regulations, orders, and directives include, but are not limited to:

**1.1** Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d, and implementing regulations at 49 CFR Part 21 – *Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act*;

**1.2** The equal employment opportunity provisions of 49 U.S.C. § 5332 and Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e *et seq.*, and implementing regulations;

**1.3** Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 *et seq.*, and implementing regulations at 49 CFR Part 25 – *Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance*;

**1.4** Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794, and the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101 *et seq.*, and implementing regulations, including:

**1.4.1** 49 CFR Part 37—*Transportation Services for Individuals with Disabilities (ADA)*;

**1.4.2** 49 CFR Part 27—*Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance*;

**1.4.3** 36 CFR Part 1192 and 49 CFR Part 38—*Americans with Disabilities (ADA) Accessibility Specifications for Transportation Vehicles*;

**1.4.4** 28 CFR Part 35—*Nondiscrimination on the Basis of Disability in State and Local Government Services*;

**1.4.5** 28 CFR Part 36—*Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities*;

**1.4.6** 41 CFR Subpart 101 – 119—*Accommodations for the Physically Handicapped*;

**1.4.7** 29 CFR Part 1630—*Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act*;

**1.4.8** 47 CFR Part 64, Subpart F—*Telecommunications Relay Services and Related Customer Premises Equipment for the Hearing and Speech Disabled*;

**1.4.9** 36 CFR Part 1194—*Electronic and Information Technology Accessibility Standards*;

**1.4.10** 49 CFR Part 609—*Transportation for Elderly and Handicapped Persons*; and

**1.4.11** Federal civil rights and nondiscrimination directives implementing those federal laws and regulations, unless the federal government determines otherwise in writing.

**1.5** The Age Discrimination Act of 1975, as amended, 42 U.S.C. §§ 6101 *et seq.*, and implementing regulations at 49 CFR Part 90 – *Nondiscrimination on the Basis of Age in Programs or Activities Receiving Federal Financial Assistance*;

**1.6** The Age Discrimination in Employment Act, 29 U.S.C. §§ 621 through 634, and implement regulations of the U.S. Equal Employment Opportunity Commission 29 CFR Part 1625—*Age Discrimination in Employment Act*;

**1.7** The Drug Abuse Office and Treatment Act of 1972, as amended, 21 U.S.C. §§ 1101 *et seq.*, the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970, as amended, 42 U.S.C. §§ 4541 *et seq.*, and the Public Health Service Act of 1912, as amended, 42 U.S.C. §§ 290dd through 290dd-2;

**1.8** Executive Order 12898—Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 42 U.S.C. § 4321 note, and DOT Order 5620.3 at Federal Register Vol. 62 No. 18377—*Department of Transportation Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*;

**1.9** Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency, 42 U.S.C. § 2000d – 1 note, and implementing policy guidance at Federal Register Vo. 70 No. 74087—*DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency (LEP) Person*; and

**1.10** All provisions of Missouri Executive Order No. 94 – 03, promulgating the Code of Fair Practices.

**2.0 NON-DISCRIMINATION POLICY, STATEMENT & ASSURANCES.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is required to adopt a non-discrimination policy as stated in a Statement of Nondiscrimination that provides assurances that it will not discriminate against any person in the performance of any federally assisted program on the basis of race, color, national origin, sex, or disability. Specifically, ***[NAME OF CONSULTANT/SUB-GRANTEE]***'s Statement of Nondiscrimination must state: "***[NAME OF CONSULTANT/SUB-GRANTEE]*** assures that no person shall, on the grounds of race, color, national origin, sex, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance." ***[NAME OF CONSULTANT/SUB-GRANTEE]***'s Statement of Nondiscrimination may be more inclusive than the language listed above, but it cannot be more exclusive.

**2.1** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is required to publicly post its non-discrimination policy as stated in its Statement of Nondiscrimination, and ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must provide a written copy of each to the Council upon execution of the Agreement. "Publicly post" includes, but is not limited to, posting the documents to ***[NAME OF CONSULTANT/SUB-GRANTEE]***'s website if it has one.

**2.2** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must include its non-discrimination policy as stated in its Statement of Nondiscrimination in all procurement documents, such as request for proposals, request for qualifications, and other similar documents.

**2.3** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must include its non-discrimination policy as stated in its Statement of Nondiscrimination in all subcontracts, including those for materials and leases, that it enters into under the Agreement.

**2.4** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must provide a sample of its procurement document(s) and subcontract to the Council upon execution of the Agreement, so that the Council can verify the inclusion of the required statement.

**2.5** If ***[NAME OF CONSULTANT/SUB-GRANTEE]*** does not have a non-discrimination policy as stated in a Statement of Nondiscrimination, then ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must notify the Council of this prior to execution of the Agreement. If ***[NAME OF CONSULTANT/SUB-GRANTEE]*** does not develop and/or adopt such a policy and statement prior to the execution of the Agreement, then ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must use and adhere to the Council's non-discrimination policy and statement. A copy of this will be provided to ***[NAME OF CONSULTANT/SUB-GRANTEE]*** upon execution of the Agreement and can be found on the Council's website at www.ewgateway.org.

**3.0 TITLE VI REQUIREMENTS IN RELATION TO COMMUNITY/PUBLIC ENGAGEMENT OR OUTREACH.** If ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is required to perform any public meetings, engagement, or other community outreach as part of the work under the Agreement, then ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must ensure that all persons, including Limited English Proficiency (LEP) persons, are provided meaningful access, as it is defined under Title VI and related provisions, to these events. These requirements include, but are not limited to, ensuring that the meeting location, date, and time are selected in such as way as to not exclude a person from participation on the basis of race, color, national origin, sex, or disability; informing attendees of their rights under Title VI; and ensuring that all attendees are provided the opportunity to participate without regard to their race, color, national origin, sex, disability, or LEP status.

**3.1** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** shall submit to the Council after every public meeting, engagement, or other community outreach a report that provides the following information: (1) description of the purpose of the event; (2) the time, date, and location of the event; (3) the methods used to advertise the event; (4) identify the building and room where the event was held; (5) note any special accommodations that were requested prior to or during the event; (6) how the attendees were informed of their rights under Title VI including complaint procedures; (7) the number of attendees; (8) the number of minority and women attendees *(note these last figures should be estimates based upon observations and should not be obtained by asking attendees to identify their gender, race, color, or national origin)*. The Council has a form that it will provide to ***[NAME OF CONSULTANT/SUB-GRANTEE]*** upon request that ***[NAME OF CONSULTANT/SUB-GRANTEE]*** can use to document its public events.

**4.0 TITLE VI REQUIREMENTS IN RELATION TO WEBSITE AND PRINTED MATERIALS DEVELOPMENT.** If ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is required to develop or create a website or printed informational materials as part of its work under the Agreement, then ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must ensure that all persons, including Limited English Proficiency (LEP) persons, are provided meaningful access, as it is defined under Title VI and related provisions, to the website and the information contained in the printed materials. As part of the effort to ensure meaningful access, ***[NAME OF CONSULTANT/SUB-GRANTEE]*** will be required to develop any printed materials intended for public informational purposes (i.e. brochures and other promotional items) in such a way that these documents can readily be

translated into other languages and/or formats upon request. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must design or create any website such that it includes a translator function so that the material included on the website can be translated into other languages. Additionally, ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must design or create any website so that it is in compliance with the Rehabilitation Act, 29 U.S.C. §§ 794 *et seq.*, as amended, and the Americans with Disabilities Act, 42 U.S.C. §§ 12101 *et seq.*, as amended, and their implementing regulations, and that it adheres to the accessibility requirements set forth by the Federal government. The website must be designed or created in adherence with Section 508 Standards of the Rehabilitation Act. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** can find more information about accessibility standards at: http://www.section508.gov/.

**5.0 TITLE VI REPORTING REQUIREMENTS.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is required to provide the Council the required information listed in 3.1 above in regard to public events. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** shall also provide the Council with any data or information required per Paragraph XX of the Agreement. Further, ***[NAME OF CONSULTANT/SUB-GRANTEE]*** shall provide the Council with any additional information that the Council requests in regard to Title VI compliance. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** shall also permit the Council to access its records up to and including accounting records that are pertinent to the Council substantiating ***[NAME OF CONSULTANT/SUB-GRANTEE]***'s compliance with Title VI.

**6.0 TITLE VI COMPLAINTS.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must notify the Council in writing if a Title VI complaint is filed against it, within five (5) business days of ***[NAME OF CONSULTANT/SUB-GRANTEE]*** being notified of such complaint. The notification must be provided to the Council even if the complaint is not in regard to work that ***[NAME OF CONSULTANT/SUB-GRANTEE]*** performed under the Agreement. The notification shall include the following information: (1) date complaint was filed; (2) nature of complaint; (3) who was involved; (4) what action has been taken to date; and (5) any outcome(s) to date, if applicable.

**7.0 DISADVANTAGED BUSINESS ENTERPRISES (DBEs) APPLICABLE REGULATIONS.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** agrees to abide by the applicable DOT regulations governing DBE participation on federally assisted projects. These regulations can be found at 49 CFR Part 26 – *Participation By Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs*. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** can find the definition of DBE, small business concern, and other relevant definitions regarding DBE participation on this project in 49 CFR Part 26.

**8.0 IMPORTANT DBE REQUIREMENTS.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is prohibited from excluding any person from participation in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and performance of any contract made under the Agreement on the basis of race, color, sex, or national origin.

**8.1** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must include this prohibition in all procurement documents, such as request for proposals, request for qualifications, and other similar documents.

**8.2** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must include this prohibition in all subcontracts, including those for materials and leases, that it enters into under the Agreement.

**8.3** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must provide a sample of its procurement document(s) and subcontract to the Council upon execution of the Agreement, so that the Council can verify the inclusion of the required prohibition.

**9.0 DBE GOALS:** If the project governed by the Agreement includes a DBE goal, ***[NAME OF CONSULTANT/SUB-GRANTEE]*** understands and agrees that it is required to strictly adhere to the DBE goal and the requirements of 49 CFR Part 26.

**10.0 SELECTING DBE SUBCONTRACTORS.** In order for a firm to be eligible to participate as a DBE subcontractor on the project governed by the Agreement, the DBE subcontractor must be a certified DBE. The firm must be certified and registered as a DBE with the Missouri Office of Equal Opportunity, the Missouri Department of Transportation, or the U.S. Small Business Administration. It is the responsibility of ***[NAME OF CONSULTANT/SUB-GRANTEE]*** to ensure that the DBE subcontractor it hires is a certified DBE firm.

**11.0 TERMINATING OR SUBSTITUTING A DBE SUBCONTRACTOR.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** cannot terminate and/or substitute a DBE firm that it listed in its proposal as a subcontractor and/or was approved by the Council as a DBE subcontractor under the Agreement without the prior written consent of the Council. This includes, but is not limited to, instances where ***[NAME OF CONSULTANT/SUB-GRANTEE]*** seeks to perform work originally designated for a DBE subcontractor with its own forces or those of an affiliate, a non-DBE firm, or with another DBE firm. If ***[NAME OF CONSULTANT/SUB-GRANTEE]*** wishes to terminate or substitute a DBE subcontractor it must first submit a written notice to the DBE subcontractor stating its intention to request a termination and/or substitution and the reason for the request, and give the DBE subcontractor no less than five (5) days to respond to the notice and to provide ***[NAME OF CONSULTANT/SUB-GRANTEE]*** and the Council the reasons why the subcontractor should not be terminated. A copy of this written notice must be provided to the Council. Only after the DBE subcontractor has been so notified and provided time to object, may ***[NAME OF CONSULTANT/SUB-GRANTEE]*** submit its request to terminate or substitute a DBE subcontractor. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** must submit its request in writing to the Council and fully state the reasons for its request. Unless the request demonstrates that ***[NAME OF CONSULTANT/SUB-GRANTEE]*** has good cause to terminate and/or substitute a DBE subcontractor, the Council will not concur in ***[NAME OF CONSULTANT/SUB-***

***GRANTEE]***'s finding of good cause and will not approve ***[NAME OF CONSULTANT/SUB-GRANTEE]***'s request to terminate and/or substitute a DBE subcontractor. The definition of "good cause" can be found at 49 CFR Part 26 § 26.53.

**11.1** When a DBE subcontractor is terminated, fails to complete its work on the Agreement for any reason, ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is required to make a good faith effort to find another DBE subcontractor to substitute for the original DBE subcontractor. These good faith efforts shall be directed at finding another DBE to perform at least the same amount of work under the Agreement as the DBE that was terminated. If there is a DBE goal on the project, then the work performed by the substitute DBE need only perform at least the same amount of work under the Agreement as the DBE that was terminated, to the extent needed to meet the DBE goal.

**12.0** **DBE REPORTING REQUIREMENTS.** ***[NAME OF CONSULTANT/SUB-GRANTEE]*** is required to submit to the Council, on a quarterly basis, the DBE Participation Form that is attached to the Agreement. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** shall also provide any other data relevant to DBE participation on the project upon request by the Council. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** shall also permit the Council to access its records up to and including accounting records that are pertinent to the Council substantiating the information provided by ***[NAME OF CONSULTANT/SUB-GRANTEE]*** on its DBE reporting forms.

**13.0** **FLOW DOWN PROVISIONS.** The provisions listed in this Attachment apply to every subcontractor hired by ***[NAME OF CONSULTANT/SUB-GRANTEE]*** to perform work under the Agreement. ***[NAME OF CONSULTANT/SUB-GRANTEE]*** will ensure that all of its subcontractors are made aware of these requirements and will include these provisions as a part to any subcontract that ***[NAME OF CONSULTANT/SUB-GRANTEE]*** enters into under the Agreement.

# Appendix 2:
# Title VI Notice to the Public

*[This Page Intentionally Left Blank]*

# Appendix 2: Title VI Notice to the Public

East-West Gateway Council of Governments (EWGCOG) will insert the paragraph in Part A in all of its significant publications that are disseminated to the public. The language in Part A is the preferred text but, where space is limited or in publications where cost is an issue, EWG may utilize the abbreviated text in Part B rather than using the long-form text.

## A. Long-Form (Preferred)

*East-West Gateway Council of Governments (EWGCOG) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America, on the grounds of race, color, sex, or national origin, shall be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which EWGCOG receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with EWGCOG. Any such complaint must be in writing and filed with EWGCOG's Title VI Coordinator within one hundred eighty (180) calendar days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Nondiscrimination Complaint Form, please see EWGCOG's website at www.ewgateway.org/titlevi or call (314) 421-4220 or (618) 274-2750.*

## B. Abbreviated Form

*EWGCOG fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Title VI Nondiscrimination Complaint Form, see www.ewgateway.org/titlevi or call (314) 421-4220 or (618) 274-2750.*

*[This Page Intentionally Left Blank]*

# Appendix 3:
# Title VI Complaint Procedures

*[This Page Intentionally Left Blank]*

# Appendix 3: Title VI Complaint Procedures

East-West Gateway Council of Governments (EWGCOG) has implemented the Title VI Complaint Procedures described in this document. These procedures outline the process by which a person can file a written complaint if the person believes that he / she has been excluded from or denied the benefits of or subjected to discrimination by EWGCOG in relation to any program or activity administered by EWGCOG or its subrecipients, consultants, or contractors. EWGCOG's complaint procedure applies to matters related to Title VI of the Civil Rights Act of 1964 (Title VI), the Americans with Disability Act (ADA), or the regulations / rules that govern providing meaningful access to limited English proficient (LEP) persons.

These procedures do not deny the rights of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide remedies that include punitive damages or compensatory remuneration for the complainant. EWGCOG will make every effort to obtain early resolution of complaints. At any stage of the process, the option of informal mediation meeting(s) between the affected parties and EWGCOG's Title VI Coordinator may be used for resolution. The Title VI Coordinator will make every effort to pursue a timely resolution of the complaint. During the initial interviews with the complainant and the respondent, if applicable, the Title VI Coordinator will request information regarding the specific relief requested and settlement opportunities.

In addition to EWGCOG's complaint procedures, complainants have the right to complain directly to the appropriate federal agency. Complainants have 180 calendar days after the date the alleged discrimination occurred to file a complaint with the appropriate federal agency. This process is described in more detail in Part 7.

*Spanish-Language Documents*

The Title VI Complaint Procedures and the Title VI Nondiscrimination Complaint Form (Complaint Form) are available in Spanish on EWGCOG's website at: www.ewgateway.org/titlevi. EWGCOG provides language assistance services free of charge when requested and to the extent that the agency determines is reasonable. If English is not your primary language or if you have a limited ability to read, write, speak, or understand English and you need assistance completing a Title VI Complaint Form or you want to request other language assistance services, please submit your request to:

Title VI Coordinator
East-West Gateway Council of Governments
1 S. Memorial Drive, Suite 1600
St. Louis, MO 63102

---

*Phone:* (314) 421-4220 / (618) 274-2750
*Fax:* (314) 231-6120
*Email:* titlevi@ewgateway.org

*Alternative Languages & Formats*

EWGCOG provides language assistance services and documents in alternative formats free of charge for eligible persons when requested and to the extent that the agency determines is reasonable, which may include, EWGCOG providing:

- The Title VI Complaint Procedures or the Complaint Form in another language or alternative format,
- Assistance completing a Complaint Form, or
- Other language assistance services

The following persons or their representative may submit a request for language assistance services or documents in alternative formats:

- Persons who primary language is not English or who have a limited ability to read, write, speak, or understand English
- Persons with a disability who are unable to use materials in its current format

To request language assistance services or alternative formats, please contact:

Title VI Coordinator
East-West Gateway Council of Governments
1 S. Memorial Drive, Suite 1600
St. Louis, MO 63102

*Phone:* (314) 421-4220 / (618) 274-2750
*Fax:* (314) 231-6120
*Email:* titlevi@ewgateway.org

**Persons who are deaf or hard of hearing may contact EWGCOG through Relay Missouri (TTY).**

***1. Submission of Complaint***

Any individual or group may file a written complaint with EWGCOG's Title VI Coordinator. The mailing address and contact information is as follows:

Title VI Coordinator
East-West Gateway Council of Governments
1 S. Memorial Drive, Suite 1600
St. Louis, MO 63102

*Phone:* (314) 421-4220 / (618) 274-2750
*Fax:* (314) 231-6120
*Email:* titlevi@ewgateway.org

The complaint must be filed within 180 calendar days after the date the alleged discrimination occurred. A Complaint Form, in fillable / savable *.pdf format, may be downloaded on EWGCOG's website at: www.ewgateway.org/titlevi and is available in printed format from the Title VI Coordinator. A sample of the Complaint Form is provided in this Appendix beginning on page 7.

A Complaint Form must be as complete as possible and must, at a minimum:

- Be in writing and signed by the complainant(s).
- Include the date of the alleged act of discrimination.
- Present a detailed description of the issues.

If a complainant chooses not to use EWGCOG's Complaint Form to submit his / her complaint, then the complaint must be in writing and signed by the complainant(s) and must include, at a minimum:

- The complainant's name, address, and telephone number.
- The name and address of the agency, institution, or department the complainant(s) believes discriminated against him / her.
- The how, why, and when that a complainant believes he / she was discriminated against. This description should include as much specific, detailed information as possible about the alleged acts of discrimination and any other relevant information.
- The names of any persons, if known, who EWGCOG can contact for clarity regarding the allegations.

Complaints or allegations received by fax, email, or telephone will be initially processed as follows:

- Complaints or allegations received by fax or email will be acknowledged and will be processed once EWGCOG establishes the identity(ies) of the complainants and the intent to proceed with the complaint.
- Complaints or allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A Complaint Form will be forwarded to the complainant for him / her to complete, sign, and return to EWGCOG for processing.

### *2. Receipt / Acceptance of Complaint*

Within 15 business days after receiving a complaint, the Title VI Coordinator will:

- Forward a copy of the complaint to one or any combination of the following entities, as appropriate or required: Missouri Department of Transportation (MoDOT), the Illinois Department of Transportation (IDOT), or to the designated federal agency (i.e. the Federal Transit Administration, the Federal Highway Administration, etc.), and
- Send a written acknowledgment to the complainant advising that the complaint will be investigated.

In order for a complaint to be accepted, it must involve:

- A covered basis such as race, color, national origin, gender, disability, or retaliation, and
- A program or activity of EWGCOG or one of EWGCOG's subrecipients, consultants, or contractors.

A complaint may be dismissed for any one or combination of the following reasons:

- The complainant requests the withdrawal of the complaint.
- The complainant fails to respond to repeated requests for additional information that is needed to process the complaint.
- The complainant cannot be located after reasonable attempts.

Once the complaint is accepted, the Title VI Coordinator will log it in a database identifying the following:

- Complainant's name
- The basis for the complaint
- The alleged harm
- The race, color, and national origin of the complainant, if applicable

***3. Referral to Review Officer***

The Title VI Coordinator, in consultation with EWGCOG's Human Resources Manager, will appoint one or more staff review officers to investigate the complaint. The staff review officer(s) will complete the investigation within 45 calendar days after EWGCOG received the complaint and will make a recommendation about the merits of the complaint and, if necessary, what steps will be taken to address the complaint.

***4. Complaint Decision***

The staff review officer(s) will forward the recommendation to EWGCOG's Executive Director for review and concurrence. If the Executive Director concurs he or she will issue the agency's response to the complainant(s) and any respondent(s)[1], if applicable.

***5. Requests for Reconsideration***

If the complainant disagrees with EWGCOG's response, he or she may request reconsideration. In order to request a reconsideration, the complainant must submit a written request to EWGCOG within 15 calendar days after he or she received EWGCOG's response. Any affected party may submit information or documentation in writing to the Title VI Coordinator in support of his or her request for reconsideration. The complainant must submit its reconsideration request / information or

[1] A respondent may be any EWGCOG subrecipient, consultant, or contractor named in the complaint.

documentation in writing to the address listed in Part 1 above. Upon completion of the review of the reconsideration request and any additional information or document, the Title VI Coordinator and the Executive Director will have 10 business days to either reaffirm or reverse the original complaint decision and provide a written notice to the complaint and respondent, if applicable.

### *6. Settlement*

If the final complaint decision or the reconsideration decision supports the allegation(s), the Title VI Coordinator will attempt to negotiate an amicable settlement of the issues in dispute. Formal, written settlement agreements must be reviewed by EWGCOG's legal counsel prior to execution and must be signed by the parties, the Title VI Coordinator, and the Executive Director.

### *7. Submission of Complaint to Other Entities*

If a complainant is dissatisfied with EWGCOG's resolution of the complaint, he or she may also submit a written complaint the appropriate state or federal agency in accordance with the requirements of the state or federal agency. A list of agencies is provided below.

*NOTE: Complaints must be filed with federal agencies no later than 180 calendar days after the alleged discrimination occurred. Prompt action after receiving EWGCOG's final response is necessary to ensure review by state or federal agencies.*

Missouri Department of Transportation
Office of External Civil Rights
1617 Missouri Blvd.
P.O. Box 270
Jefferson City, MO 65102
*Phone:* (573) 526-2978
*Fax:* (573) 526-0558
www.modot.org/ecr/

Federal Highway Administration
Office of Civil Rights
1200 New Jersey Ave., SE
8th Floor E81-105
Washington, DC 20590
*Phone:* (202) 366-0693
*TTY:* (202) 366-5132
*Fax:* (202) 366-1599
*Email:* CivilRights.FHWA@dot.gov
www.fhwa.dot.gov/civilrights/contact.cfm

Illinois Department of Transportation
Bureau of Civil Rights
2300 Dirksen Parkway, Room 317
Springfield, IL 62764
*Phone:* (217) 782-2762
*TTY:* (866) 273-3681
*Fax:* (217) 524-4063
www.idot.illinois.gov/about-idot/civil-rights/index

Environmental Protection Agency
Office of Civil Rights
Mail Code 1201A
1200 Pennsylvanie Ave., NW
Washington, DC 20460
*Phone:* (202) 564-7272
*Fax:* (202) 501-1836
www.epa.gov/civilrights/

Federal Transit Administration
Office of Civil Rights
Attn: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590
*Phone:* (888) 446-4511
www.fta.dot.gov/civilrights/12328_5104.html

Civil Rights Program Specialist
Federal Transit Administration
Region VII and Region VIII
1961 Stout Street, Suite 13301
Denver, CO 80294-3007
*Email:* kevin.osborn@dot.gov
*Phone:* (303) 362-2393

Department of Homeland Security
Office for Civil Rights and Civil Liberties
Building 410, Mail Stop # 0190
Washington, DC 20528
*Phone:* (202) 401-1474
(866) 644-8360
*TTY:* (202) 401-0470
(866) 644-8361
*Fax:* (202) 401-4708
*Email:* crcl@dhs.gov
www.dhs.gov/office-civil-rights-and-civil-liberties

For the appropriate agency for ADA complaints go to: www.ada.gov/cguide.pdf or call the ADA information line at: (800) 514-0301 (voice) or (800) 514-0383 (TTY).

### *8. Confidentiality*

To the extent feasible and permitted by law, EWGCOG shall keep confidential the information regarding any complaint that EWGCOG receives or collects during the formal and informal investigation process.

### *9. Investigation Records*

EWGCOG will maintain complaint and investigation records in accordance with applicable federal guidelines or, in the absence of federal guidelines, applicable state guidelines.

# Appendix 3: Title VI Complaint Procedures

## Title VI Nondiscrimination Complaint Form

This form may be used to file a complaint with East-West Gateway Council of Governments (EWGCOG) pursuant to nondiscrimination laws, rules, and regulations including, but not limited to: Title VI of the Civil Rights Act of 1964 and Executive Order 13166 - *Improving Access to Services for Persons with Limited English Proficiency.*

*This form is also available in Spanish and can be found on EWGCOG's website at: www.ewgateway.org/titlevi.*

If you need assistance completing this form, please contact us by phone at (314) 421-4220 or (618) 274-2750 or by fax at (314) 231-6120 and ask for Royce Bauer (Title VI Coordinator).

Feel free to add additional pages if necessary. You are not required to use this form; a signed letter that provides the same information is sufficient to file your complaint.

Complaints of discrimination must be filed within 180 calendar days of the date that the alleged discrimination occurred.

This form MUST be completed by the complainant or the complainant's designated representative.

### Complainant's Personal Information

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Phone (Home / Work): _____ Phone (Cell): _____

Name of person completing this form, if different from above: _____

Your relationship to the complainant indicated above: _____

### Alleged Discrimination - Details of Complaint

**I. Identify the agency, department, or program that allegedly discriminated**

Agency or Department Name: _____

Name of any individual (if known): _____

City: _____ State: _____ Zip Code: _____

Phone (Work): _____ Fax: _____

Date(s) of alleged act: _____

Date alleged discrimination began: _____ Last or most recent date of alleged discrimination: _____

## Title VI Nondiscrimination Complaint Form

### II. What is the basis for this complaint?

If your complaint is in regard to discrimination in the delivery of services or discrimination that involved the treatment of you or others by the agency or department indicated in Part I above, please indicate below the basis on which you believe these discriminatory actions were taken.

**Example:** If you believe that you were discriminated against because you are African American, you would mark the box labeled "Race/Color" and write / type "African American" in the space provided.

**Check all that apply:**

☐ Race/Color _____

☐ National Origin _____

☐ Other (*please specify*) _____

### III. Explain what happened

Please explain as clearly as possible what happened. Provide the name(s) of witnesses, fellow employees, supervisors, others involved in the alleged discrimination. Please include all information that you feel is relevant to the investigation. (Attach additional sheets if necessary and provide a copy of any written materials pertaining to your complaint).

## Title VI Nondiscrimination Complaint Form

**IV. How can this/these issue(s) be resolved to your satisfaction?**

**V. What is the most convenient time and place for us to contact you about this complaint?**

**VI. If we will not be able to reach you directly, please give us the name and phone number of a person who can reach you or provide information about your complaint.**

Name: _____

Phone: _____

**VII. If you have an attorney representing you concerning the matter raised in this complaint, please provide the following information:**

Name: _____

Address: _____ City: _____

State: _____ Zip Code: _____ Phone: _____

**Signature & Date**

_____ _____

Signature Date

Note: The laws enforced by this agency prohibit retaliation or intimidation against anyone because the individual has either taken action or participated in an action to secure rights protected by these laws. If you experience retaliation or intimidation separate from the discrimination alleged in this complaint or if you have questions regarding the completion of this form, please contact:

Title VI Coordinator
East-West Gateway Council of Governments
1 S. Memorial Drive, Suite 1600
St. Louis, MO 63102

Phone: (314) 421-4220
(618) 274-2750
Fax: (314) 231-6120

# Appendix 3: Title VI Complaint Procedures

## Title VI Nondiscrimination Complaint Form

You can use this page if you need additional space to provide the information requested on this form.

# Appendix 4:
# Public Involvement Plan

*[This Page Intentionally Left Blank]*

The East-West Gateway Council of Governments

# COMMUNITY CONNECTIONS

## Public Involvement Plan

EAST-WEST GATEWAY
Council of Governments
Creating Solutions Across Jurisdictional Boundaries

*Create Meaningful Engagement Opportunities That Are Accessible to Everyone*

## A Note from the Executive Director

The East-West Gateway Council of Governments (EWG) has always had a strong commitment to public involvement in our regional decision-making processes. Our Board of Directors make transportation-related decisions affecting everything from the vitality of our regional economy to the daily lives of our citizens. Our work impacts our environment and our neighborhoods. Public guidance and advice are a vital consideration in how we allocate millions of dollars to transportation and other projects here in the St. Louis region.

We are constantly developing new resources, analyzing regional trends through data analysis, and providing technical assistance and education for our member governments and their constituents. Meaningful public involvement is not always easy. We are all aware that in today's fast paced world it is challenging to achieve high levels of engagement on issues that have a longer time horizon or on initiatives that are not in our own backyards. But it is our obligation and mission to educate, inform and involve. Our process of engaging the public must give ALL people a variety of opportunities to influence public decision-making.

The purpose of the East-West Gateway Public Involvement Plan is to set forth expectations and procedures for public involvement in our region's transportation planning and other processes. Federal funders provide lots of guidance about what we MUST do but we have "wide latitude to determine how, when and how often specific public involvement measures should take place, and what specific measures are most appropriate." This is a huge responsibility and we don't take it lightly. This document outlines our resources and approach but most importantly it outlines specific public involvement goals and strategies that our staff will work to achieve in the coming years.

This plan benefitted from the time and expertise of many people. We received invaluable input from an advisory committee of community members, suggestions from focus groups and a public survey. This plan will change and grow as East-West Gateway continues to engage our political leaders, businesses, residents and community organizations. Public involvement starts with you. I invite all our partners and stakeholders to become involved in regional planning discussions with us and in your community. It is only through your involvement that we can truly create a regional agenda that is meaningful.

Ed Hillhouse

### Inside this plan you will find:


Regional Planning Matters ..... 2

Who We Are..... 3

The Public Involvement Planning Process ..... 4

Mission, Vision and Goal Statement Overview..... 5

Our Commitment to the Community..... 6

Goals and Strategies..... 7

The Agency's Core Plans ..... 10

Title VI Program Policy..... 12

Tracking and Evaluation..... 12

Current Engagement Tools ..... 13

Conclusion ..... 15

Appendix ..... 16

## Regional Planning Matters

Regional planning might not seem like the most exciting topic. Every day we are bombarded with requests for our time and attention and it is often hard to find the time to PARTICIPATE, especially when the issue doesn't seem to affect us directly at this moment. Moreover, when we deal with big regional issues, like planning for regional safety and security, planning for a sustainable future, planning for new levees, planning for future business, planning for the needs of our changing population, planning for future land use, or planning for future infrastructure needs, it is often hard to believe that our voice or opinion could be heard in a meaningful way.

The East-West Gateway Council of Governments (EWG) undertakes many different types of regional planning activities, in partnership with federal, state, local governments and nonprofit organizations. We understand that our decisions affect all of our region's citizens and therefore this public involvement plan works to create avenues for you to participate in all of our planning activities.

## Transportation Impacts Each of Us

EWG is responsible for a wide variety of regional planning activities but none more highly visible than the transportation planning and funding decisions for the St. Louis region. Transportation has a tremendous impact on a wide range of regional activities and institutions. Our transportation system makes it possible for us to get where we want to go, as well as to enjoy products and services from all over the world. It is a driving force behind our region's economic health and our ability to grow.

In the St. Louis metropolitan region, our vast transportation system includes the Mississippi River, Lambert St. Louis International Airport and several regional airports, MetroLink (light rail), Metro Bus and paratransit services, ports, bike paths and greenways, sidewalks and the many local or state roadways and bridges we use each day.

EWG is designated by the federal government as the region's Metropolitan Planning Organization (MPO), charged with coordinating transportation planning for the St. Louis metropolitan region. This includes roadway construction and maintenance projects, as well as bus, rail, pedestrian, and bicycle projects from bridges that span our rivers to streetscape improvements in our neighborhoods.

Allocating transportation dollars for specific projects and programs is a huge responsibility. EWG staff considers a number of federal requirements, such as the need to conform to federal air quality standards and inclusive public involvement, in our decision making. In addition, we must work with limited transportation funding made available by federal, state, and local sources to pay for projects. Our needs far outweigh our resources so we make tough decisions that balance many regional needs.

The advice and input of a wide range of stakeholders is critical to making good regional decisions. Stakeholders include individuals and groups alike. They include citizens, business owners, environmental and civic organizations and advocacy groups that represent the needs of the underserved/underrepresented-including low income, minority, elderly, and disabled populations.

## Your Voice Makes a Difference

Each of our stakeholders has a different perspective, a different set of needs and interests that East-West Gateway hears and considers. Public involvement encompasses the process and the methods used by EWG to inform and involve the public in regional issues and decisions. It is required by the federal laws that guide metropolitan planning organizations. But, it is also a valued tool we use to ensure that investments made by state and local governments utilizing public dollars are meaningful and meet the needs of our citizens and other stakeholders. We will work diligently through this plan to reach you. Please join us and PARTICIPATE.

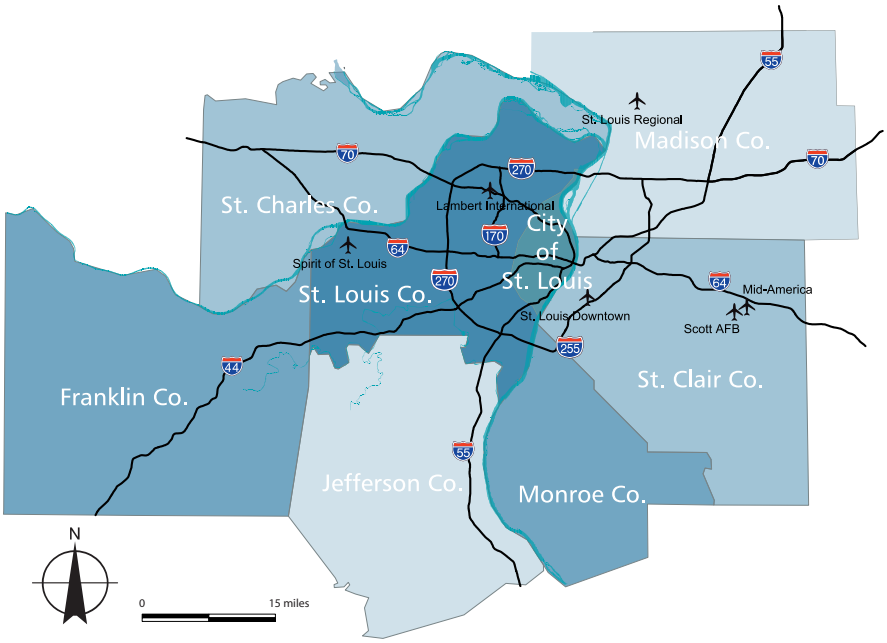
*All citizens ... must be involved in regional discussions surrounding social, economic, environmental, community development and transportation planning decisions*

## Who We Are

East-West Gateway Council of Governments is a membership organization for local governments in the St. Louis metropolitan area. We cover eight counties including the city of St. Louis; Franklin, Jefferson, St. Charles, and St. Louis counties in Missouri; Madison, Monroe, and St. Clair counties in Illinois. Formed in 1965, EWG provides a forum for the local governments of the bi-state St. Louis area to work together to solve problems that cross jurisdictional boundaries. Our 24-member Board of Directors is comprised of the chief elected officials from our eight counties and numerous other elected officials.

EWG's designation as a regional council of governments (COG) means that the agency has the civic responsibility to set the table for cooperative planning and problem-solving among and between any of its member local governments who believe that they can accomplish better things by working together than by acting separately. Although much of this cooperative planning takes place among the eight major jurisdictions of the region, it is not uncommon to find several small cities and towns clustered around a community betterment initiative at EWG. These initiatives address issues as diverse as tax policy, environmental quality, regional security, economic development, and community planning.

EWG Metropolitan Planning Area




EWG is the metropolitan planning organization (MPO) for the area, which means that the federal government and the states have vested legal authority and responsibility in the agency for developing and adopting plans for the region's transportation system.

Any transportation project within the boundaries of the eight member counties that will be fully or partially funded with federal dollars must be contained in plans that are formally adopted by the Board of Directors.

Transportation planning is not simply an exercise in design and engineering. It requires understanding and addressing the complex relationship between mobility and the region's economy, community, and ecology. Its final product is an evolving transportation investment strategy to serve the region's economic vitality and broad quality of life goals.

The tools we use include population and employment estimates, land use and transportation facility inventories and maps, environmental quality assessments, computer models of existing and future travel patterns, and activities to engage interest groups and community residents in setting priorities.

One of the Council's strengths is providing an understanding of the regional impact of local decisions. Effective public engagement and education is an essential part of the planning process and helps to inform the work of our agency.

## The Public Involvement Planning Process

As the regional planning agency, our community and transportation planning activities impact every citizen in the St. Louis metropolitan area. Like all public entities, we are required to engage in a public involvement process that garners input from all of our citizens, regardless of geography, economic background, age, ethnicity, race, physical or developmental ability. Our commitment is to provide opportunities for everyone to have an active voice in regional policy decisions. This plan meets these requirements and guides staff in their public involvements and efforts to ensure meaningful engagement opportunities.

East-West Gateway Council of Governments is required by the Federal Highway Administration and Federal Transit Administration to develop, submit, and implement a public involvement plan. All citizens, including low-income, minority, older adults, limited English proficient populations and individuals living with disabilities, must be involved in regional discussions surrounding social, economic, environmental, community development and transportation planning decisions.

We began to develop this plan in 2013. As part of the year-long process, the following actions were taken to support this plan's development, completion and passage.

- EWG's community engagement staff established a Public Involvement Planning Advisory Committee that represented key perspectives in the community. The planning committee met four times throughout the process and had a clear set of tasks and outcomes.

- EWG's community engagement staff reviewed meeting evaluation forms submitted over the past few years. Feedback from various regional planning initiatives such as Renewing the Region (RtR), Transportation Improvement Plan (TIP), Long Range Plan (LRP) and the Regional Plan for Sustainable Development (RPSD) helped inform this public involvement plan.

- All EWG staff was included at the beginning and the end of the planning process. Since this plan provides the blueprint for agency public participation efforts, the full staff was asked to engage in the creation of the mission and vision for the plan. We also discussed current engagement efforts and requested ideas that should be considered as we developed the plan.

- An EWG staff advisory committee, comprised of staff members who manage projects with major public involvement components, were convened at key points in the process. The goal of this staff committee was to ensure that the ideas that were recommended for inclusion in the plan fit the needs of key agency projects and could be realistically implemented.

- The planning process also included a public survey concentrating on the approached for reaching citizens effectively. The survey received over 400 responses from around the region.

- Eleven focus groups were held with more than 85 community members representing diverse constituencies.

- Comments from the 45 day public comment period were considered and incorporated .

- The Board of Directors approves the plan in May 2014.

*Thank you to our Public Involvement Planning Advisory Committee*

Bola Akande
*City of Brentwood*

Vianey Beltran
*Hispanic Chamber of Commerce of Metro St. Louis*

Laura Cohen
*Environmental Advocate*

Gerry Hasenstab
*Catholic Urban Programs (IL)*

Mayor Monica Huddleston
*City of Greendale*

Will Jordan
*Equal Housing Opportunity Council*

Linda Lehr
*Monroe County*

Gayle McHenry
*Shepherd's Center of Webster/ Kirkwood*

Patrick McKeehan
*Small Business Development Center (IL)*

S.J. Morrison
*Madison County Transit*

Mark Phillips
*Metro*

Naomi Soule
*Missouri Rehabilitation Services for the Blind*

Dr. Morris Taylor, Ph.D.
*Southern Illinois University-Edwardsville*

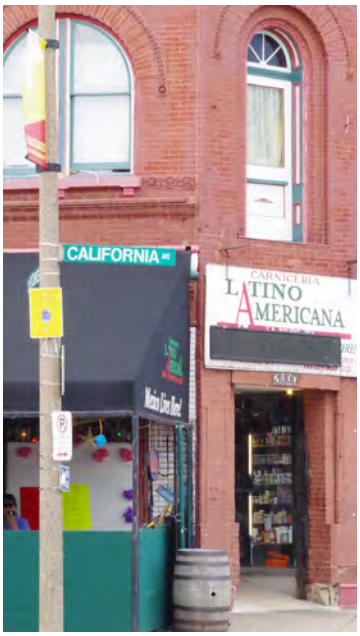
Terry Wilson
*Franklin County*

## Mission of the Public Involvement Plan

Create Meaningful Engagement Opportunities That Are Accessible to Everyone

## Vision:

EWG staff, in our commitment to include all citizens in regional planning discussions and decisions, will create and continuously support a framework that guides our public involvement efforts. Our public involvement program will always include specific strategies that welcome ideas, leverage partnerships, respect differences, embrace community, share knowledge, and foster responsive solutions that reflect the citizen's regional aspirations.




## GOALS

This plan offers meaningful opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation and community plans at East-West Gateway. One of the primary goals of EWG as the MPO in providing opportunities for public involvement is to ensure that transportation plans reflect community values and benefit all segments of the community equitably.

We envision a future where communities will see themselves as part of the regional decision-making process and understand how to accomplish their goals. We hope to offer our citizens an effective voice and a way to be heard by regional decision makers. We will work with our Board, our staff and our partners to ensure that the public concerns and aspirations are consistently understood and considered.

**Goal 1**

EWG will clearly articulate the process for public information and involvement from the outset of a project.

**Goal 2**

EWG will create mechanisms that document public feedback and make it available for public consideration and report how we used/ incorporated public input in the decision-making process.

**Goal 3**

EWG will create and strengthen the Council's strategies for reaching people and communicating appropriately.

**Goal 4**

EWG will assure that every effort is made to ensure nondiscrimination in all of our programs and activities, whether they are federally funded or not.

**Goal 5**

EWG will provide access to and create quality information, education and data.

**Goal 6**

EWG will continuously evaluate the effectiveness of our public involvement program.

## Our Commitment to the Community

The following fundamentals drive East-West Gateway public involvement activities:

### Inclusive

We proactively reach out and engage citizens and take specific actions to ensure the involvement of typically hard-to-reach communities including low income, minority, Limited English Proficiency (LEP), senior adult and disabled, so these groups have an opportunity to participate and contribute.

### Responsive

We strive to respond and incorporate appropriate public comments into all transportation decisions.

### Accurate

We make every effort to provide accurate information.

### Respectful

All feedback we receive is given careful and respectful consideration.

### Proactive and Timely

Participation methods allow for early involvement and are ongoing and proactive so participants can impact Council decisions.

### Understandable

Participation methods have a clear purpose and are described in language that is easy to understand.

### Transparent

We will report how the public's input informs decisions.

### Authentic and Meaningful

We support public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels of the organization.

### Customized

We customize our public participation methods in a variety of ways to match local and cultural preferences.

# Public Involvement Goals and Strategies

The community engagement staff will be responsible for working with all EWG staff to design action items and timelines for each of the following goals and will track progress.

## Goal 1

***EWG will clearly articulate the process for public information and involvement from the outset of a project.***

**Objective 1:** Ensure meaningful participation opportunities for ALL communities.

**Strategy A:** In consultation with community engagement staff, a planning process will be developed and then tracked for all projects.

***Approach:*** *Staff will meet with PIP staff to discuss their plans allowing for early input that continues throughout the project/ planning process. Plans must explicitly consider potential for influence and how feedback will be incorporated and must identify hard to reach communities and how these communities will be reached and engaged.*

**Strategy B:** We will create an advisory committee comprised of people who represent key perspectives of the community to help EWG staff assess their plans.

***Approach:*** *Staff should present their public involvement strategy to this committee at the beginning of a project/planning process.*

**Strategy C:** EWG will collect data on how people receive their information and provide feedback.

***Approach:*** *Staff will consider public involvement survey feedback when planning outreach strategies. (see Appendix)*

**Objective 2:** Create a vehicle for evaluation at the end of the public involvement activity.

**Strategy A:** In collaboration with EWG staff a new project close out process will be created with an eye toward documenting public involvement efforts and outcomes.

**Strategy B:** New evaluation and tracking mechanisms will be developed to collect feedback and assessment on all public involvement processes.

***Approach:*** *These will be analyzed and reported out in conjunction with the advisory committee at regular intervals. Staff will be required to collect this data and submit to community engagement staff at regular intervals.*

**What We Heard:** In advisory committee meetings, we heard that staff needs to decide the best strategies in advance. We also heard that we shouldn't ask for feedback after everything has been decided and we need to tell people what we actually need to know so they can provide useful feedback. Survey results showed that 63 percent of respondents really want information or feedback concerning regional issues. EWG needs to work hard to create opportunities to hear people better and respond accordingly. EWG should provide clear statements when requesting ideas and opinions on input into planning. Ask specific questions. Define the feedback needs. EWG should obtain data about communities with whom we work before we engage.

## Goal 2

***EWG will create mechanisms that document public feedback and make it available for public consideration and report how we used/ incorporated public input in the decision-making process.***

**Objective 1:** Report back often to the community as to status of input, decisions and plans.

**Strategy A:** Create an easy to find, dedicated space for public involvement reporting on the EWG website that "tie-in" to Facebook and Twitter.

**Strategy B:** Create an agency monthly electronic newsletter that reports the activities of the agency to the community.

**Strategy C:** Create a monthly electronic update for e-mail and print that specifically reports public involvement outcomes, opportunities, activities and strategies.

**What We Heard:** The public needs to know that EWG utilizes public opinion in the decision-making process. People want to hear back on discussions and results of meetings. They want to be kept in the "loop" when regional and community planning and actions are taking place. Do this on a regular basis not just at the end of the process. Survey results showed that 72 percent of respondents voice their opinions through online surveys; 50 percent also opt to talk to their elected official to voice their opinions. Survey results tell us that 72 percent of respondents in the region utilize online newspapers to get information; followed by watching the local news stations.

# Goal 3

***EWG will create and strengthen the Council's strategies for reaching people and communicating appropriately.***

**Objective 1:** Find new and creative ways to reach and involve people.

**Strategy A:** Redesign and assess necessary content of EWG website to make it more user friendly, to ensure important information is easier to find and that content is relevant for users.

**Strategy B:** The agency will continue to enhance its social media capabilities.

***Approach:*** *EWG has recently begun using Facebook and Twitter. We will explore ways to begin to use integrated video, surveys and blogs.*

**Strategy C:** We will create a communication staff committee to discuss, assess existing and implement new outreach communication tools and strategies.

***Approach:*** *This committee will meet quarterly to assess and improve our social media content and its efficacy, to identify new social media options and website options and to ensure that all the use of all electronic and other communication tools are coordinated.*

**Objective 2:** Expand the types of opportunities for participation.

**Strategy A:** Develop creative programming, including speaker series, discussion forums and expanded policy briefings.

**Strategy B:** Identify new strategies for reaching people electronically including web meetings, on-line real-time question and answer sessions, interactive electronic open houses and webinars

**Strategy C:** Conduct effective, productive and interactive meetings.

***Approach:*** *Project staff should work with community engagement staff to identify planning meeting activities that maximize participation. Identify new ways to collect public feedback at meetings including touchpad polling surveys at the end of meetings to ensure collection of evaluation data.*

**Objective 3:** Expand and enhance the EWG network through partnerships.

**Strategy A:** Assess current agency memberships in order to ensure agency participation with a broad array of partners and track EWG attendance and participation in meetings and events.

**Strategy B:** Serve as a matchmaker to help partners find the right resources.

**Strategy C:** Create a process under which EWG staff actively contacts and engages with new groups quarterly.

**Strategy D:** Actively look for new partnership opportunities through sponsorship/involvement in regional events.

**Objective 4:** Create training for staff to introduce members of the communities that we need to reach and discuss appropriate approaches for engagement.

