JANUARY 2016

Title VI
PROGRAM

EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

Board Approved 1/27/2016

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Title VI Nondiscrimination Complaint Form

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

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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:

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

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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

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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.

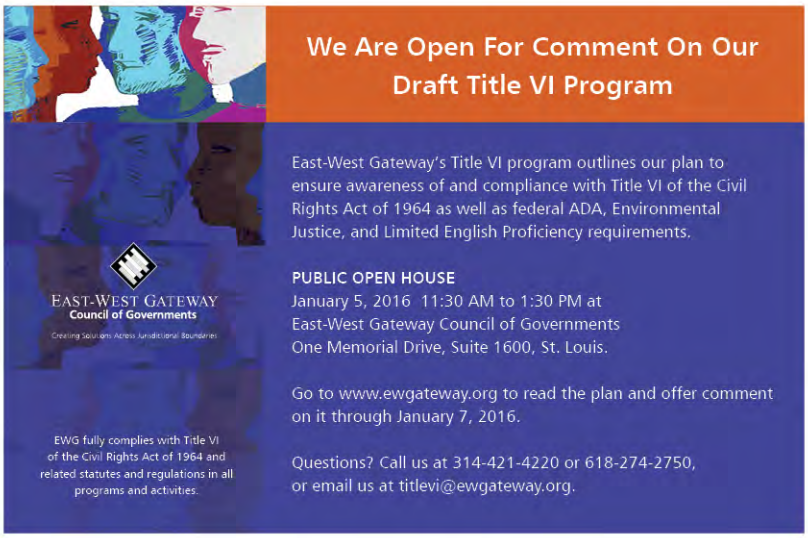
I. Introduction, Public Outreach & Background

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.

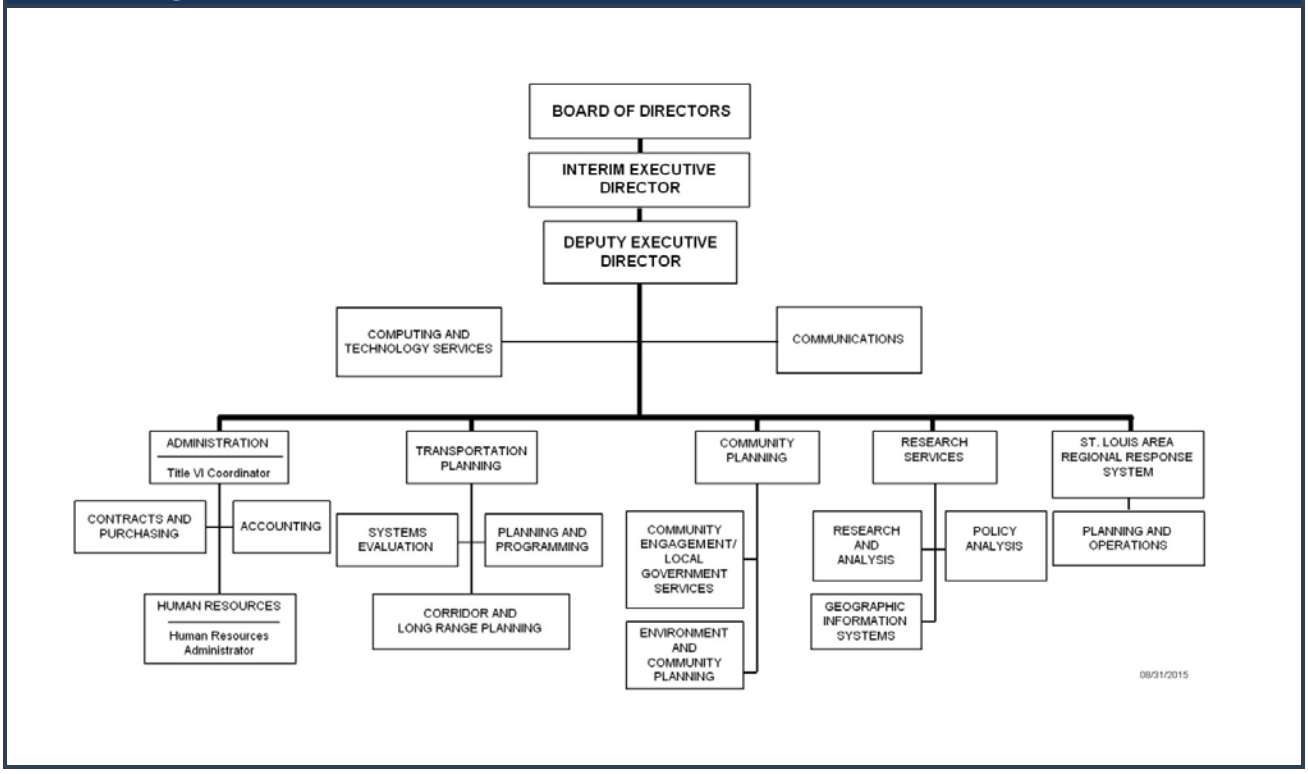
A current list of committee members can be found on-line at: www.ewgateway.org/AboutUs/Committees/committees.htm and www.stl-starrs.org/AboutUs/BOD/bod.htm. A description of each committee and its membership is also provided in Appendix 6.