**Strategy A:** Invite members of key community groups to be part of an ongoing agenda and introduce their groups to staff.

**Strategy B:** Introduce staff to fundamental and advanced approaches and tools for effective public involvement

**What We Heard:** EWG needs to update and remodel the website. Create an effective webpage. Make the website more interactive. Social media is a must to communicate to the public. Staff should trust community's suggestions when trying to reach people. Staff needs to use diverse strategies and means. EWG should be more visible in communities—connecting, listening, and involving them in the process.

Utilize the community organizations to better reach people through publications, places of worship, alumni organizations, homeowner associations, etc. Go to where the groups are already meeting such as senior meals, coffee shops, at fish frys, educational situations (classrooms).

EWG needs to recognize and access memberships to and support for other organizations. Find ways to use new technology to reach people. Explain who we are. Survey results show that 61 percent of respondents get their information from the workplace with 50 percent receiving information from community organizations and or community meetings.

# Goal 4

***EWG will assure that every effort is made to ensure nondiscrimination in all of our programs and activities, whether they are federally funded or not.***

**Objective 1:** Provide information to the public regarding Title VI obligations.

**Strategy A:** Post EWG's policy statement regarding Title VI on the website along with the complaint procedure.

**Strategy B:** Title VI, ADA, and environmental justice materials will be available at EWG meetings.

**Strategy C:** EWG will offer translations of necessary materials and provide appropriate accommodations as requested. We will track all requests for accommodation.

***Approach:*** *EWG has developed informational material regarding Title VI obligations. Information regarding requests for accommodation must be included on all public involvement materials along with the agency's Title VI statement.*

# Goal 5

***EWG will provide access to and create quality information, education and data.***

**Objective 1:** Data, information, and plans need to focus on relevance and impact to the public whenever possible.

**Strategy A:** Identify new ways to present data/information to the public, including on our website and through social media, in an understandable and accessible manner.

**Strategy B:** Work to make our GIS and demographic products easily available to the communities and groups that have an interest.

**Strategy C:** Continue to expand and enhance *Where We Stand* and its updates and ensure broad distribution of regional policy analysis of the topics we choose to highlight.

**Strategy D:** Continue to expand and enhance the availability of training and workshops on EWG projects, grants and key regional and local government policy issues.

**Strategy E:** Create partnerships with public radio, news and television outlets.

**What We Heard:** EWG needs a comprehensive communications strategy. Be careful not to make presentations too technical and avoid bureaucratic language. EWG needs to understand its communities by collecting its own data and data from other agencies. 62 percent of survey respondents feel that EWG should share information and data with the public. Use more visuals, less words. 60 percent feel that EWG should provide information and education for the public about regional topics.

***Approach:*** *Materials produced for public consumption need to use formats that are accessible and make sense to non-planning professionals and include explanations of how the data material can be used. Data and information should include a staff contact for questions. Staff should look at how searchable databases can be used and made available.*

**Objective 2:** Ensure that staff has access to the appropriate tools and information.

**Strategy A:** Create an intranet site where staff can post and find the latest information, data and updates from colleagues that can be used internally by different departments.

***Approach:*** *Community Engagement staff in consultation with program staff will develop a toolkit for staff that includes resources, templates, internal databases and shared materials to enhance our efforts to effectively communicate with our publics.*

**Objective 3:** Information, education, data development and articulation needs to consider all Title VI, EJ, ADA, and LEP requirements in the planning stages and ensure that citizens, members and contractors are aware of these requirements.

**Strategy A:** Community engagement staff in cooperation with program staff will continue to develop mechanisms to ensure that citizens understand their rights under Title VI, to ensure that recipients of funding are fulfilling their obligations and that EWG documents its efforts to ensure compliance.

# Goal 6

***EWG will continuously evaluate the effectiveness of EWG public involvement program.***

**Objective 1:** Continuously evaluate participant and public satisfaction.

**Strategy A:** Track participation efforts and approaches for every EWG sponsored meeting.

**Strategy B:** Create a realistic evaluation policy and ensure that staff is capturing necessary and appropriate evaluation data.

**Strategy C:** Create an internal database to capture all evaluation data.

**Strategy D:** Analyze the results of evaluative data on a regular basis to illustrate changes in participation, representative participation and identify areas for improvement.

**Strategy E:** Institute a EWG regional public awareness and satisfaction survey every two to three years to assess public perceptions about EWG and assess how we can improve our outreach efforts.

**Strategy F:** Implement an agency self-evaluation process of public involvement efforts annually.

***Approach:*** *Utilize advisory committee for assistance on evaluation techniques and analysis.*

**What We Heard:** A project close-out process could be implemented. Experiences about what has worked and what hasn't need to be shared. Identify a tracking mechanism that does not require unreasonable staff time requirements.

## The Agency's Core Plans

Public participation is a valuable tool used to shape plans that accurately reflect the goals and vision for the region. EWG develops several core plans on a regularized schedule that have stipulated, minimum public input requirements. In each case we strive to find new avenues to engage the public and expand input beyond what is required. EWG recognizes that specific plans and studies with regional goals and objectives are more valuable when active community input is included. The following plans describe EWG's core plans with public comment periods identified. All of EWG's core plans are available on the EWG website.

### A. Unified Planning Work Program

The Unified Planning Work Program (UPWP) is used to organize and unify all of the agency's work for the coming year. The development of the UPWP creates an opportunity for the policy-makers on the Board of Directors, the agency's advisory committees, and our funding agencies to review and consider EWG's many discrete activities in the context of the whole. It also provides staff with a valuable management tool and is part of grant applications for several state and federal programs.

Unexpected circumstances sometimes necessitate additions to the document outside the regular annual cycle. When this happens, and funding has been clearly identified for new activities, the Board can amend new work into the UPWP as part of monthly board meetings.

The complexity of our work frequently demands interdepartmental coordination, interdisciplinary research, and considerable involvement of members of the affected public and constituent interest groups. Virtually none of the work elements contained in the UPWP can be properly implemented without a team effort.

The UPWP is supported by financial grants and in-kind resources from federal, state, and local government sources, non-profit organizations as well as private foundations. EWG submits this UPWP to our funding agencies as a commitment to fulfill our legal obligations as the region's designated MPO, and to our local governments and the public as a commitment to do all we can to enhance quality of life as the region's council of governments.

**Comment period: 45 days**
**Update schedule: Annually**

### B. Long-Range Transportation Plan

The Long-Range Transportation Plan (LRTP) is the cornerstone of the metropolitan transportation planning process and serves as a blueprint for the management of the region's transportation system. It identifies transportation improvements for a 25 to 30 year period. It articulates region-wide transportation goals, policies and strategies ranging from road and transit improvements to projects that enhance bike, pedestrian and freight movement. As required by federal law, EWG develops the LRTP every four years.

The principles and strategies included in the LRTP are carried out through a variety of short range transportation-related plans and programs. Chief among these is the Transportation Improvement Program (TIP), which reflects short-term decisions on how federal funds are spent in the region. In effect the TIP is used to implement the LRTP. Other plans connected to the implementation of the LRTP include, the Coordinated Human Services Plan, the Regional Bike and Walking Transportation Plan, the Regional Freight Study, the Congestion Mitigation Process and OneSTL:The Plan for Regional Sustainable Development.

The Council's Board of Directors oversees the development of short and long range plans for the region and selects the federally and locally funded capital projects and operational initiatives that best carry our the principles and strategies of the long-range plan.

The Council develops the LRTP under certification from the U.S. Department of Transportation and under joint agreements among the states of Missouri and Illinois and the eight counties in the region: the city of St. Louis, St. Charles, St. Louis, Franklin, Jefferson, Madison, Monroe and St. Clair counties. All federally-funded transportation projects must be consistent with the principles of the LRTP to be included in the TIP.

**Comment period: 30 days**
**Update schedule: Every 4 years**

## C. Transportation Improvement Program

The Transportation Improvement Program (TIP) is a financial and implementation schedule for projects receiving federal transportation funding in the St. Louis metropolitan area. The TIP documents how St. Louis will prioritize limited transportation resources to meet the needs of the region. It contains major surface transportation projects planned to receive federal, state and local funding within the metro area that will be carried out in a four year period. Project examples include new roadways, additional through lanes to existing streets, interchange construction or modification, improvements to intersections, transit amenities and bicycle/pedestrian facilities. EWG updates the TIP every year.

Projects identified in the TIP are prioritized from, and must be consistent with, the region's 20-year Long-Range Transportation Plan. The TIP consists of a four-year program: the current year plus the next three consecutive years. Each year the TIP is modified by adding a new fourth year and advancing the first of its future years to current status. While the projects in the TIP are shown for a four-year time period, the emphasis is on the first three years. Presenting a four-year span allows for a more systematic forecast of funding needs during a four-year planning cycle, and provides a more comprehensive view of the program for public information purposes.

Public notice of public involvement activities and time established for public review and comment on the TIP satisfies the program of projects requirements of the Section 5307 Program for public transportation operators.

**Comment period: 30 days**
**Update schedule: Annually**

## D. Public Involvement Plan

The Public Involvement Plan (PIP) provides a framework to guide the public participation process for all activities at EWG including transportation-planning projects and a range of programs and special studies, including major investment studies. This plan specifies EWG's strategies and techniques to be considered and employed in achieving the goals of the public participation process.

As part of the plan we document and assess current public involvement approaches and activities. We identify new ways that our agency should and can reach out to the public, inform the public and ensure meaningful involvement from all of our citizens.

The plan is informed by the board of directors, staff, an advisory committee and citizen feedback.

EWG is dedicated to a planning process that allows all citizens affected by the agency's activities to have a voice. As the designated metropolitan planning organization for transportation planning in the bi-state St. Louis area, EWG receives federal funding from the Federal Highway Administration (FHWA) the Federal Transit Administration (FTA), the Environmental Protection Agency (EPA) and other state and federal agencies responsible for metropolitan planning.

Effective public involvement requires that the agency be as inclusive as possible to serve the widest range of citizens, especially the hard to reach populations who reside in the bi-state area. The plan will be continuously reassessed for updating needs.

**Comment period: 45 days**
**Update schedule: As needed**

## Title VI Policy Statements

The East-West Gateway Council of Governments assures that no person shall, on the grounds of race, color, national origin, or gender, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259) (Title VI), or because of a disability, as provided by the Americans with Disabilities Act (ADA), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. East-West Gateway further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. East-West Gateway includes Title VI and ADA language in all written agreements with subrecipients, contractors and consultants and will monitor programs and activities for compliance. East-West Gateway's Title VI Coordinator is responsible for initiating and monitoring Title VI and ADA activities, preparing required reports, and other responsibilities as required by law.

**Non-discrimination policy**

East- West Gateway is committed to ensuring that its plans and processes include as many individuals as possible and that no one is discriminated against in the implementation of its programs. East-West Gateway has a non-discrimination policy to help ensure that discrimination does not occur, and if someone believes they have been discriminated against, there is a process to follow to file a complaint and have the matter investigated. The non-discrimination policy applies to race, color, sex, national origin, disability, and limited English proficiency. The Non-Discrimination Policy and Procedure Manual may be found at www.ewgateway.org, or a copy may be obtained by contacting the Title VI Coordinator at 314-421-4220 or 618-274-2750, or by email at TitleVI@ewgateway.org. As referenced in the Non-Discrimination Policy and Procedure Manual, East-West Gateway is required to have a plan in place to address the challenge of citizens in our region of Limited English Proficiency, who may want to participate in our activities but cannot effectively do so due to language barriers. In certain cases, East-West Gateway has an obligation to ensure that appropriate accommodations have been made to make information available to LEP communities. More information on our non-discrimination processes can be found in the EWG Title VI program.

## Tracking and Evaluation

We know that the key factors in a successful effort are that participants have a clear concept of the goals of the meetings, that they understand what they are being asked to do and they know how we will incorporate their input. Included in evaluation design is developing a process for ensuring that feedback is considered and incorporated where appropriate and then communicated back to our stakeholders.

**Participation Tracking** (see Goal 6)

In order to improve upon the participation process and to improve upon the use of public input, the EWG staff will track public involvement activities. Part of this tracking will involve the consideration of follow-up and feedback to the public. To facilitate participation tracking the EWG staff will utilize the project tracking form template shown on this page. The act of tracking public participation not only will help to create more effective public outreach efforts, but it will also serve as one means for the EWG to evaluate how well various participation and outreach efforts work.

**EWG Participation Tracking Form**

**1. Event:**

a. Date:

b. Conducted by:

c. Attendees (# and type):

**2. Summary of public comments/concerns/interests that need to be addressed:**

**3. Information learned:**

**4. Who gets information?**

a. When?

b. How?

**5. Follow-up with the public:**

a. Immediate follow-up activities:

| Who will? | With whom? (Name/address/phone) | For what? | When? |
|---|---|---|---|

b. Feedback to the public (what did we do with their input?)

| Who will? | With whom? (Name/address/phone) | For what? | When? |
|---|---|---|---|

**6. Process advice:**

a. What worked well in this public participation activity?

b. What would I change next time?

c. How can this information be shared with others working at/with EWG?

## Engagement Tools We Are Currently Using

East-West Gateway has many approaches that are currently used to reach the public and garner input.

**East-West Gateway Committees—**EWG supports numerous committees that include citizens and professionals from other organizations for the purpose of advising the agency's work. These committees include the Air Quality Advisory Committee, the Water Resources Council, the Transportation Planning Committee, the Bicycle and Pedestrian Advisory Committee, and the Advisory Council of the St. Louis Area Regional Response System. Citizens and officials on these committees provide regular and ongoing input.

The agency also convenes ad hoc advisory policy and technical committees to support agency initiatives as needed. The Great Streets Advisory committee, the Northside-Southside advisory committee (considers alternatives for future light rail expansion) and the working group assisting with the agency's creation of a Coordinated Human Services Transportation Plan, are a few of the newer policy groups created to improve the services in the region.

**Presentations—**EWG staff, by invitation, attends meetings of numerous civic, volunteer, business, neighborhood, and professional organizations to share information about the agency's work.

**Publications—**Numerous regular publications are created to inform and educate the public on regional issues of concern. Other materials are continuously developed to support citizen engagement as the need arises. Examples include:

- *Local Government Briefings* (a weekly newsletter distributed by e-mail and fax). Any individual who asks to be placed on the distribution list is accommodated.
- *Where We Stand: A Regional Strategic Assessment* that ranks the St. Louis Metropolitan Area as compared to 35 major metropolitan areas throughout the nation on indicators of regional importance.
- *Talking the Talk: A Pocket Guide to the Language of Transportation Planning:* Updated in 2007 and designed to aid citizens in understanding transportation planning and the problem-solving process.
- Annual *Public Officials Directory:* An eight county reference guide containing contact information for key local government elected officials and personnel.
- *Know Your Rights*- Title VI brochure series: Available in English, Spanish and Bosnian.
- *East-West Gateway Informational Brochure:* Explains the mission, history and functions of the agency and how the public and others can be involved in agency activities.
- *Frequently Asked Questions about the TIP:* A Q&A brochure explaining the Transportation Improvement Program process.

**The Internet—**EWG website, Twitter, Facebook, the EWG interactive blog—EWG maintains a web site at www.ewgateway.org . Information and educational materials about planning and problem-solving activities are regularly posted for the public to review on this web site. Copies of draft plans, reports, final publications, RFPs, meeting agendas and minutes are also available. Opportunities to learn and be involved in EWG activities and other regional events are posted. The web page has interactive features, allowing citizens to register their comments on an ongoing basis. We also use Twitter, Facebook and the agency blog for continuous outreach and engagement.

**The Outstanding Local Government Achievement Awards—**Each year, East-West Gateway presents its Outstanding Local Government Achievement Awards recognizing the extraordinary work of municipal, county, public safety and school district officials. Nominations are widely solicited from community organizations and individuals and local government officials. The goals of the program are to acknowledge the good work occurring in the local government community, to raise public awareness of the positive impacts of local government and to involve community members in a program that highlights the progress in their communities.

**Local Government Partnership**—The agency is also a member of the Local Government Partnership, a collaborative effort with the University of Missouri.
The Partnership mission is to provide technical assistance and training to local government officials throughout the region.

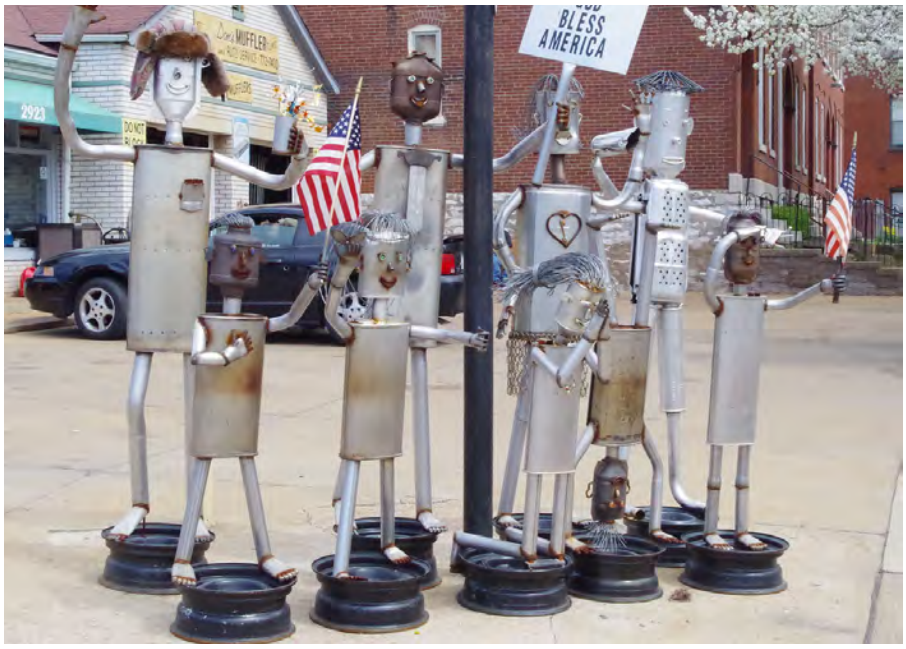
**Technical Assistance and Training—**Council staff works with local officials and citizens to recognize, analyze and find regional solutions. EWG works with citizens, community organizations and local government officials, providing technical assistance and training to help them voice their perspectives and do business more effectively.

**Workshops—**EWG hosts workshops that are open to the public in accessible settings on an array of regional issues.

**Surveys—**Staff utilizes surveys in order to gather more comprehensive information and viewpoints from the region. Responses and results of the surveys can be found on the website.

**Mapping—**Our GIS team develops maps to inform the public, our research partners and for use in presentations. They produce a new map each month on different demographic trends that are made available on our website.

**Research—**The research staff provides indepth analysis of regional trends related to transportation planning, demographic changes, and sustainability planning. Staff uses Geographic Information Systems (GIS) applications, and data from the Census and other sources to ensure the availability of accurate information.



## Conclusion

East-West Gateway has maintained and enhanced its strong commitment to public involvement since its inception 49 years ago. This document is another phase in an on-going planning process designed to ensure continuous improvement in our efforts. We are committed to overcoming today's challenges to public participation and identifying new avenues to involve all the citizens of the region. We would therefore ask you to contact us with any suggestions you may have.

Please send comments, feedback or inquiries on this plan to:

Julianne Stone
Manager, Community Engagement and Local Government Services
East-West Gateway Council of Governments,
One S. Memorial Drive. Suite 1600,
St. Louis, MO 63102
Phone: 314-421-4220 or 618-274-2750

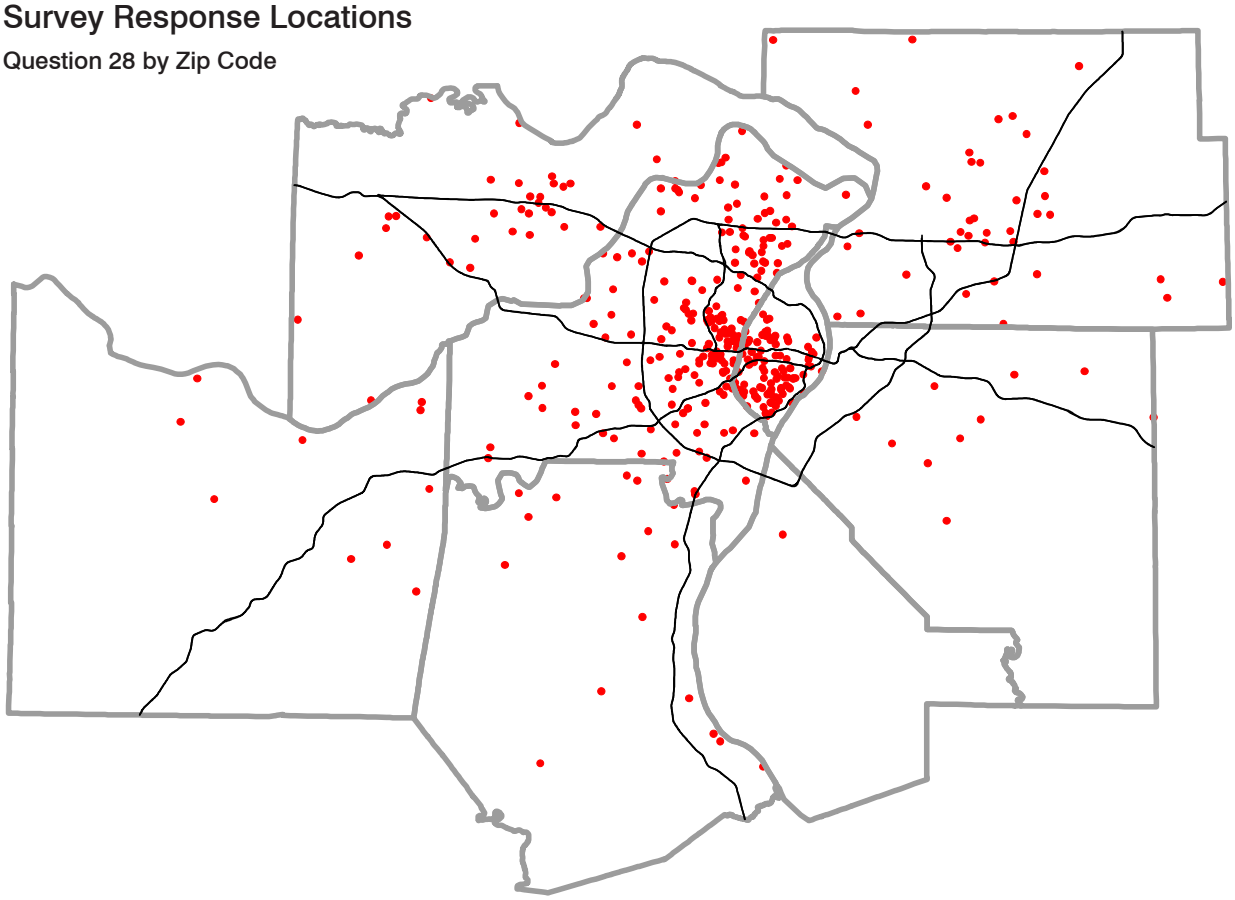
# Appendix:

## Public Involvement Survey

This survey is a collection of facts and opinions on how the public receives information about EWG and our region. It explores the challenges that keep individuals from participating in events and what might make one more likely to share their opinions about big regional projects and smaller ones that may only impact specific communities. We have also thrown in a couple of questions on what issues are important and what they think EWG goals should be as they relate to public participation. EWG staff, members of the community and our partner organizations can use this information to hone appropriate outreach strategies for target audiences. We received 409 responses to the survey.

### Survey Response Locations

**Question 28 by Zip Code**



## *Pertaining to East-West Gateway:*

### 1: Are you familiar with the activities of the East-West Gateway Council of Governments? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| I've been to an East-West Gateway sponsored meeting or event. | 54% | 202 |
| I've heard about East-West Gateway on the news. | 53% | 196 |
| My jurisdiction/agency has received funding from East-West Gateway. | 31% | 113 |
| I have completed an East-West Gateway survey. | 21% | 77 |
| I've participated in an East-West Gateway project. | 32% | 117 |
| I've received information from East-West Gateway. | 49% | 181 |
| I work with East-West Gateway as part of my job. | 36% | 135 |
| I have never heard of or worked with East-West Gateway. | 16% | 58 |
| Other (please specify) | 15 | 15 |
| answered question | | 371 |
| skipped question | | 13 |

### 2: Which of the following East-West Gateway activities are most important to you? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| Economic Development/Jobs | 69% | 240 |
| Environment | 41% | 143 |
| Homeland Security | 12% | 42 |
| Highway/Street System Improvements | 62% | 213 |
| Public Transit System Improvements | 61% | 211 |
| Sustainability | 51% | 178 |
| Community Participation and Training | 35% | 120 |
| Regional Dialogues | 36% | 123 |
| Intergovernmental Collaboration | 54% | 188 |
| Local and Regional Data | 48% | 167 |
| Other (please specify) | | 13 |
| answered question | | 346 |
| skipped question | | 38 |

### 2. Other

*"Historic preservation "Public Safety "Media bias "Natural disaster preparation/response*

*"Selling off or removing deteriorating or abandoned property*

*"Universal design and accessibility for people with disabilities*

*"Regional planning "Biking and walking improvements*

*"Equitable Transportation Investments/Project funding & PEDESTRIAN SAFETY*

## *Communication:*

### 3: Which of the following electronic resources do you use to get information about what is happening in your community or the region? (Check top 3)

| | Response Percent | Response Count |
|---|---|---|
| Television | 62% | 209 |
| Radio | 54% | 182 |
| Youtube | 3% | 10 |
| Twitter | 15% | 49 |
| Facebook | 32% | 110 |
| Next Door (electronic neighborhood network) | 8% | 26 |
| Newspapers (online or print) | 74% | 251 |
| Electronic Newsletters | 53% | 178 |
| E-mail | 62% | 211 |
| Phone calls | 17% | 59 |
| Text messaging | 10% | 35 |
| Blogs | 10% | 35 |
| Other. Also, if you selected TV, radio or blog, please specify. | | 72 |
| answered question | | 339 |
| skipped question | | 45 |

### 4: Which of the following community-based resources do you use to get information about what is happening in your community or the region? (Check top 3)

| | Response Percent | Response Count |
|---|---|---|
| Workplace | 61% | 201 |
| Neighborhood organizations/meetings | 48% | 157 |
| Neighborhood places (i.e. barbershop, coffee house) | 19% | 61 |
| House of worship/spiritual leader | 11% | 35 |
| Community-wide event (i.e. Earth Day, Annie Malone, International Festival) | 26% | 84 |
| U.S. mailed newsletters, flyers, etc. | 47.4% | 156 |
| Yard signs, neighborhood banners, door-hangers | 22% | 72 |
| Roadside variable message boards | 18% | 58 |
| Community bulletin boards | 16% | 51 |
| Neighborhood Library | 9% | 28 |
| Local elected officials | 30% | 98 |
| Other (please specify) | | 21 |
| answered question | | 329 |
| skipped question | | 55 |

### 3. Other

(Responses are aggregated to eliminate duplication)

*"Local network TV news,*

*"Local Radio (KMOX, KPNT, KDHX, KWMU, KTRS, WSIE, KJFF)*

*"National Public Radio*

*"Local Blogs and Forums (UrbanSTL, NextSTL, urbanreviewstl)*

*"Preservation Office, pretty much any development or preservation blog in STL.*

*"I read half a dozen STL specific blogs including Mayor Slay's*

*"St. Louis Post Dispatch (Stltoday.com and Weekly Transportation Chat)*

*"Push and notifications from smartphone and mobile applications*

*"Mostly: word of mouth*

*"Webcasts*

*"City Hall/City websites*

*"PUBLIC News Announcements. Community Website and Community news sites*

*"Work "LinkedIn.*

*"Neighborhood Watch Program*

## 5: Where or to whom would you be most likely to voice your opinion? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| Workplace | 50.3% | 167 |
| Neighborhood meeting | 49.1% | 163 |
| Organization meeting | 47.3% | 157 |
| House of worship/spiritual leader | 6.9% | 23 |
| Radio call-in | 4.5% | 15 |
| Youtube video | 0.9% | 3 |
| Online survey | 72.0% | 239 |
| Mail-back survey | 27.7% | 92 |
| Leave message on a phone line | 9.9% | 33 |
| At a virtual meeting | 10.5% | 35 |
| Twitter | 11.1% | 37 |
| Comment section of local website | 20.5% | 68 |
| Facebook | 24.7% | 82 |
| Next Door (electronic neighborhood network) | 6.3% | 21 |
| Letter to the editor | 14.5% | 48 |
| Letter to or conversation with an elected official | 43.1% | 143 |
| Newsletter contribution | 12.3% | 41 |
| Yard sign | 3.9% | 13 |
| Public/Council Meeting | 34.6% | 115 |
| Public demonstration | 6.0% | 20 |
| Phone bank for an organization | 2.4% | 8 |
| Blog | 5.7% | 19 |
| Though educational institution. | 7.8% | 26 |
| Other. Also if you selected TV, radio, website, blog or organization please specify. | | 16 |
| answered question | | 332 |
| skipped question | | 52 |

### 5. Other
(Responses are aggregated to eliminate duplication)

- *Have a toll free comment line*
- *Local Blogs and Forums (NextSTL, UrbanreviewSTL,*
- *E-mail*
- *Petition*
- *Public radio*
- *STLtoday.com*
- *Local Radio (KMOX, KWMU, KSHE)*
- *Local Television*
- *Climate Reality St. Louis and Sierra Club*
- *American Planning Association - St. Louis Metro Section*
- *St Louis County Council on Disabilities, Paraquad, Diversity Awareness Partnership*
- *Kirkwood Chamber of Commerce in Kirkwood*
- *Any organization I'm a part of*
- *E-mail to elected officials*

### 4. Other (Responses are aggregated to eliminate duplication)

*Friends* *University* *Social media (Facebook, Neighborhood Social Media),* *Community Based Social Media)* *Local media* *Mostly: word of mouth* *Municipal website* *Newspaper* *American Planning Association - St. Louis Metro Section* *Websites* *St. Louis American* *Webster-Kirkwood Times newspaper* *Web calendars like RFT and Explore St. Louis*

## *Time, Access, Location:*

### 6: When are you most likely to attend a public meeting or event? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| Morning during the week | 29.8% | 98 |
| Afternoon during the week | 32.8% | 108 |
| Evening during the week | 69.3% | 228 |
| Saturday | 23.7% | 78 |
| Sunday | 10.3% | 34 |
| Online (Flexible Schedule) | 36.8% | 121 |
| Not likely to attend | 8.8% | 29 |
| Other (please specify) | | 8 |
| answered question | | 329 |
| skipped question | | 55 |

**6. Other**

*"Lunchtime on weekdays*

*"Any week day*

*"Early morning - before work*

### 7: If you require accommodations, such as an interpreter, language translation, special seating or transportation issues, have you ever requested them?

| | Response Percent | Response Count |
|---|---|---|
| Yes | 3% | 6 |
| No | 97% | 195 |
| answered question | | 201 |
| skipped question | | 183 |

### 8: Has a lack of accommodations ever prevented you from attending an event?

| | Response Percent | Response Count |
|---|---|---|
| Yes | 5.0% | 13 |
| No | 95.0% | 249 |
| answered question | | 262 |
| skipped question | | 122 |

### 9: If you have a disability, what type of accommodations do you need?

| | Response Count |
|---|---|
| ...see pullout list to the right | 39 |
| answered question | 39 |
| skipped question | 345 |

**9. Type of Accommodataion**

*"I'm disabled, use a wheelchair. Don't need accommodations. Just make sure location is accessible*

*"Large print materials and transportation for me with my relater*

*"Transportation* *"Braille*

*"Wheelchair lift* *"Hearing*

## 10. Other

"Online (2)

"School building - let's take advantage of these buildings our tax dollars built.

"Near transit

## 10: What is your preferred meeting location? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| City Hall/ Government Building | 73% | 234 |
| Community Center/ Recreation Building | 82% | 263 |
| Library | 56% | 179 |
| Restaurant | 22% | 71 |
| Church/House of Worship | 16% | 50 |
| Coffee Shop | 25% | 81 |
| School Building | 50% | 160 |
| Neighbor's Home | 10% | 33 |
| Other (please specify) | | 11 |
| answered question | | 320 |
| skipped question | | 64 |

## 11: If there is a meeting about a community topic that interests you, are you willing to travel?

| | Response Percent | Response Count |
|---|---|---|
| I will go to a city other than my own. | 40% | 129 |
| I will go to a county other than my own. | 23% | 75 |
| I will go to a state other than my own (Missouri or Illinois). | 17% | 55 |
| I will not attend a meeting out of my own community. | 13% | 43 |
| I do not attend meetings. | 7% | 22 |
| answered question | | 324 |
| skipped question | | 60 |

## 12: If you are willing to travel, how far are you willing to go?

| | Response Percent | Response Count |
|---|---|---|
| Less than 10 minutes. | 9% | 30 |
| 10-20 minutes travel time. | 36% | 116 |
| 20-30 minutes travel time. | 35% | 112 |
| 30 minutes or more. | 24% | 78 |
| Not willing to travel. | 4% | 14 |
| answered question | | 325 |
| skipped question | | 59 |

## 9. Accommodation Continued...

"Young families are chronically under-represented in all things, because they are "handicapped" in their ability to show up and make their voice heard. Yet, we are building the better world — for them!

"No steps, microphones, no slide show type of presentations.

"Mobility impairment in wheelchair. Stairs, doorways, Limited meeting space.

"Sighted assistance in getting to my seat and hearing assistance [microphone, sitting up front, etc]

"Visual (legally blind)

"I need a listening device, and a place that is near public transportation.

"Hearing impairment - not sure how to accommodate that.

"Main level access, elevator, handicapped parking that's not a mile away from the entrance

"Accessibility as specified by ADA, public transportation

"Large screens & type

## 13: How are you presently involved in your community? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| I serve on a nonprofit, neighborhood, or local government board. | 48.8% | 146 |
| I participate on a community discussion blog. | 9.7% | 29 |
| I donate to or am a member of a local organization. | 51.5% | 154 |
| I attend local community meetings (i.e. city council, neighborhood associations.) | 60.5% | 181 |
| I participate in regional organizations (i.e. NAACP, Urban League, United Way.) | 21.1% | 63 |
| I plan community events. | 26.1% | 78 |
| I am not currently involved. | 13.0% | 39 |
| Other. Also, please specify organizations of which you are a member. | | 32 |
| answered question | | 299 |
| skipped question | | 85 |

### 13. Other

- *International City/County Management Association*
- *City/Arch/River Advisory, Patch neighborhood board*
- *I am an elected official - member of NAACP, Coalition of 100 Black Women, and Democratic Club*
- *I serve as an employee of a municipal government*
- *North County Inc., chamber of commerce, Rotary-Florissant*
- *Delta Sigma Theta*
- *Benton Park West Neighborhood Association, St. Louis Rehabbers Club, St. Louis Association of Community Organizations*
- *urbanreviewstl.com*
- *Homeowners Association*
- *Metro Tri Club*
- *Crossing Church*
- *Work for a City*
- *Government employee*
- *Suburban Mayors, 24:1,*
- *Also work part-time for neighborhood nonprofit organization*
- *APA, CNU, EDF, MBG, MRRA*
- *League of Women Voters, St. Vincent Greenway Inc., FOCUS St. Louis, Sierra Club*
- *I work in municipal government.*
- *I am a Village Administrator in IL*
- *St. Louis Metro section APA St. Louis section ULI*
- *Metropolitan Congregations United*
- *Work for a local government*
- *I have participated in past community planning projects*
- *Top Ladies of Distinction-Cardinal Chapter*
- *I am an employee at city hall*
- *Neighborhood Watch*
- *Work for local government*
- *I work for a municipality*
- *Elks Lodge, Mo City Clerks and Finance Officers,*
- *IIMC, NAP*
- *I am involved through working at a non-profit*
- *Through my job at a university*
- *I'm a member of CERT*

## 14. Other

- *Collaborative events*
- *If it is a subject that affects my constituents*
- *If it's related to sustainability, I'll be there.*
- *It matters to an underserved population or it protests an onerous population*
- *Refreshments are always so refreshing!*
- *It is well run meeting with fair opportunities for discussion*
- *It directly affects my interests.*
- *It concerns an environmental or sustainability issue.*

## 14: What would motivate you to attend an information session on an important community or regional issue? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| It is a subject of interest that directly affects me. | 93% | 286 |
| It is taking place as part of a meeting/gathering that I already attend. | 53% | 164 |
| The session is available online. | 33% | 101 |
| There is a public health concern. | 33% | 103 |
| There is a natural disaster concern. | 26% | 80 |
| I want to be more informed. | 61% | 189 |
| I want to improve my community. | 70% | 216 |
| I want to meet my neighbors. | 20% | 62 |
| It's fun and there are refreshments. | 19% | 57 |
| Other (please specify) | | 8 |
| answered question | | 308 |
| skipped question | | 76 |

## 15: What would keep you from attending a meeting? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| The issue is not important to me. | 77% | 236 |
| There will be too many people at a meeting, I prefer a smaller group. | 11% | 33 |
| I don't feel like I would be welcome. | 14% | 44 |
| It is not in my community. | 24% | 74 |
| I don't believe my opinion will be taken into consideration. | 27% | 83 |
| No means of transportation. | 6% | 19 |
| No public transit access. | 7% | 22 |
| I don't speak English very well. | 1% | 3 |
| No refreshments. | 4% | 11 |
| Inconvenient time of day. | 73% | 225 |
| I'm concerned that I won't be able to hear and/or see the speaker. | 4% | 11 |
| Location or area perceived as not safe. | 30% | 93 |
| Family care (family member at home who requires assistance). | 8% | 25 |
| Concern about accessibility. | 3% | 10 |
| Other (please specify) | | 17 |
| answered question | | 308 |
| skipped question | | 76 |

## 15. Other

- *Little advanced notice*
- *Usually painfully boring.*
- *Many meetings are more argument than discussion*
- *Overbooked already*
- *Did not know about the meeting although posted but not on an email list*
- *A pattern of ignoring public input / no feedback or response*
- *Perception there will be few substantial outcomes coming from a meeting*
- *Health*
- *Anxiety about not knowing anyone*
- *When I did attend neighborhood association meetings, it was full of crackpots who wanted to spout off. There wasn't anything productive about it.*
- *Not knowing when the meetings are taking place*
- *Accessibility - ready & free parking*
- *Not enough time to fit into work & life*
- *Time restrictions due to job; or other meeting conflicts; there are always more meetings I want to attend than is realistic*
- *The weather*
- *Churches - perceived hidden agendas when meeting in a church*
- *Meeting conflict*

## 16: When we reach out to ask for your involvement and feedback on an important community or regional project, how would you like us to inform you about what is happening?

| | Response Count |
|---|---|
| ...see pullout list below | 206 |
| answered question | 206 |
| skipped question | 178 |

### 16. Other (Responses are aggregated to eliminate duplication)

- *E-mail or online (very high number of responses)*
- *Through multiple news media: blogs, online news, radio, etc.*
- *Social media, Facebook, Twitter, Nextdoor (high number of responses)*
- *Internet surveys like this one are great*
- *Telephone*
- *Text Alerts*
- *Work through local organizations, E-mail blast, Electronic Message Boards*
- *Public notices,*
- *Newsletter by mail*
- *Radio or newspaper (online)*
- *Direct mailing (newsletter, postcard explaining issue)*
- *Emails through organizations I'm already connected*
- *Through community e-bulletins like this one from North County Inc (NCI).*
- *Newsletter*
- *Flyer*
- *Radio Ads/announcements*
- *Local Government Briefing Newsletter*
- *Newsletter or a link on your website.*
- *Regular updates - online is fine*
- *Roadside/Street signs, flyers*
- *Radio or Television Q & A - Virtual Meetings; Online Report*
- *Use the TV news...if you have a site setup to take comments, they will direct us there.*
- *Printed materials*
- *E-mail followup or web link where updates are posted*
- *Online surveys through email*
- *Blogs*
- *Articles*
- *Volunteer opportunities*
- *Community newsletter (print or electronic)*
- *EWGCC newsletter, press releases, etc.*
- *Blog that is updated regularly*
- *Start as early as possible before a decision is required by your staff.*
- *City newsletter or website.*

## 17: What are the best ways to present informational material to you? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| Maps, charts or other visual aids. | 73% | 225 |
| Post online video. | 40% | 123 |
| Post information online for review. | 75% | 233 |
| Discussion with subject experts. | 46% | 142 |
| Printed materials. | 57% | 176 |
| Display or posters at a library or community event. | 25% | 77 |
| Presentation at a conference or workshop. | 51% | 156 |
| Translated materials in my preferred language. | 1% | 4 |
| Other (please specify) | | 9 |
| answered question | | 309 |
| skipped question | | 75 |

### 17. Other

- *Post at MetroLink stops*
- *Braille*
- *Facebook group to follow*
- *Electronic (e-mail, files)*
- *White paper*
- *Update your outdated website!*

### 18. Other

- *"Anonymous comments*
- *"Let the people speak & listen to them, not yourselves & what you want. And not just those who you've convinced, but everyone who it could involve.*
- *"Online survey*
- *"Project website*
- *"E-mail*
- *"Group discussion helps me generate better questions*
- *"Online survey. Feedback form on website post event.*
- *"Opportunity to ask questions not in front of an audience*

### 18: Which of the following methods would help you express your views on a specific issue? (Check all that apply)

| | Response Percent | Response Count |
|---|---|---|
| Comment card/written survey | 67% | 205 |
| Opportunity to speak or address a panel/audience | 34% | 104 |
| Electronic voting | 62% | 188 |
| Group discussion | 53% | 163 |
| Focus group | 53% | 160 |
| One-on-one conversation | 45% | 136 |
| Translation available | 1% | 2 |
| Meeting facilitated by a 3rd party | 16% | 49 |
| Availability of social media channels (i.e. blog, Facebook page, twitter page) | 29% | 87 |
| Virtual meetings | 20% | 60 |
| Other (please specify) | | 8 |
| answered question | | 305 |
| skipped question | | 79 |

## *Public Involvement Goals*

### 19: Which of these public involvement goal statements resonate with you? (Check up to 5)

| | Response Percent | Response Count |
|---|---|---|
| Find new and creative ways to reach people. | 56% | 166 |
| Identify strategies for reaching immigrant communities. | 16% | 48 |
| Ensure meaningful participation for all communities. | 59% | 175 |
| Create mechanisms that report how we incorporate public feedback. | 29% | 86 |
| Provide information and education for the public about regional topics. | 62% | 186 |
| Report on how public input is used. | 38% | 113 |
| Solicit input early and throughout the decision-making process. | 60% | 170 |
| Expand the types of opportunities for involvement in regional planning. | 40% | 120 |
| Continuously evaluate the effectiveness of our public involvement program. | 34% | 102 |
| Share information and data with the public. | 63% | 188 |
| Partner with organizations to enhance our network. | 42% | 124 |
| Other (please specify) | | 9 |
| answered question | | 299 |
| skipped question | | 85 |

### 19. Other

- *"Update website, it's awful*
- *"Address communication obstacles in non English speaking residents.*
- *"Identify strategies for reaching the disability communities*
- *"Eliminate the redundancy of multiple organizations offering/ doing same thing, region wide.*
- *"All information must be factual and accurate, don't play politics!!*
- *"All are good!*
- *"Use community input to inform your decisions/ projects/funding*

## 20: What is your age?

| | Response Percent | Response Count |
|---|---|---|
| Less than 18 | 0.0% | 0 |
| 18 to 24 | 3% | 8 |
| 25 to 34 | 20% | 60 |
| 35 to 44 | 23% | 70 |
| 45 to 54 | 22% | 67 |
| 55 to 64 | 24% | 72 |
| 65 to 74 | 8% | 25 |
| 75 or older | 1% | 4 |
| answered question | | 306 |
| skipped question | | 78 |

# *Demographics*

## 21: What is your gender?

| | Response Percent | Response Count |
|---|---|---|
| Female | 48% | 146 |
| Male | 52% | 158 |
| Self-identification other than those listed above. | | 2 |
| answered question | | 304 |
| skipped question | | 80 |

## 22: What race/ethnicity would you consider yourself to be?

| | Response Percent | Response Count |
|---|---|---|
| White (Caucasian) | 87% | 254 |
| Black (African American) | 11% | 31 |
| Hispanic | 3% | 8 |
| Asian | 1% | 2 |
| Native American | 0% | 1 |
| Hawaiian/Pacific Islander | 0% | 0 |
| Other. Ethnic origin, nationality or any information not listed above | | 5 |
| answered question | | 292 |
| skipped question | | 92 |

**22. Other**

*"Indian*

## 23: What is your approximate average household income?

| | Response Percent | Response Count |
|---|---|---|
| Less than $35,000 | 13% | 39 |
| More than $35,000 | 87% | 254 |
| answered question | | 293 |
| skipped question | | 91 |

## 24: What is the highest level of education you have completed?

| | Response Percent | Response Count |
|---|---|---|
| Did not attend high school. | 0% | 0 |
| Attended high school. | 2% | 5 |
| Graduated from high school/GED. | 4.% | 12 |
| Attended university, community or vocational college. | 11% | 32 |
| Graduated from university, community or vocational college. | 29% | 87 |
| Attended graduate school. | 10% | 29 |
| Completed graduate school. | 47% | 142 |
| answered question | | 302 |
| skipped question | | 82 |

## 25: Are you a person with a disability?

| | Response Percent | Response Count |
|---|---|---|
| Yes | 7% | 22 |
| No | 93% | 278 |
| If yes, please specify | | 16 |
| answered question | | 300 |
| skipped question | | 84 |

## 26: In what language do you prefer to receive information?

| | Response Count |
|---|---|
| English | 255 |
| answered question | 255 |
| skipped question | 129 |

## 27: How often do you access the internet?

| | Response Percent | Response Count |
|---|---|---|
| Every day. | 96% | 289 |
| Once a week. | 0% | 0 |
| Several times a week. | 4% | 13 |
| Once a month. | 0% | 0 |
| Several times a month. | 0% | 0 |
| Rarely. | 0% | 0 |
| I do not have access. | 0% | 0 |
| answered question | | 302 |
| skipped question | | 82 |

## 28: In what ZIP code is your home located?

See survey response location map on page 16.

### 25. Specify Disabilty

- *"Some paralysis*
- *"Leqally blind, mild hearing loss and end orthopedic*
- *"Poor vision*
- *"Orthopedic*
- *"Spinal cord injury, paralysis*
- *"Totally Blind*
- *"Legally blind and hard of hearing*
- *"Blind*
- *"I am deaf and blind.*
- *"I have Muscular dystrophy and other health issues.*
- *"Hard of hearing*
- *"I use a wheelchair*
- *"Rheumatoid Arthritis, Fibromyalgia*
- *"Unable to walk*
- *"Visually impaired*
- *"Hearing deficit*

## 29: Please name the community in which you live.

| | Response Count |
|---|---|
| Various | 282 |
| answered question | 282 |
| skipped question | 102 |

## 30: Additional comments or suggestions

| | Response Count |
|---|---|
| ...see comments in pullouts that follow | 42 |
| answered question | 42 |
| skipped question | 342 |

### *30. Additional Comments or Suggestions*

*"My favorite way to get info is with my rss feed. With it I subscribe to tons of sites and if something new is posted it shows up in my feed – I don't have to remember to check a site. It is better than Facebook as i can get back to something in my feed easily. If you have a blog or site with rss syndication send me a link -I will subscribe.*

*"Please advocate for robust public transportation to bring people together and wean us off the blight of sprawling highways, Integrated communities, desegregation, Preservation of historic architectural legacy as a tool for revitalization of poor communities.*

*"Reach out to the numerous higher education institutions to host regular regional seminars. It is amazing how the region is divided and segmented. Highlight regional cooperation. The YMCA is finally creating a metro organization. The Catholic dioceses should look at collaboration. The tourism bureaus should also collaborate. There are many opportunities for regionalism. EWG would be better served with a name like St. Louis region. It should be St. Louis Place/ STL city/ STL County, Greater St. Charles, Southern STL etc. Keep the monikers to SAINTS with greater, southern, upper and Place as defining images.*

*"As long as this group attempts to apply regional solutions to local issues it will continue to struggle with defining a mission.*

*"We need more clearly marked bike trail and paths, and we need to involved minority communities, immigrants and people of color - Hispanics and blacks, youth too.*

*"Why when considering improvement in St. Louis Metropolitan Area you all never consider going North County (north above New Halls Ferry Road, I-270 to the Missouri River). I believe we need a thoroughfare that will take us down town St. Louis City or Rapid transit that will get there.*

*"I am an elected official representing (and advocating for 39 municipalities in North County which includes most of University City.*

*"You need to re-brand EWG and reintroduce the organization to the community. Expand your resources to more ground level groups, such as muni's, school, senior groups, chambers of commerce, other populated groups, you need to better network.*

### *30. Additional Comments or Suggestions Continued...*

*"I question the general public's knowledge of the existence/role/structure/purpose of EWGCoG*

*"I believe that the regional area should consolidate. Maybe drop the 92 St. Louis county cities. Do maybe 20 or so*

*"Remove political connections that serve NO purpose and understanding the responsibility of the appointed position and focus on the MISSION and keep politics OUT. Political appointments should be willing to serve and accomplish the goals for the betterment of the community. The involvement of this agency really has NOT served my community well in my opinion. The lack of information is not distributed to me realizing that I really do not make a difference to this agency. Get back to basics and focus on the mission and purpose.*

*"I think EW Gateway also needs to do a better job in soliciting input directly from municipal officials. The St. Louis area has an abundance of intelligent and experienced municipal employees, and from my experience, EWG rarely engages them for input prior to their studies.*

*"Public meetings should have press releases and the website could be updated. The council does good work in my opinion and I am currently starting to study Urban Planning. Also, I work for the St. Louis County Board of Elections and have spent most of my life living in St. Louis, MO.*

*"I think it would be helpful to add what county you live in and separately what county you work in.*

*"Consider hiring a graphic artist to attend public input meetings and capture public comments visually instead of simply with words. Once complete, share the finished work with the public as a way to communicate the meeting outcomes.*

*"Biggest thing is to show respect for community members who show up - nothing should be a "done deal" if you're asking for input - best recent bad example was the South County Connector public process - many participants questioned why the preferred route (to solve a county problem) placed greater impacts on city residents than county residents! The only rationalization given by the COUNTY planning staff was that it would involve the least amount of land acquisition and that people in Shrewsbury objected to ANY route through their city!*

*"Madison County Transit buses should run on major holidays persons work on those days getting a cab costs too much.*

*"Keep up the great work! The content on your site is great, but it is definitely time to update the online presence. I would love to see more open/visible access to GIS data and other valuable information.*

*"Thank you for the comprehensive questionnaire.*

*"I am involved due to job which is located in a zip code other than my home and in the St. Louis County community.*

*"Families with young children are chronically under-represented in planning sessions, as families are temporarily "handicapped" by childcare and severe time restraints for many years. Thus, infrastructure often neglects to provide for their needs, (ie: wider sidewalks to accommodate double strollers, toddler toilets, drinking fountains at child level, adequate restroom facilities for women, stepping stools to wash hands, the list goes on.) Please set up an assessment tool to determine if the views of very young families are properly represented. As a nature teacher and preschool teacher, I am happy to provide this viewpoint at any time:. Thx for all you do! Saint Louis is awesome.*

### *30. Additional Comments or Suggestions Continued...*

*"Well done.*

*"The organization comes off cheesy, disingenuous, old-school, and exclusive. If it can overcome this image, it will attract more involvement from a broader spectrum of citizens.*

*"Most people have no idea EWG even exists. I only know of EWG because of my job.*

*"EWGCG should stay out of project implementation. You can barely do planning, your implementation particularly supervision of design contracts has been a disaster.*

*"1. While I like that you are taking your time to get a sense of how to better reach the community, this survey is not the way to do it. You are asking exploratory questions in a format that is quite restricting. I'm actually really interested to know how you are going to go about getting actual valuable data from this. You asked us to rank absolutely nothing out of those check boxes... There's no way to analyze this which makes me think this is a PR generating survey. 2. You took my demographics, whatever, so you should know that the only thing I really care about is getting a new bridge over the Missouri River in Washington, MO. That's some community feedback because a lot of people in Franklin and Warren Co are concerned about it.*

*"Open houses for the public to comment on the TIP are pointless. Involve the public earlier on if possible.*

*"It is important that community is heard and the suggestions seriously considered. In the St. Louis region, the old, exclusive, patriarchal approach of the privileged, "we're the experts and know what to do and how to do it" has consistently retarded progress, alienated creativity and certain constituencies. This is a sink or swim moment for the region. We have to get it right, right away of we'll be left behind while other more progressive regions thrive. I don't believe the influencers are lifelong learners. Instead they live in their comfort zone, The same people, doing the same thing, all the time. There is a glimmer of hope and energy transplants and newly returning St. Louisans are bringing to the table. If only the closed, good ole boy network will respect them and work with them. What could they possibly be afraid of? They have all the resources and power. It's a shame.*

*"Thanks for this survey. Thought you asked good questions.*

*"Do a better job of involving wealth of talent among municipal officials and administrators.*

*"This survey took me 24 minutes. Getting rid of abandoned and deteriorating properties would be a place to begin improving all or most neighborhoods. Absent or negligent owners have the option of selling their property or at least making it secure and nonhazardous to their neighbors. The proceeds of sales could finance the effort. Why does the City own these properties?*

*"People have meeting/open house fatigue. If there's going to be a meeting, we need to make them as effective and meaningful, as possible. It would be nice for major agencies in region to so some coordinating around big regional projects.*

*"Thank you and good luck!*

*"I have been to several EW Gateway meetings and they all seem to do a lot of asking questions, but nothing ever gets changed.*

*"I feel Jefferson County is treated as a stepchild of EWG and other groups and does not receive its fair share of regional $$ for infrastructure or economic projects.*

### *30. Additional Comments or Suggestions Continued...*

*"The East West Gateway Blog is very interesting, and I wish that you would publish more often.*

*"Plans fail without people.*

*"So glad you are doing this! We need real, meaningful participation that is more like collaboration and empowerment of community members--not just informing or consulting residents as to what EWG has already decided to do.*

*"I know EW Gateway tries to do community engagement, I just think it's done so uncreatively. No one wants to go to a community meeting. A community meeting with less than 100 people is not an effective meeting-even for topics that are more "boring" like roads. Meet people where they are at-do street teams, installation displays at MetroLink stops, etc. Partner with organizations that are really strong at community engagement like Beyond Housing to understand best practices in community engagement.*

*"I think you should really try to push the tech/social boundaries of engagement throughout the region and become a model for other local jurisdictions. The old school ways aren't working any more.*

*"Thanks for the opportunity.*

*"Please fix our roads and create a more pedestrian-friendly sidewalk on Brentwood Blvd. (trees, buffer between pedestrian and cars and/or pedestrian underpass.*

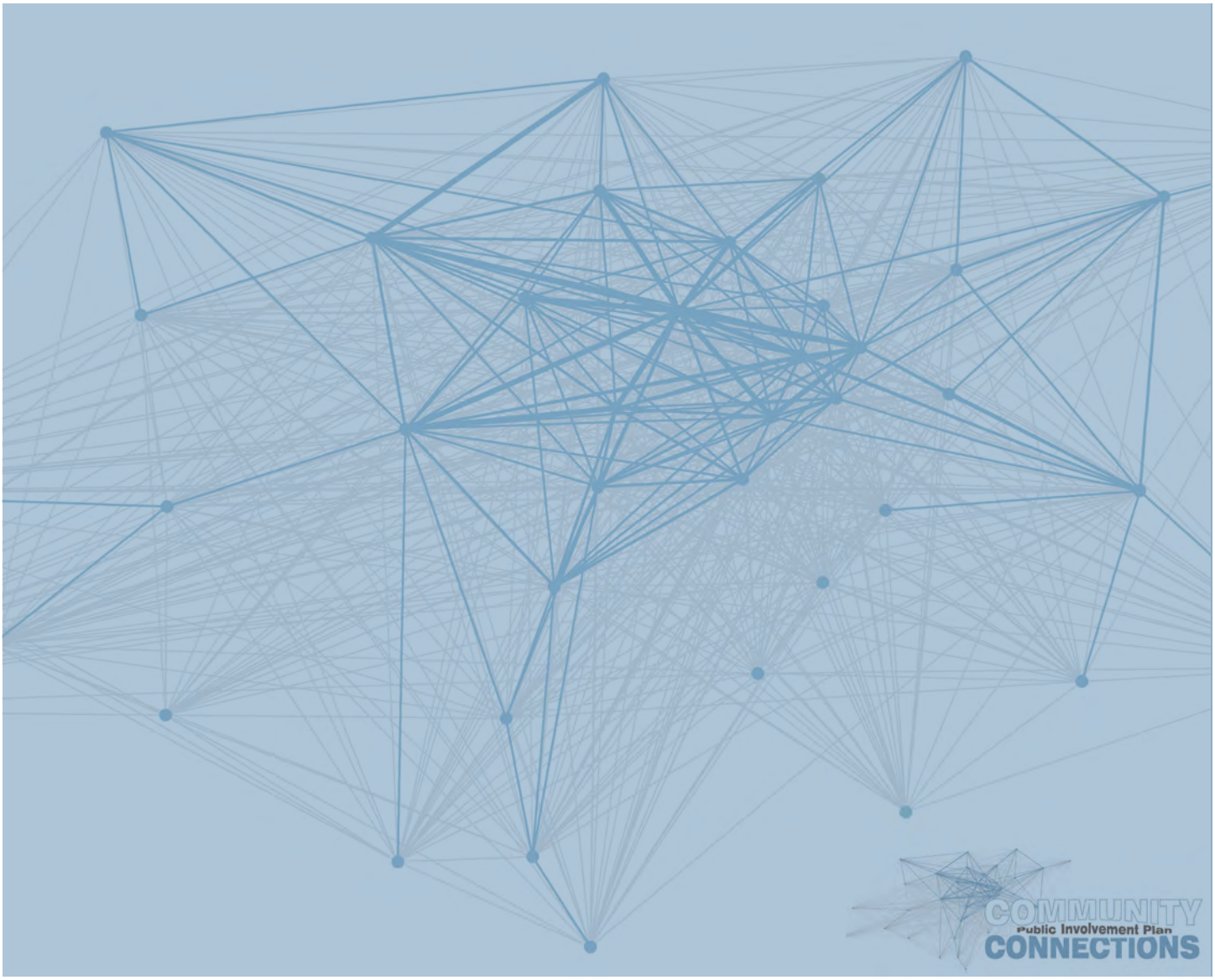
EAST-WEST GATEWAY
**Council of Governments**

Creating Solutions Across Jurisdictional Boundaries

**One Memorial Drive, Suite 1600**
**St. Louis, MO 63102**

**314-421-4220 • 618-274-2750**
**www.ewgateway.org**

EWG fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, see http://www.ewgateway.org or call (314) 421-4220.



# Appendix 5:
# LEP Plan

*[This Page Intentionally Left Blank]*

# Appendix 5: LEP Plan

## A. Introduction & Background

Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d – 2000e) (Title VI), Executive Order 13166 – *Improving Access to Services for Persons with Limited English Proficiency*, and U.S. Department of Transportation (DOT) guidance – *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*, govern East-West Gateway Council of Governments' (EWGCOG) plan regarding LEP persons (LEP Plan). Under federal law, individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are considered to be LEP.[1] This language barrier may prevent individuals from accessing services and benefits and these individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. As a federal-aid recipient, EWGCOG is responsible for ensuring that its LEP constituents have meaningful access to EWGCOG's programs and activities.

EWGCOG promotes a positive and cooperative understanding of the importance of providing language assistance so that LEP persons can have meaningful access to EWGCOG's programs and activities. To this end, EWGCOG's LEP Plan analyzes the most recent data available regarding the Region's LEP population (see Part C – Four Factor Analysis). EWGCOG uses this data to develop the agency's strategies for providing language assistance to LEP persons and how it will notify LEP persons of the availability of language assistance. The LEP Plan also describes how EWGCOG will monitor, evaluate, and update its LEP Plan and how the agency will train its staff with respect to the agency's LEP Plan.

The results of EWGCOG's Four Factor Analysis (see Part C) show, in part, that the Region has a very low, overall LEP population (at 2.3 percent) and that EWGCOG has infrequent contact with LEP persons. Based on the results of the Four Factor Analysis, EWGCOG has determined that it will provide language assistance services on a case-by-case or as-needed basis.

EWGCOG is prepared at all times to respond to each request for language assistance and to provide *reasonable* access to EWGCOG's programs and activities. Language assistance may include oral interpretation services of agency documents or at public events, written or electronic translation of summaries of agency documents or the full text of agency documents. For more information about EWGCOG's language assistance services please refer to Part D.

EWGCOG's data analysis and LEP Plan is described in detail below. Full size version of the maps referenced in this LEP Plan can be found in Appendix 8 of the Title VI Program.

[1] The Federal Transit Administration also defines LEP persons as those who reported to the U.S. Census Bureau that they speak English less than very well, not well, or not at all (see FTA Circular 4702.1B, Chapter I, Part 5(l)). This definition is used by EWGCOG in its data analysis.

## B. The Data

The data used in this LEP Plan is taken from the U.S. Census Bureau's (Census) 5-Year American Community Survey (ACS) for the period 2009 – 2013.[2] This is the most recent dataset available that includes all of the data that EWGCOG needed to conduct its analysis. The data that EWGCOG used in this LEP Plan include persons who speak English *"less than very well,"* which includes those persons who indicated to the Census that they speak English "less than very well," "not well," or "not at all." This is consistent with the Federal Transit Administration's (FTA) definition of LEP persons.[3]

## C. Four Factor Analysis

The first step EWGCOG's LEP Plan development is for EWGCOG to conduct a "Four Factor Analysis" that EWGCOG will use to determine whether it communicates effectively with LEP persons and will inform EWGCOG's language access planning. The Four Factor Analysis includes:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity, or service provided by the program to people's lives.
4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Each of the factors in this analysis is described in more detail below.

1. *Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.*

This factor examines the persons eligible to be served or likely to be directly affected by EWGCOG's programs or activities. EWGCOG's service area is the Region (see Figure 10 below). As a planning agency, EWGCOG does not have daily interaction with LEP persons; rather, EWGCOG's interaction with LEP persons is limited to instances when the agency conducts a particular planning project for a community or neighborhood within the Region. Given this, EWGCOG's analysis focuses on identifying those areas within the Region that have highest concentrations of LEP persons. EWGCOG uses this data to identify LEP communities that may be part of EWGCOG's planning project service area so that EWGCOG can conduct appropriate outreach and provide any LEP persons living in these communities meaningful access to EWGCOG's planning efforts.

[2] More information about the ACS can be found on the Census' website at: www.census.gov/programs-surveys/acs/about.html.
[3] See the Census Bureau's website at: www.census.gov/topics/population/language-use/about.html to learn more about the languages and language groups.

Figure 10. The St. Louis Region

Based on EWGCOG's analysis, the Region has very few LEP persons (56,098 persons or 2.3 percent of the Region's total population) and households (13,221 households or 1.3 percent of the Region's total household). Most LEP persons live in the City of St. Louis (12,885 persons) or St. Louis County (28,989 persons). Table 9 summarizes the data for LEP persons and households. Figure 11 shows the spatial distribution of LEP persons in the Region.

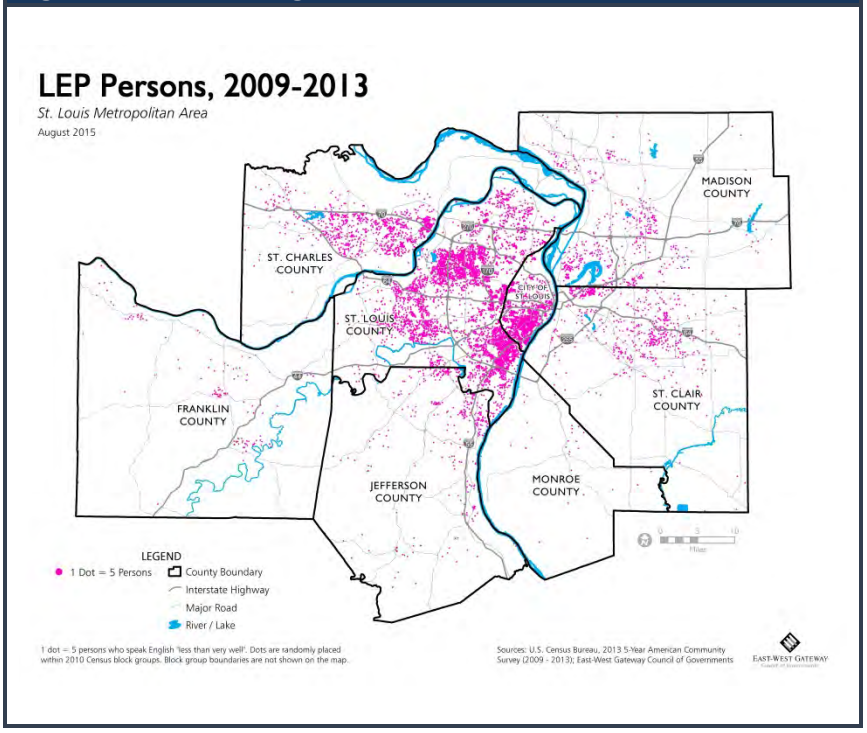
**Table 9. St. Louis Region Limited English Proficient (LEP) Persons & Households[1]**

| | | Total Persons | LEP Persons | | Total Households | LEP Households | |
|---|---|---|---|---|---|---|---|
| | | # | # | % | # | # | % |
| **St. Louis Region** | | **2,414,972** | **56,098** | *2.3* | **1,022,623** | **13,221** | *1.3* |
| ILLINOIS | Madison County | 252,221 | 2,645 | *1.0* | 107,238 | 540 | *0.5* |
| | Monroe County | 31,272 | 152 | *0.5* | 12,506 | 53 | *0.4* |
| | St. Clair County | 250,929 | 3,427 | *1.4* | 102,885 | 699 | *0.7* |
| MISSOURI | City of St. Louis | 297,679 | 12,885 | *4.3* | 140,652 | 3,420 | *2.4* |
| | Franklin County | 95,243 | 626 | *0.7* | 39,263 | 83 | *0.2* |
| | Jefferson County | 205,031 | 1,902 | *0.9* | 80,812 | 374 | *0.5* |
| | St. Charles County | 341,309 | 5,472 | *1.6* | 135,974 | 955 | *0.7* |
| | St. Louis County | 941,288 | 28,989 | *3.1* | 403,293 | 7,097 | *1.8* |

*Source: U.S. Census 2013 5-Year American Community Survey.*

[1] An LEP person includes an individual who reported to the U.S. Census that they do not speak English "very well." This includes those persons who speak English "well," "not well," or "not at all." An LEP household is defined as a household in which no one in the household aged 14 years and older speaks English "very well."

**Figure 11. St. Louis Region, LEP Persons, 2009 – 2013**




Although EWGCOG's interaction with LEP persons is very limited,[4] EWGCOG's analysis shows that, if the agency were to have contact with LEP persons, those persons are most likely to speak Spanish. When examining the Region's 56,098 LEP persons, approximately 30.7 percent or a total of 17,201 persons speak Spanish (see Table 11).[5] The next two most common languages spoken by LEP persons are Serbo-Croatian (Bosnian) and Chinese. Bosnian speaking LEP persons represent approximately 10.6 percent of all LEP persons; with a total of 5,962 persons. Chinese speaking LEP persons are the third most prevalent LEP language group, with 9.7 percent of all LEP persons or 5,459 total persons.

**Table 10. Top 3 Languages Spoken by LEP Persons in the St. Louis Region**

| Total LEP Persons | Spanish | | Serbo-Croatian (Bosnian) | | Chinese | |
|---|---|---|---|---|---|---|
| | # | % | # | % | # | % |
| **56,098** | 17,201 | *30.7* | 5,962 | *10.6* | 5,459 | *9.7* |

*Source: U.S. Census 2013 5-Year American Community Survey.*

[4] Since 2011, EWGCOG has not had contact with any LEP persons.

[5] In 2011, the top three languages spoken by the Region's LEP residents were also Spanish, Bosnian, and Chinese; however, since the data was last examined, the number of LEP persons speaking these languages changed, as follows: Spanish speaking LEP persons decreased by 8.0 percent, Bosnian speaking LEP persons decreased by 10.0 percent, and Chinese speaking LEP persons increased by 18.7 percent. Despite these changes, the number of LEP residents in EWGCOG's service area remains very low and Spanish still represents the most prevalent language spoken by the Region's LEP residents.

As shown in Table 11, each county within EWGCOG's service area has at least some Spanish speaking LEP persons, while Bosnian speaking and Chinese speaking LEP residents are largely concentrated in a few locations. For example, the City of St. Louis and St. Louis County have the highest proportion of the Region's Bosnian speaking LEP persons and the highest proportion of the Region's Chinese speaking LEP persons. Although these three language groups represent the largest number of LEP residents, all of these groups make up a very low proportion of the Region's total population – 0.7 percent for Spanish speaking LEP persons and 0.2 percent for both Bosnian speaking and Chinese speaking LEP persons (see Table 12). Figures 12 and 13 show the concentration of all LEP populations in the City of St. Louis and St. Louis County.

**Table 11. Proportion of Spanish, Bosnian & Chinese Speaking LEP Populations by County**

| | LEP Persons | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Region | ILLINOIS | | | | | | MISSOURI | | | | | | | | | |
| | | Madison County | | Monroe County | | St. Clair County | | City of St. Louis | | Franklin County | | Jefferson County | | St. Charles County | | St. Louis County | |
| | # | # | % | # | % | # | % | # | % | # | % | # | % | # | % | # | % |
| Spanish | **17,201** | 1,359 | *7.9* | 75 | *0.4* | 1,959 | *11.4* | 3,776 | *22.0* | 340 | *2.0* | 547 | *3.2* | 2,131 | *12.4* | 7,014 | *40.8* |
| Serbo-Croatian (Bosnian) | **5,962** | 0 | *0.0* | 0 | *0.0* | 9 | *0.2* | 1,334 | *22.4* | 0 | *0.0* | 342 | *5.7* | 114 | *1.9* | 4,163 | *69.8* |
| Chinese | **5,459** | 85 | *1.6* | 0 | *0.0* | 71 | *1.3* | 816 | *14.9* | 179 | *3.3* | 35 | *0.6* | 341 | *6.2* | 3,932 | *72.0* |

*Source: U.S. Census 2013 5-Year American Community Survey.*

**Table 12. LEP Persons in the St. Louis Region by Language Spoken**

| | | Total Persons | Language Groups[1] | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Spanish | | Other Indo-European Languages | | | | Asian & Pacific Island Languages | | | | Other Languages | | Total LEP | |
| | | | | | Serbo-Croatian (Bosnian) | | Other | | Chinese | | Other | | | | | |
| | | | # | % | # | % | # | % | # | % | # | % | # | % | # | % |
| **St. Louis Region** | | **2,414,972** | **17,201** | ***0.7*** | **5,962** | ***0.2*** | **11,928** | ***0.5*** | **5,459** | ***0.2*** | **11,131** | ***0.5*** | **4,417** | ***0.2*** | **56,098** | ***2.3*** |
| ILLINOIS | Madison County | 252,221 | 1,359 | *0.5* | 0 | *0.0* | 682 | *0.3* | 85 | *0.0* | 365 | *0.1* | 154 | *0.1* | 2,645 | *1.0* |
| | Monroe County | 31,272 | 75 | *0.2* | 0 | *0.0* | 77 | *0.2* | 0 | *0.0* | 0 | *0.0* | 0 | *0.0* | 152 | *0.5* |
| | St. Clair County | 250,929 | 1,959 | *0.8* | 9 | *0.0* | 375 | *0.1* | 71 | *0.0* | 847 | *0.3* | 166 | *0.1* | 3,427 | *1.4* |
| MISSOURI | City of St. Louis | 297,679 | 3,776 | *1.3* | 1,334 | *0.4* | 2,399 | *0.8* | 816 | *0.3* | 2,656 | *0.9* | 1,904 | *0.6* | 12,885 | *4.3* |
| | Franklin County | 95,243 | 340 | *0.4* | 0 | *0.0* | 91 | *0.1* | 179 | *0.2* | 16 | *0.0* | 0 | *0.0* | 626 | *0.7* |
| | Jefferson County | 205,031 | 547 | *0.3* | 342 | *0.2* | 431 | *0.2* | 35 | *0.0* | 460 | *0.2* | 87 | *0.0* | 1,902 | *0.9* |
| | St. Charles County | 341,309 | 2,131 | *0.6* | 114 | *0.0* | 1,243 | *0.4* | 341 | *0.1* | 1,274 | *0.4* | 369 | *0.1* | 5,472 | *1.6* |
| | St. Louis County | 941,288 | 7,014 | *0.7* | 4,163 | *0.4* | 6,630 | *0.7* | 3,932 | *0.4* | 5,513 | *0.6* | 1,737 | *0.2* | 28,989 | *3.1* |

*Source: U.S. Census 2013 5-Year American Community Survey.*

[1] Language groups are defined by the U.S. Census. The numbers in the table reflect a combination of all the individual languages that make-up each of the four language groups (Spanish, Other Indo-European, Asian and Pacific, and Other). The definition of the languages and language groups can be found on the Census' website at: https://www.census.gov/hhes/socdemo/language/about/.

**Figure 12. City of St. Louis, LEP Persons, 2009 – 2013**

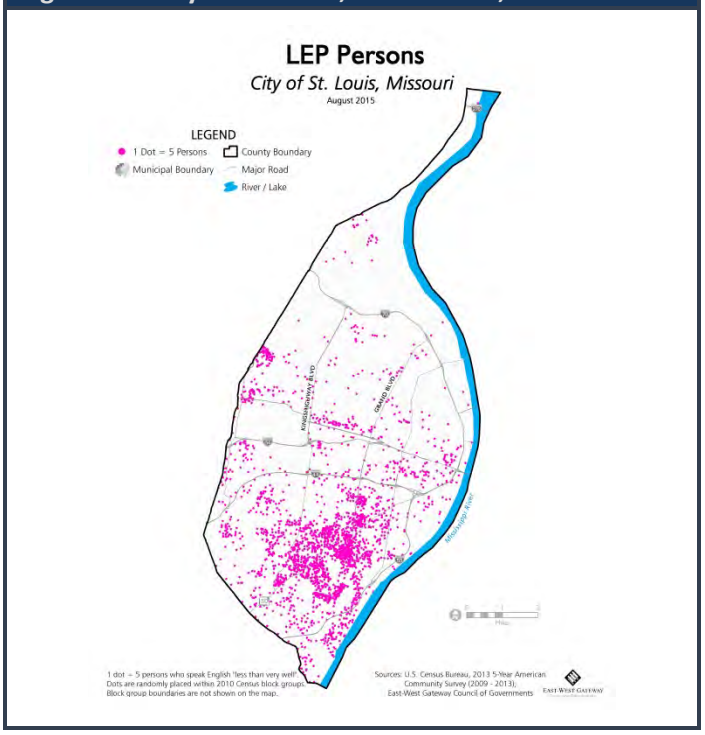
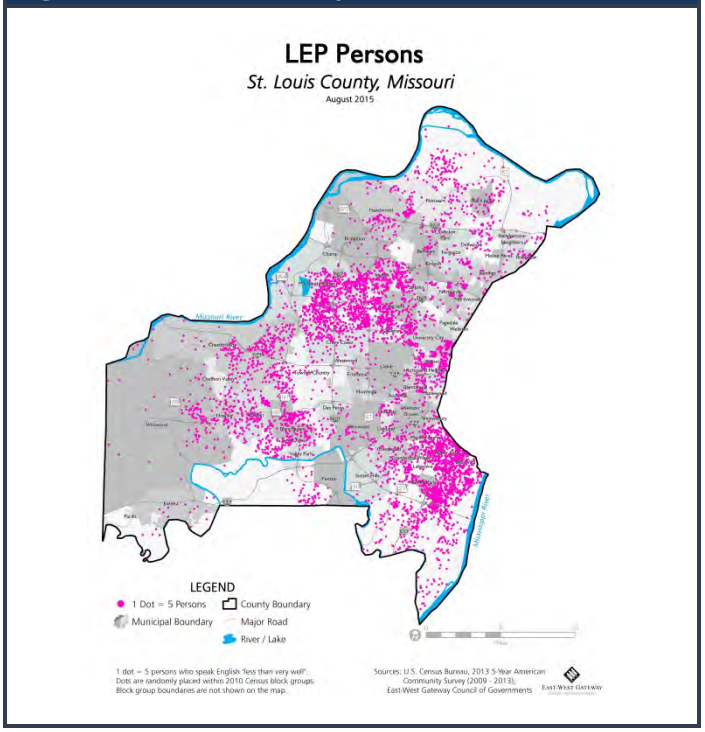



**Figure 13. St. Louis County, LEP Persons, 2009 – 2013**



2. *Factor 2: The frequency with which LEP persons come into contact with the program.*

Factor 2 of the Four Factor Analysis requires EWGCOG to review its key program areas and assess major points of contact with the public. Due to the low proportion of LEP persons in the Region, EWGCOG does not have frequent contact with LEP persons. To-date EWGCOG has not had any contact with LEP persons – EWGCOG has not ever received a request for language assistance services from an LEP individual or had an LEP person attend any public meeting for EWGCOG's programs (i.e. open houses for the Transportation Improvement Program). EWGCOG does not provide any services to the public directly, such as bus or rail service; however, as part of its planning processes EWGCOG does conduct public outreach. It is through its planning and outreach that EWGCOG has the greatest likelihood of encountering LEP persons.

Although EWGCOG does not typically have frequent contact with LEP populations, EWGCOG recognizes that there are communities in the Region that have high concentrations of LEP persons and that, if EWGCOG undertakes a project in these communities, EWGCOG may have an occasion to have more frequent contact with LEP persons. As part of its project planning process, EWGCOG analyzes the community-level data to identify these LEP populations and take steps to include LEP persons in the project. EWGCOG has developed a database of over 300 organizations in the Region that work with LEP persons and other underserved populations (i.e. minority groups, persons with disabilities, etc.).[6] EWGCOG utilizes this list to conduct public outreach by sending these groups notifications about public meetings and other information about EWGCOG's projects.

3. *Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.*

This factor is concerned with whether a federal-aid recipient's programs, activities, or services are vitally important to the recipient's constituents or have wide-spread impacts. EWGCOG is the metropolitan planning organization (MPO) for the Region. As described in Section V of the Title VI Program, EWGCOG's federal mandate is to conduct and support cooperative and comprehensive transportation planning for the Region and develop certain documents and plans that govern transportation investments for the Region. EWGCOG's planning processes are focused on the Region's transportation network which facilitates the movement of people and products. The health and vitality of the Region and its residents depends on how well this transportation network functions. All of the Region's residents, including its LEP population, rely on the network to get to work, hospitals, schools, and other essential places. EWGCOG recognizes that it is important for all constituents to have meaningful access to the planning process that ultimately affects the transportation network. If *all* of the Region's residents do not have an opportunity to express their needs, the network could fail to meet their needs which could hinder their quality of life.

EWGCOG must ensure that all segments of the Region's population, including LEP persons, have the opportunity to be involved in the planning process. EWGCOG works diligently to ensure that it evaluates the impact of proposed transportation investments on underserved and underrepresented groups (i.e. low-income persons, minority groups, and LEP persons) in order to prevent these groups from being overlooked during the planning process. EWGCOG is committed to ensuring that the agency's planning

[6] This list includes a wide variety of organizations such as the Metropolitan St. Louis Equal Housing Opportunity Council, the Urban League, and the Diversity Awareness Partnership.

projects and activities are accessible to all of the Region's residents; therefore, through its planning processes, EWGCOG takes all appropriate and reasonable measures to reach the LEP community.

4. *Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.*

Under the 4th factor in the analysis, EWGCOG must examine the resources that it has available to provide meaningful access to LEP persons and the likely cost that EWGCOG will incur for providing language assistance services to LEP persons. Language assistance services include oral interpretation either in person or via telephone and written translation of significant documents. Under federal requirements, federal-aid recipients are expected to take reasonable steps to provide language assistance services to its LEP constituents. Notably, reasonable steps do not require a recipient to expend resources for language assistance services if the cost imposed substantially exceed the benefits.

In a typical year, EWGCOG budgets $15,000 - $20,000 to produce significant agency documents (in English). These significant documents include: the Transportation Improvement Program (TIP) along with the Air Quality Conformity Determination and the Unified Planning Work Program (UPWP). EWGCOG has other significant documents that are not produced or updated every year, such as the Long Range Transportation Plan (LRTP), *Where We Stand*, and the Coordinated Human Services Transportation Plan (CHSTP). EWGCOG's significant documents are very lengthy and the cost to provide written translation of these documents is summarized in Table 13 below. Additionally, EWGCOG conducts public outreach with respect to the planning process associated with the LRTP, TIP, and other projects. The cost to provide oral interpretation services at public outreach events is summarized in Table 14 below. The total cost to EWGCOG for providing this type of outreach as a regular or automatic service exceeds EWGCOG's available budget.

**Table 13. Average[1] Cost of Written Translation of Significant Agency Documents**

| | Est. # of Words[2] | Avg. Cost Per Word | Total Cost |
|---|---|---|---|
| TIP | 56,400 | $0.18 | $10,152.00 |
| Air Quality Conformity | 31,800 | $0.18 | $5,724.00 |
| UPWP | 23,090 | $0.18 | $4,156.20 |
| | | *Subtotal* | *$20,032.20* |
| LRTP | 45,000 | $0.18 | *$8,100.00* |
| *Where We Stand* | 49,800 | $0.18 | $8,964.00 |
| CHSTP | 29,000 | $0.18 | $5,220.00 |
| | | ***Total Costs*** | ***$42,316.20*** |

[1] Written translation services are charged by the word and the price can range from $.17 - $.19 per word, depending on the organization providing the service (see Table 14 for a list of service providers). EWGCOG used an average of the per word cost, which is $.18. The costs above do not include the cost of having the translated documents formatted or edited, which would cost between $33 and $38 / hour. The number of pages required reflect an estimate of the pages in each document based on the most current version of the document's page number. *The number of pages will vary from year-to-year based upon actual content.*

[2] The number of words for the TIP, Air Quality Conformity, and *Where We Stand* were adjusted downward in order to account for the volume of the words that are numbers, so would not have to be translated. For example, EWGCOG estimated that at least 40% of the TIP document is numbers and would not have to be translated.

**Table 14. Average[1] Cost of Oral Interpretation at Public Meetings**

| | Est. # of Hours | Avg. Cost Per Hour | Total Cost |
|---|---|---|---|
| LRTP | 8 | $60.29 | $482.29 |
| TIP & Air Quality Conformity | 11 | $60.29 | $663.14 |
| Other | 10 | $60.29 | $602.86 |
| | | ***Total Costs*** | ***$1,748.29*** |

[1] In-person oral interpretation services are charged by the hour and the price can range from $47 - $75 per hour, depending on the organization providing the service and the language needed (see Table 15 for a list of service providers). EWGCOG used an average of the hourly cost, which is $60.29/hour. The number of hours required reflect the total number of hours that EWGCOG staff typically spends at the public meetings for each event multiplied by the typical number of events EWGCOG holds for that project. For example, for the 2016 - 2019 TIP & Air Quality Conformity, EWGCOG held 5 open houses for 2 hours each and 1 on-line chat for 1 hour. *The hours spent at each meeting will vary from year-to-year.*

## D. Language Assistance Services

A recipient is responsible for determining the right mix of language assistance services based upon what is reasonable and necessary for the recipient after consideration of the results from the Four Factor Analysis. EWGCOG's Four Factor analysis shows that the Region has a low, overall LEP population and that EWGCOG has infrequent contact with LEP persons; therefore, EWGCOG has determined that it will provide language assistance services on a case-by-case or as-needed basis. EWGCOG is prepared at all times to respond to each request for language assistance and to provide reasonable access to EWGCOG's programs and activities. Language assistance may include oral interpretation services of agency documents or at public events, written or electronic translation of summaries of agency documents or the full text of agency documents. Table 15 provides a list of organizations that can provide EWGCOG these services.

Although EWGCOG has determined that it is not reasonable and necessary to automatically provide written translation or oral interpretation of significant agency documents or oral interpretation at public outreach events, EWGCOG has decided that it will translate certain materials into Spanish. The data analysis shows that the Region's LEP persons are most likely to be Spanish-speaking and Spanish-speaking LEP persons reside in every county within EWGCOG's service area. The materials that EWGCOG will translate into Spanish include: (1) EWGCOG's brochures: "Commitment to Limited English Proficient (LEP) Persons" and "Your Rights Under Title VI," (2) the Title VI Complaint Procedures, (3) the Title VI Nondiscrimination Complaint Form, and (4) information about EWGCOG's provision of free language assistance services. Translating these documents is a low-cost way for EWGCOG to inform LEP persons about the protections afforded them under Title VI and provide LEP persons a way to request additional information or services. EWGCOG will also place a statement on its website that informs visitors that EWGCOG will provide language assistance services free of charge and upon request. This statement will be placed on EWGCOG's website in Spanish; however, additional languages will be added if, after an examination of the data, the proportion of other languages spoken by LEP persons in the Region changes to a level that indicates that translation into other languages is needed.

In addition, EWGCOG recognizes that the Region has certain areas with higher concentrations of LEP persons who may speak languages other than Spanish, so EWGCOG has determined that it will take

several low-cost or no-cost proactive steps to provide meaningful access to EWGCOG's program, activities, and services to all LEP persons. These steps include:

- Utilizing bilingual EWGCOG staff on an as-needed basis to assist during public outreach efforts or other interactions with LEP persons.
- Seeking the assistance of organizations that provide translation and interpretation services. EWGCOG will use the State of Missouri Cooperative Procurement List to identify entities that provide these services.[7]
- Coordinating with other MPOs to share translated materials, such as informational notices.
- Working with local groups, citizens, and businesses that represent or work with LEP persons in order to identify appropriate strategies that EWGCOG can use to reach LEP persons, as well as provide opportunities for those who represent LEP interests to participate in regional decision making by serving on advisory groups and citizen panels.
- Continuing to monitor the demographic characteristics of the Region in order to identify changes in the LEP population that may necessitate a change to EWGCOG's LEP Plan.

**Table 15. Language Assistance Providers***

| **Telephone Foreign Language Interpretation ($44 / hour, 2-hour minimum)** | |
|---|---|
| Global Village<br>St. Louis, MO<br>globalvillagelanguagecenter.com/<br>(314) 989-9112 | International Language Center<br>St. Louis, MO<br>www.ilcworldwide.com<br>(800) 445-4440 |
| **Language Interpreter – Verbal ($47 - $81 / hour)** | |
| International Language Center<br>St. Louis, MO<br>www.ilcworldwide.com<br>(800) 445-4440<br><br>International Institute of Metropolitan St. Louis<br>St. Louis, MO<br>www.iistl.org/iibsctranslation.html<br>(314) 773-9090 | Bilingual International Assistant Services<br>St. Louis, MO<br>www.bilingualstl.org/<br>(314) 645-7800 |
| **Language Translation – Written ($.17 - $.19 / word; $33 - $38 / hour for editing and formatting)** | |
| International Language Center<br>St. Louis, MO<br>www.ilcworldwide.com<br>(314) 647-8888<br><br>Global Village<br>St. Louis, MO<br>globalvillagelanguagecenter.com/<br>(314) 989-9112 | International Institute of Metropolitan St. Louis<br>St. Louis, MO<br>www.iistl.org/iibsctranslation.html<br>(314) 773-9090<br><br>Propio Language Services, LLC<br>Overland Park, KS<br>propio-ls.com/index.asp<br>(888) 528-6692 |

**Costs are based on current contract rates at the time this list was developed and the prices may vary based upon the specific language that is the basis for the interpretation or translation service request.*

[7] The State of Missouri's Cooperative Procurement List can be found on-line at: oa.mo.gov/purchasing/cooperative-procurement-services and oa.mo.gov/purchasing/bidding-contracts/awarded-bid-contract-document-search.

## E. Monitoring, Evaluating & Updating the LEP Plan

EWGCOG consistently monitors its programs and projects to ensure that the needs of LEP persons are being considered during the planning process. The Title VI Coordinator has primary responsibility for monitoring staff and contractor compliance with the LEP Plan. Specifically, when projects are conducted at a sub-regional level (i.e. for a specific county, municipality, etc.), EWGCOG planning staff coordinates with EWGCOG research staff to obtain and evaluate data regarding the demographic composition of the affected community. Given that LEP persons are concentrated in certain areas within the Region, EWGCOG planning staff pays particular attention to this demographic characteristic. EWGCOG planning staff also works with the Title VI Coordinator to develop strategies for providing meaningful access to LEP persons, when appropriate. These strategies may include coordinating with existing organizations in the project area to determine the best ways to conduct outreach and engage LEP persons during the project, having interpreters available, or translating meeting notices, flyers, and agendas into other languages.

EWGCOG evaluates the data available on the number and proportion of LEP persons in the Region as often as needed when it conducts local projects. The data examined by EWGCOG includes U.S. Census Bureau data for the particular area affected (i.e. number of LEP persons and language spoken), as well as information gathered from local organizations that are familiar with the project area. EWGCOG analyzes the data to identify locations within the project area that have high concentrations of LEP persons and the language(s) spoken by the LEP residents. This analysis is used to keep staff informed about and cognizant of where these persons live so that staff is able to incorporate LEP persons into the planning process. EWGCOG also uses this data to evaluate the language assistance services it provides and to determine what methods need to be used to provide these services.

Additionally, every three years during the Title VI Program update, EWGCOG reviews the entire LEP Plan based on the data collected during the program period and determines what updates need to be made to the Plan. The data EWGCOG uses during this process includes: the most recent U.S. Census Bureau data and staff surveys that collect information regarding how many LEP persons staff has been in contact with and how the needs of LEP persons have been addressed.[8] In the event that EWGCOG has contact with LEP persons, staff will also collect information from LEP persons served, such as:

- Was the local language assistance provided effective and sufficient to meet the person's needs?
- Were any complaints received? If so, what was the nature of the complaint?

Also, in conjunction with community partners, EWGCOG conducts a periodic assessment of LEP needs in the Region and the outreach strategies that EWGCOG can use to engage the LEP community.

## F. Staff Training

Every three years the Title VI Coordinator with assistance of other staff persons conducts training to EWGCOG's planning, research, and support staff. This training includes:

- Information about EWGCOG's Title VI Program and the LEP Plan
- A description of the language assistance services offered to the public

[8] To-date no LEP persons have contacted EWGCOG for language assistance or attended any of EWGCOG's outreach events.

- Instructions and information about how to handle a request for language assistance services and how to handle a potential LEP complaint (cultural competency)
- Information about what steps staff can take to understand the LEP community in the staff person's project area and the planning process for outreach to that community

Additionally, if a particular project will include a third-party contractor's services, EWGCOG informs the contractor about its Title VI and LEP obligations (see Appendix 1 for the language that is included in each federally-funded third-party contract).

# Appendix 6: Committees

*[This Page Intentionally Left Blank]*

# Appendix 6: Committees

East-West Gateway Council of Governments (EWGCOG) has five standing committees that provide recommendations to the agency's Board of Directors (BOD). These committees include:

- An Executive Advisory Committee (EAC) that provides recommendations to the BOD.
- Four "subject-matter" committees that provide information and support to the agency's initiatives on various program areas including:
  - transportation – including bicycle / pedestrian planning
  - the environment – including air quality and water resources, and
  - public safety / emergency management.

A current list of committee members can be found on-line at: www.ewgateway.org/AboutUs/Committees/committees.htm and www.stl-starrs.org/AboutUs/BOD/bod.htm. A description of each committee and its membership is also provided below. EWGCOG does not select or appoint the members of these committees; however, EWGCOG encourages any BOD member, staff person, or organization to select appointees that best reflect the diversity of the Region and the constituents that a represented organization serves.[1]

## Executive Advisory Committee (EAC)

The EAC is an advisory committee that makes recommendations to the BOD. The EAC includes 27 members with 21 voting members and 6 non-voting members. EWGCOG's bylaws specify that the voting members of the EAC will be appointed by the BOD members. The non-voting EAC members are appointed by other organizations. The entities and organizations that appoint members to the EAC are as follows:

| City / County Governments | |
|---|---|
| City of St. Louis, Missouri | East St. Louis, Illinois |
| Franklin County, Missouri | Madison County, Illinois |
| Jefferson County, Missouri | Monroe County, Illinois |
| St. Charles County, Missouri | St. Clair County, Illinois |
| St. Louis County, Missouri | |
| **State Government & Local Entities** | |
| State of Missouri, Governor's Office | St. Louis County Municipal League |
| Southwestern Illinois Conference of Mayors | Southwestern Illinois Metropolitan and Regional Planning Commission |
| **Local, State & Federal Agencies** | |
| Bi-State Development Agency d/b/a Metro | Federal Highway Administration |
| Missouri Department of Transportation | Federal Aviation Administration |
| Illinois Department of Transportation | U.S. Department of Housing and Urban Development |
| Federal Transit Administration | |

[1] FTA's circular 4702.1B, Chapter III, Part 10 does not apply to committees that have a membership that is not selected by the recipient.

# Appendix 6: Committees

## Subject-Matter Committees

***Transportation Planning Committee (TPC)*** – The TPC assists and provides recommendations to the EAC and BOD regarding regional policy decisions as these pertain to the planning of transportation improvements in the eight county, bi-state St. Louis metropolitan area (the Region). The TPC carries out the policies of the BOD relating to transportation plans and exchanges information and viewpoints to arrive at consensus on transportation planning issues. Currently, there is a Missouri TPC, which has 10 members, and an Illinois TPC which has 9 members. The members to both the Missouri and the Illinois TPCs are appointed by local governmental entities and other organizations in accordance with the TPC's rules of procedures. The TPC members are appointed by the following:

| City / County Governments* | |
|---|---|
| Mayor, City of St. Louis, Missouri | County Executive, St. Louis County, Missouri |
| President, Board of Alderman, City of St. Louis, Missouri | County Board Chairman, Madison County, Illinois |
| Presiding Commissioner, Franklin County, Missouri | County Board Chairman, Monroe County, Illinois |
| County Executive, Jefferson County, Missouri | County Board Chairman, St. Clair County, Illinois |
| County Executive, St. Charles County, Missouri | Mayor, City of East St. Louis, Illinois |
| **Local Entities*** | |
| St. Louis Regional Chamber | Vice-President, Southwestern Illinois Council of Mayors |
| President, St. Louis County Municipal League | President, Southwestern Illinois Metropolitan and Regional Planning Commission |
| President, Southwestern Illinois Council of Mayors | |
| **Local, State & Federal Transportation Agencies*** | |
| Bi-State Development Agency d/b/a Metro | Freight Advisory Committee |
| St. Clair County Transit District | Bicycle and Pedestrian Advisory Committee |
| Madison County Transit District | Missouri Department of Transportation |
| St. Charles County Transit Authority | Illinois Department of Transportation |
| Special Transportation Management Authority | |

*The position listed serves on the TPC or the person holding the position appoints a person to serve on the TPC.

***Bicycle and Pedestrian Advisory Committee (BPAC)*** –The BPAC advises the Council on bicycle and pedestrian related investment, development, and policy issues. The BPAC committee is currently composed of 15 members who are appointed by local entities that are involved in bike / pedestrian planning in accordance with BPAC's bylaws and include: planning or engineering officials from the Region's municipalities, counties, state transportation departments, and transit authorities; representatives from the Region's principal universities; individuals from key public interest and advocacy groups; and individuals representing the general bicycle and walking community. The BPAC includes one individual citizen and the organizations listed below.

| Local & State Entities | |
|---|---|
| City of St. Louis, Missouri | Great Rivers Greenway |
| City of O'Fallon, Missouri | Metro East Parks and Recreation District |
| St. Louis County, Missouri | Missouri Department of Transportation |
| Bi-State Development Agency d/b/a Metro | Illinois Department of Transportation |

| Non-Profit & Educational Organizations | |
|---|---|
| Trailnet | Cycling Savvy |
| Citizens for Modern Transit | Washington University |
| HeartLands Conservancy | |

## Appendix 6: Committees

***Air Quality Advisory Committee (AQAC)*** – The AQAC is a 20 member committee that serves as the advisory body for the BOD and a public forum for the dissemination of information and receipt of feedback about air quality issues. Organizations in the Region that handle or address air quality issues are invited to attend the committee meetings and each of these organizations appoint representatives to the AQAC. The organizations represented include:

| Local, State & Federal Entities | |
|---|---|
| Madison County Transit District | Missouri Department of Natural Resources |
| Madison County Highway Department | Illinois Environmental Protection Agency |
| St. Clair County Transit District | Missouri Department of Transportation |
| Bi-State Development Agency d/b/a Metro | Illinois Department of Transportation |
| St. Louis Regional Chamber | Federal Highway Administration |
| St. Louis County Municipal League | |
| **Non-Profit & Educational Organizations** | |
| American Lung Association of the Upper Midwest | AAA Auto Club of Missouri |
| Missouri Coalition for the Environment | St. Louis University |
| Missouri Corn Growers Association | |

***Water Resources Committee (WRC)*** – The WRC is a 59 member committee that's primary function is to serve as a place for organizations to share information about projects and programs. Organizations that handle or address water resources are invited to attend the committee members and each of these organizations appoint representatives to this committee. The WRC includes representatives from governmental entities, non-profit organizations, and private industry. The organizations represented include:

| City / County Governments | |
|---|---|
| City of St. Louis, Missouri | St. Louis County, Missouri |
| City of St. Peters, Missouri | Village of Maryville, Missouri |
| City of Wildwood, Missouri | Madison County, Illinois |
| **Local, State & Federal Entities** | |
| Great Rivers Greenway | Missouri Department of Natural Resources |
| Kaskaskia Port District | U.S. Army Corps of Engineers |
| Missouri Department of Conservation | U.S. Fish & Wildlife Service |
| **Public Works & Utilities** | |
| Metropolitan St. Louis Sewer District | Wentzville Public Works Division |
| Missouri American Water | St. Louis-Jefferson Solid Waste Management District |

## Appendix 6: Committees

| Non-Profit & Educational Organizations | |
|---|---|
| American Bottom Conservancy | HeartLands Conservancy |
| Missouri Coalition for the Environment | Home Builders Association |
| St. Louis Earth Day | St. Louis Association of Community Organizations |
| Great River Environmental Law Center | Southern Illinois University – Edwardsville |
| The Open Space Council | Whitney R. Harris World Ecology Center (UMSL) |
| Sierra Club | Public Policy Research Center (UMSL) |
| Regulatory Environmental Group for Missouri | |
| **Private Industry** | |
| AECOM | Geosyntec Consultants |
| Mississippi Lime | EcoWorks Unlimited |
| Trinity Consultants | Hastings Engineering |
| RJN Group | TNC |
| M3 Engineering Group | Reitz & Jens, Inc. |
| SCI Engineering | Intuition and Logic |
| The Doe Run Company | Geotechnology |
| TRC Solutions | Terracon |
| Boeing | Golder |
| Mallincrodt | Lions CSG |

***St. Louis Area Regional Response System (STARRS) Board of Directors (BOD)*** – The STARRS BOD is a 43 member body that is composed of representatives from local government, public safety and emergency response agencies, emergency management agencies, public health departments, hospitals, and other entities that play a role in emergency / disaster preparedness and response. The STARRS BOD consists of 28 voting members and 15 non-voting members, as specified in the STARRS bylaws. In accordance with the STARRS bylaws, the city / county governments and agencies described below appoint members to the STARRS BOD.

| City / County Governments* | |
|---|---|
| City of St. Louis, Missouri | St. Louis County, Missouri |
| Franklin County, Missouri | Madison County, Illinois |
| Jefferson County, Missouri | Monroe County, Illinois |
| St. Charles County, Missouri | St. Clair County, Illinois |

**The chief elected official of each entity makes the appointment.*

| City / County Emergency Management Agencies* | |
|---|---|
| City of St. Louis, Missouri | St. Louis County, Missouri |
| Franklin County, Missouri | Madison County, Illinois |
| Jefferson County, Missouri | Monroe County, Illinois |
| St. Charles County, Missouri | St. Clair County, Illinois |

**The chief executive of the agency is the representative or appoints the representative.*

## Appendix 6: Committees

In accordance with the STARRS bylaws, each of the discipline areas described below appoint representatives to the STARRS BOD.

| Discipline Areas* | |
|---|---|
| ***Fusion Center*** | ***Emergency Medical Services*** |
| St. Louis County Police Department | Clayton Fire Department<br>MedStar Ambulance |
| ***HazMat*** | ***Hospital Preparedness*** |
| St. Louis City Fire Department | BJC Healthcare<br>Missouri Baptist Medical Center |
| ***Interoperable Communications*** | ***Law Enforcement*** |
| Eureka Fire Protection District<br>St. Charles County, Missouri | St. Louis County Police Department<br>St. Charles County Police Department |
| ***Public Health*** | ***St. Area Regional Coalition of COADs*** |
| St. Louis County Health Department<br>Franklin County Health Department | Lutheran Family & Children's Services<br>American Red Cross, Eastern Missouri |
| ***Training & Exercise*** | ***Urban Search & Rescue*** |
| City of Crestwood Police Department | West County Fire & EMS<br>Monarch Fire Protection District |
| ***ESF-8 Coordination*** | ***Mass Fatality*** |
| SLU Hartland Center | St. Clair County Coroner's Office |

**It is the discipline area sub-committees that appoint representatives to the STARRS BOD, not the specific agencies / entities noted. The entities / agencies noted reflect the current representation; however, the specific entities / agencies represented may change from year-to-year in accordance with the STARRS' bylaws.*

| Other* | |
|---|---|
| Southern Illinois University – Edwardsville | City of Collinsville, IL |
| Cottleville Fire Protection District | East-West Gateway Council of Governments |

**With the exception of the EWGCOG Executive Director, the other representatives are appointed by the STARRS BOD and may change in accordance with the STARRS bylaws.*

*[This Page Intentionally Left Blank]*

# Appendix 7:
# Board Approval Documents

*[This Page Intentionally Left Blank]*

**RESOLUTION NO. 2016-2**
**EAST-WEST GATEWAY COUNCIL OF GOVERNMENTS**
**TITLE VI PROGRAM APPROVAL / ADOPTION**

A resolution of East-West Gateway Council of Governments that authorizes the following: (1) the approval / adoption of East-West Gateway Council of Governments' 2015 Title VI Program, (2) the execution of the Title VI Assurance, and (3) the incorporation certain minor changes to the Title VI Program.

WHEREAS, the U.S. Department of Transportation (DOT) requires that all recipients of federal funding develop and implement a program that ensures that the federal-aid recipient is implementing programs and activities in a nondiscriminatory manner and in compliance with the Civil Rights Act of 1964 and other statutes, regulations, executive orders, and guidance that mandate nondiscrimination;

WHEREAS, the Federal Transit Administration (FTA) has issued guidance that describes the requirements for and content of these nondiscrimination programs known as Title VI Programs, which includes, in part, that a federal-aid recipient's Title VI Program: (1) be updated every three years, (2) include a signed Title VI Assurance, and (3) be approved by the recipient's governing body;

WHEREAS, East-West Gateway Council of Governments is the Metropolitan Planning Organization and regional planning commission for the St. Louis metropolitan area and is a recipient of federal funding, including DOT funding;

WHEREAS, East-West Gateway Council of Governments has completed an update of its Title VI Program, which includes the Title VI Assurance;

NOW, THEREFORE, BE IT RESOLVED BY the East-West Gateway Council of Governments Board of Directors:

1. The 2015 Title VI Program is approved and adopted.

2. The Executive Director or his designee is authorized to execute and submit to grant funding agencies the Title VI Assurance.

3. The Executive Director or his designee is authorized to make minor changes to the Title VI Program that are necessary to keep the documents up-to-date (i.e. update contact information, fix broken URLs, etc.) and in compliance with any new or revised state or federal requirements. This authorization is limited to the three year period between the date that the 2015 Title VI Program is accepted by FTA and the date that the next Title VI Program update is due to DOT and presented to the Board of Directors for approval.

**EWGCOG Resolution 2016-2**
**Page 1 of 2**

**CERTIFICATION OF AUTHORIZING RESOLUTION NO. 2016-2**

The undersigned duly qualified Executive Director of East-West Gateway Council of Governments, acting on behalf of East-West Gateway Council of Governments, certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the East-West Gateway Council of Governments Board of Directors held on January 27, 2016.

James M. Wild
**Name**

Executive Director
**Title**

James M. Wild
**Signature**

1-27-16
**Date**

**EWGCOG Resolution 2016-2**
**Page 2 of 2**

# Appendix 8:
# Maps

*[This Page Intentionally Left Blank]*

# Appendix 8: Maps

The maps provided in this Appendix 8 include:

| Topic | # of Maps | | |
|---|---|---|---|
| | Region | County | Total |
| Low-Income Persons | 1 | 8 | **9** |
| Zero-Vehicle Households (Mobility Needs) | 1 | 8 | **9** |
| Minority Population | 2 | 8 | **10** |
| LEP Persons | 1 | 8 | **9** |
| Elderly Persons | 1 | 8 | **9** |
| Persons with a Disability | 1 | 8 | **9** |
| Environmental Justice | 2 | 0 | **2** |

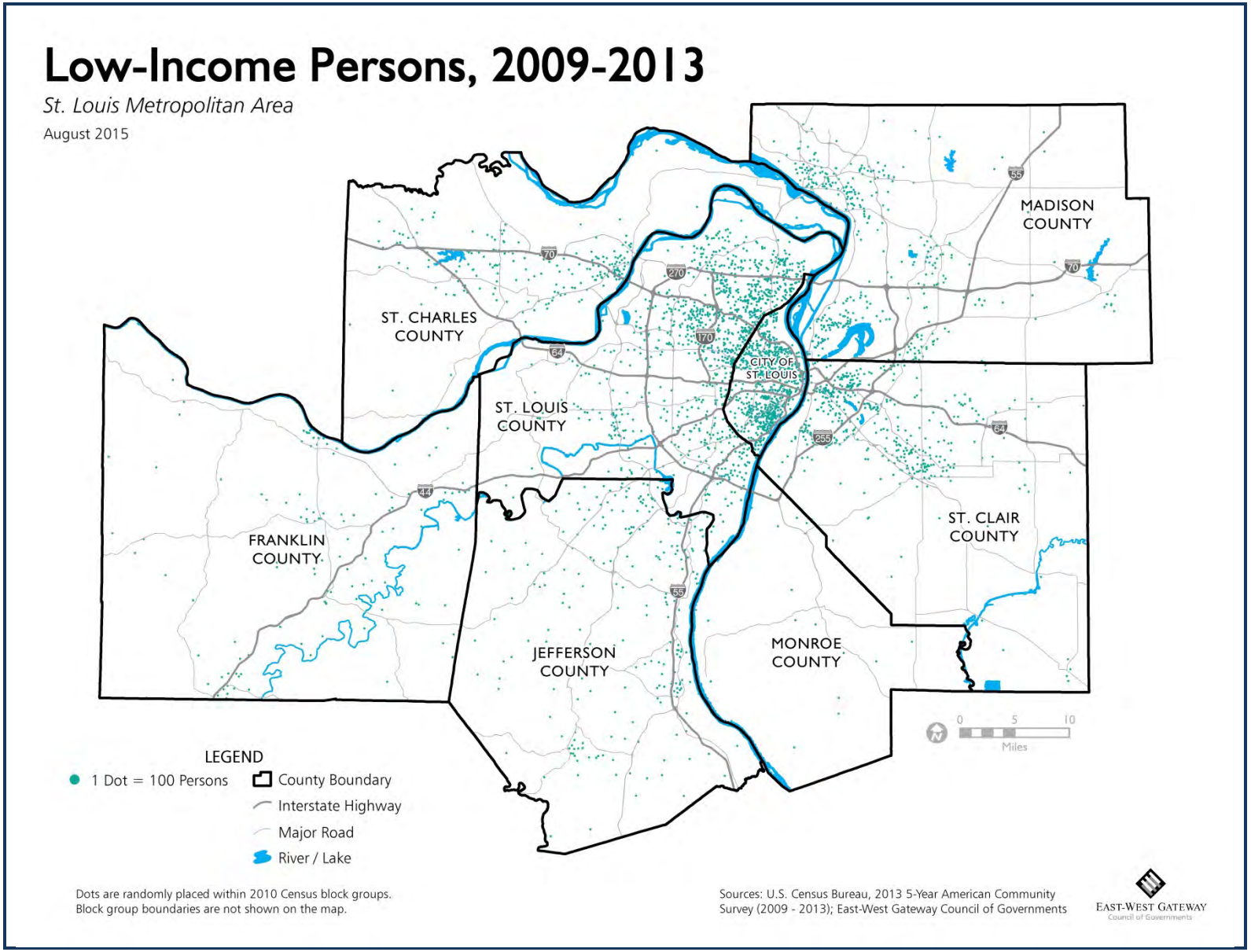
The maps reflect a spatial analysis of the data used in the Title VI Program. The terms used on the maps having the meanings described in the Title VI Program.

The maps include dots that represent a certain number of persons or households that have the particular demographic characteristic (i.e. low-income, LEP, elderly, etc.). The number of persons represented by a single dot varies by the type of demographic characteristic that is reflected on the map and is based upon the total number of persons in the Region that has the characteristic. Importantly, the dots represent the *concentration* of persons in a geographical area and do not reflect the proportion of persons in the area that have the characteristic.

*[This Page Intentionally Left Blank]*

## Low-Income Persons
## Region-Level & County-Level Maps

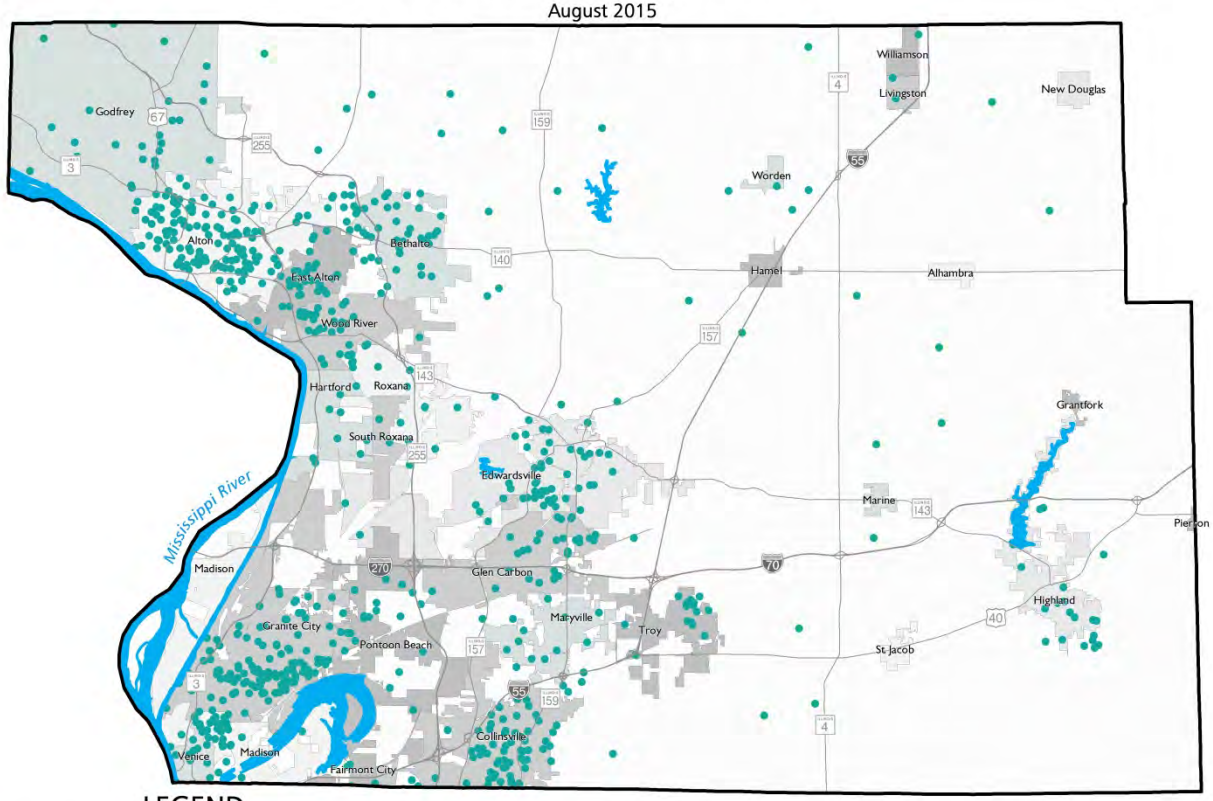
*[This Page Intentionally Left Blank]*


Low-Income Persons, 2009-2013
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
ST. CLAIR COUNTY
JEFFERSON COUNTY
MONROE COUNTY
0 5 10
Miles
LEGEND
1 Dot = 100 Persons
County Boundary
Interstate Highway
Major Road
River / Lake
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

# Low-Income Persons

*Madison County, Illinois*

August 2015




LEGEND

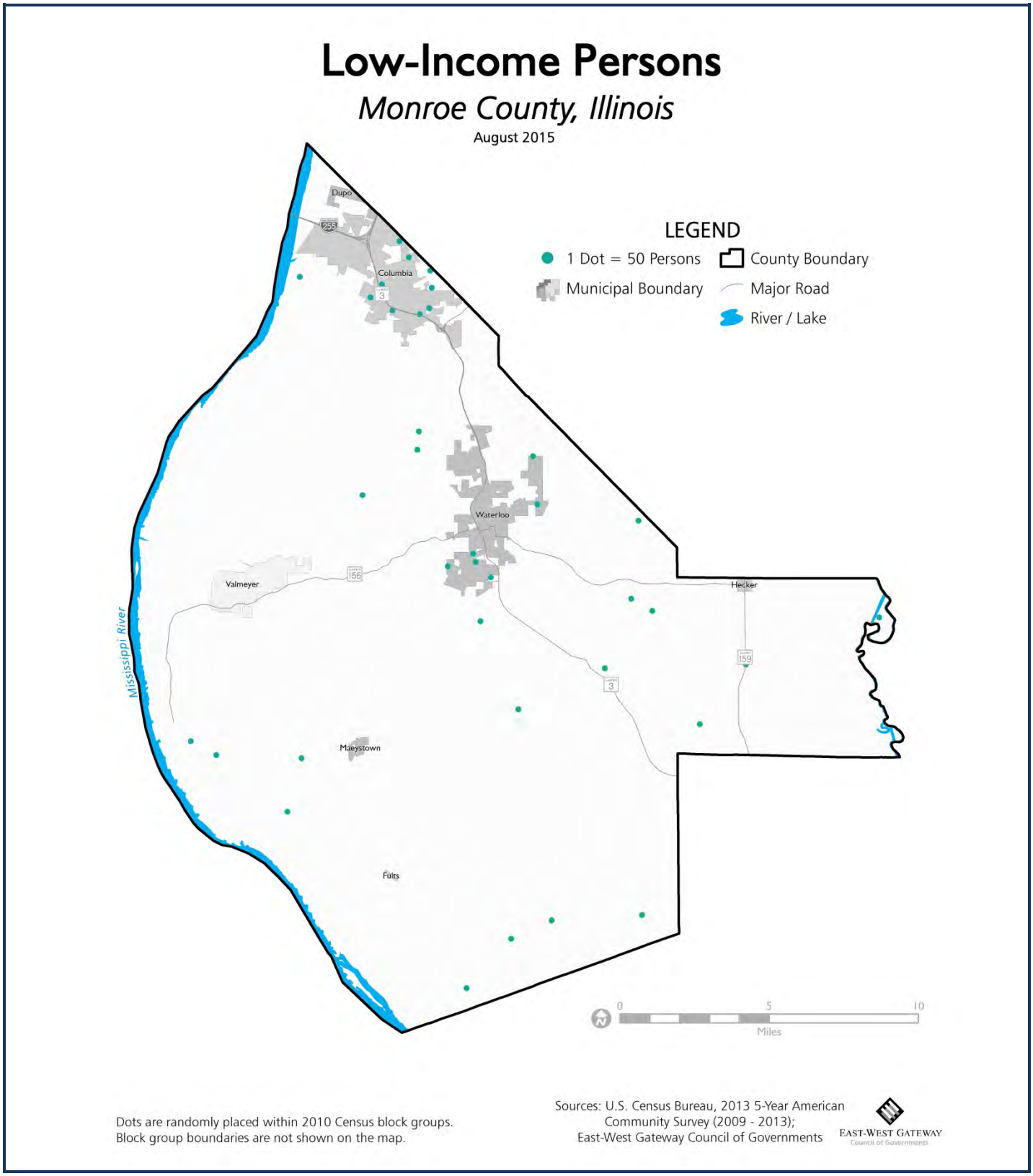
- 1 Dot = 50 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

0 5 10 Miles

Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments

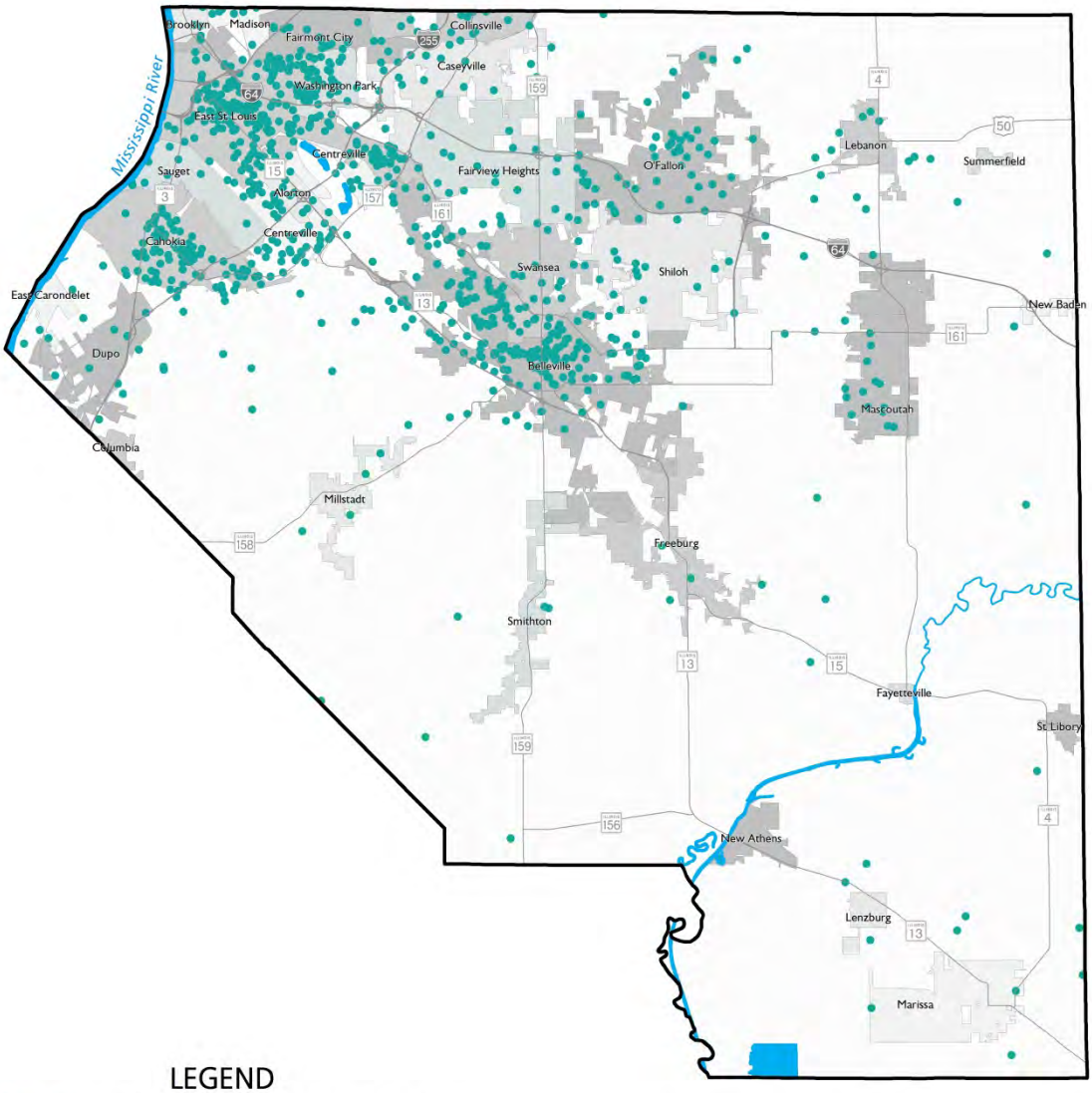
EAST-WEST GATEWAY Council of Governments


Low-Income Persons
Monroe County, Illinois
August 2015
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
Dupo
Columbia
Waterloo
Valmeyer
Hecker
Maeystown
Fults
Mississippi River
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

# Low-Income Persons

*St. Clair County, Illinois*

August 2015




## LEGEND

- 1 Dot = 50 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

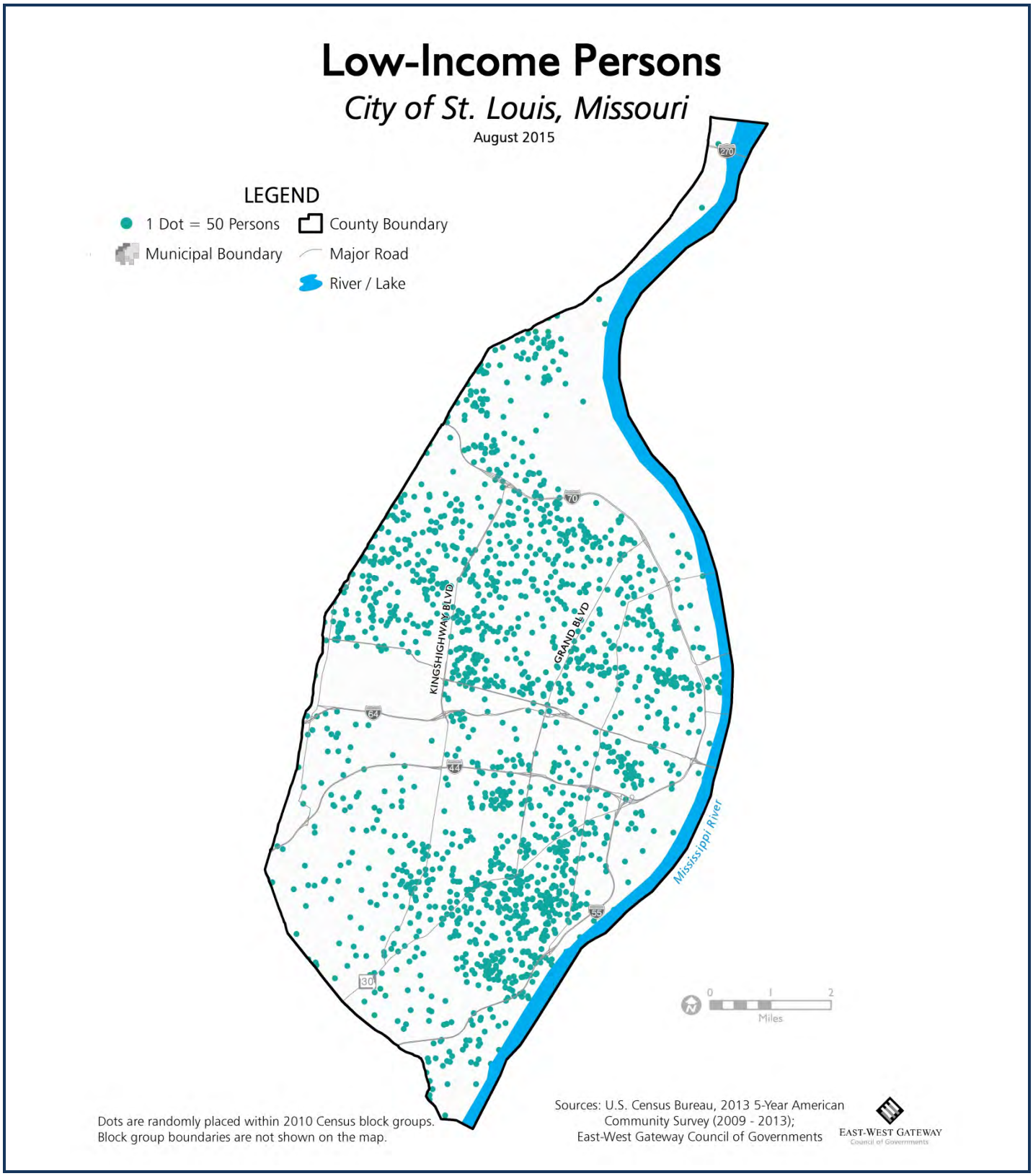
0 5 10 Miles

Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

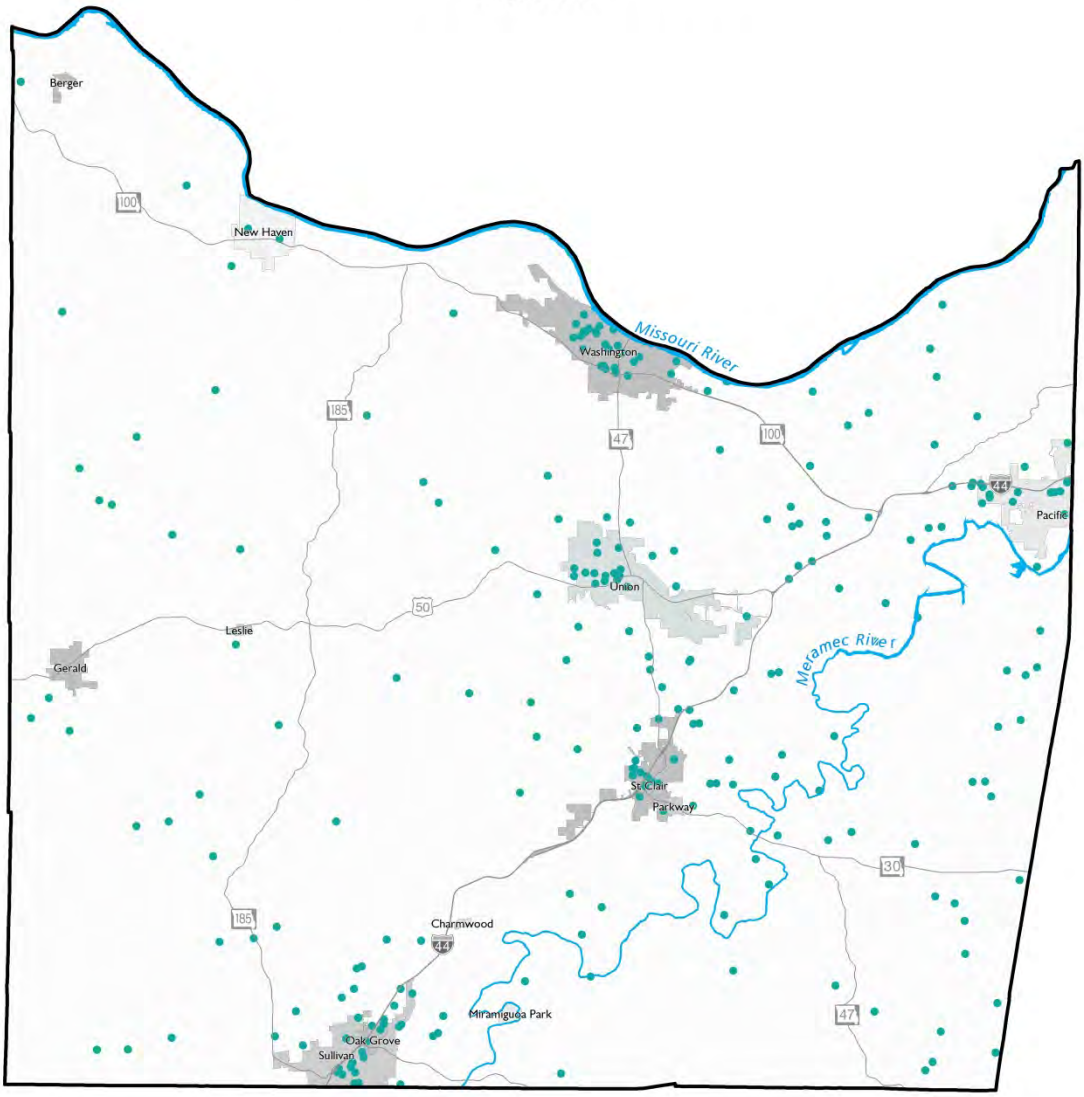
## Appendix 8: Maps, Low-Income Persons, County-Level



# Low-Income Persons

*Franklin County, Missouri*

August 2015




LEGEND

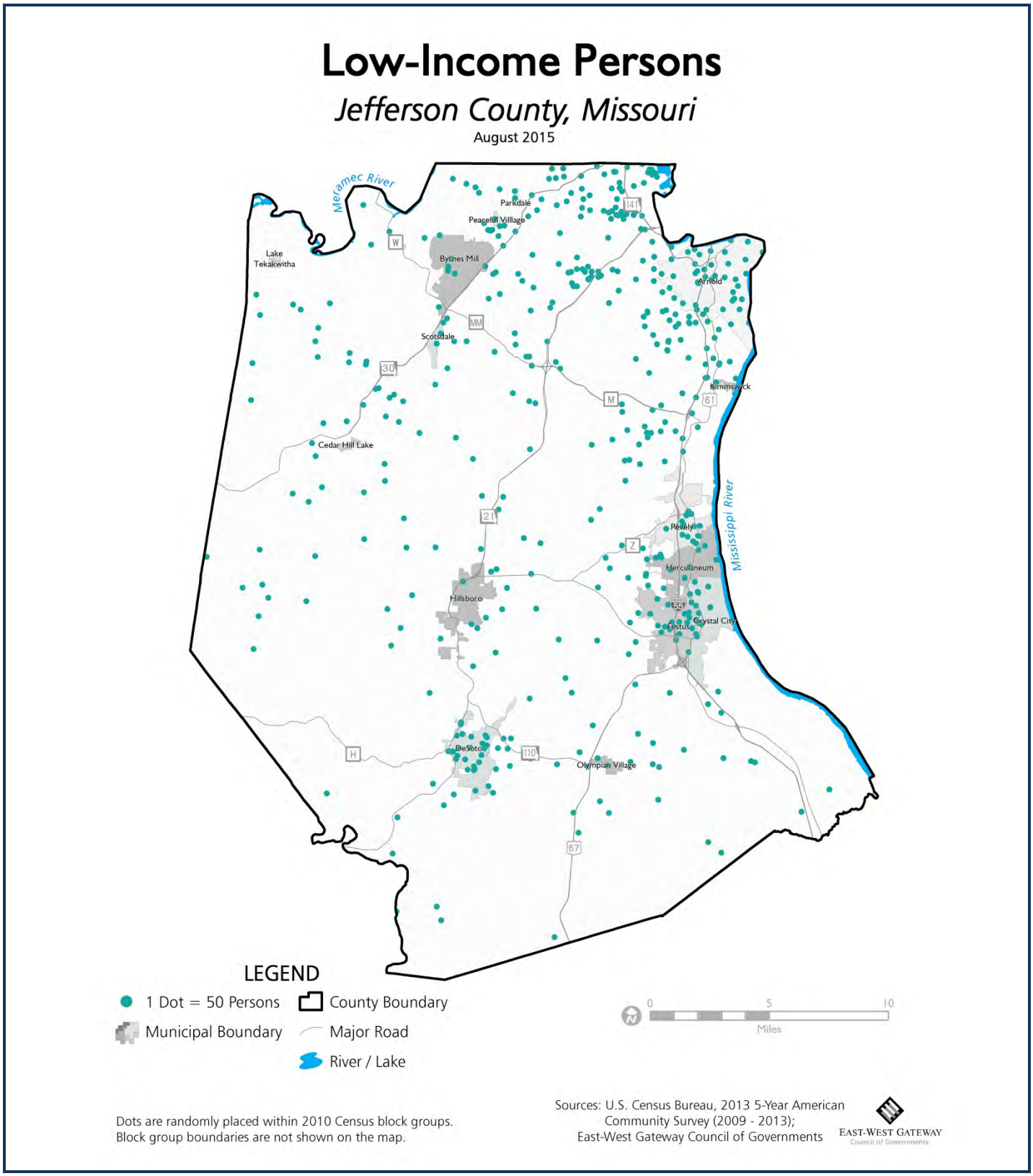
- 1 Dot = 50 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

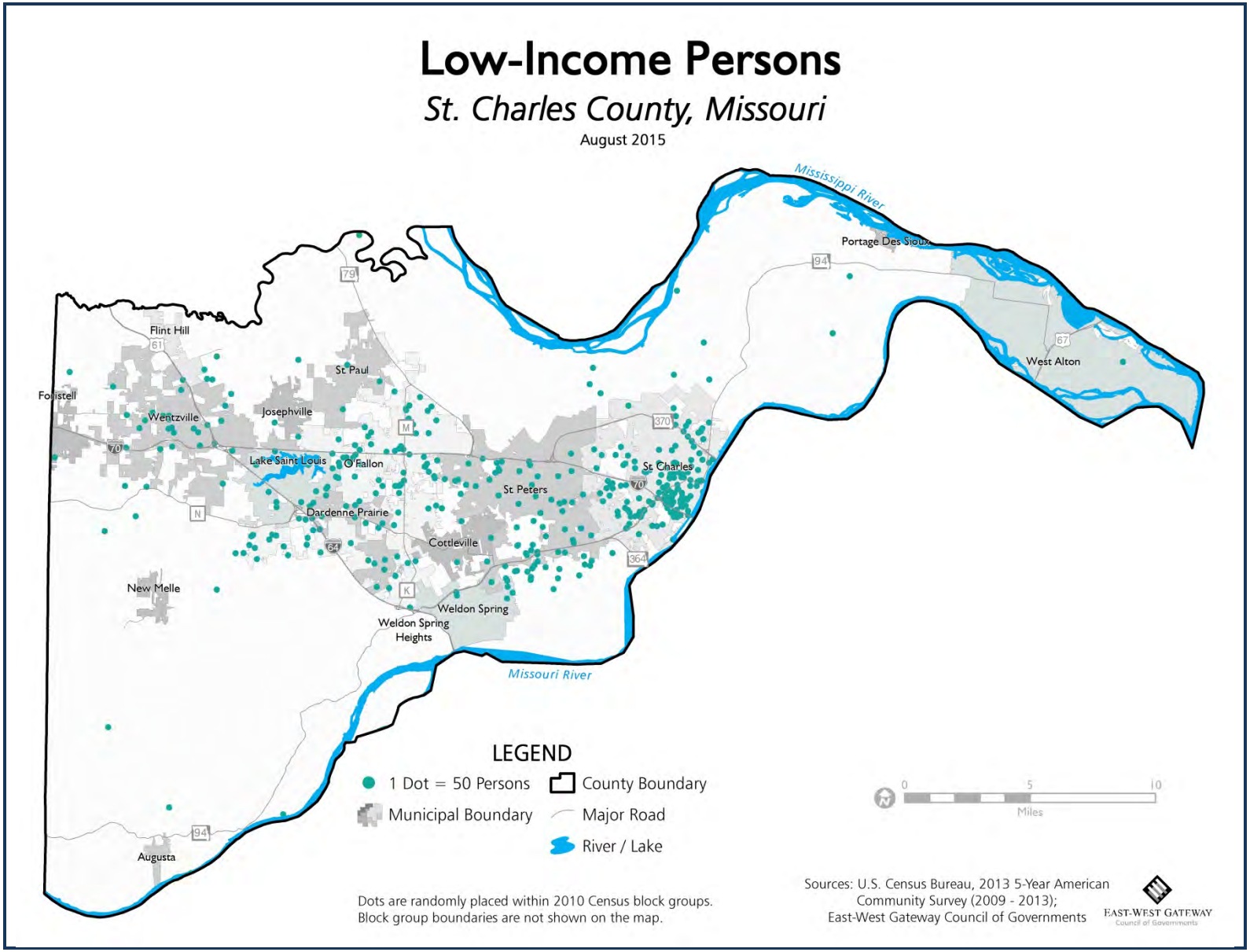
0 5 10 Miles

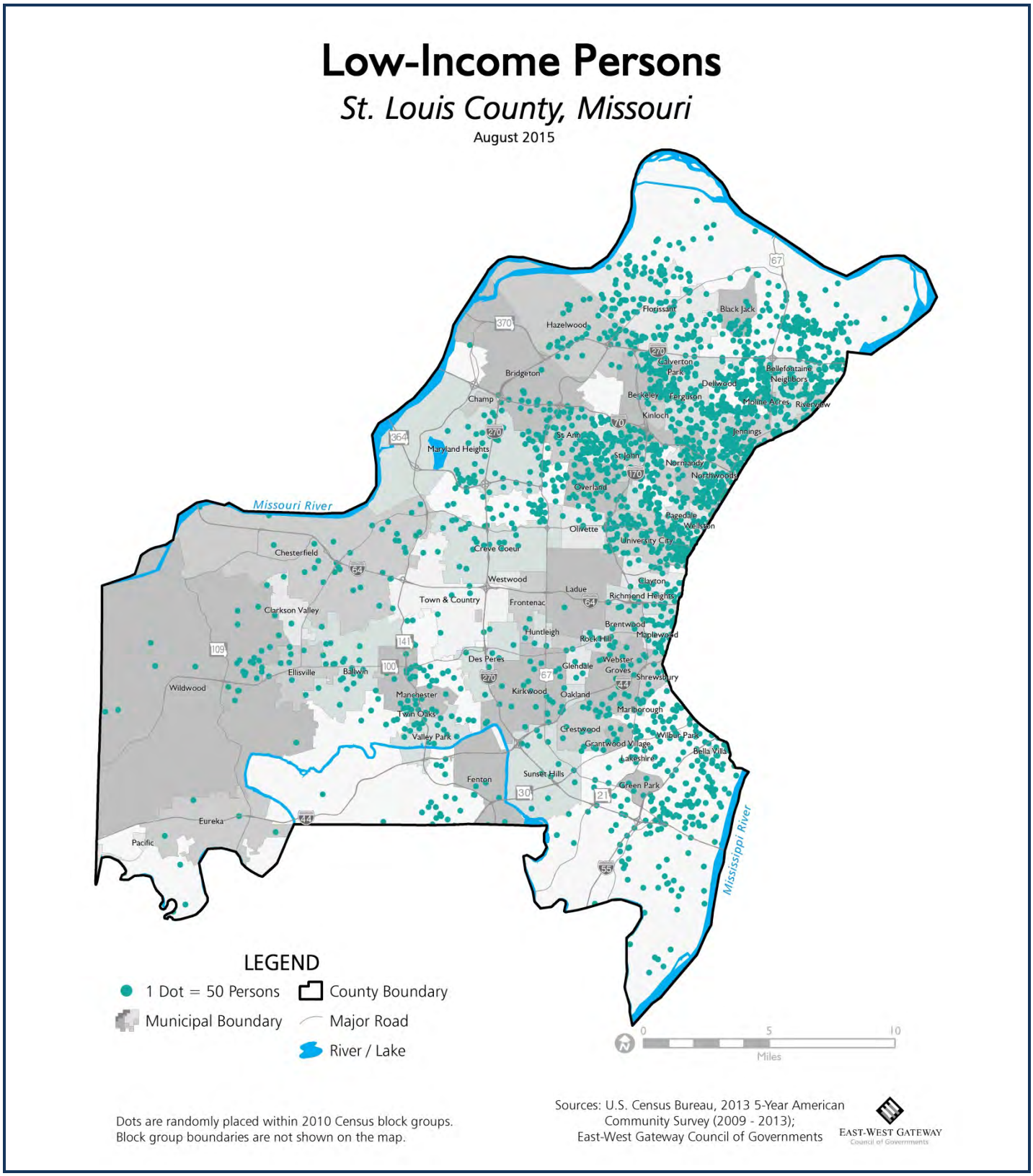
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments


Low-Income Persons
Jefferson County, Missouri
August 2015
Meramec River
Parkdale
Peacefull Village
Lake Tekakwitha
Byrnes Mill
Arnold
Scotsdale
Kimmswick
Cedar Hill Lake
Mississippi River
Pevely
Herculaneum
Hillsboro
Crystal City
Festus
DeSoto
Olympian Village
141
W
MM
30
M
61
21
Z
55
H
110
67
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

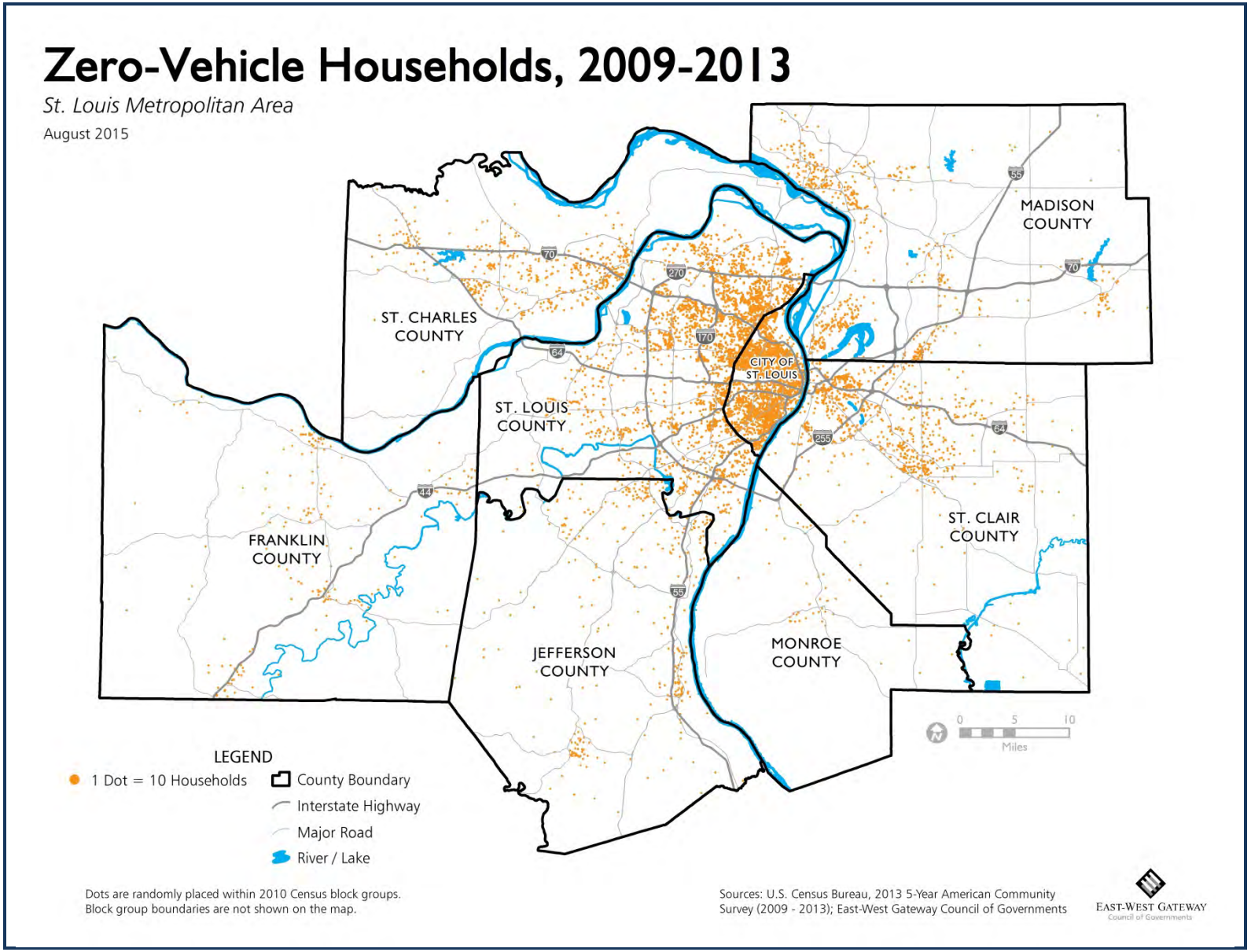

Low-Income Persons
St. Charles County, Missouri
August 2015
Mississippi River
Portage Des Sioux
West Alton
Flint Hill
St Paul
Foristell
Wentzville
Josephville
Lake Saint Louis
O'Fallon
St Charles
St Peters
Dardenne Prairie
Cottleville
New Melle
Weldon Spring
Weldon Spring Heights
Missouri River
Augusta
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


Low-Income Persons
St. Louis County, Missouri
August 2015
Missouri River
Mississippi River
Hazelwood
Florissant
Black Jack
Bridgeton
Champ
Maryland Heights
Berkeley
Ferguson
Kinloch
Dellwood
Bellefontaine Neighbors
Moline Acres
Riverview
Jennings
St Ann
St John
Normandy
Northwoods
Overland
Pagedale
Wellston
Olivette
University City
Creve Coeur
Chesterfield
Westwood
Clayton
Ladue
Richmond Heights
Town & Country
Frontenac
Clarkson Valley
Huntleigh
Brentwood
Rock Hill
Maplewood
Des Peres
Webster Groves
Glendale
Shrewsbury
Ellisville
Ballwin
Wildwood
Kirkwood
Oakland
Manchester
Marlborough
Twin Oaks
Crestwood
Valley Park
Grantwood Village
Wilbur Park
Bella Villa
Lakeshire
Fenton
Sunset Hills
Green Park
Eureka
Pacific
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

*[This Page Intentionally Left Blank]*

## Zero-Vehicle Households (Mobility Needs)
## Region-Level & County-Level Maps

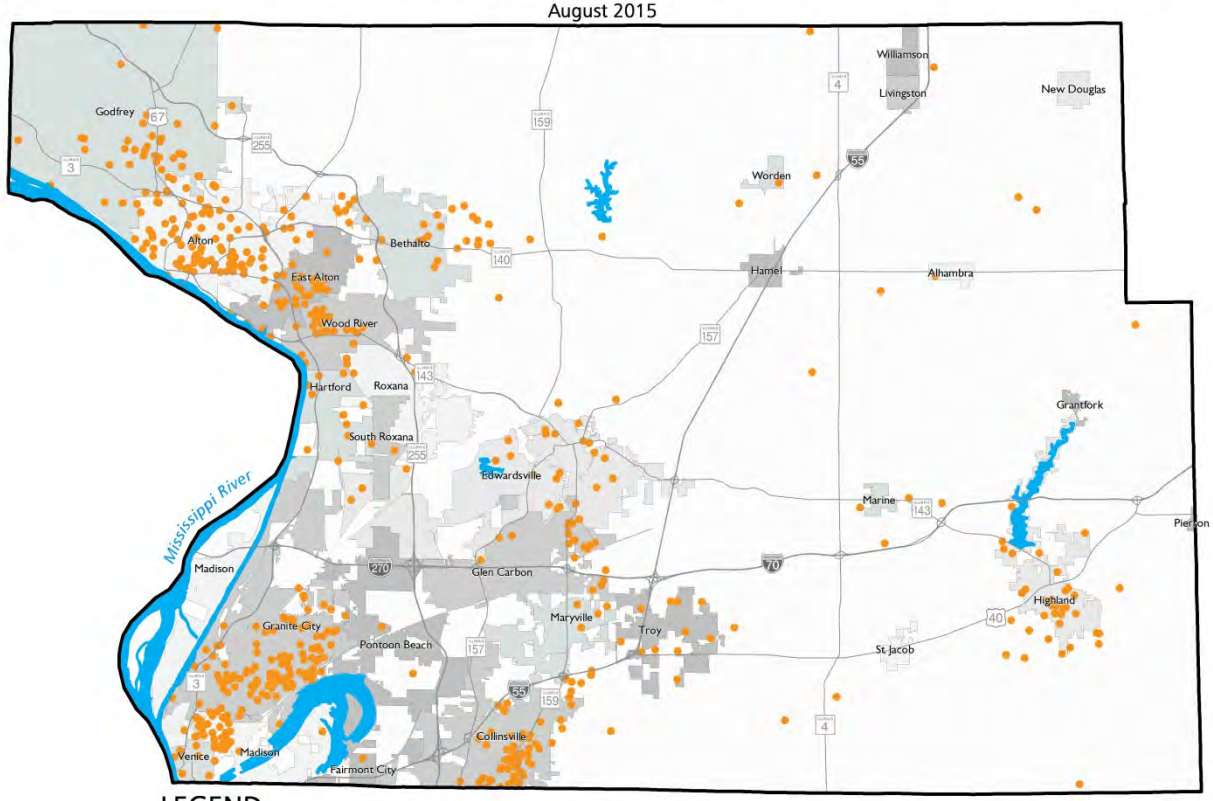
*[This Page Intentionally Left Blank]*


Zero-Vehicle Households, 2009-2013
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
JEFFERSON COUNTY
MONROE COUNTY
ST. CLAIR COUNTY
0 5 10
Miles
LEGEND
1 Dot = 10 Households
County Boundary
Interstate Highway
Major Road
River / Lake
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
East-West Gateway
Council of Governments

# Zero-Vehicle Households

*Madison County, Illinois*

August 2015




LEGEND

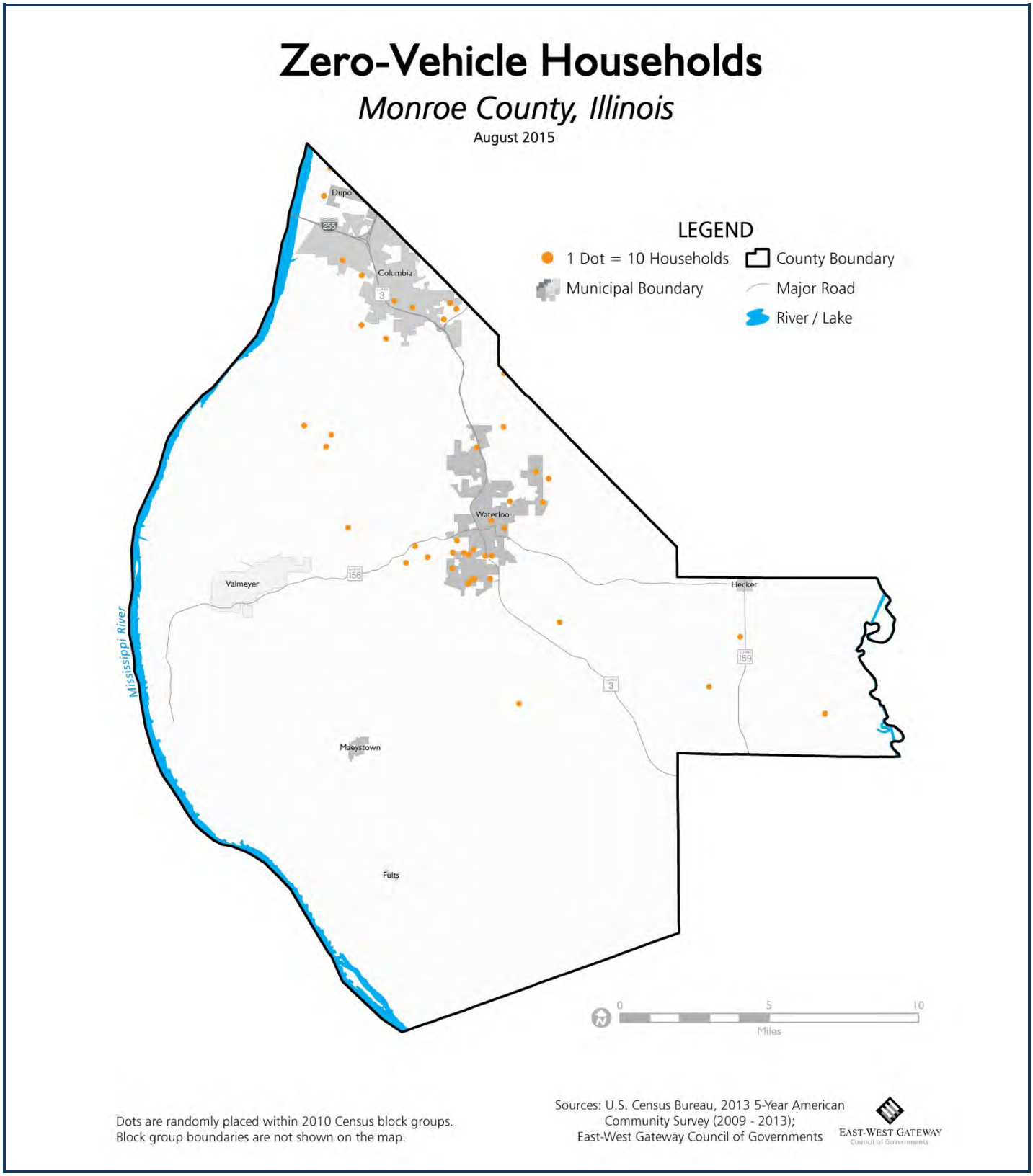
- 1 Dot = 10 Households
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

0 5 10 Miles

Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

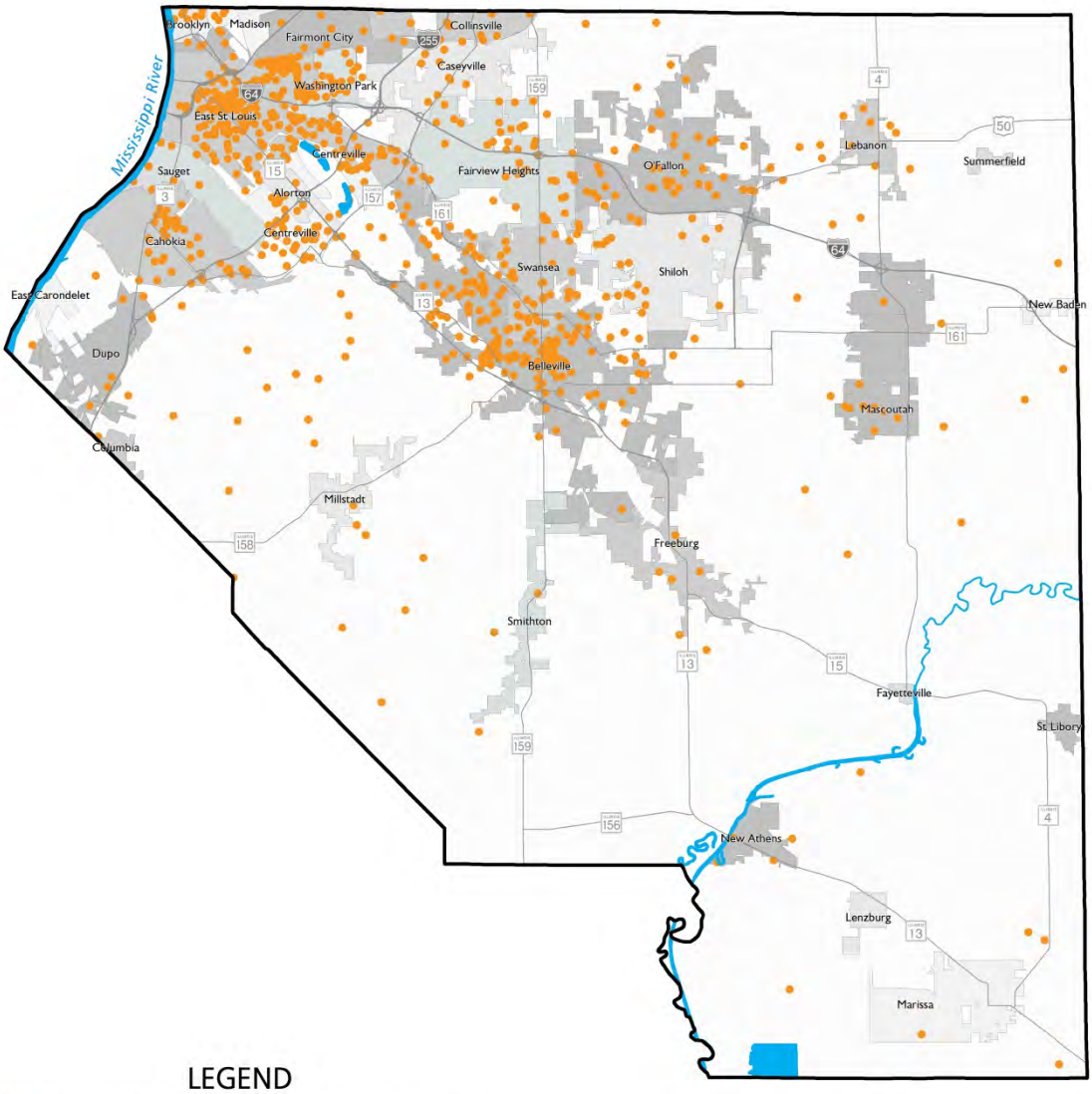
EAST-WEST GATEWAY Council of Governments


Zero-Vehicle Households
Monroe County, Illinois
August 2015
LEGEND
1 Dot = 10 Households
County Boundary
Municipal Boundary
Major Road
River / Lake
Dupo
Columbia
Waterloo
Valmeyer
Hecker
Maeystown
Fults
Mississippi River
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

# Zero-Vehicle Households

*St. Clair County, Illinois*

August 2015




LEGEND

- 1 Dot = 10 Households
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

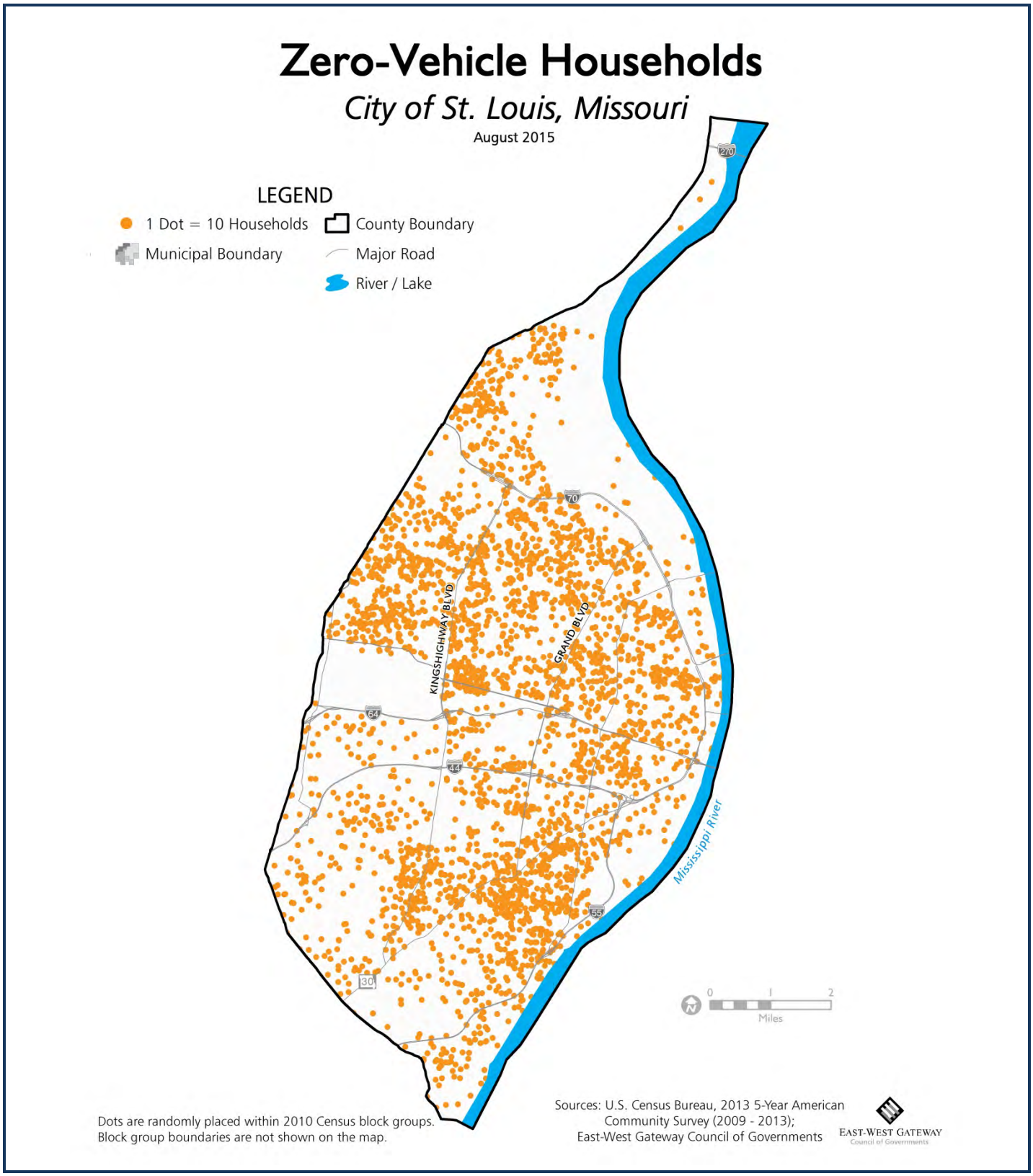
0 5 10 Miles

Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

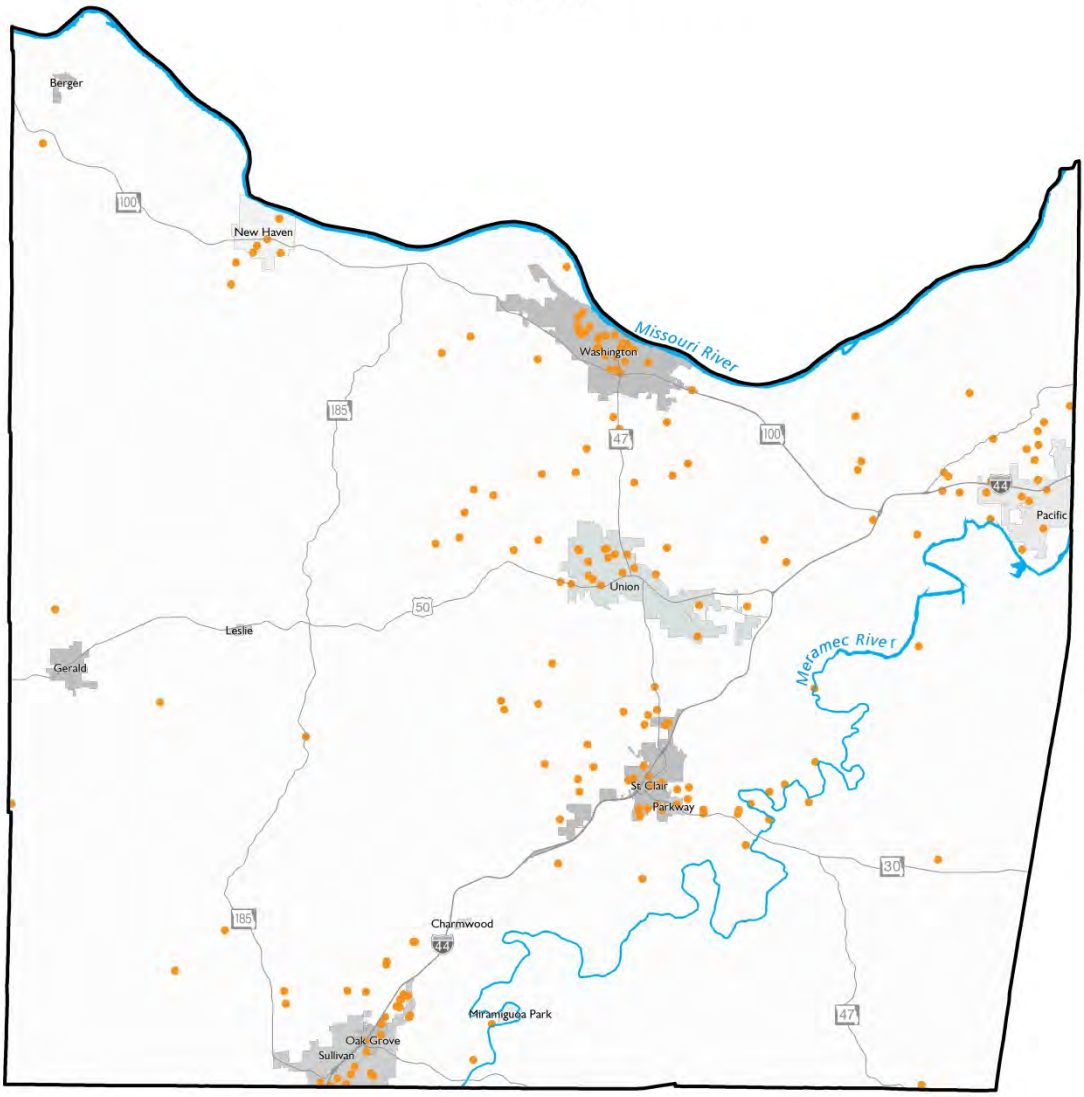
## Appendix 8: Maps, Zero-Vehicle Households (Mobility Needs), County-Level



# Zero-Vehicle Households

*Franklin County, Missouri*

August 2015




LEGEND

- 1 Dot = 10 Households
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

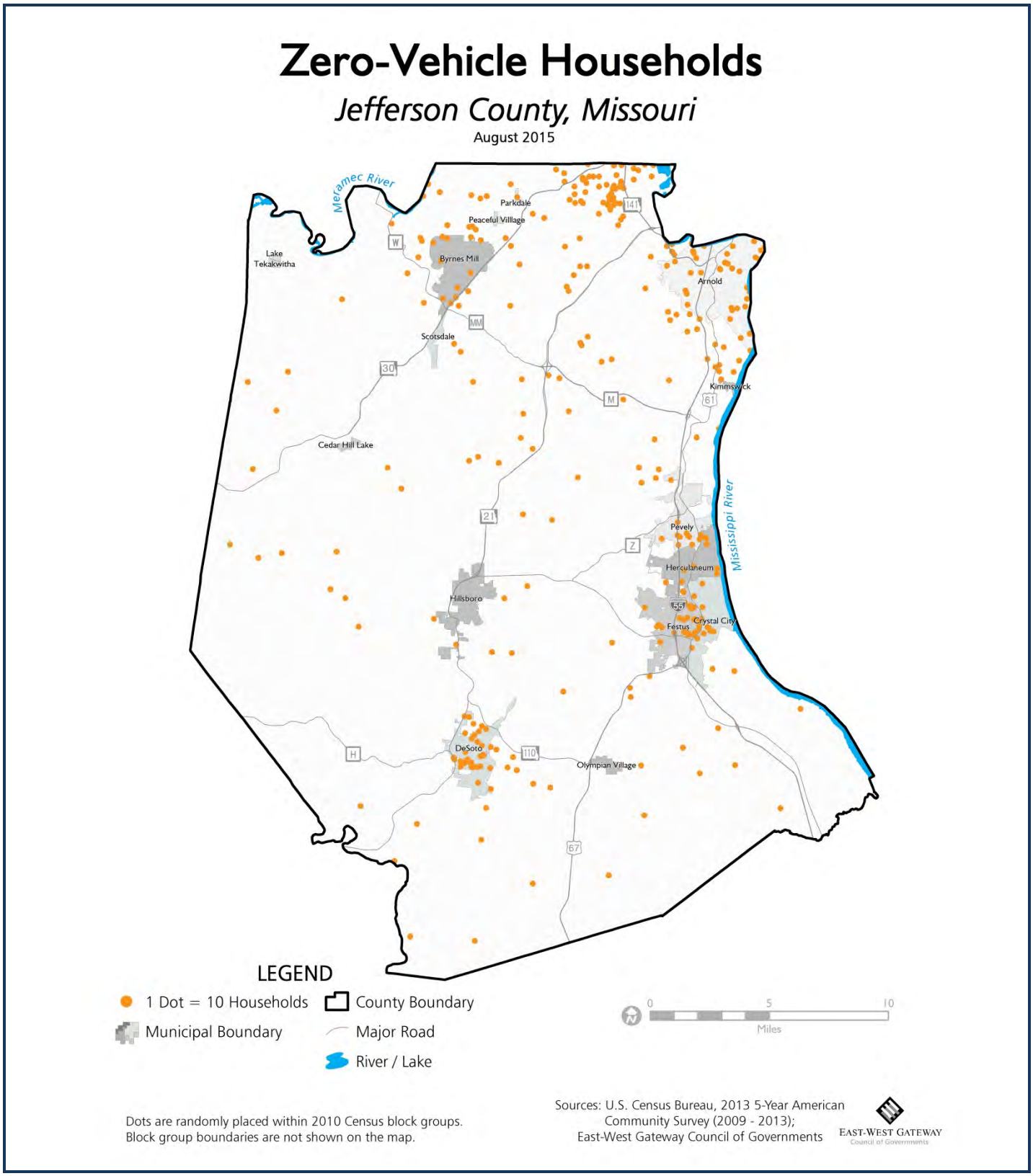
0 5 10 Miles

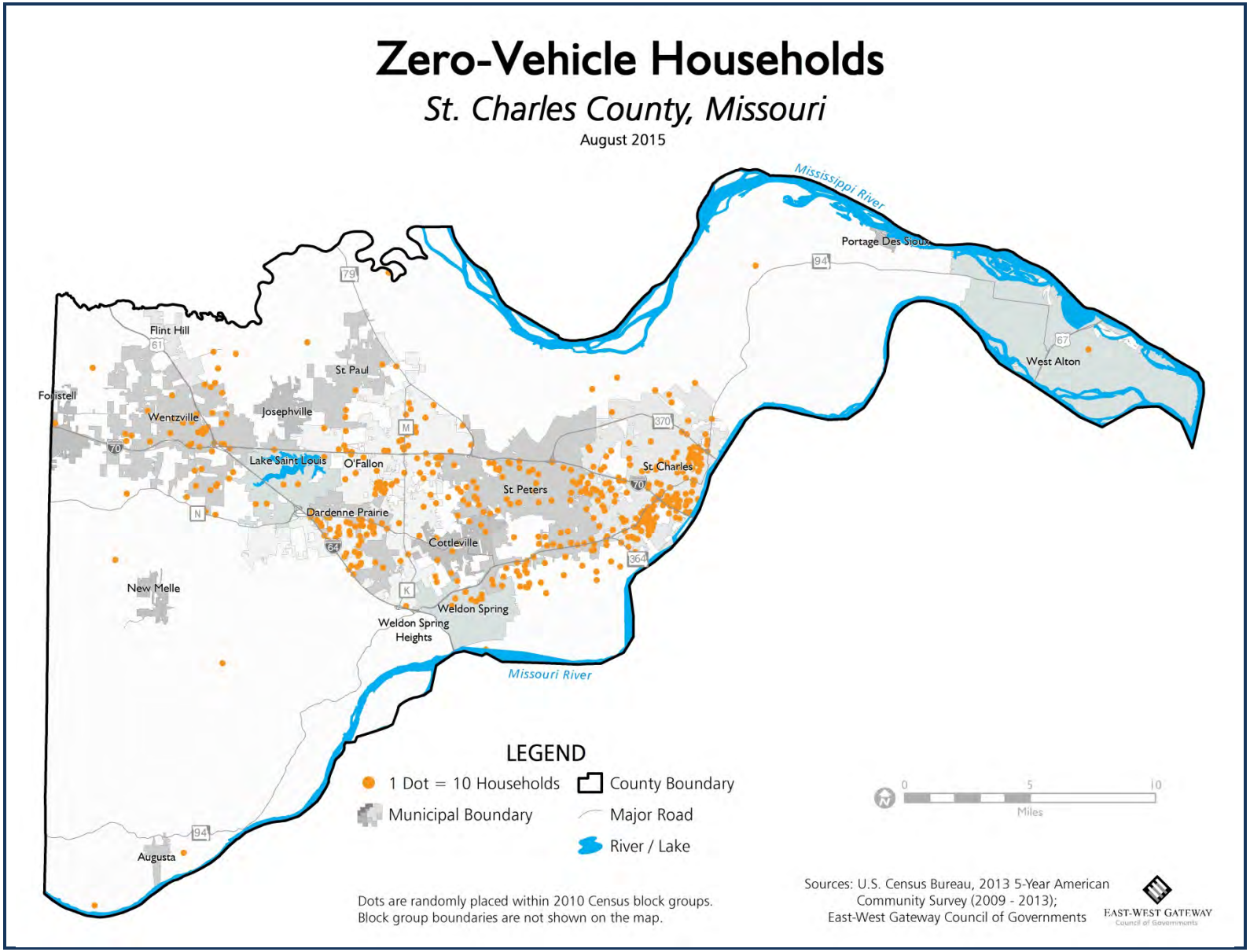
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

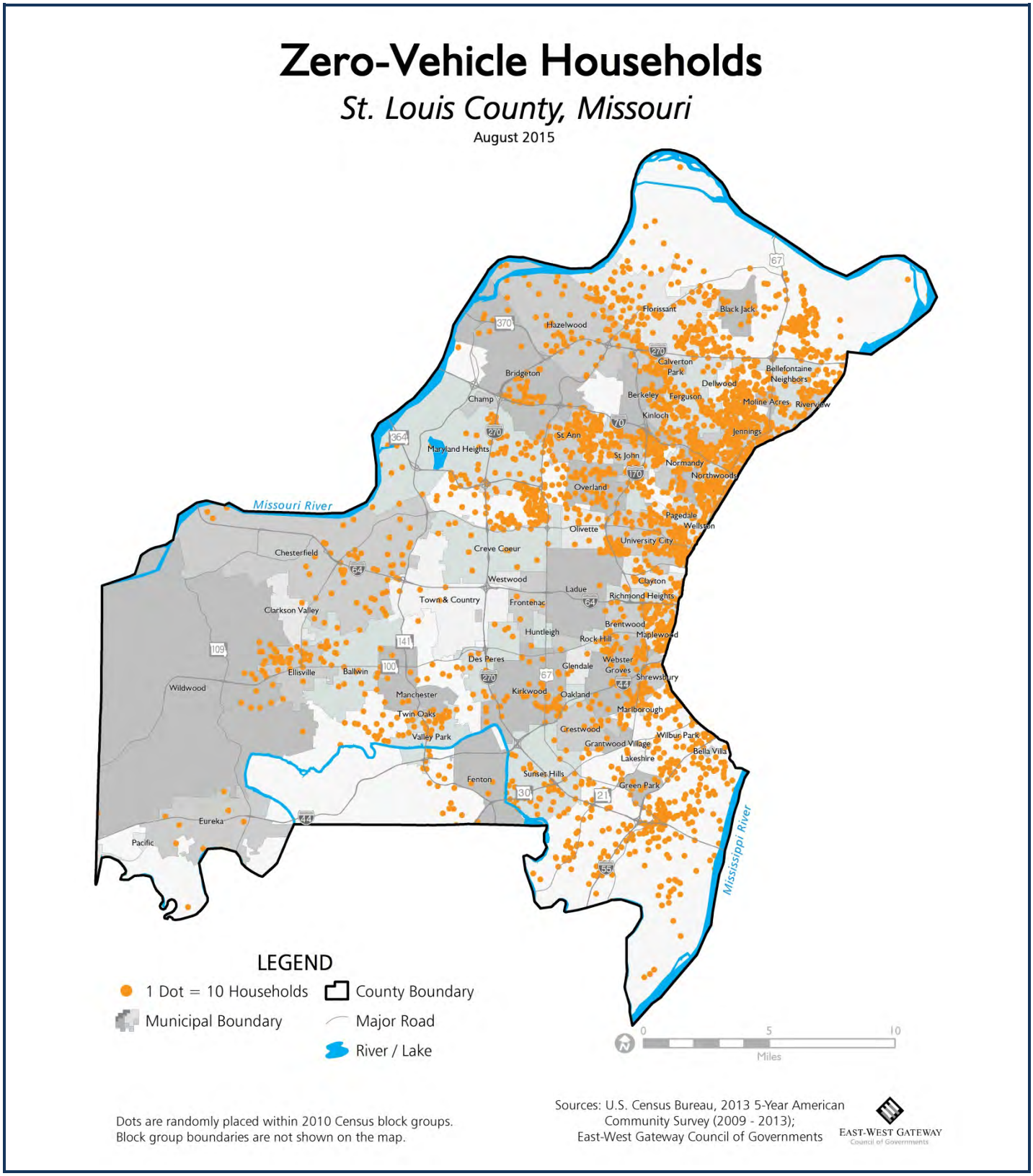
EAST-WEST GATEWAY Council of Governments

## Appendix 8: Maps, Zero-Vehicle Households (Mobility Needs), County-Level




Zero-Vehicle Households
St. Charles County, Missouri
August 2015
Mississippi River
Portage Des Sioux
West Alton
Flint Hill
St Paul
Foristell
Wentzville
Josephville
Lake Saint Louis
O'Fallon
St Charles
St Peters
Dardenne Prairie
Cottleville
New Melle
Weldon Spring
Weldon Spring Heights
Missouri River
Augusta
LEGEND
1 Dot = 10 Households
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

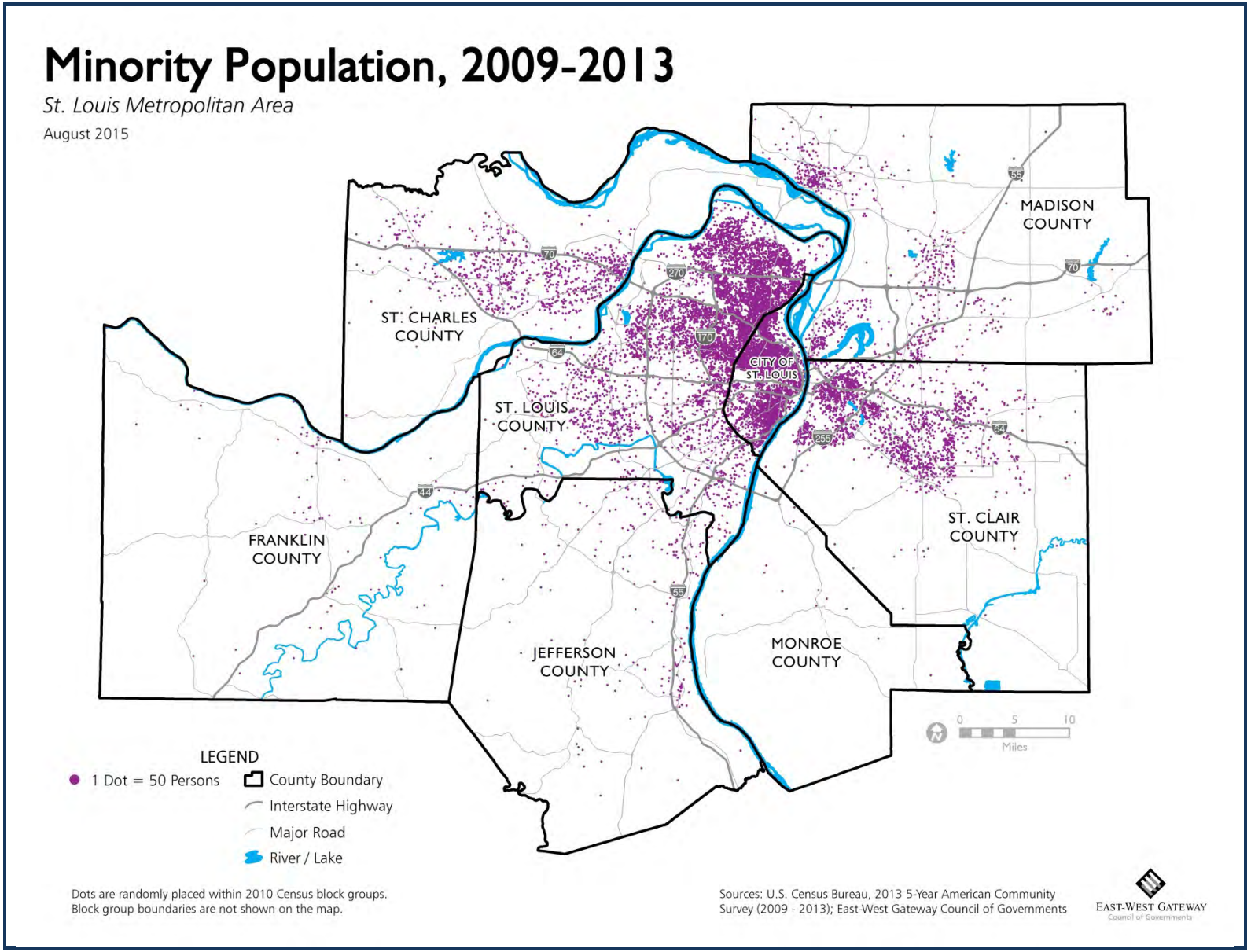
## Appendix 8: Maps, Zero-Vehicle Households (Mobility Needs), County-Level

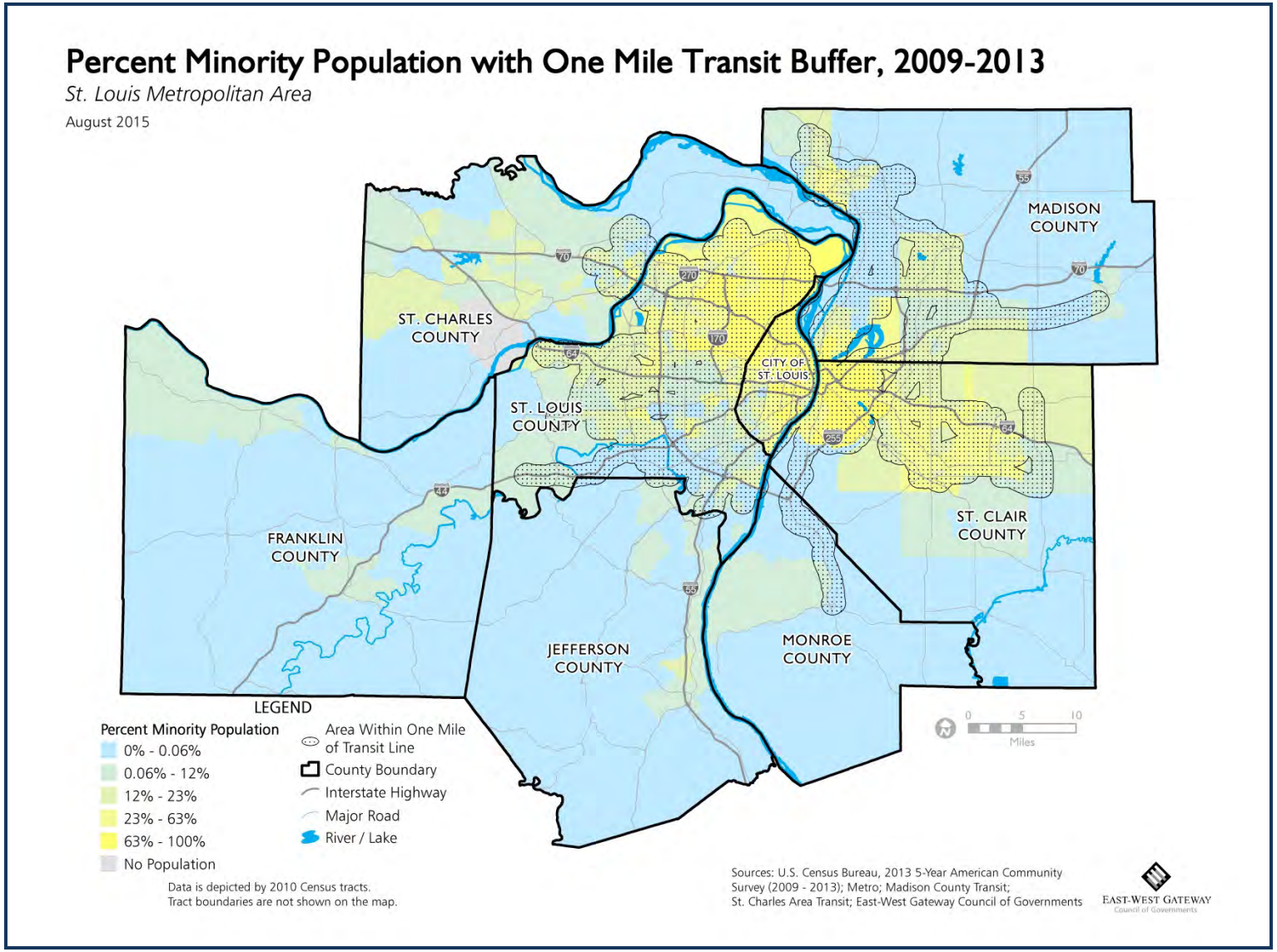


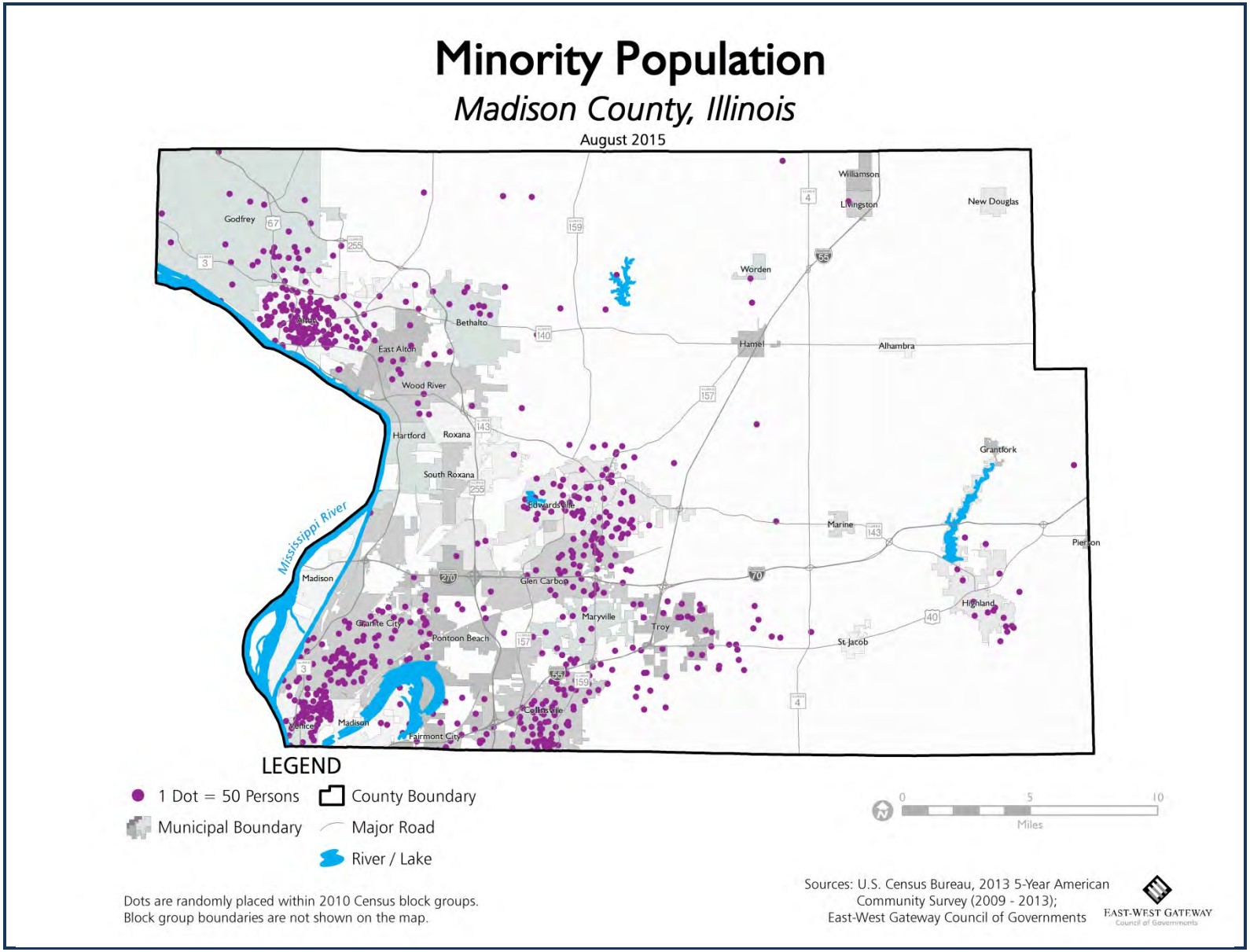
*[This Page Intentionally Left Blank]*

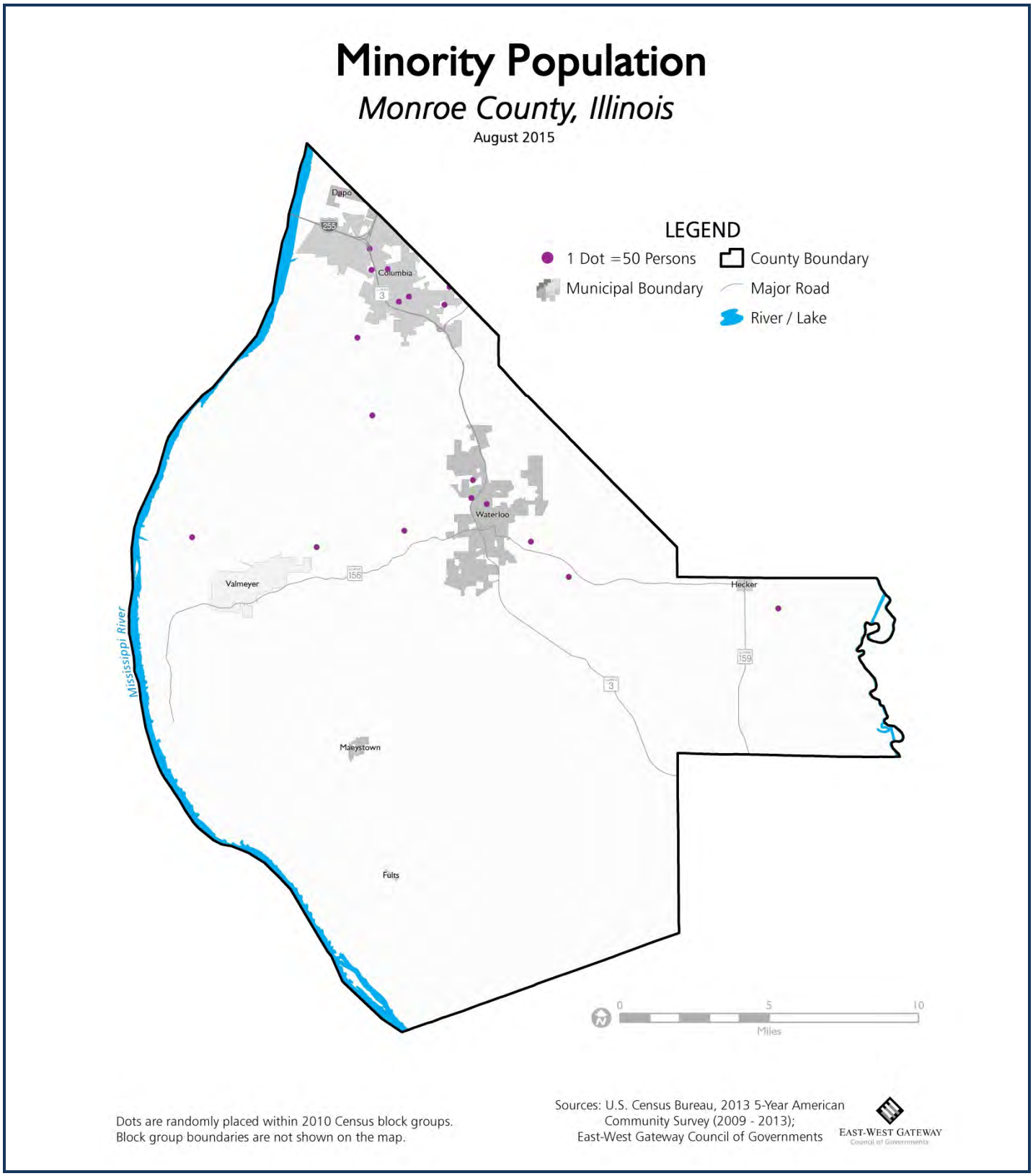
## Minority Population
## Region-Level & County-Level Maps

*[This Page Intentionally Left Blank]*


Minority Population, 2009-2013
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
JEFFERSON COUNTY
MONROE COUNTY
ST. CLAIR COUNTY
0 5 10
Miles
LEGEND
1 Dot = 50 Persons
County Boundary
Interstate Highway
Major Road
River / Lake
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


Percent Minority Population with One Mile Transit Buffer, 2009-2013
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
CITY OF ST. LOUIS
ST. LOUIS COUNTY
ST. CLAIR COUNTY
FRANKLIN COUNTY
JEFFERSON COUNTY
MONROE COUNTY
LEGEND
Percent Minority Population
0% - 0.06%
0.06% - 12%
12% - 23%
23% - 63%
63% - 100%
No Population
Area Within One Mile of Transit Line
County Boundary
Interstate Highway
Major Road
River / Lake
Data is depicted by 2010 Census tracts.
Tract boundaries are not shown on the map.
0 5 10
Miles
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); Metro; Madison County Transit; St. Charles Area Transit; East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

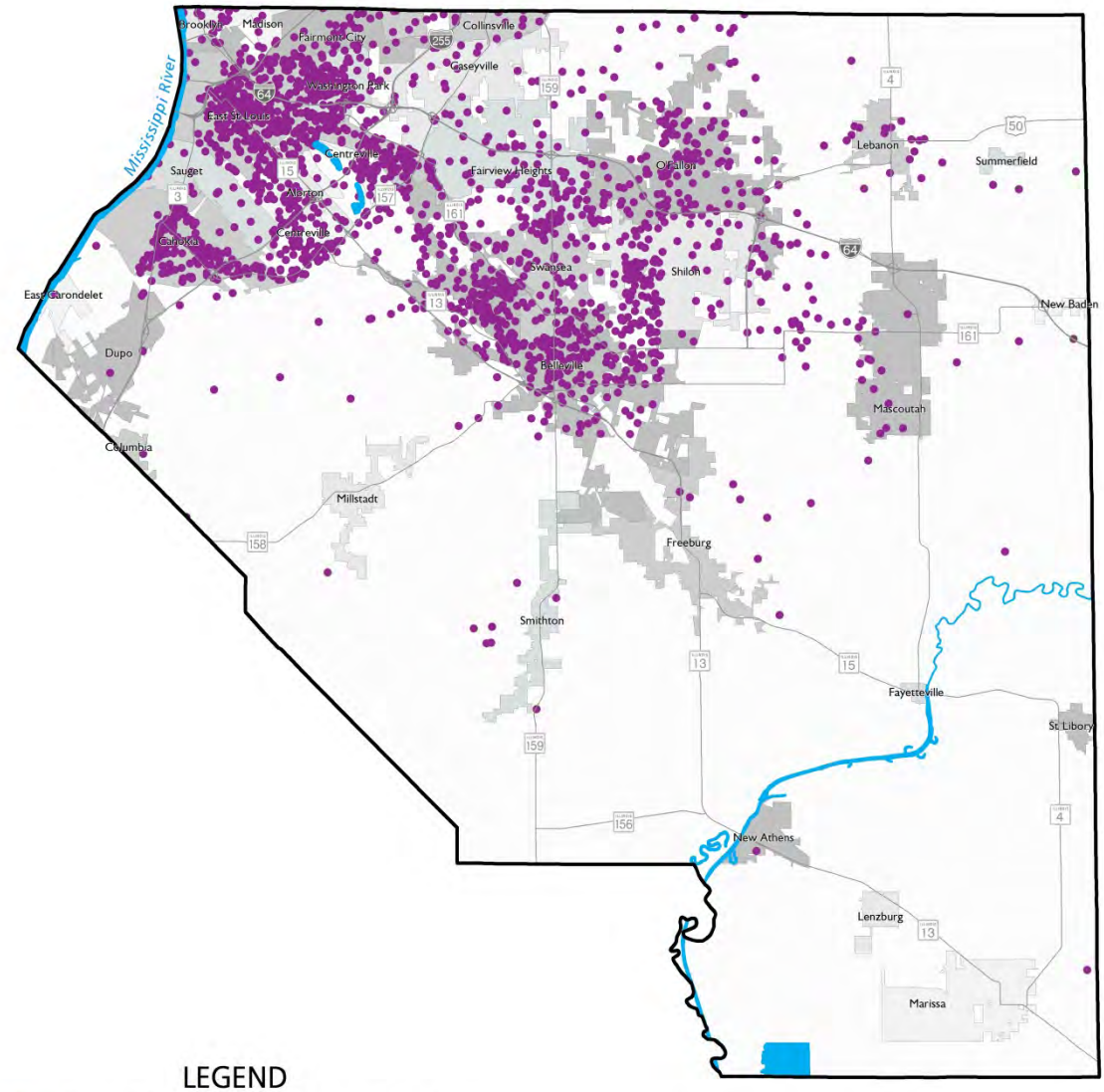

Minority Population
Madison County, Illinois
August 2015
Godfrey
Alton
Bethalto
East Alton
Wood River
Hartford
Roxana
South Roxana
Edwardsville
Mississippi River
Madison
Glen Carbon
Granite City
Pontoon Beach
Maryville
Troy
Cottonwood
Venice
Madison
Fairmont City
Worden
Hamel
Alhambra
Williamson
Livingston
New Douglas
Grantfork
Marine
Pierron
Highland
St Jacob
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


Minority Population
Monroe County, Illinois
August 2015
LEGEND
1 Dot =50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
Dupo
Columbia
Waterloo
Valmeyer
Hecker
Maeystown
Fults
Mississippi River
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

# Minority Population

*St. Clair County, Illinois*

August 2015



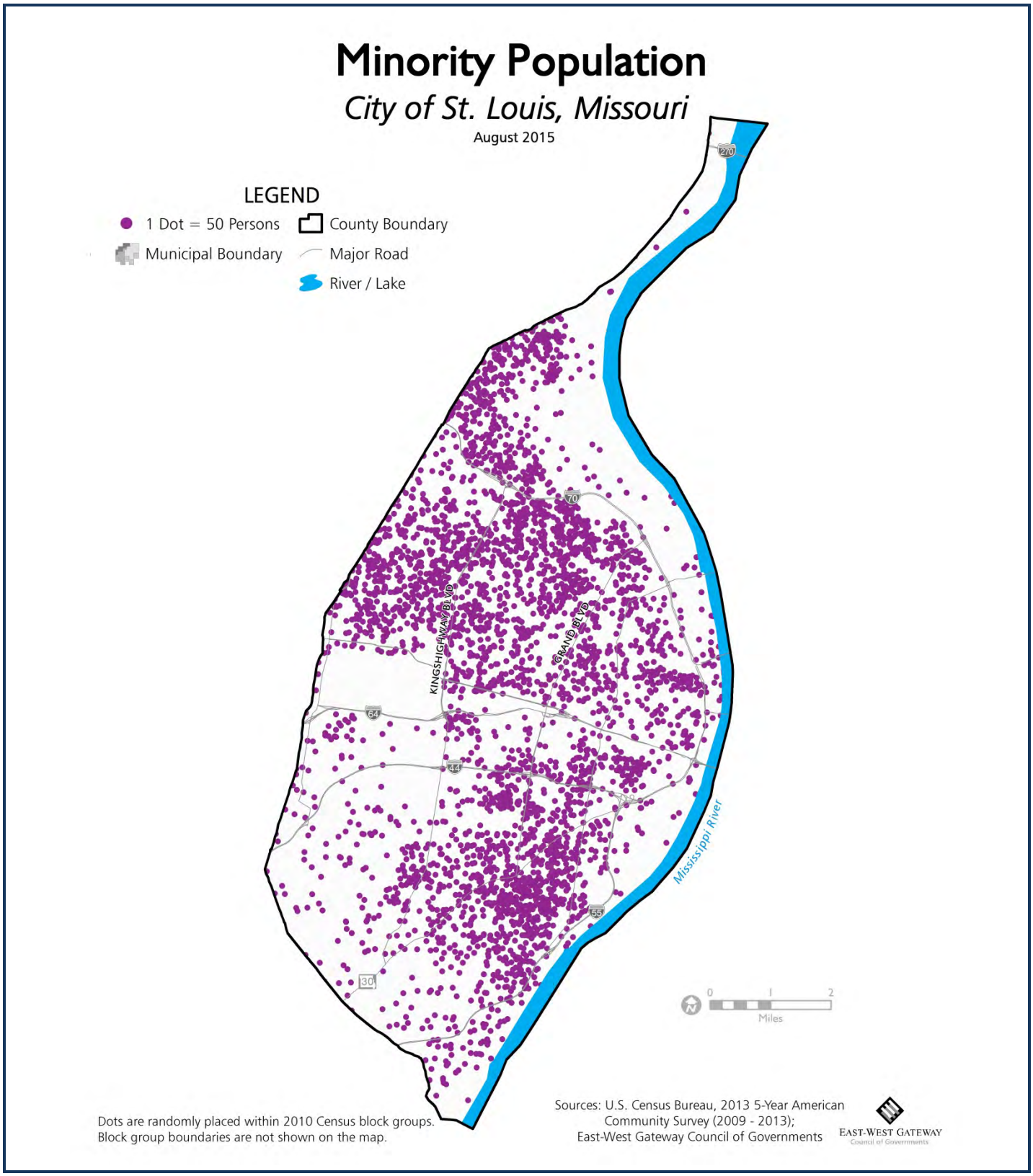

## LEGEND

- 1 Dot = 50 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

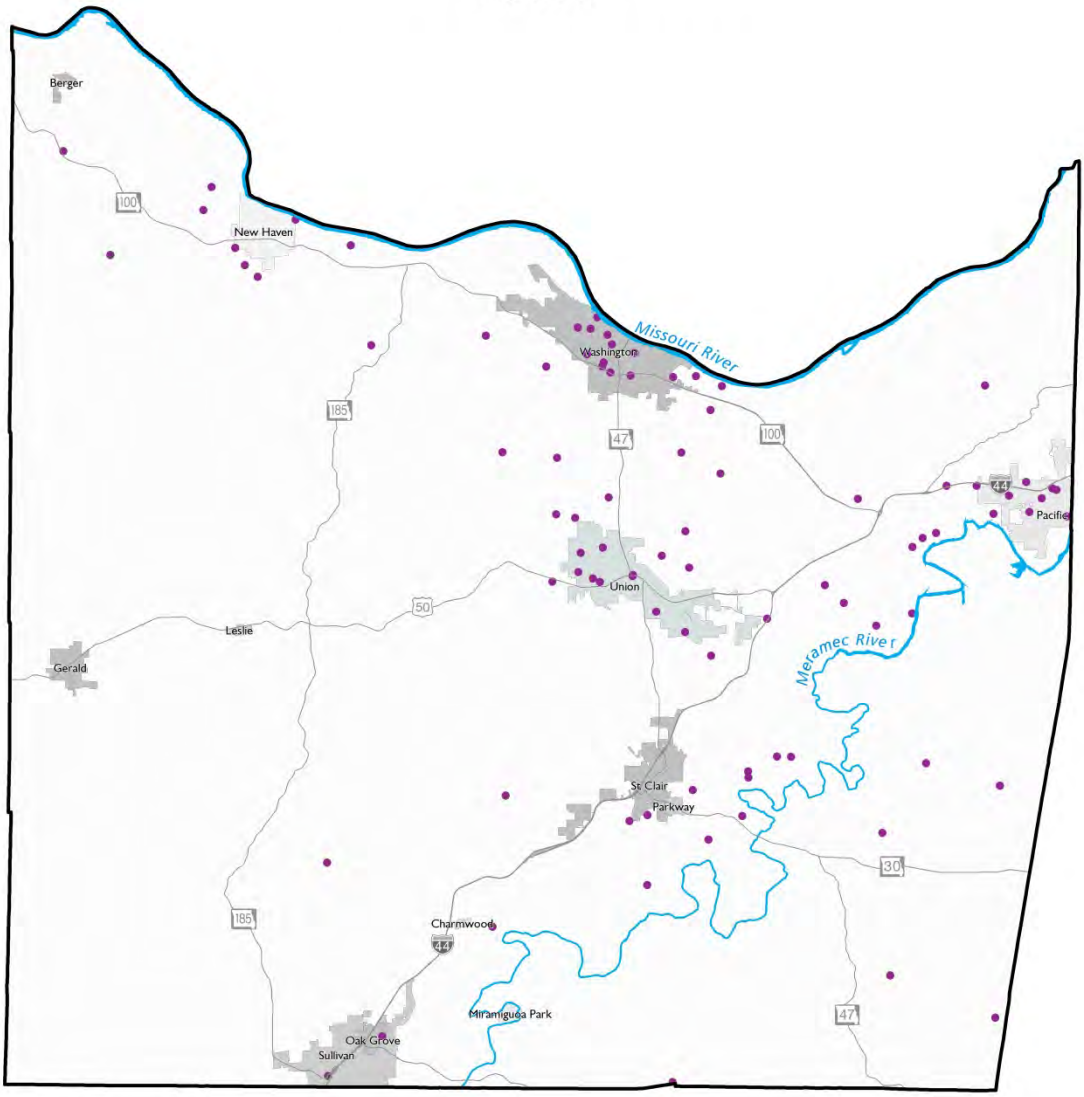
EAST-WEST GATEWAY
Council of Governments


Minority Population
City of St. Louis, Missouri
August 2015
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
KINGSHIGHWAY BLVD
GRAND BLVD
Mississippi River
270
70
64
44
55
30
0
1
2
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

# Minority Population

*Franklin County, Missouri*

August 2015




LEGEND

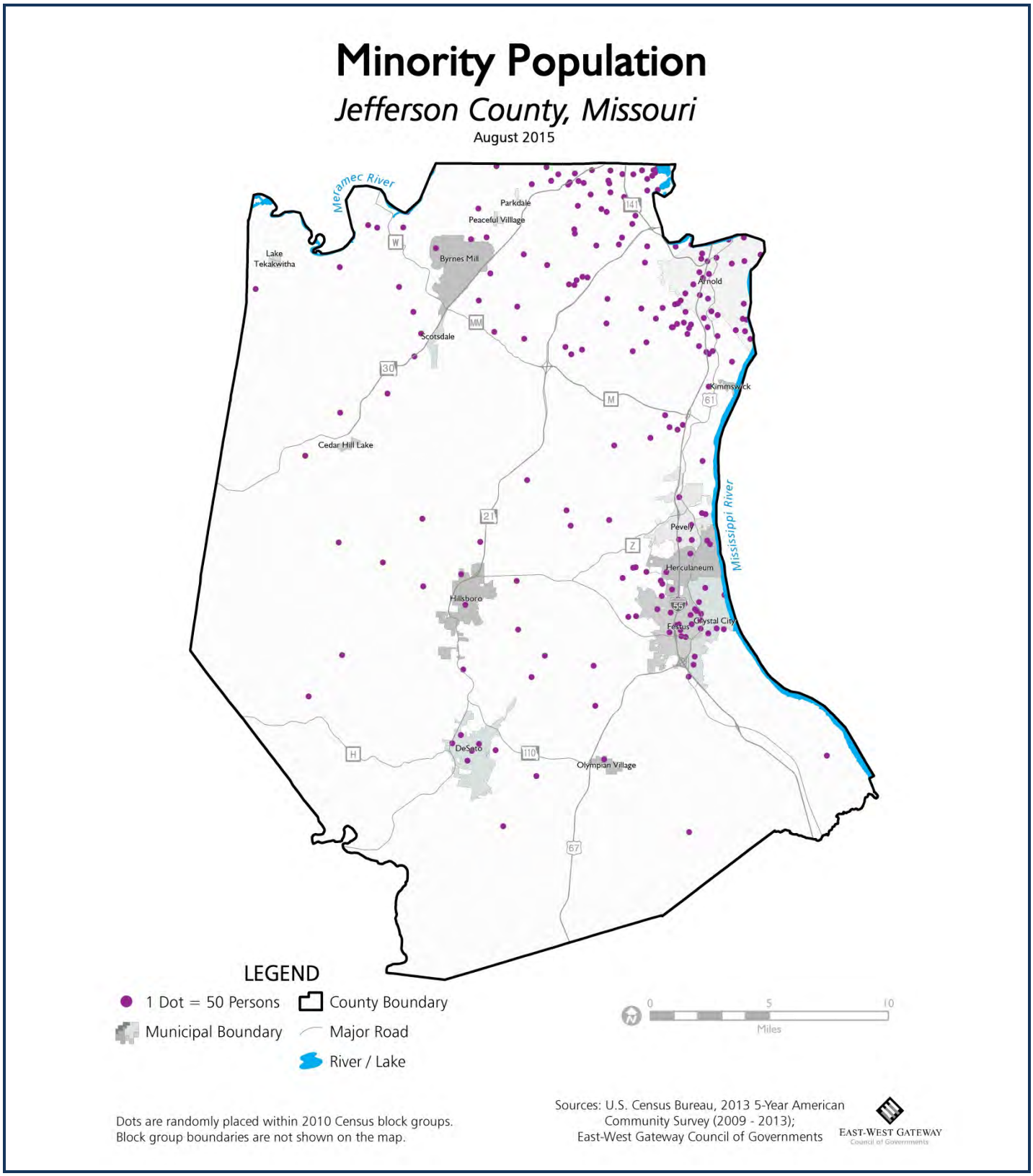
- 1 Dot = 50 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

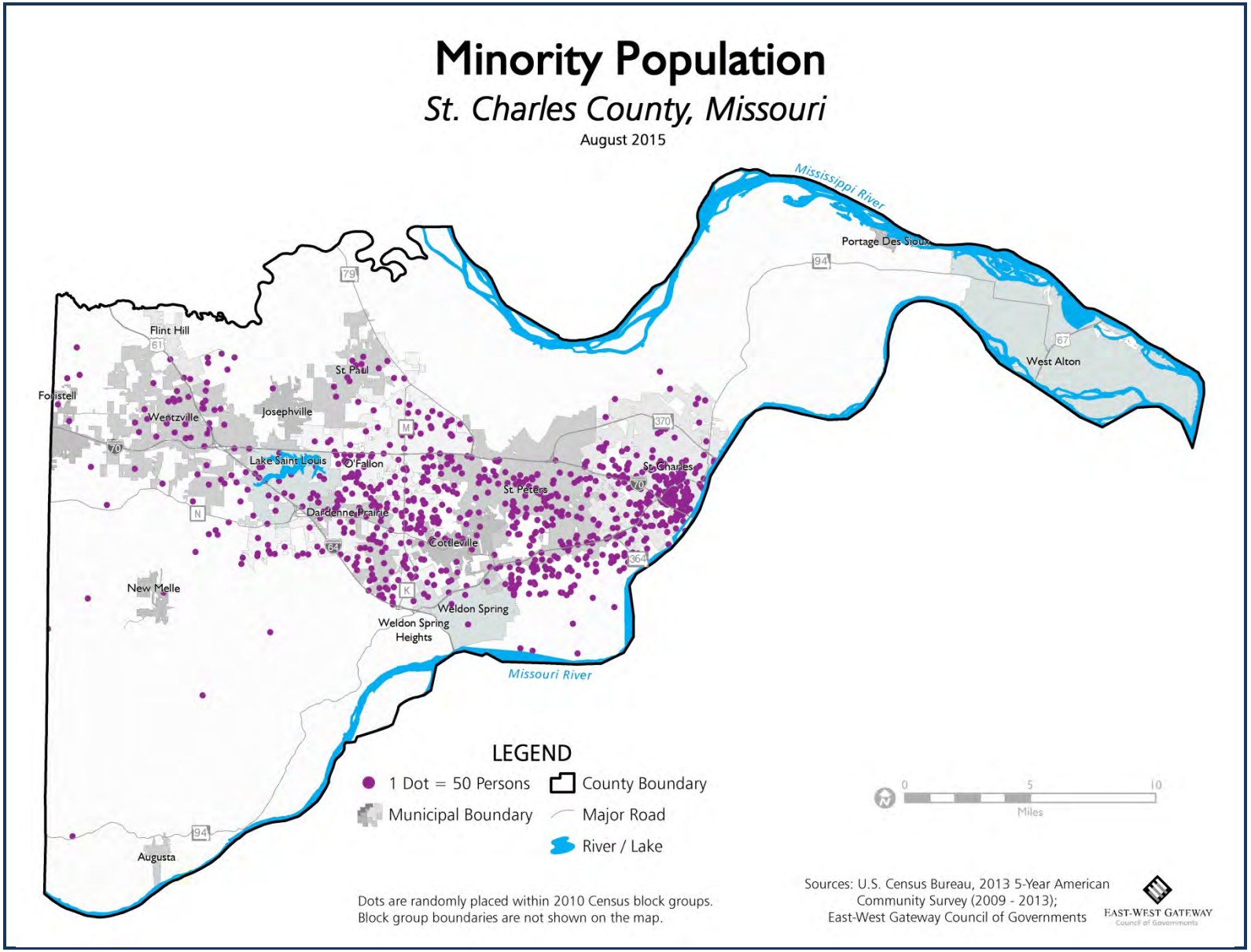
0 5 10 Miles

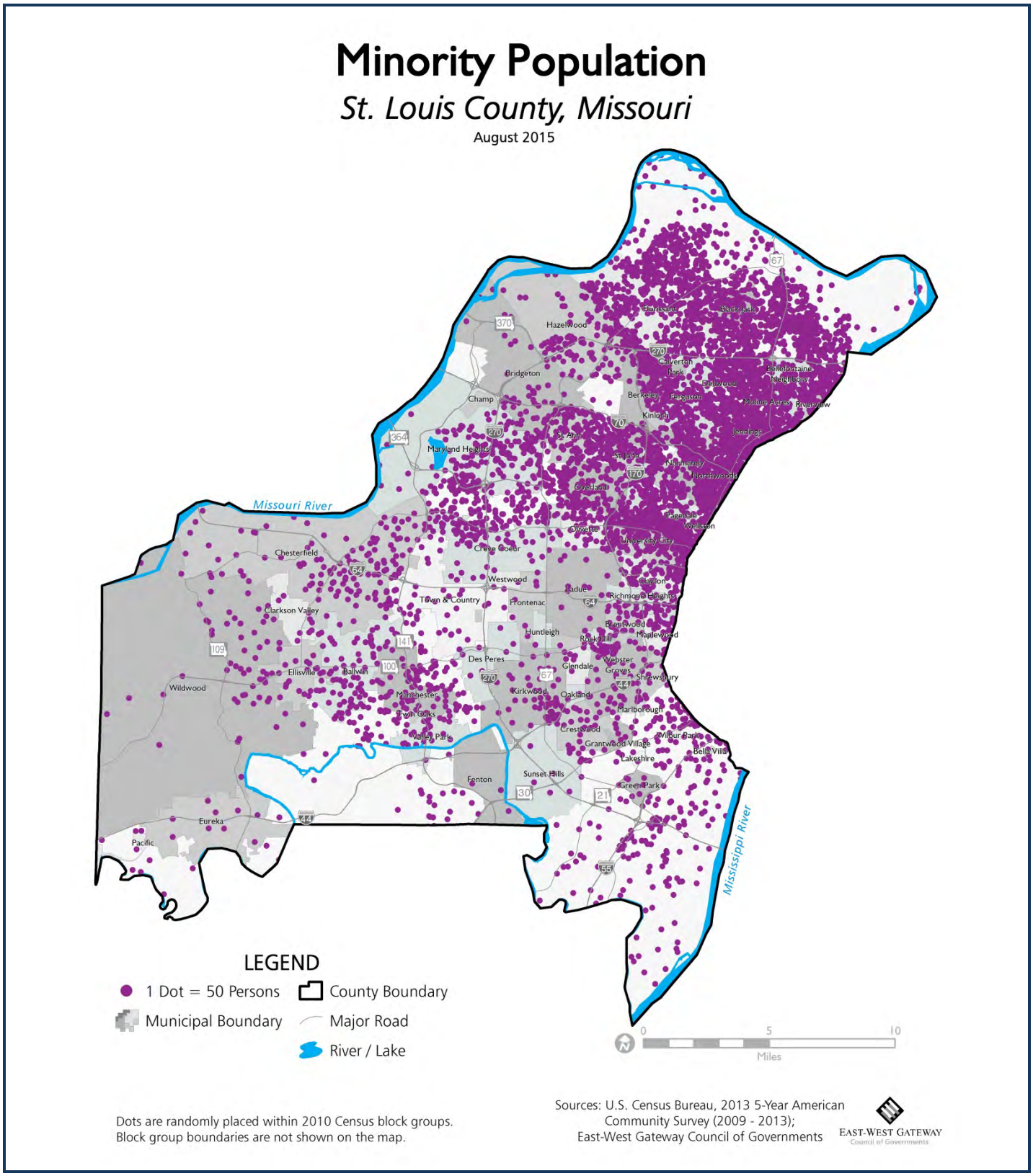
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

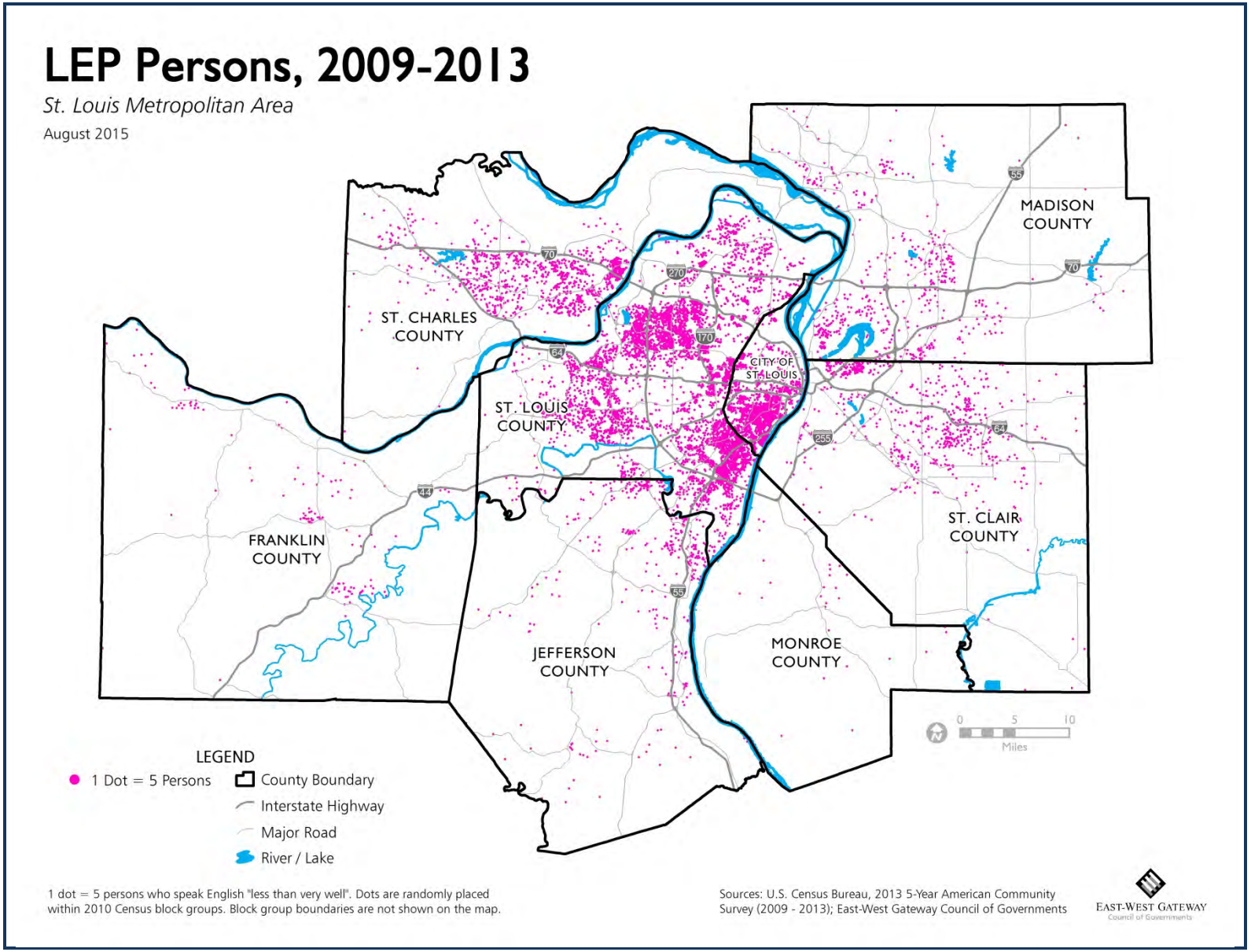

Minority Population
Jefferson County, Missouri
August 2015
Meramec River
Parkdale
Peaceful Village
Lake Tekakwitha
Byrnes Mill
Arnold
Scotsdale
Kimmswick
Cedar Hill Lake
Mississippi River
Pevely
Herculaneum
Hillsboro
Crystal City
Festus
DeSoto
Olympian Village
W
141
MM
30
M
61
21
Z
55
H
110
67
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
East-West Gateway
Council of Governments

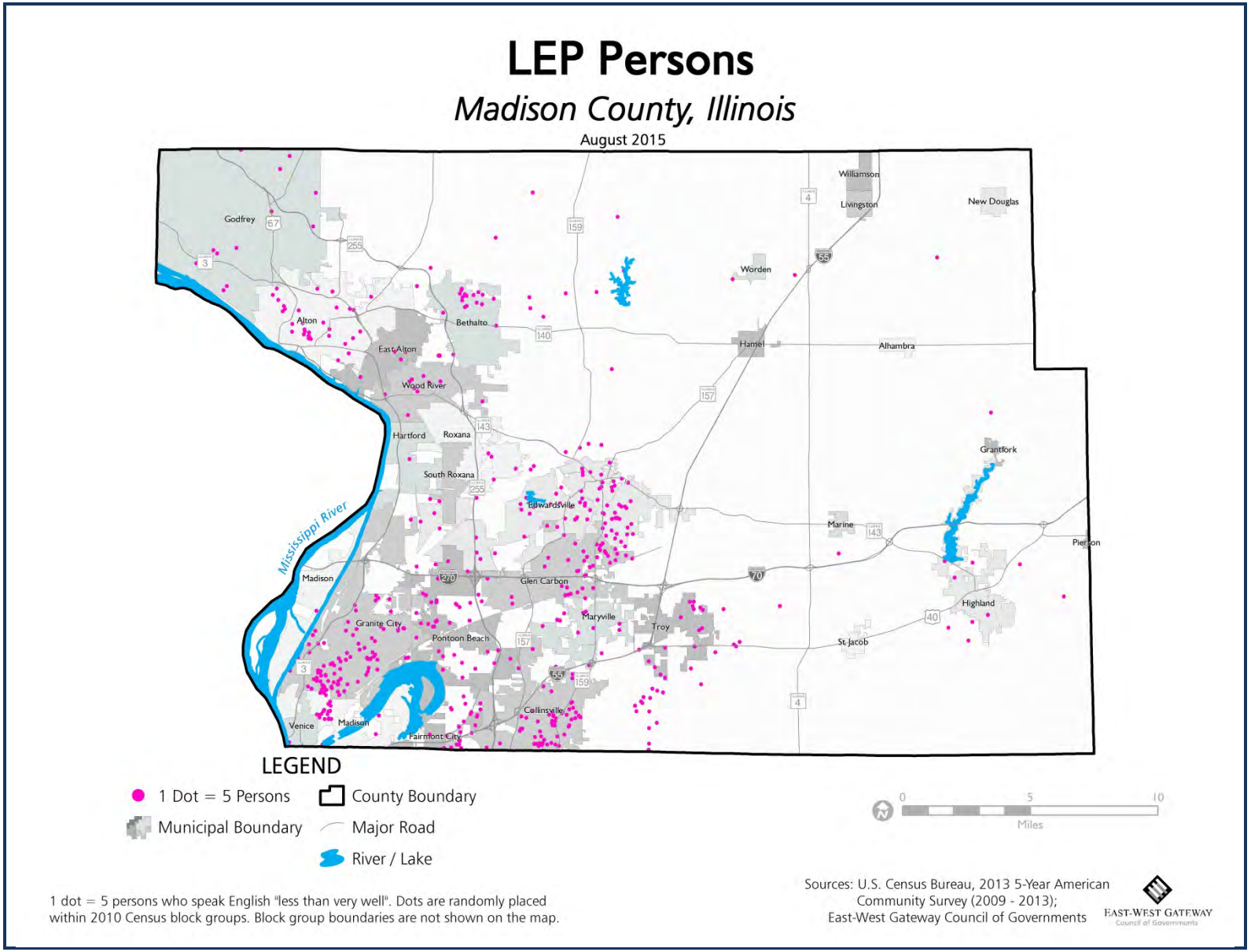

Minority Population
St. Charles County, Missouri
August 2015
Mississippi River
Portage Des Sioux
West Alton
Flint Hill
St Paul
Foristell
Wentzville
Josephville
Lake Saint Louis
O'Fallon
St Charles
St Peters
Dardenne Prairie
Cottleville
New Melle
Weldon Spring
Weldon Spring Heights
Missouri River
Augusta
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

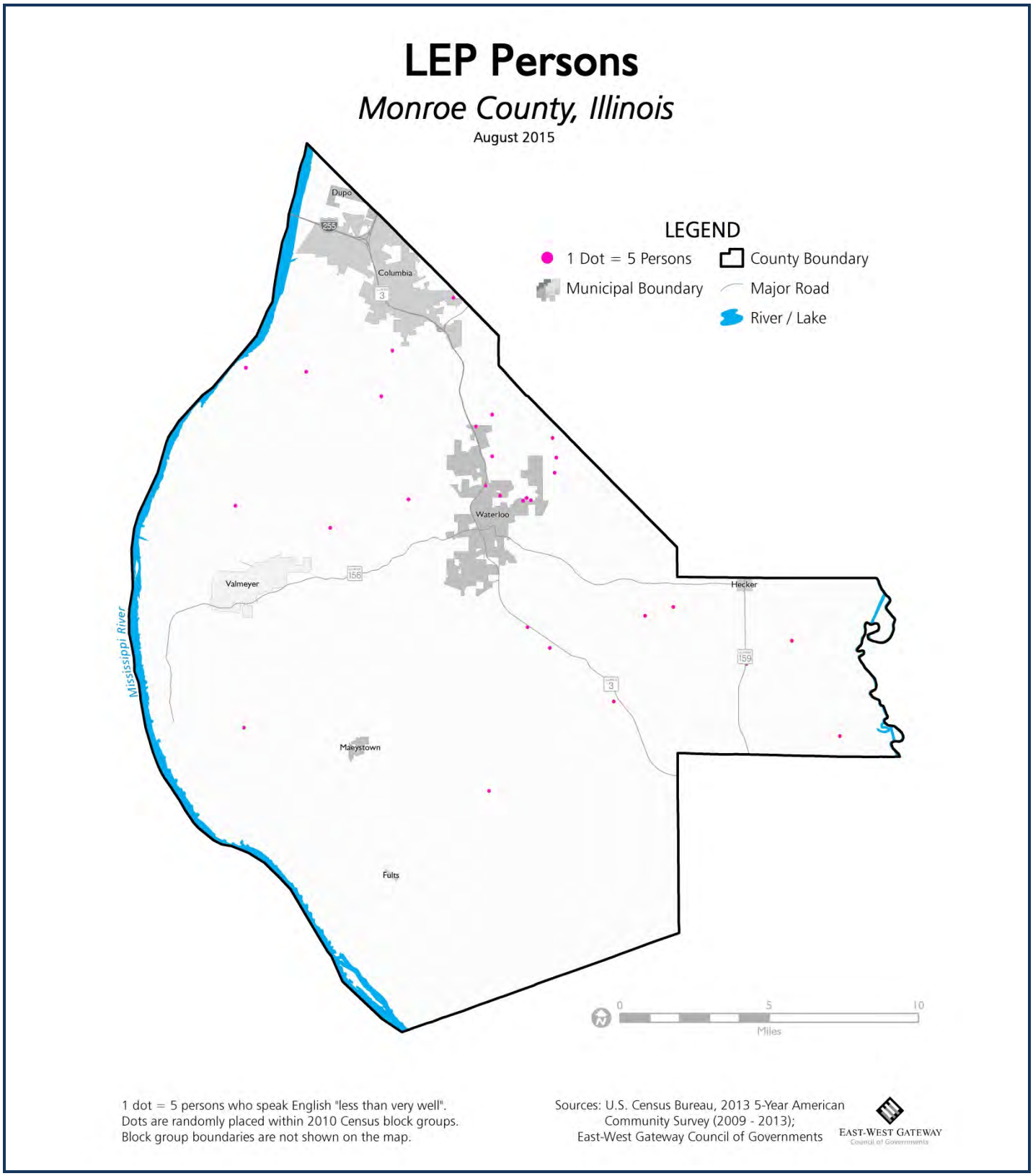

Minority Population
St. Louis County, Missouri
August 2015
Missouri River
Mississippi River
Hazelwood
Bridgeton
Champ
Maryland Heights
Chesterfield
Clarkson Valley
Wildwood
Ellisville
Balwin
Eureka
Pacific
Manchester
Twin Oaks
Valley Park
Fenton
Sunset Hills
Des Peres
Kirkwood
Oakland
Crestwood
Grantwood Village
Lakeshire
Green Park
Bella Villa
Wilbur Park
Marlborough
Webster Groves
Shrewsbury
Glendale
Rockwood
Maplewood
Brentwood
Richmond Heights
Clayton
Ladue
Frontenac
Huntleigh
Town & Country
Westwood
Creve Coeur
Olivette
University City
Overland
Normandy
Northwoods
St. Ann
St. John
Berkeley
Ferguson
Kinloch
Calverton Park
Bellerive
Bellefontaine Neighbors
Jennings
Maline Acres
RiverView
Florissant
Black Jack
Pagedale
Wellston
LEGEND
1 Dot = 50 Persons
Municipal Boundary
County Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

## LEP Persons
## Region-Level & County-Level Maps

*[This Page Intentionally Left Blank]*


LEP Persons, 2009-2013
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
JEFFERSON COUNTY
MONROE COUNTY
ST. CLAIR COUNTY
0 5 10
Miles
LEGEND
1 Dot = 5 Persons
County Boundary
Interstate Highway
Major Road
River / Lake
1 dot = 5 persons who speak English "less than very well". Dots are randomly placed within 2010 Census block groups. Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

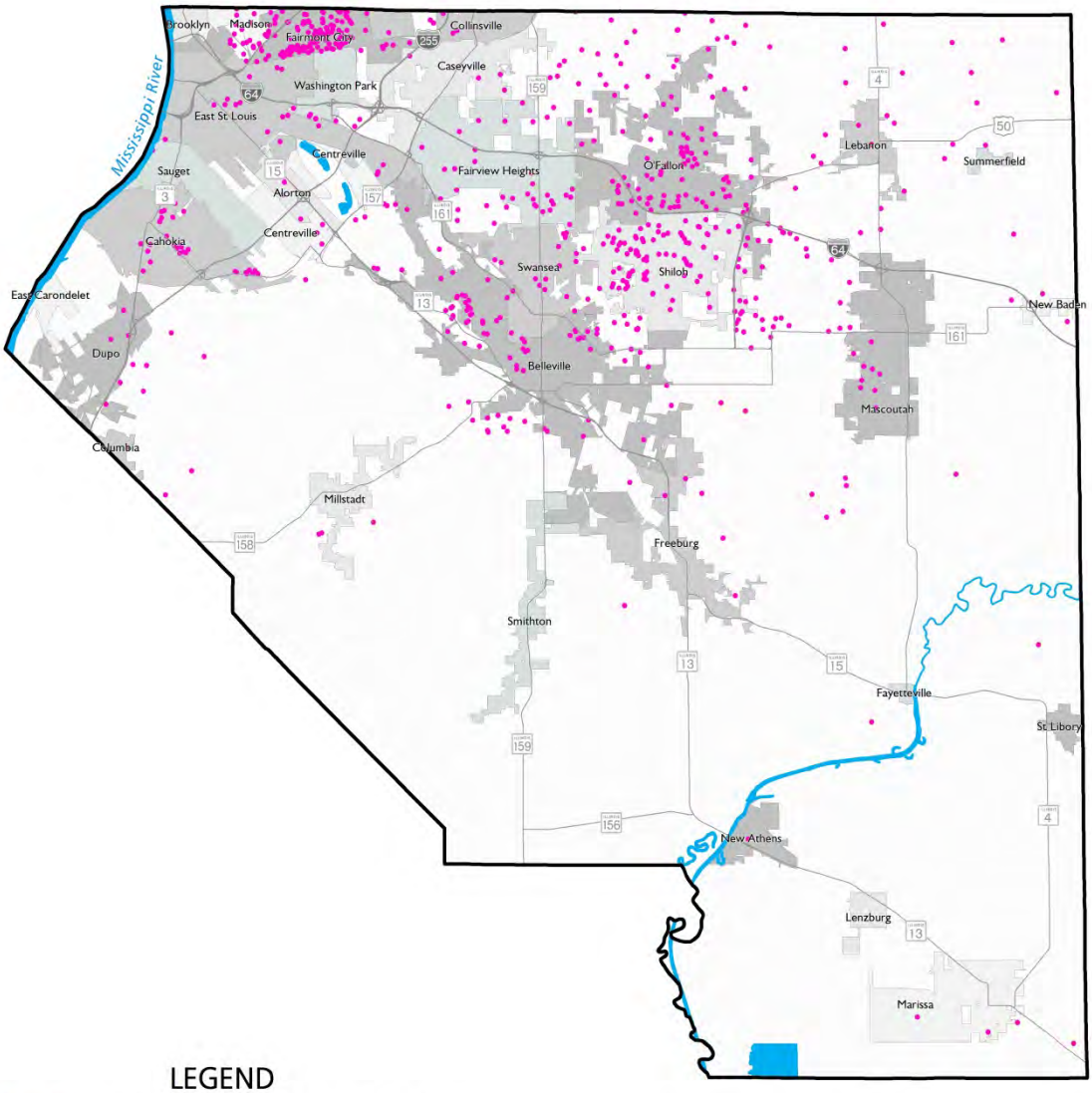

LEP Persons
Madison County, Illinois
August 2015
Godfrey
Alton
East Alton
Bethalto
Wood River
Hartford
Roxana
South Roxana
Edwardsville
Mississippi River
Madison
Granite City
Pontoon Beach
Glen Carbon
Maryville
Troy
Collinsville
Venice
Madison
Fairmont City
Williamson
Livingston
New Douglas
Worden
Hamel
Alhambra
Grantfork
Marine
Pierron
Highland
St Jacob
LEGEND
1 Dot = 5 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
1 dot = 5 persons who speak English "less than very well". Dots are randomly placed within 2010 Census block groups. Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


LEP Persons
Monroe County, Illinois
August 2015
LEGEND
1 Dot = 5 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
Dupo
255
Columbia
3
Waterloo
Valmeyer
156
Hecker
159
Mississippi River
Maeystown
Fults
0
5
10
Miles
1 dot = 5 persons who speak English "less than very well".
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
East-West Gateway
Council of Governments

# LEP Persons

*St. Clair County, Illinois*

August 2015




## LEGEND

- 1 Dot = 5 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

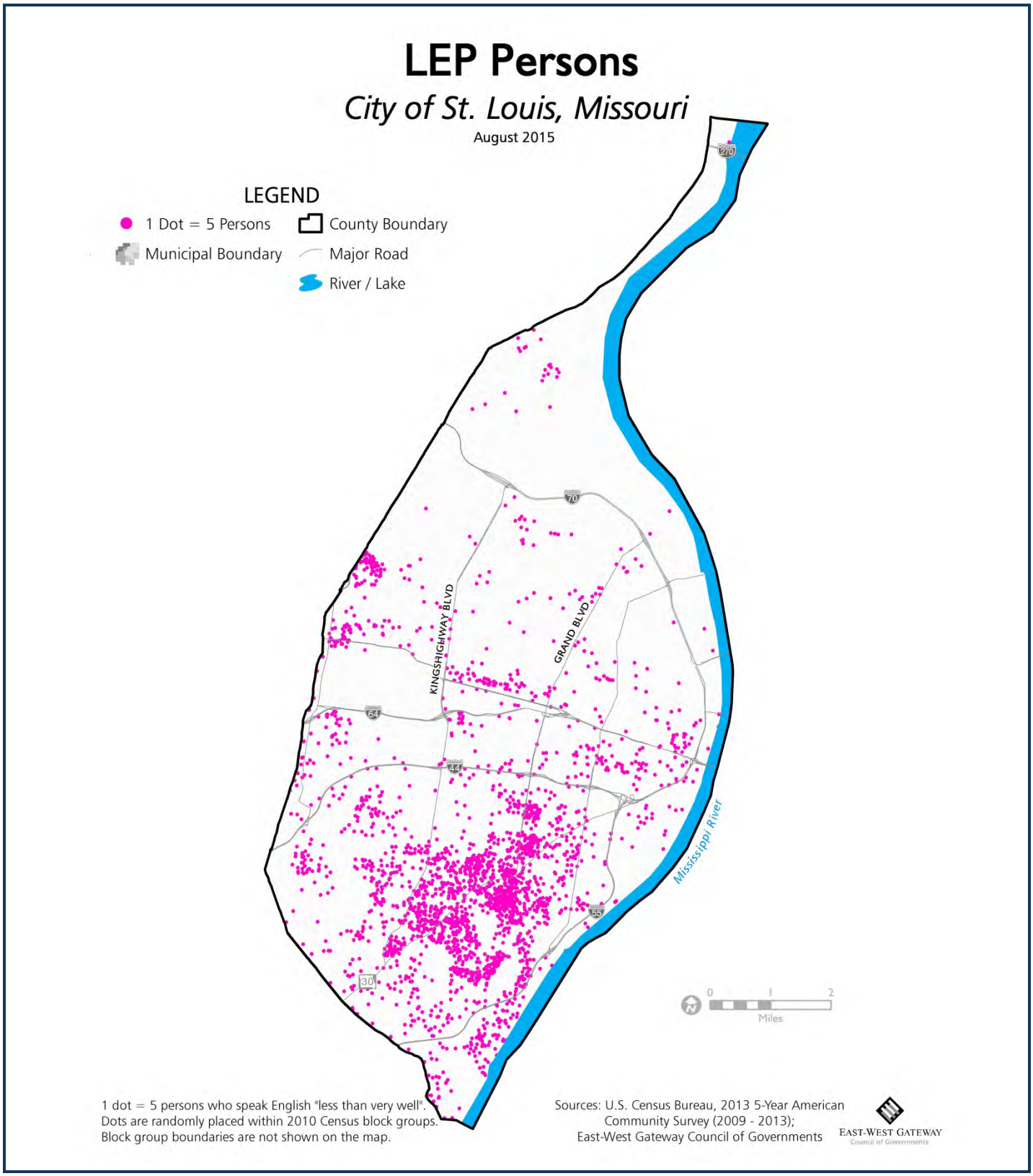
0 5 10 Miles

1 dot = 5 persons who speak English "less than very well".
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments

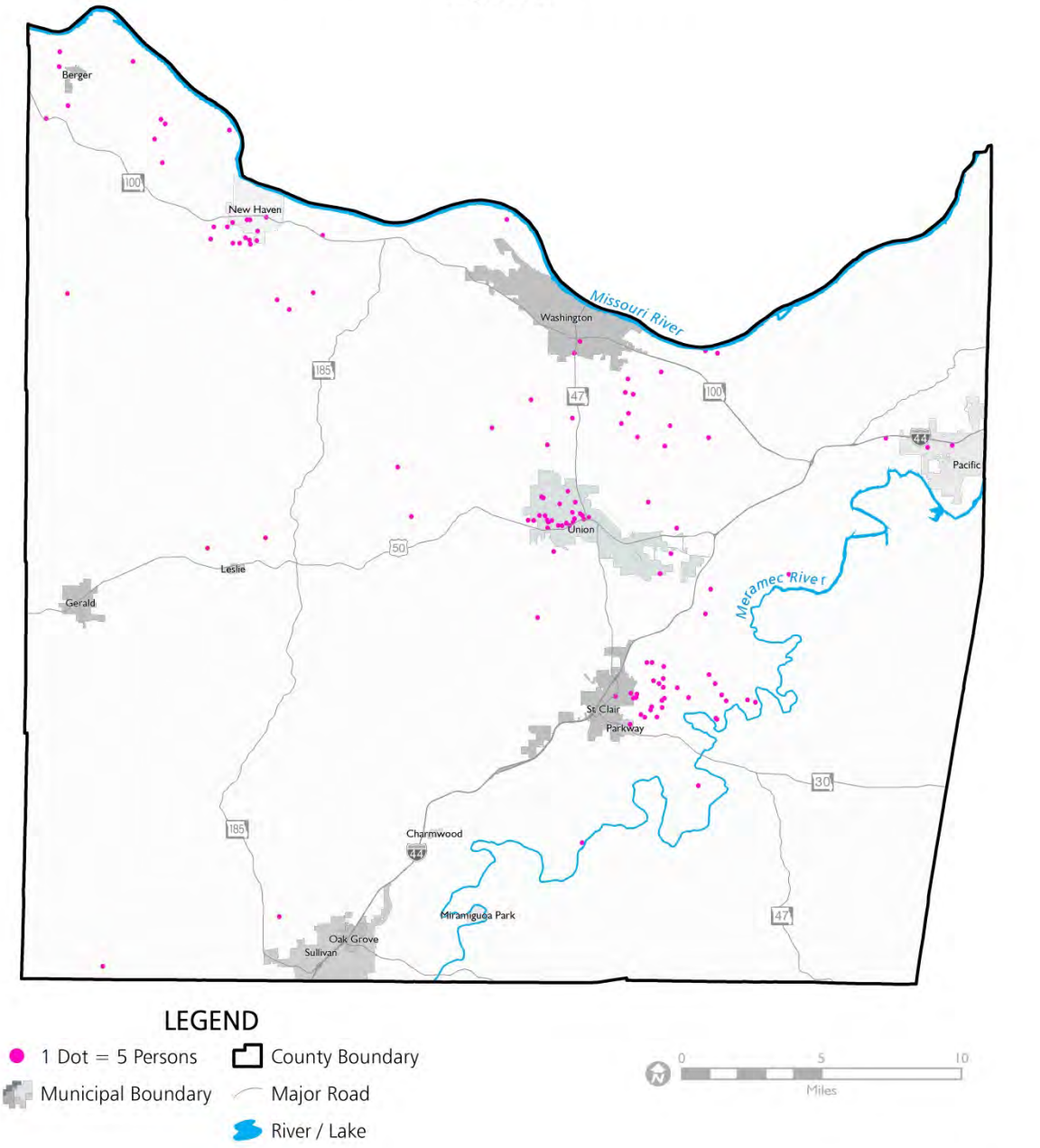
## Appendix 8: Maps, LEP Persons, County-Level



# LEP Persons

*Franklin County, Missouri*

August 2015




LEGEND

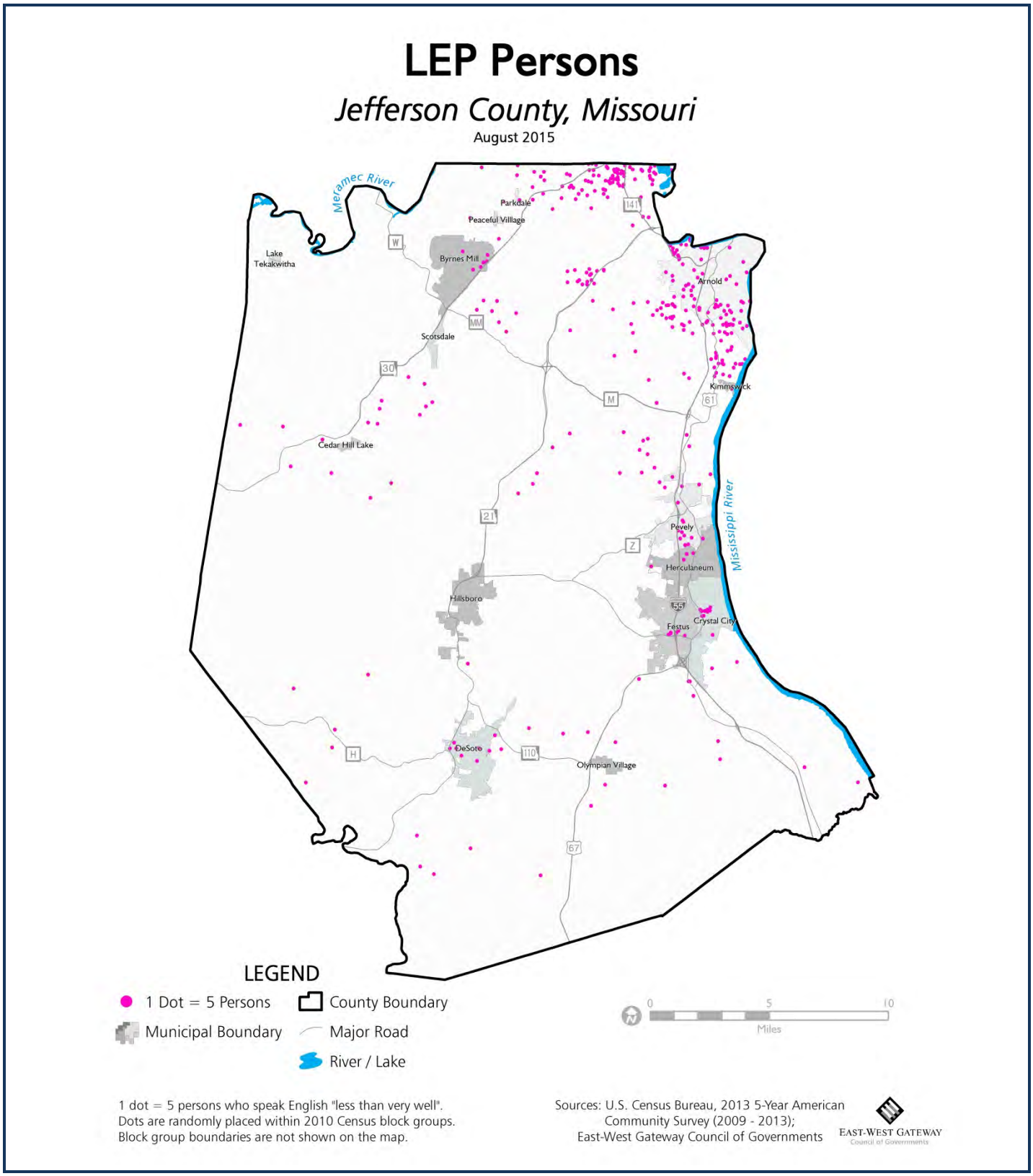
- 1 Dot = 5 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

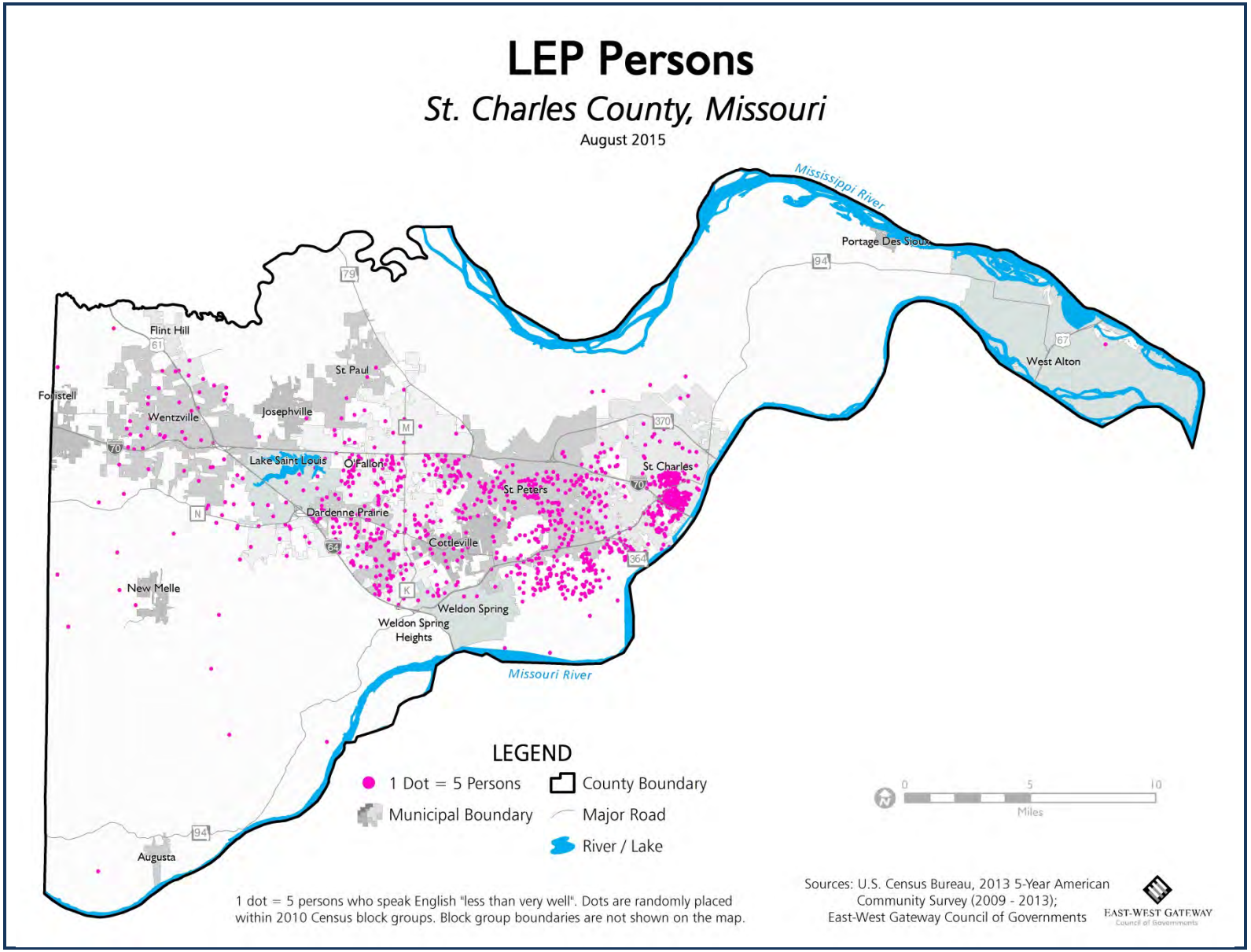
0 5 10 Miles

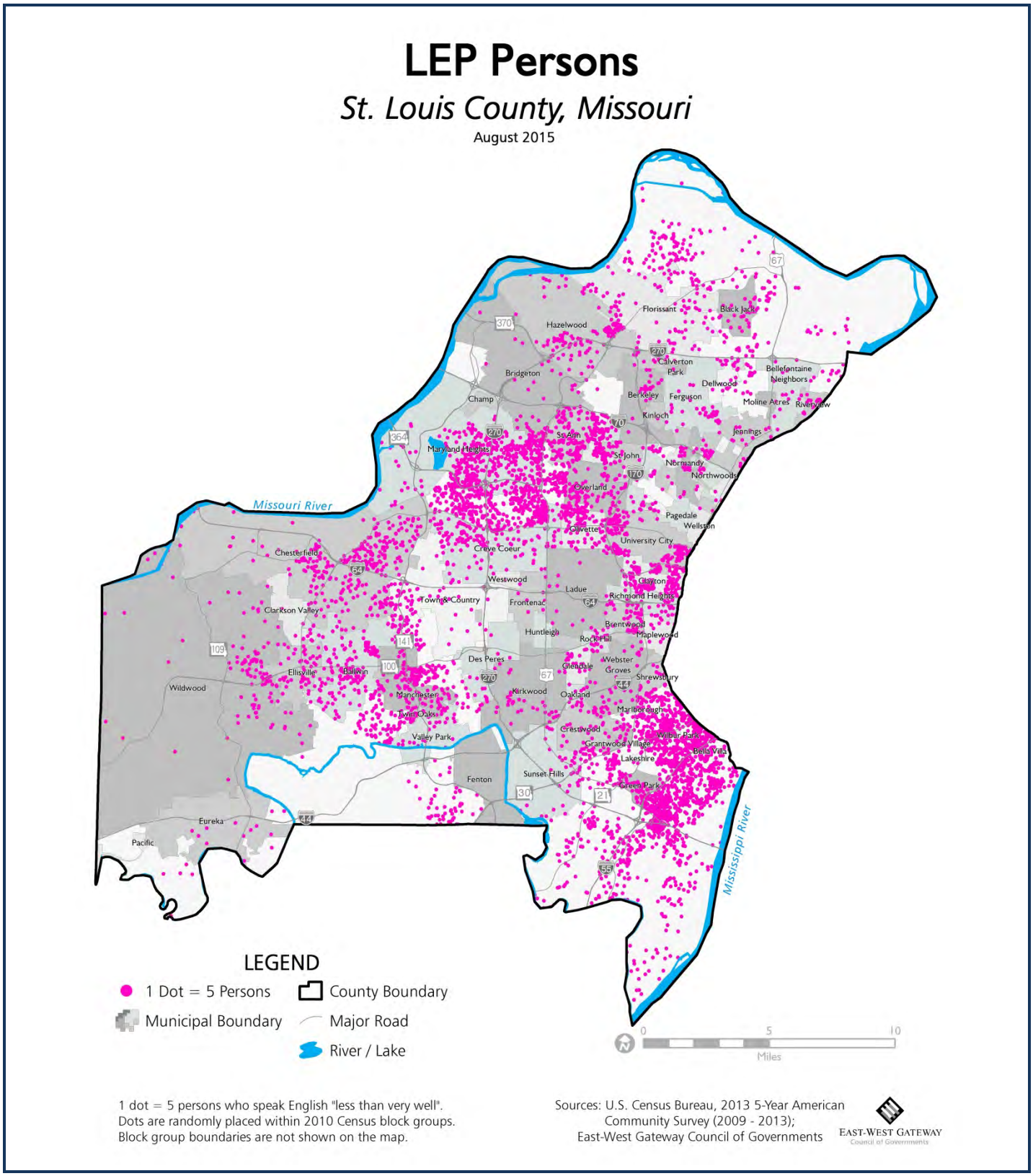
1 dot = 5 persons who speak English "less than very well".
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments


LEP Persons
Jefferson County, Missouri
August 2015
Meramec River
Parkdale
Peaceful Village
Lake Tekakwitha
Byrnes Mill
Arnold
Scotsdale
Kimmswick
Cedar Hill Lake
Mississippi River
Pevely
Herculaneum
Hillsboro
Festus
Crystal City
DeSoto
Olympian Village
141
W
MM
30
M
61
21
Z
55
H
110
67
LEGEND
1 Dot = 5 Persons
Municipal Boundary
County Boundary
Major Road
River / Lake
0
5
10
Miles
1 dot = 5 persons who speak English "less than very well".
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
East-West Gateway
Council of Governments

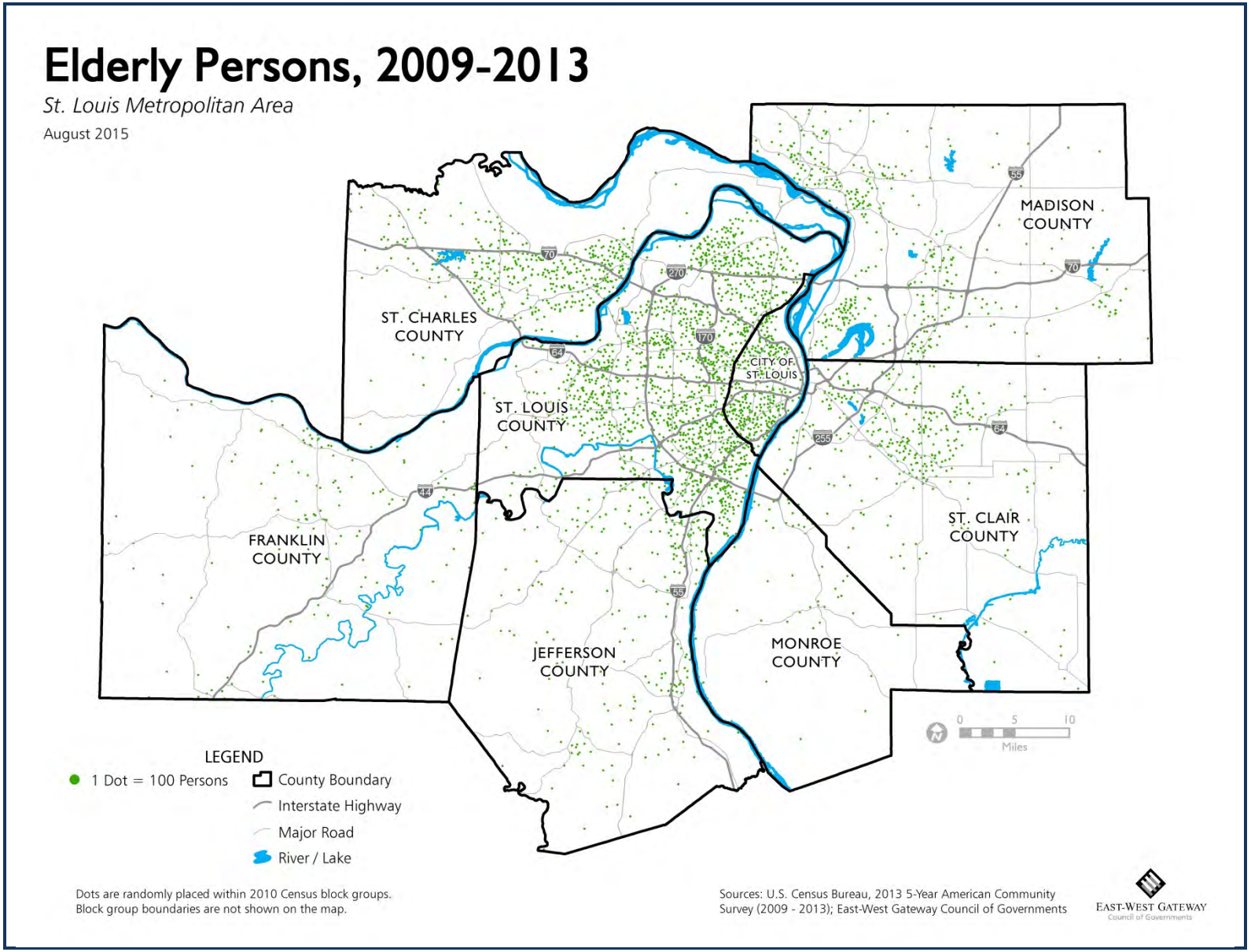

LEP Persons
St. Charles County, Missouri
August 2015
Mississippi River
Portage Des Sioux
West Alton
Flint Hill
St Paul
Foristell
Wentzville
Josephville
Lake Saint Louis
O'Fallon
St Peters
St Charles
Dardenne Prairie
Cottleville
New Melle
Weldon Spring
Weldon Spring Heights
Missouri River
Augusta
LEGEND
1 Dot = 5 Persons
Municipal Boundary
County Boundary
Major Road
River / Lake
0
5
10
Miles
1 dot = 5 persons who speak English "less than very well". Dots are randomly placed within 2010 Census block groups. Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

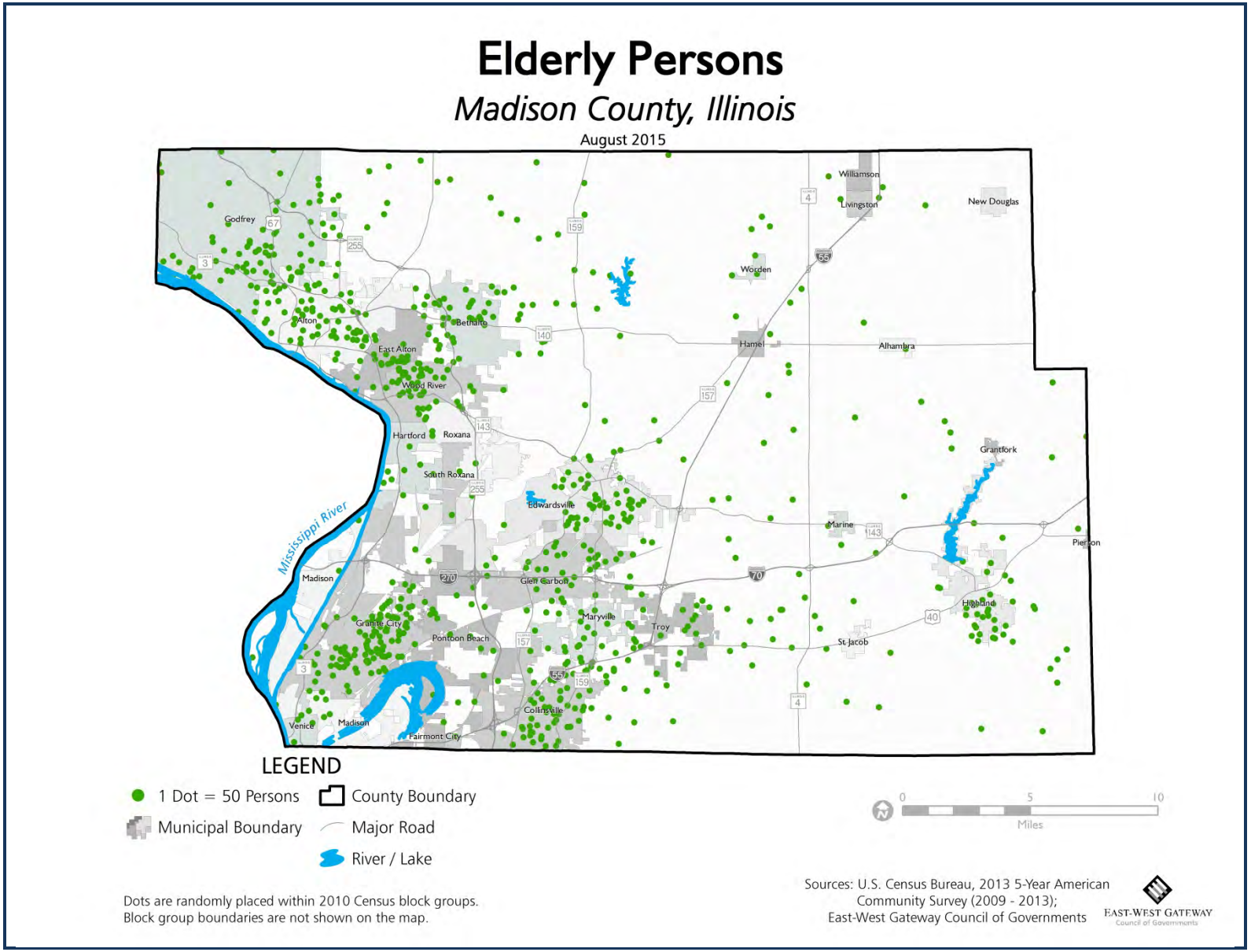

LEP Persons
St. Louis County, Missouri
August 2015
Missouri River
Mississippi River
Florissant
Black Jack
Hazelwood
Calverton Park
Bellefontaine Neighbors
Bridgeton
Dellwood
Berkeley
Ferguson
Moline Acres
Riverview
Champ
Kinloch
Jennings
St. Ann
Maryland Heights
St. John
Normandy
Northwoods
Overland
Pagedale
Wellston
Olivette
University City
Chesterfield
Creve Coeur
Westwood
Clayton
Ladue
Richmond Heights
Town & Country
Frontenac
Clarkson Valley
Brentwood
Huntleigh
Maplewood
Rock Hill
Des Peres
Webster Groves
Ellisville
Ballwin
Glendale
Shrewsbury
Wildwood
Kirkwood
Oakland
Manchester
Marlborough
Twin Oaks
Crestwood
Valley Park
Wilbur Park
Grantwood Village
Bella Villa
Lakeshire
Fenton
Sunset Hills
Green Park
Eureka
Pacific
LEGEND
1 Dot = 5 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
1 dot = 5 persons who speak English "less than very well".
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

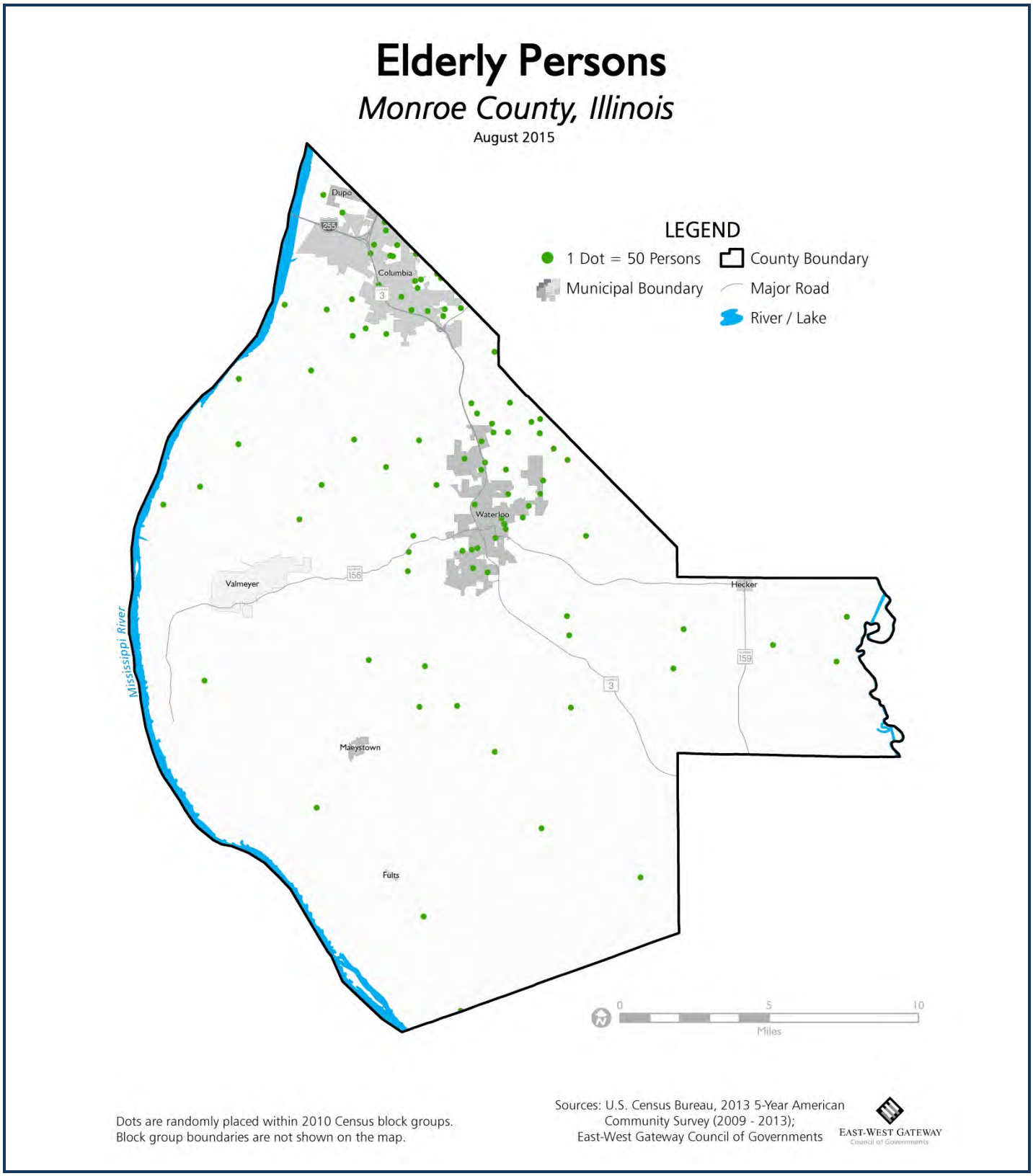
*[This Page Intentionally Left Blank]*

## Elderly Persons
## Region-Level & County-Level Maps

*[This Page Intentionally Left Blank]*


Elderly Persons, 2009-2013
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
JEFFERSON COUNTY
MONROE COUNTY
ST. CLAIR COUNTY
0 5 10
Miles
LEGEND
1 Dot = 100 Persons
County Boundary
Interstate Highway
Major Road
River / Lake
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

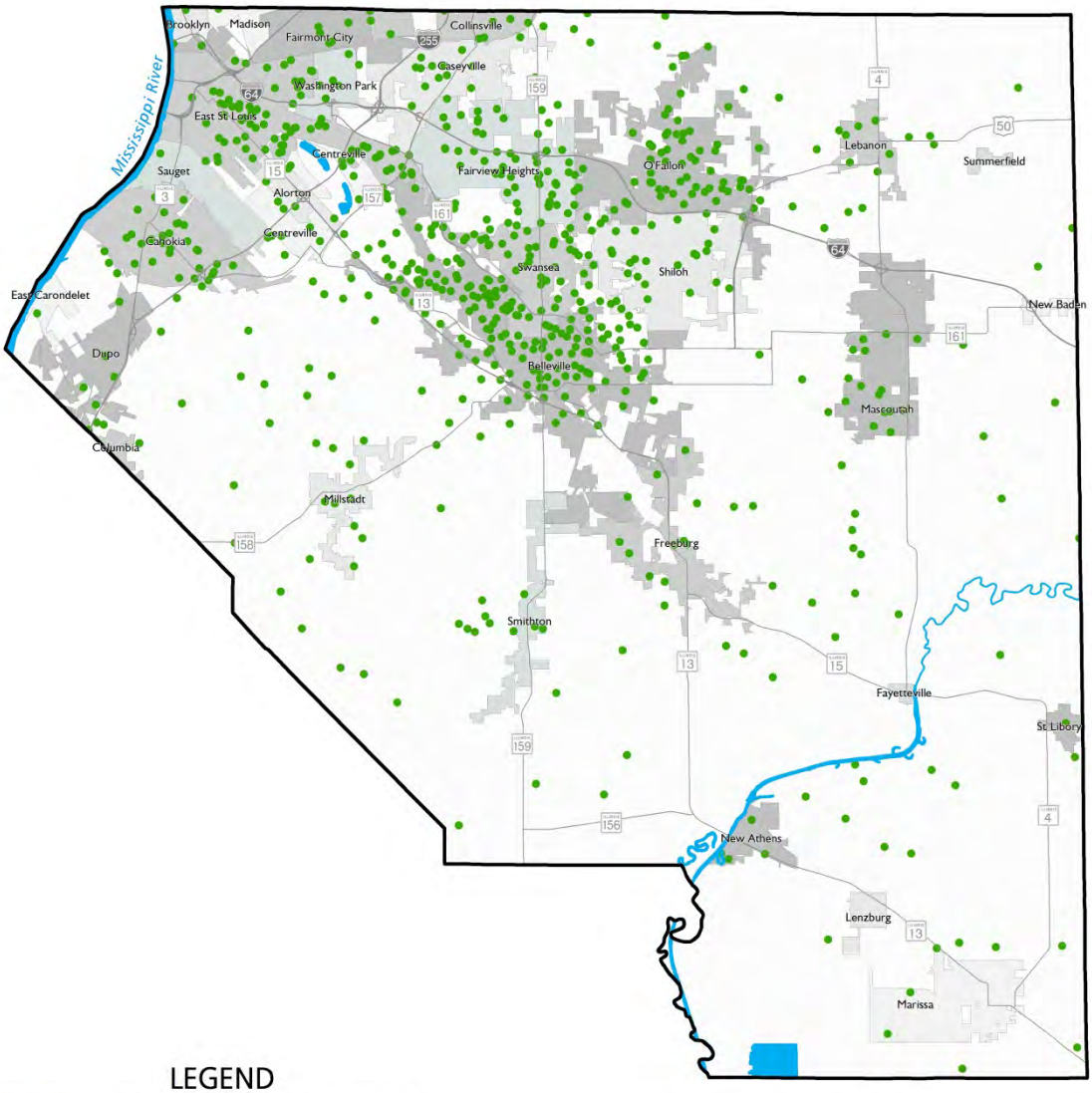

Elderly Persons
Madison County, Illinois
August 2015
Godfrey
Alton
East Alton
Bethalto
Wood River
Hartford
Roxana
South Roxana
Edwardsville
Mississippi River
Madison
Glen Carbon
Granite City
Pontoon Beach
Maryville
Troy
Collinsville
Venice
Madison
Fairmont City
Williamson
Livingston
New Douglas
Worden
Hamel
Alhambra
Grantfork
Marine
Pierron
Hobland
St Jacob
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


Elderly Persons
Monroe County, Illinois
August 2015
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
Dupo
Columbia
Waterloo
Valmeyer
Hecker
Maeystown
Fults
Mississippi River
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

# Elderly Persons

*St. Clair County, Illinois*

August 2015




LEGEND

- 1 Dot = 50 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

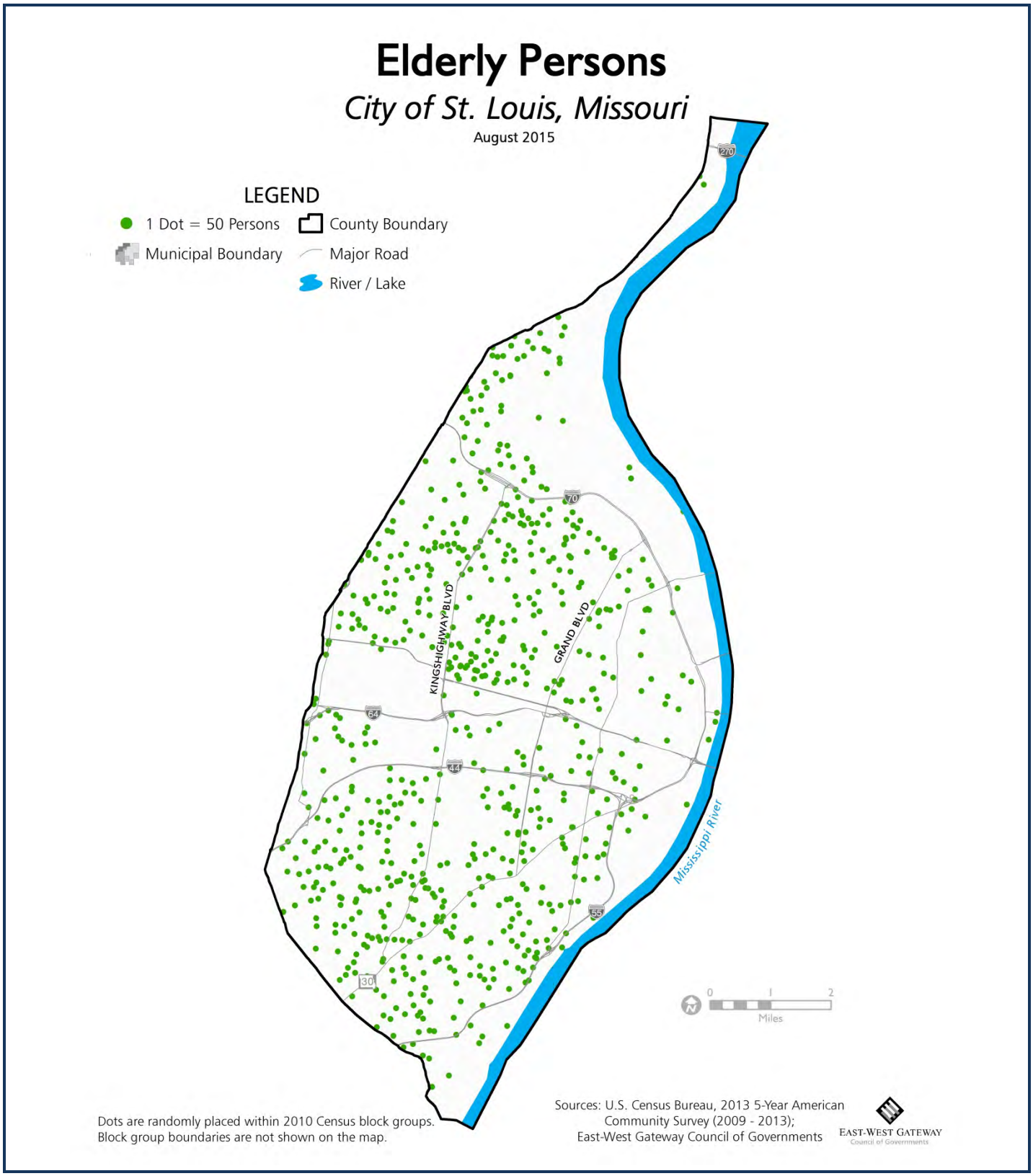
0 5 10 Miles

Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

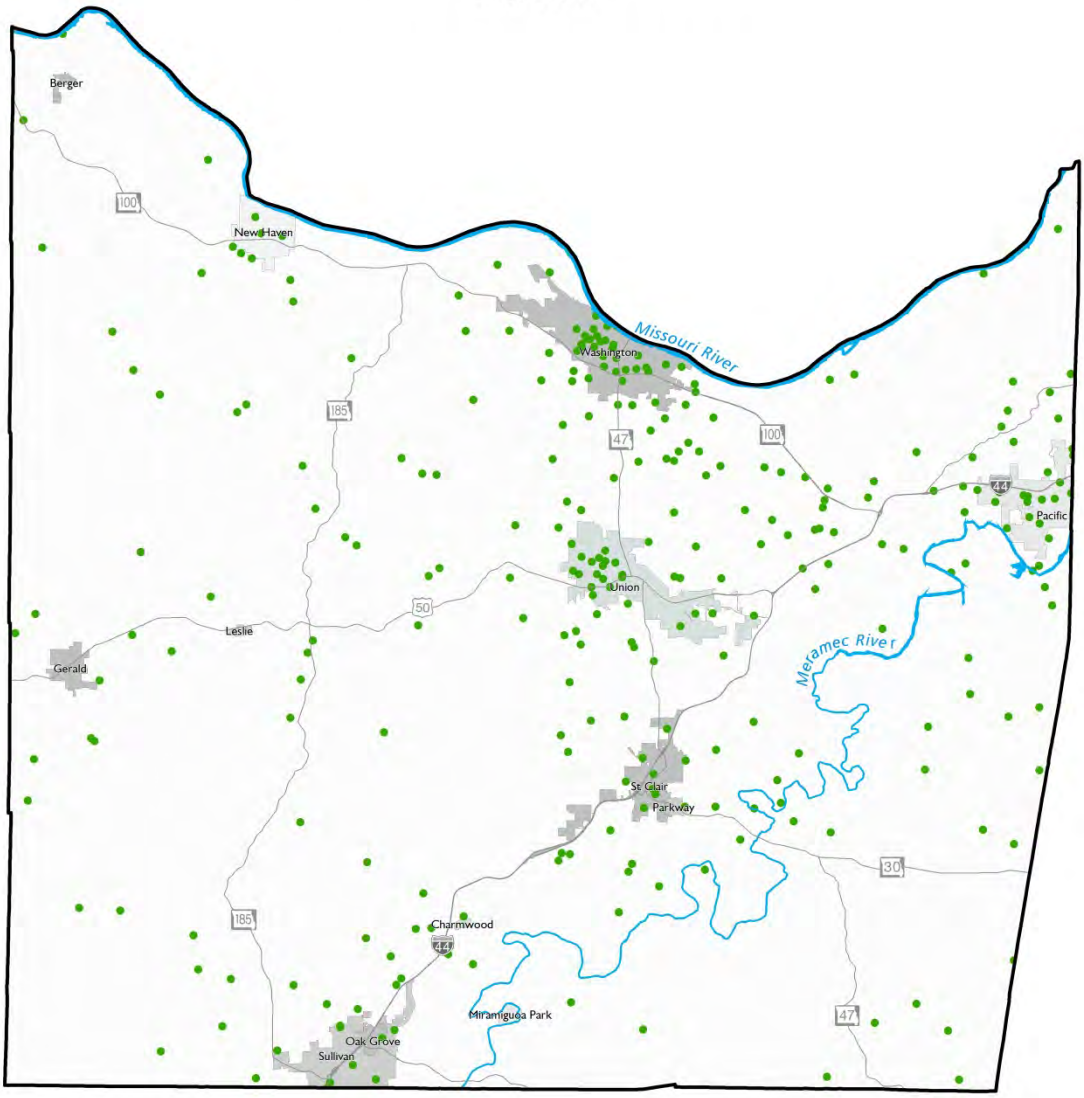
## Appendix 8: Maps, Elderly Persons, County-Level



# Elderly Persons

*Franklin County, Missouri*

August 2015




LEGEND

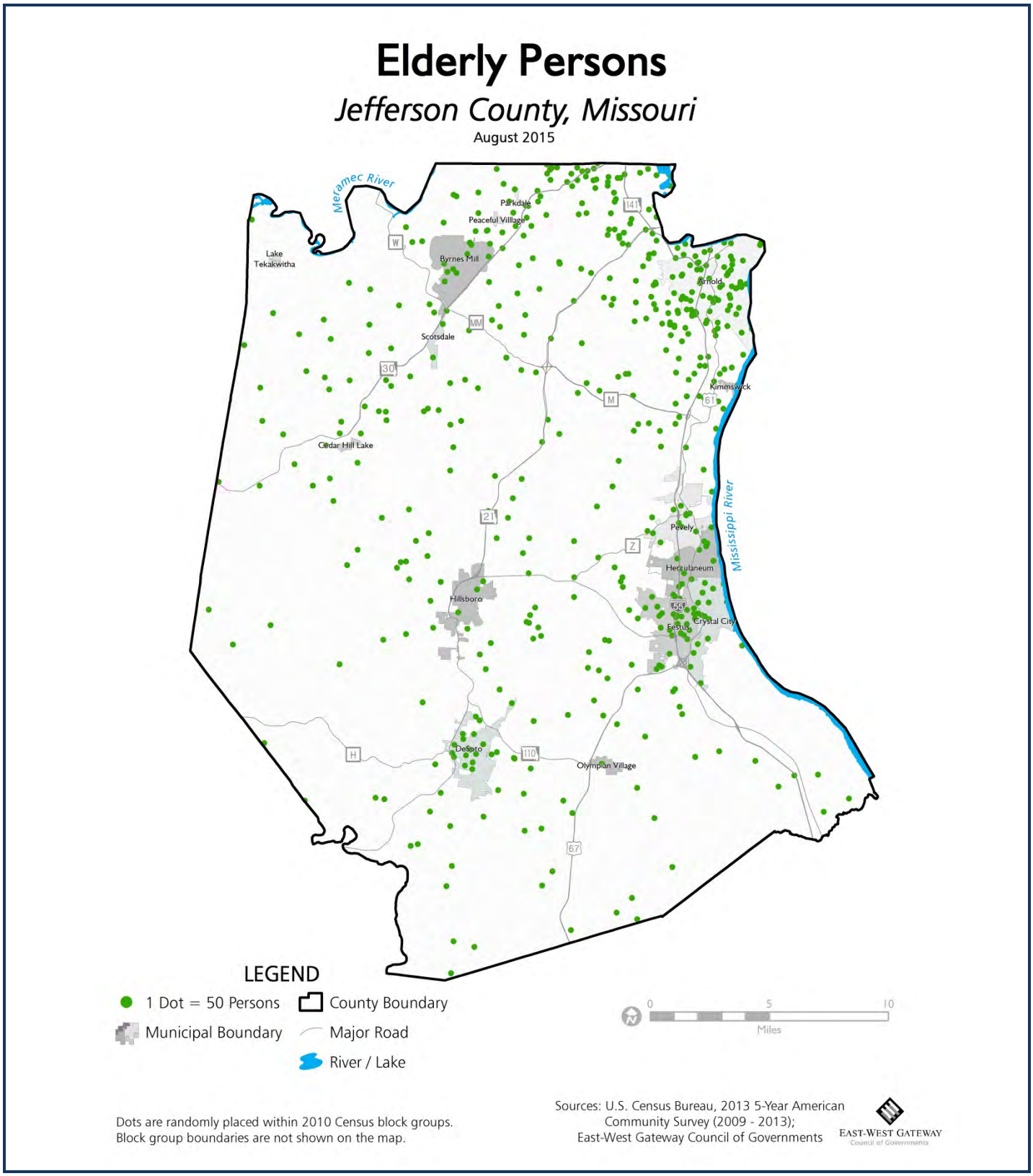
- 1 Dot = 50 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

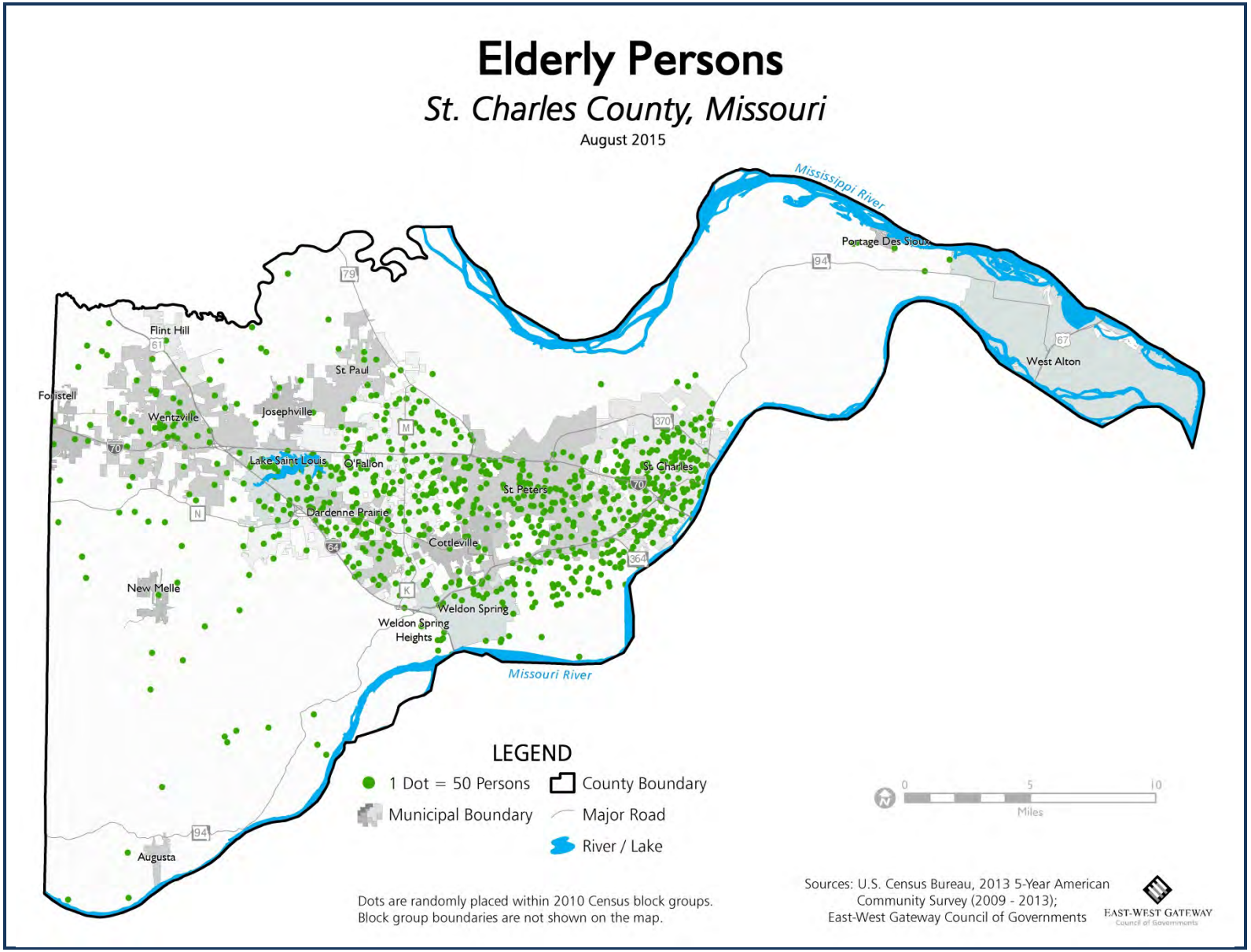
0 5 10 Miles

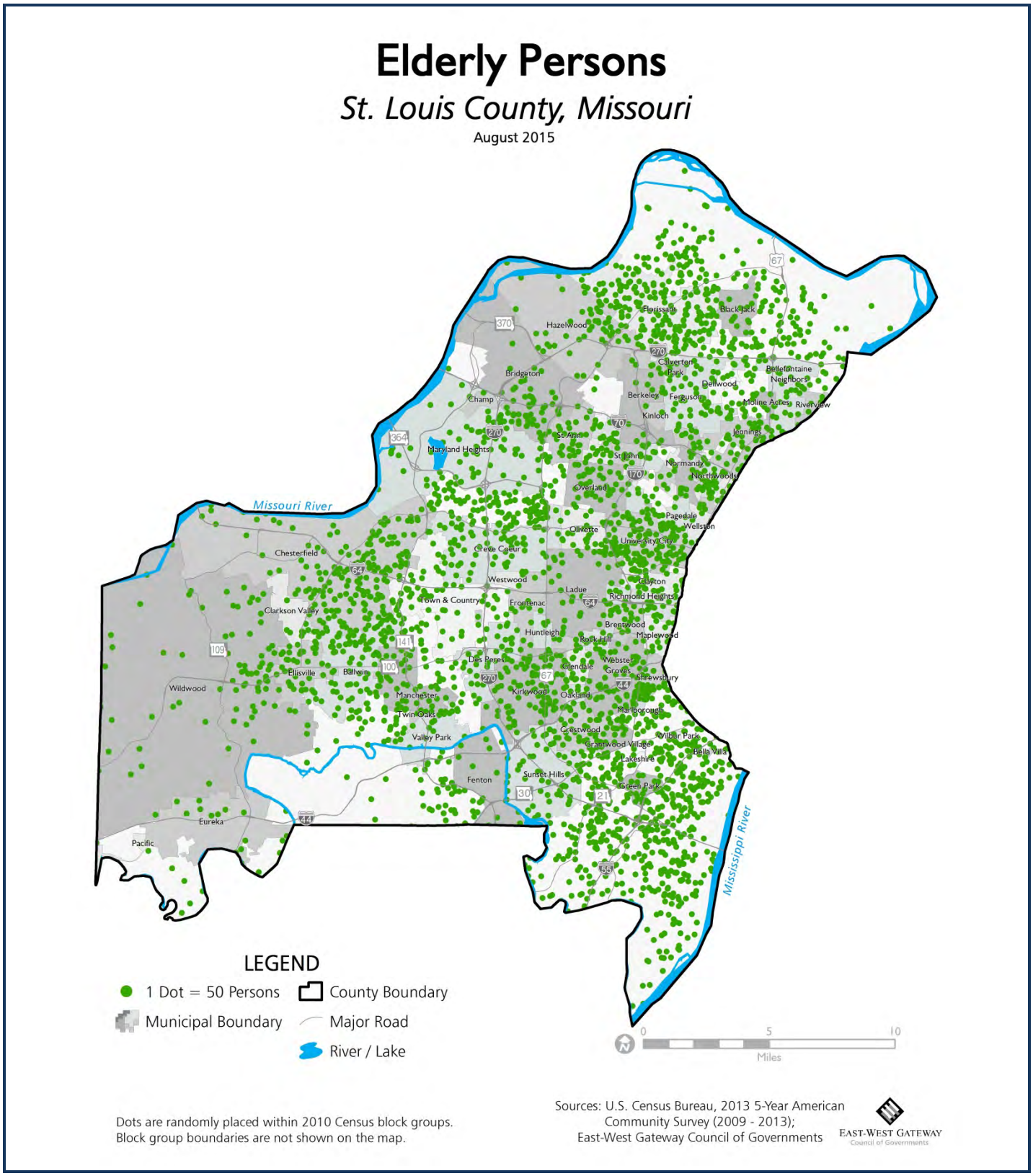
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments


Elderly Persons
Jefferson County, Missouri
August 2015
Meramec River
Parkdale
Peaceful Village
Lake Tekakwitha
Byrnes Mill
Arnold
Scotsdale
Kimmswick
Cedar Hill Lake
Mississippi River
Pevely
Herculaneum
Hillsboro
Crystal City
Festus
Desoto
Olympian Village
141
W
MM
30
M
61
21
Z
55
H
110
67
LEGEND
1 Dot = 50 Persons
Municipal Boundary
County Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
East-West Gateway
Council of Governments

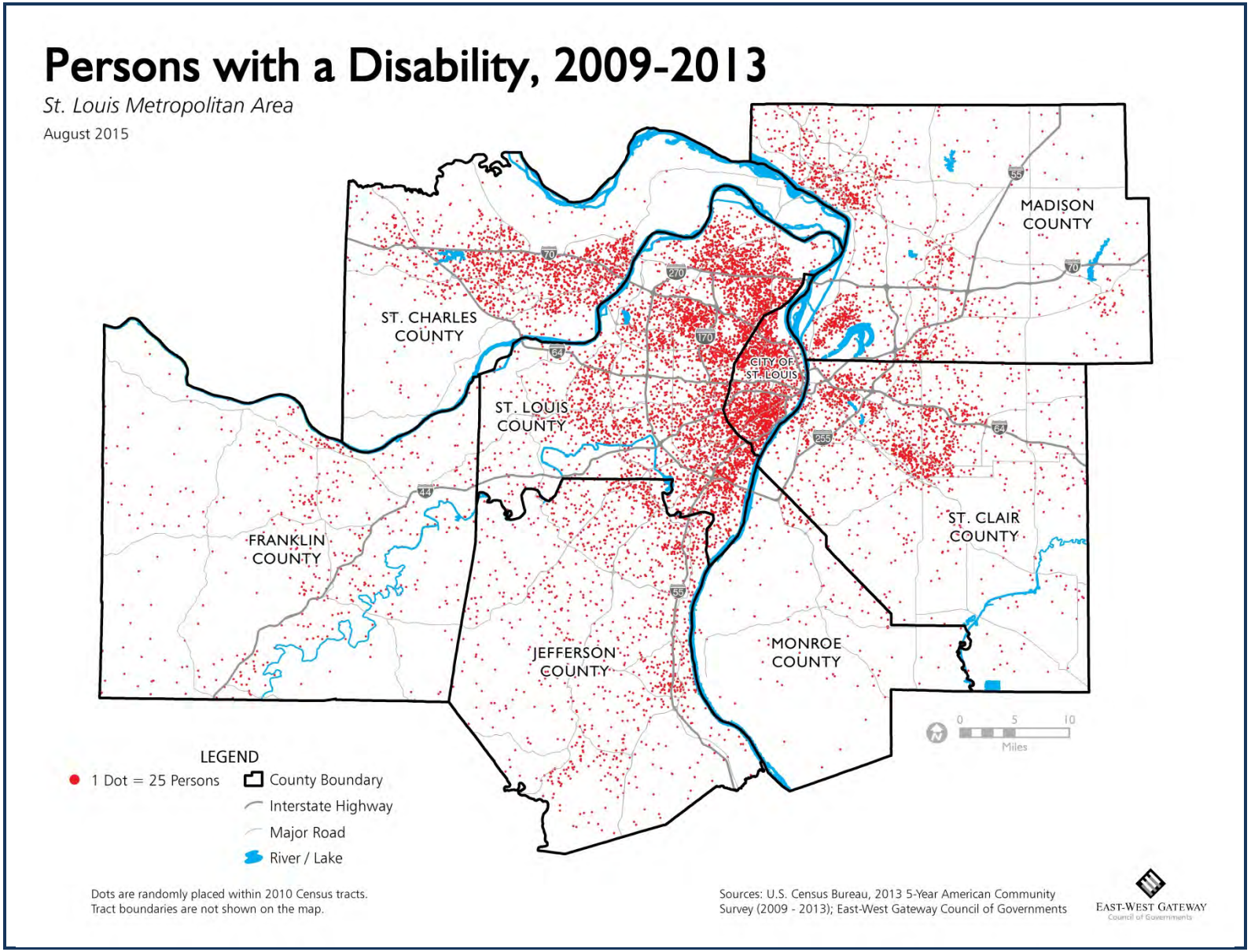

Elderly Persons
St. Charles County, Missouri
August 2015
Mississippi River
Portage Des Sioux
West Alton
Flint Hill
St Paul
Foristell
Wentzville
Josephville
Lake Saint Louis
O'Fallon
St Charles
St Peters
Dardenne Prairie
Cottleville
New Melle
Weldon Spring
Weldon Spring Heights
Missouri River
Augusta
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

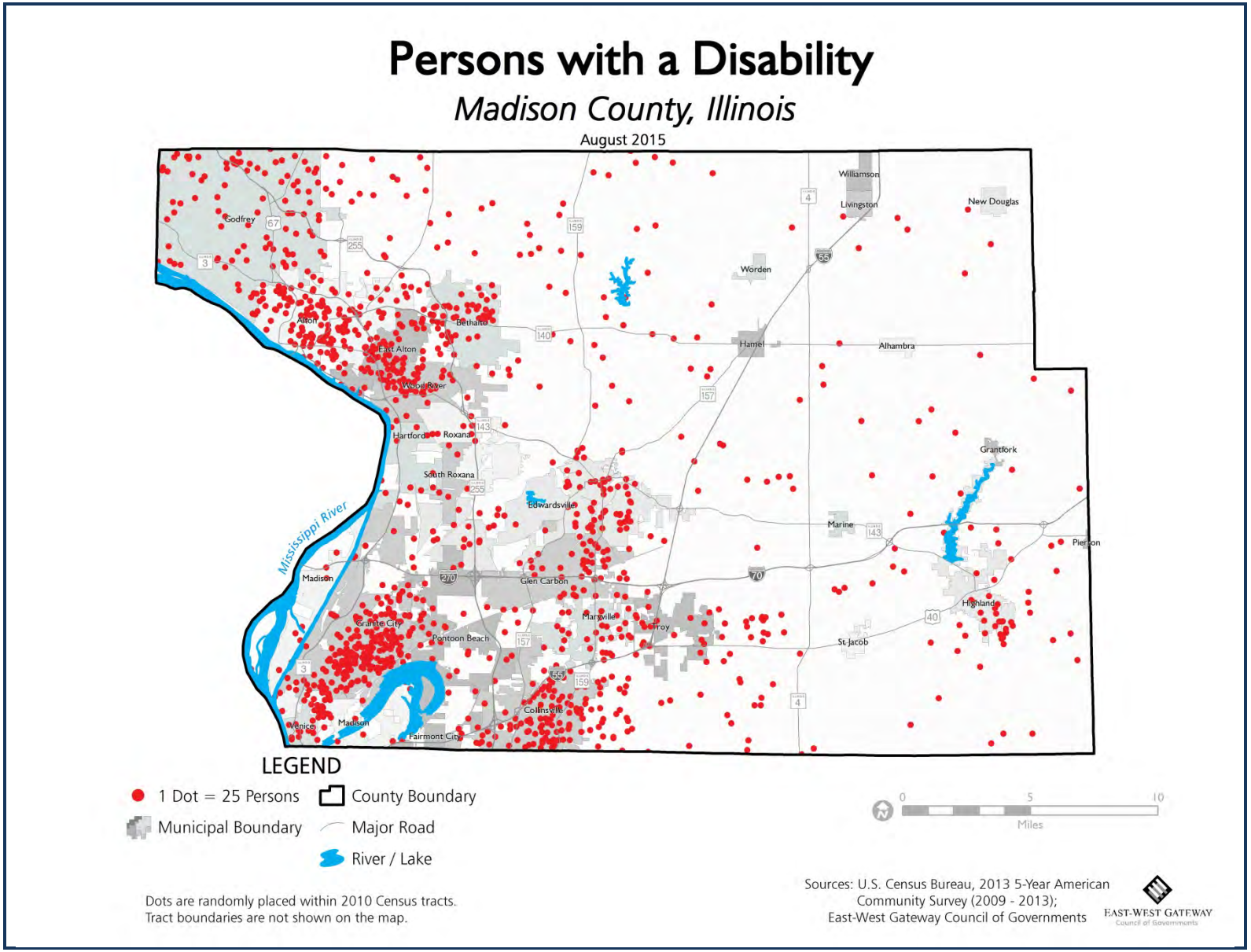

Elderly Persons
St. Louis County, Missouri
August 2015
Missouri River
Mississippi River
Hazelwood
Florissant
Black Jack
Bridgeton
Calverton Park
Bellefontaine Neighbors
Dellwood
Berkeley
Ferguson
Moline Acres
Riverview
Kinloch
Jennings
Champ
St. Ann
Maryland Heights
St. John
Normandy
Northwoods
Overland
Pagedale
Wellston
Olivette
University City
Chesterfield
Creve Coeur
Westwood
Clayton
Ladue
Richmond Heights
Town & Country
Frontenac
Clarkson Valley
Brentwood
Maplewood
Huntleigh
Rock Hill
Webster Groves
Des Peres
Glendale
Ellisville
Ballwin
Shrewsbury
Wildwood
Kirkwood
Oakland
Manchester
Marlborough
Twin Oaks
Crestwood
Valley Park
Wilbur Park
Grantwood Village
Bella Villa
Lakeshire
Fenton
Sunset Hills
Green Park
Eureka
Pacific
LEGEND
1 Dot = 50 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census block groups.
Block group boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

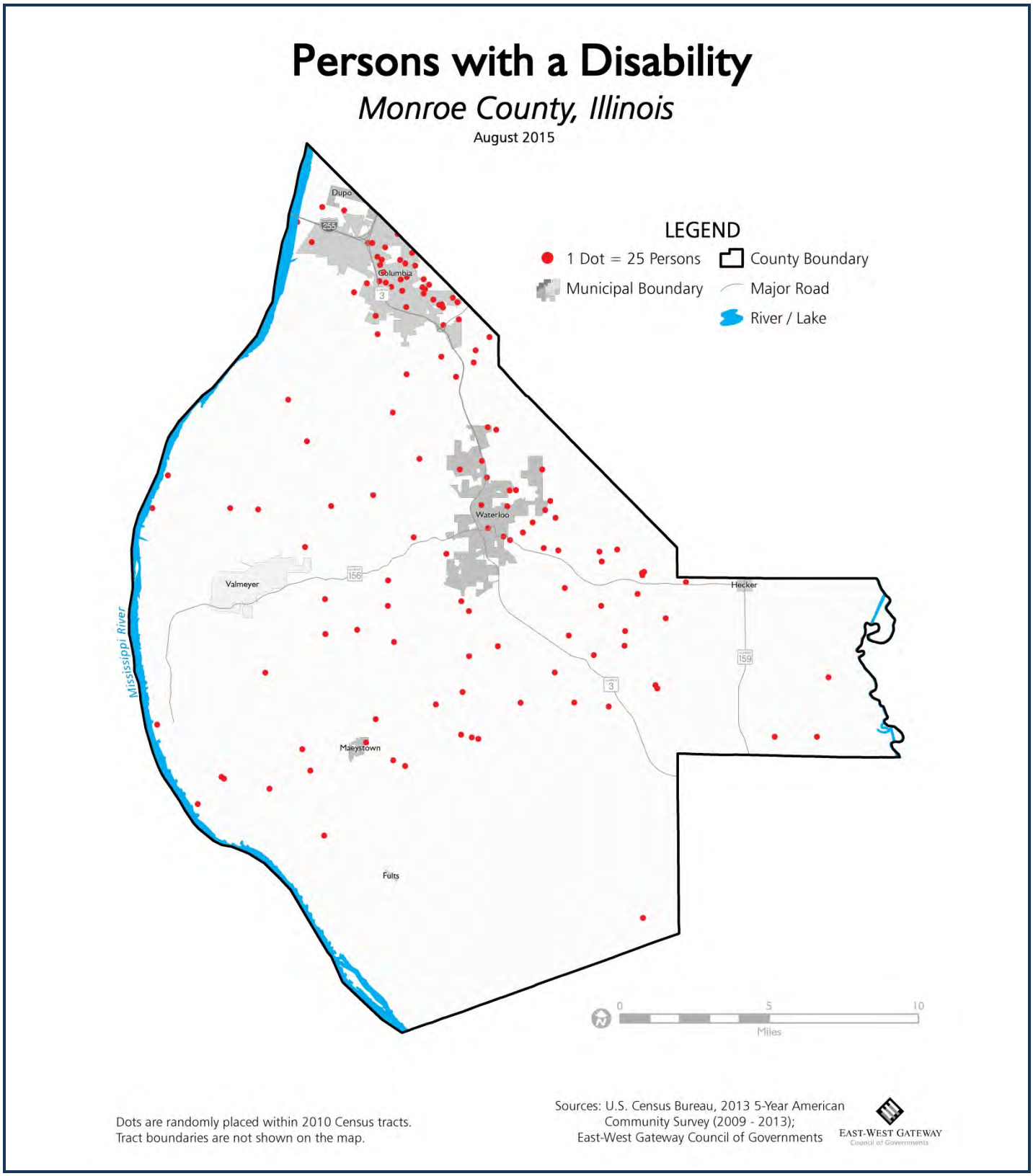
*[This Page Intentionally Left Blank]*

## Persons with a Disability
## Region-Level & County-Level Maps

*[This Page Intentionally Left Blank]*


Persons with a Disability, 2009-2013
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
ST. CLAIR COUNTY
JEFFERSON COUNTY
MONROE COUNTY
0 5 10
Miles
LEGEND
1 Dot = 25 Persons
County Boundary
Interstate Highway
Major Road
River / Lake
Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

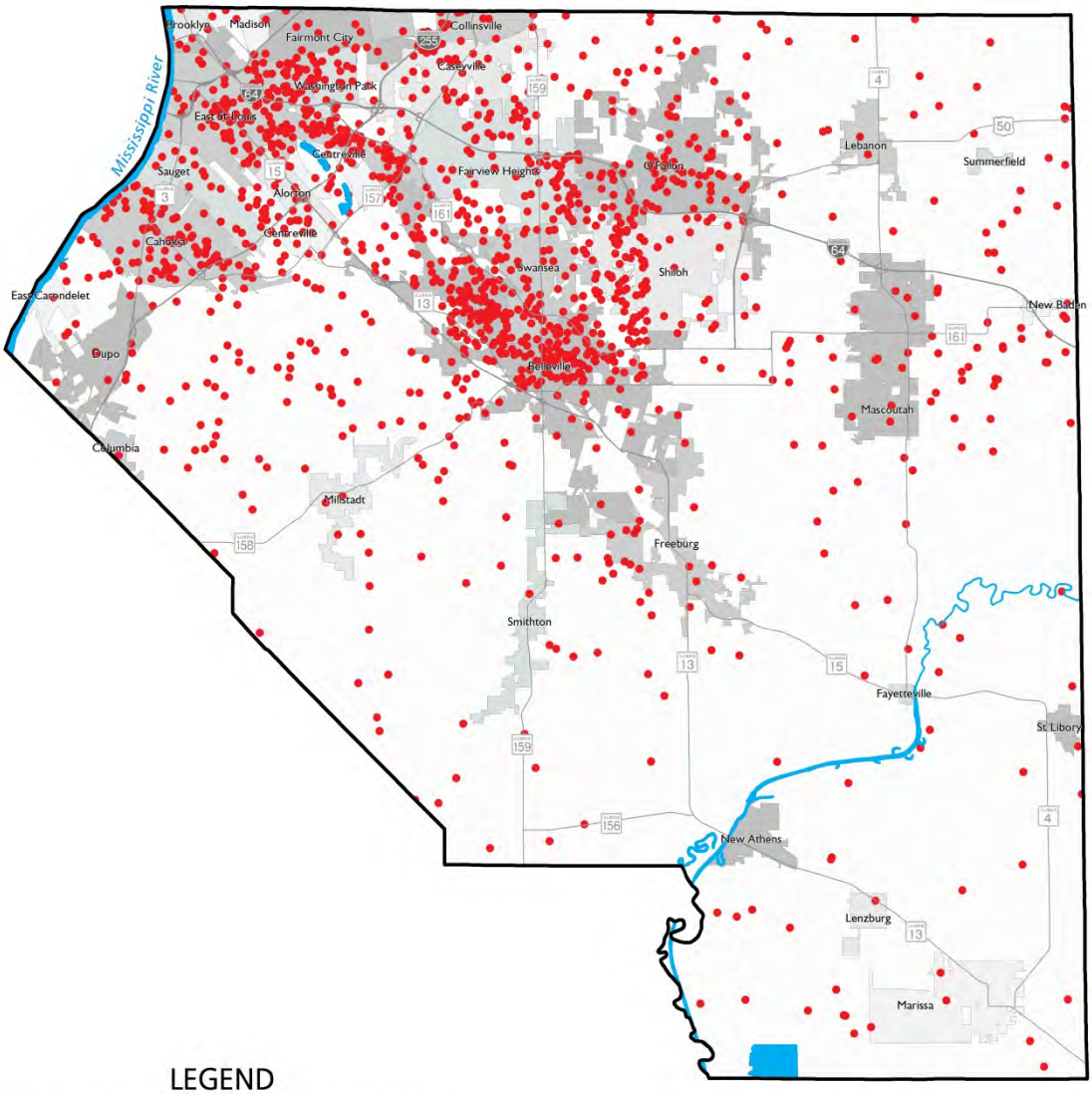

Persons with a Disability
Madison County, Illinois
August 2015
Godfrey
Alton
East Alton
Bethalto
Wood River
Hartford
Roxana
South Roxana
Edwardsville
Mississippi River
Madison
Granite City
Pontoon Beach
Glen Carbon
Maryville
Troy
Collinsville
Venice
Madison
Fairmont City
Worden
Hamel
Alhambra
Williamson
Livingston
New Douglas
Grantfork
Marine
Pierron
Highland
St Jacob
LEGEND
1 Dot = 25 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


Persons with a Disability
Monroe County, Illinois
August 2015
LEGEND
1 Dot = 25 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
Dupo
Columbia
Waterloo
Valmeyer
Hecker
Maeystown
Fults
Mississippi River
0
5
10
Miles
Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

# Persons with a Disability

*St. Clair County, Illinois*

August 2015




## LEGEND

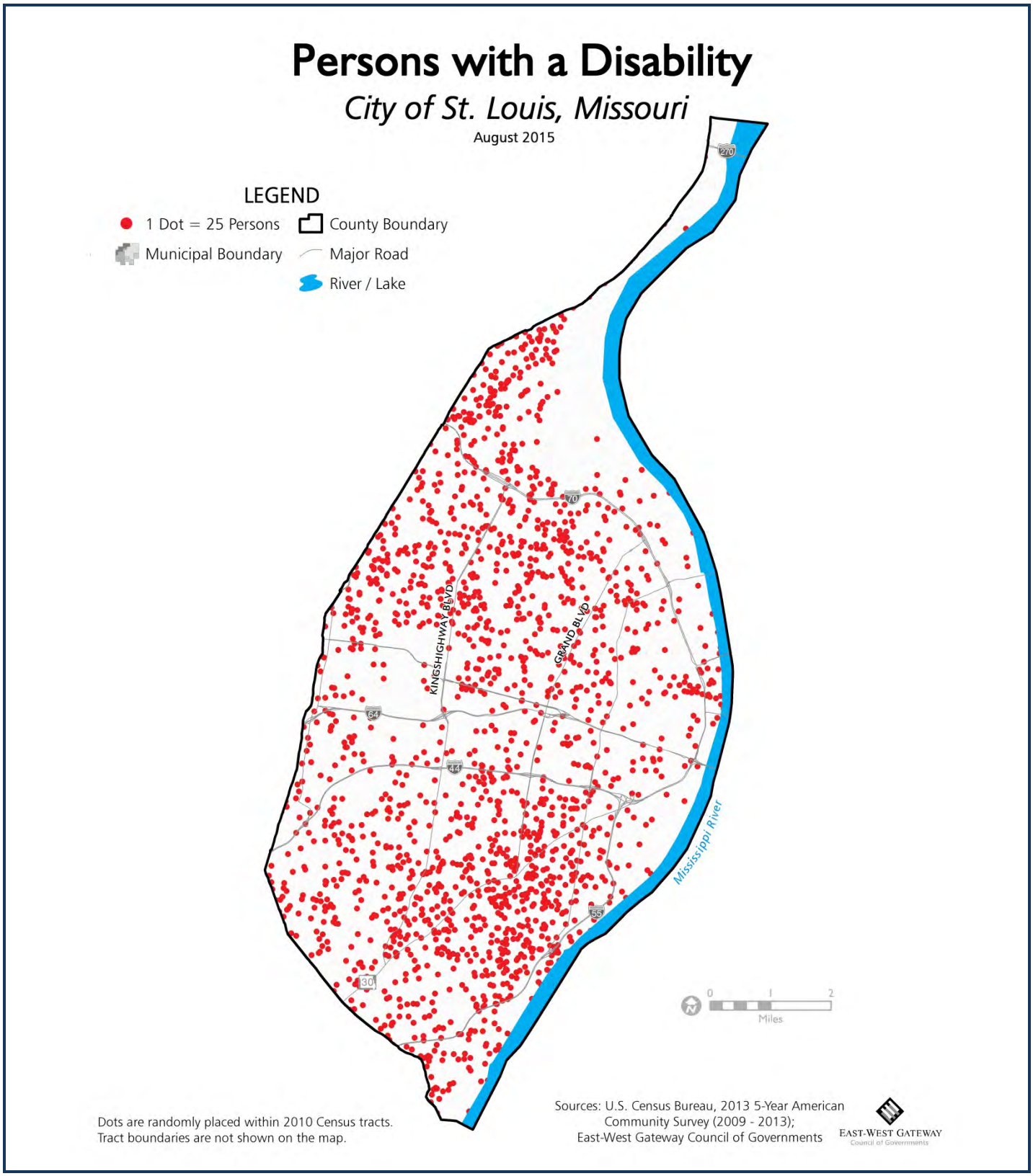
- 1 Dot = 25 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments

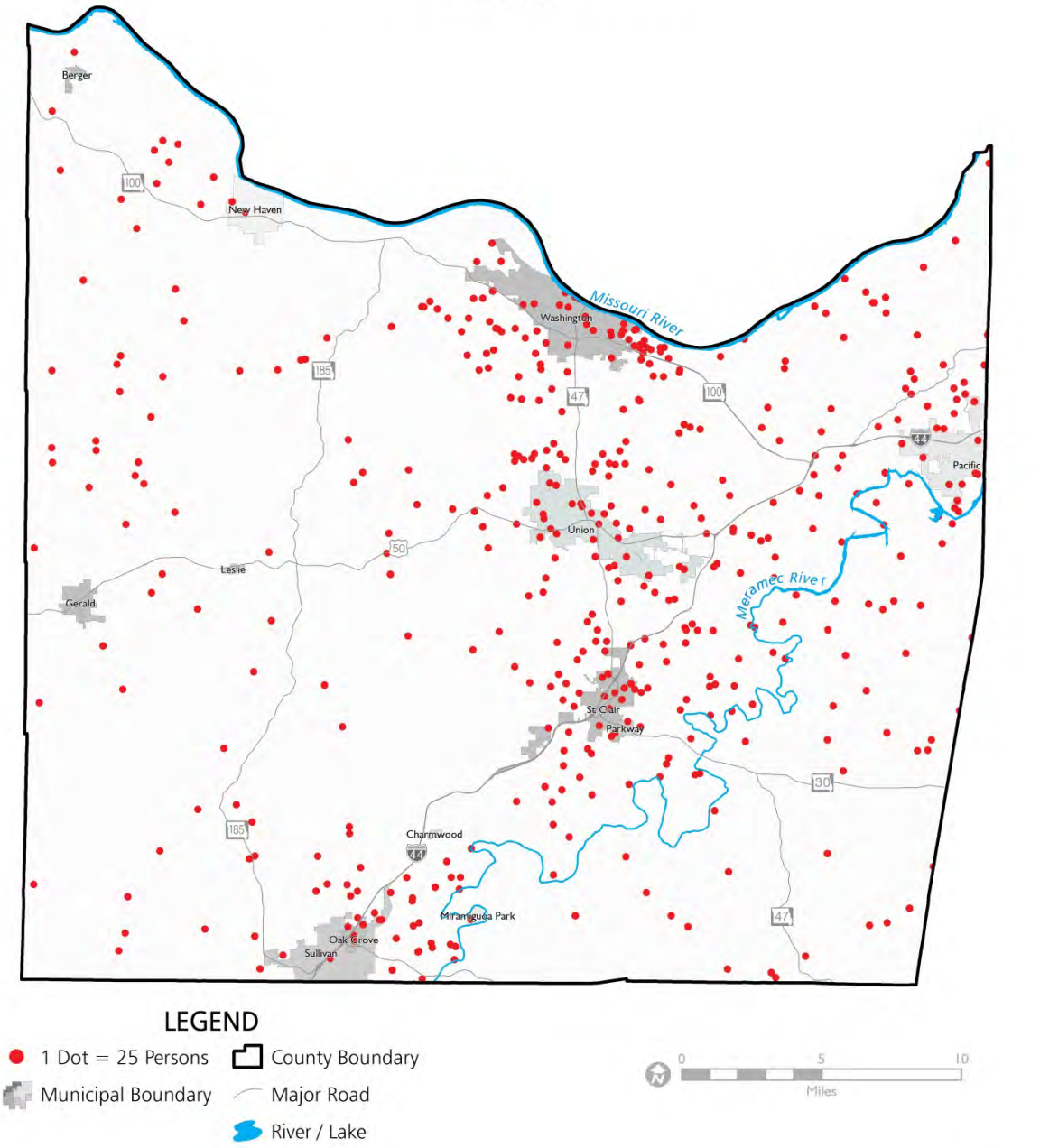
## Appendix 8: Maps, Persons with a Disability, County-Level



# Persons with a Disability

*Franklin County, Missouri*

August 2015




LEGEND

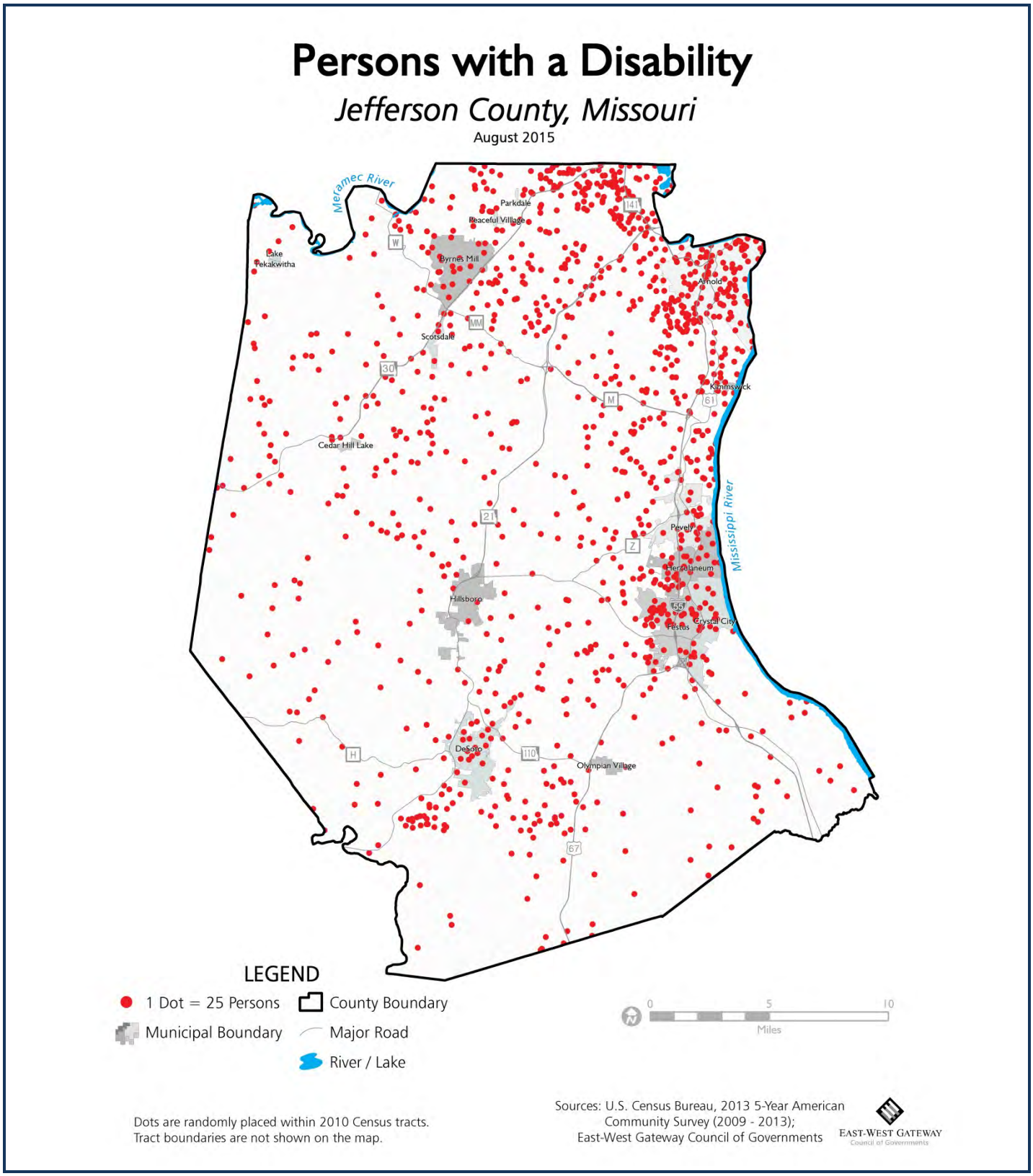
- 1 Dot = 25 Persons
- Municipal Boundary
- County Boundary
- Major Road
- River / Lake

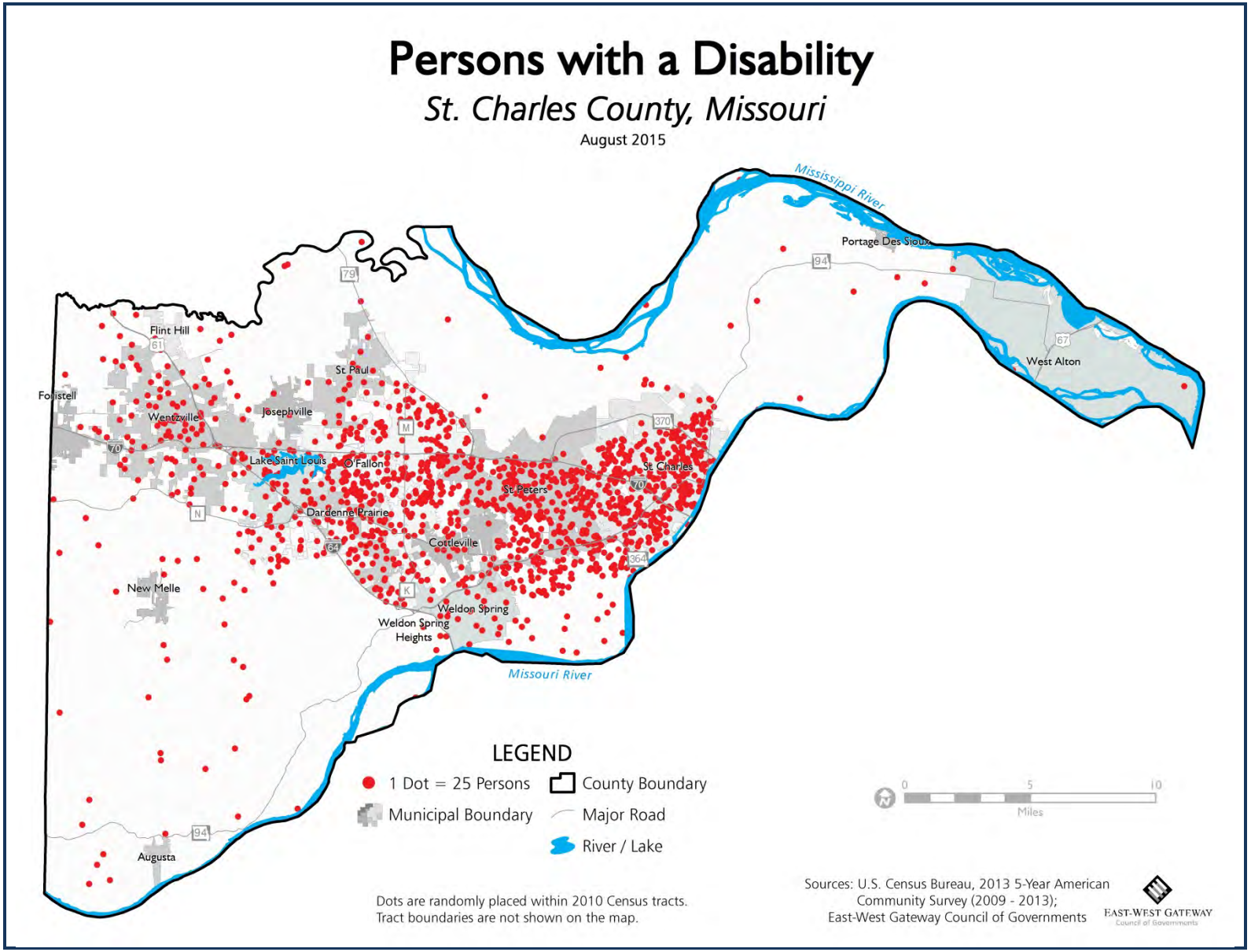
0 5 10 Miles

Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.

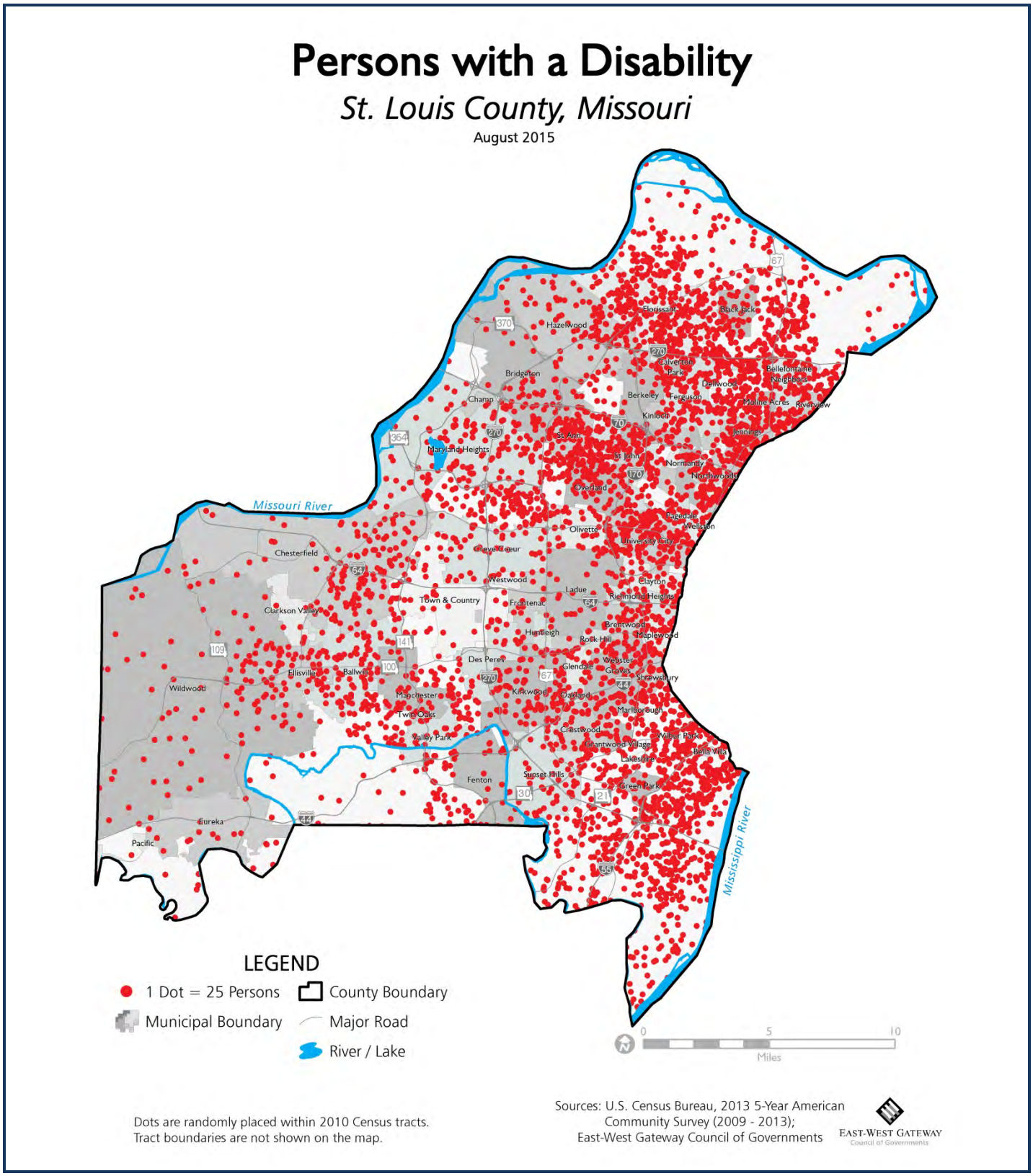
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments


Persons with a Disability
Jefferson County, Missouri
August 2015
Meramec River
Mississippi River
Parkdale
Peaceful Village
Lake Tekakwitha
Byrnes Mill
Arnold
Scotsdale
Kimmswick
Cedar Hill Lake
Pevely
Herculaneum
Hillsboro
Crystal City
Festus
DeSoto
Olympian Village
141
W
MM
30
M
61
21
Z
55
H
110
67
LEGEND
1 Dot = 25 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


Persons with a Disability
St. Charles County, Missouri
August 2015
Mississippi River
Portage Des Sioux
West Alton
Flint Hill
St Paul
Foristell
Wentzville
Josephville
Lake Saint Louis
O'Fallon
St Charles
St Peters
Dardenne Prairie
Cottleville
New Melle
Weldon Spring
Weldon Spring Heights
Missouri River
Augusta
LEGEND
1 Dot = 25 Persons
County Boundary
Municipal Boundary
Major Road
River / Lake
0
5
10
Miles
Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2013 5-Year American Community Survey (2009 - 2013);
East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

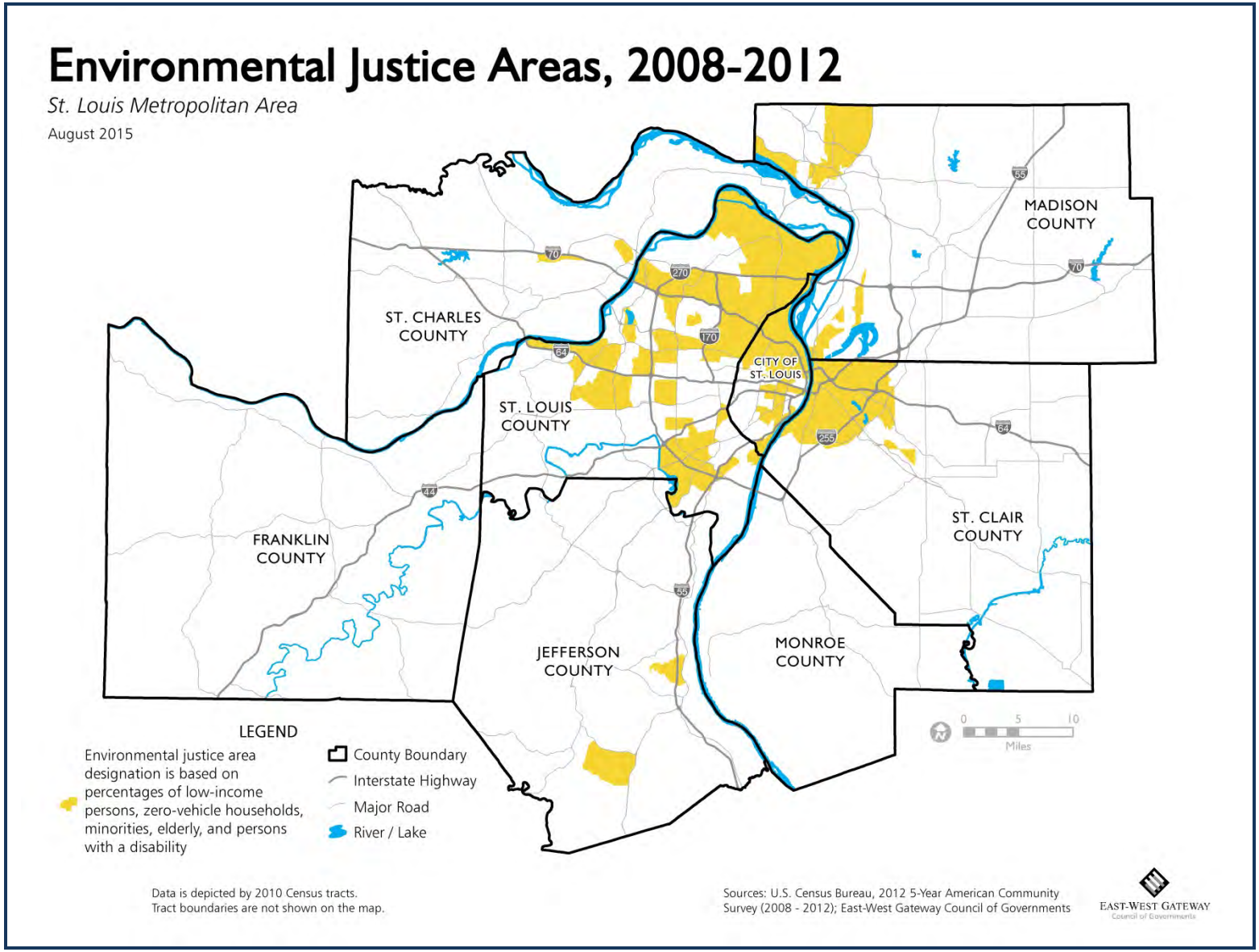
## Appendix 8: Maps, Persons with a Disability, County-Level

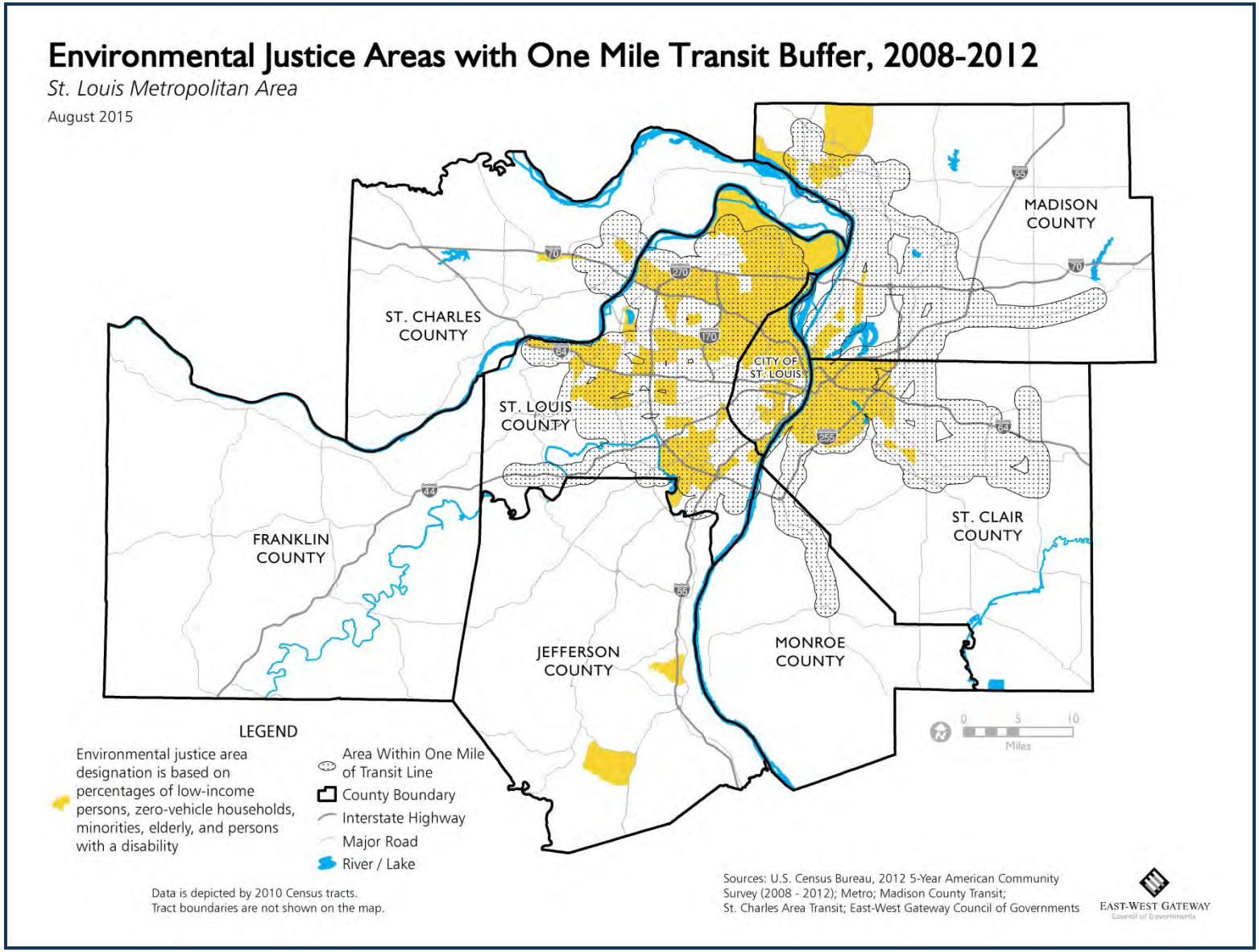


*[This Page Intentionally Left Blank]*

## Environmental Justice Areas
## Maps

*[This Page Intentionally Left Blank]*


Environmental Justice Areas, 2008-2012
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
JEFFERSON COUNTY
MONROE COUNTY
ST. CLAIR COUNTY
0 5 10
Miles
LEGEND
Environmental justice area designation is based on percentages of low-income persons, zero-vehicle households, minorities, elderly, and persons with a disability
County Boundary
Interstate Highway
Major Road
River / Lake
Data is depicted by 2010 Census tracts.
Tract boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2012 5-Year American Community Survey (2008 - 2012); East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments


Environmental Justice Areas with One Mile Transit Buffer, 2008-2012
St. Louis Metropolitan Area
August 2015
MADISON COUNTY
ST. CHARLES COUNTY
ST. LOUIS COUNTY
CITY OF ST. LOUIS
FRANKLIN COUNTY
JEFFERSON COUNTY
MONROE COUNTY
ST. CLAIR COUNTY
0 5 10
Miles
LEGEND
Environmental justice area designation is based on percentages of low-income persons, zero-vehicle households, minorities, elderly, and persons with a disability
Area Within One Mile of Transit Line
County Boundary
Interstate Highway
Major Road
River / Lake
Data is depicted by 2010 Census tracts.
Tract boundaries are not shown on the map.
Sources: U.S. Census Bureau, 2012 5-Year American Community Survey (2008 - 2012); Metro; Madison County Transit; St. Charles Area Transit; East-West Gateway Council of Governments
EAST-WEST GATEWAY
Council of Governments

*[This Page Intentionally Left Blank]*

*[This Page Intentionally Left Blank]*

EAST-WEST GATEWAY
**Council of Governments**

Creating Solutions Across Jurisdictional Boundaries

**1 S. Memorial Drive, Suite 1600**
**St. Louis, MO 63102**

**(314) 421-4220 | (618) 274-2750**

www.ewgateway.org