[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) Focus groups (8 – 10) Surveys On-line comments
Connected2045 (Long-Range Transportation Plan)	Public workshops (4) Open houses (2) Stakeholder meetings (2) On-line chat (2) On-line comments
Great Streets	Open houses / public meetings (10) Focus groups (2)
OneSTL (Regional Plan for Sustainable Development)	Public meetings (32) 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) On-line chat (1) 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) 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.

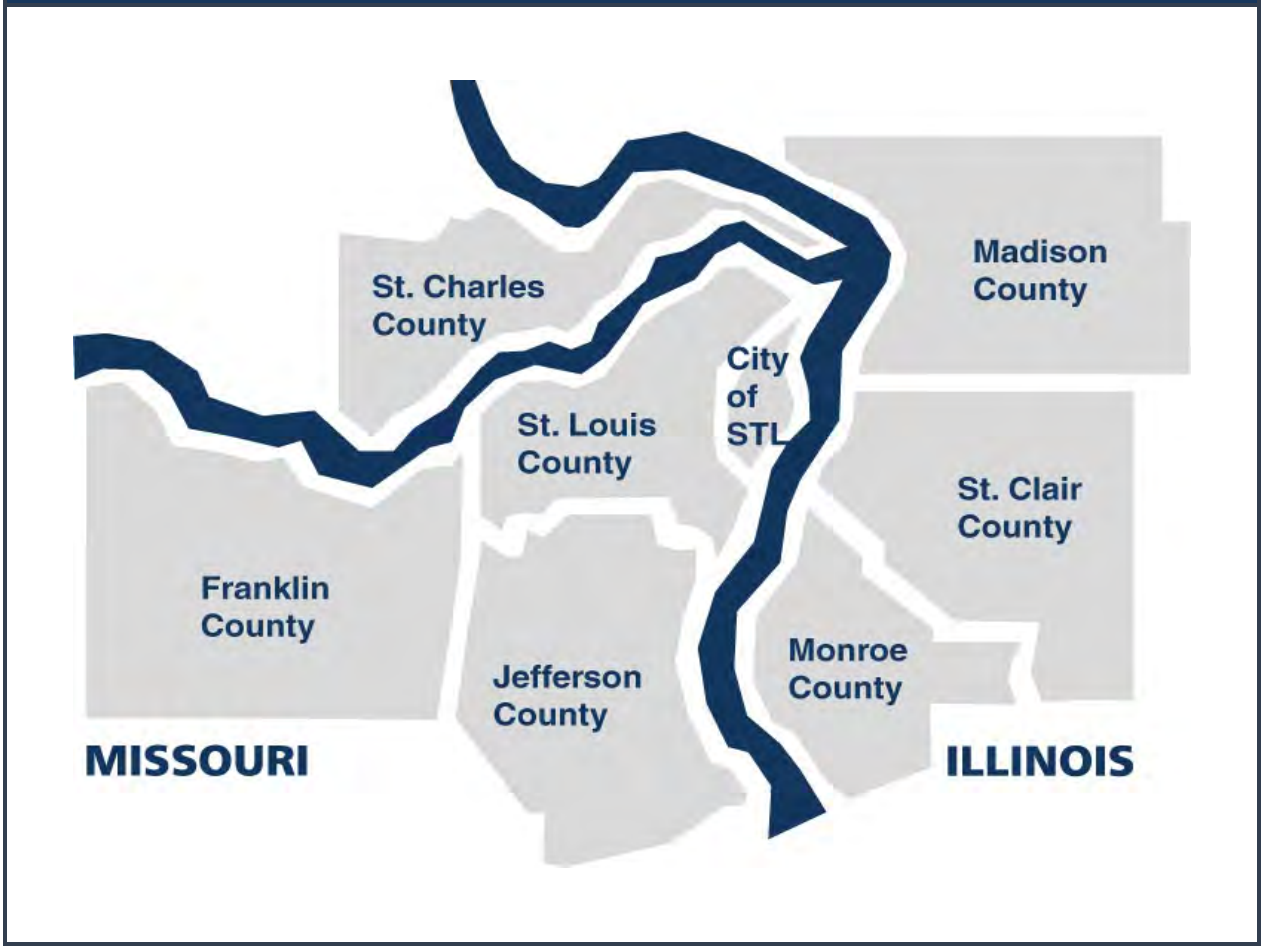
Demographic Characteristic	Data Level
Low-income (poverty)	Census block group
Zero-Vehicle Households (mobility needs)	Census block group
Minorities	Census block group
LEP Persons	Census block group
Elderly	Census block group
Persons with a Disability	Census tract level (*data not available at block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



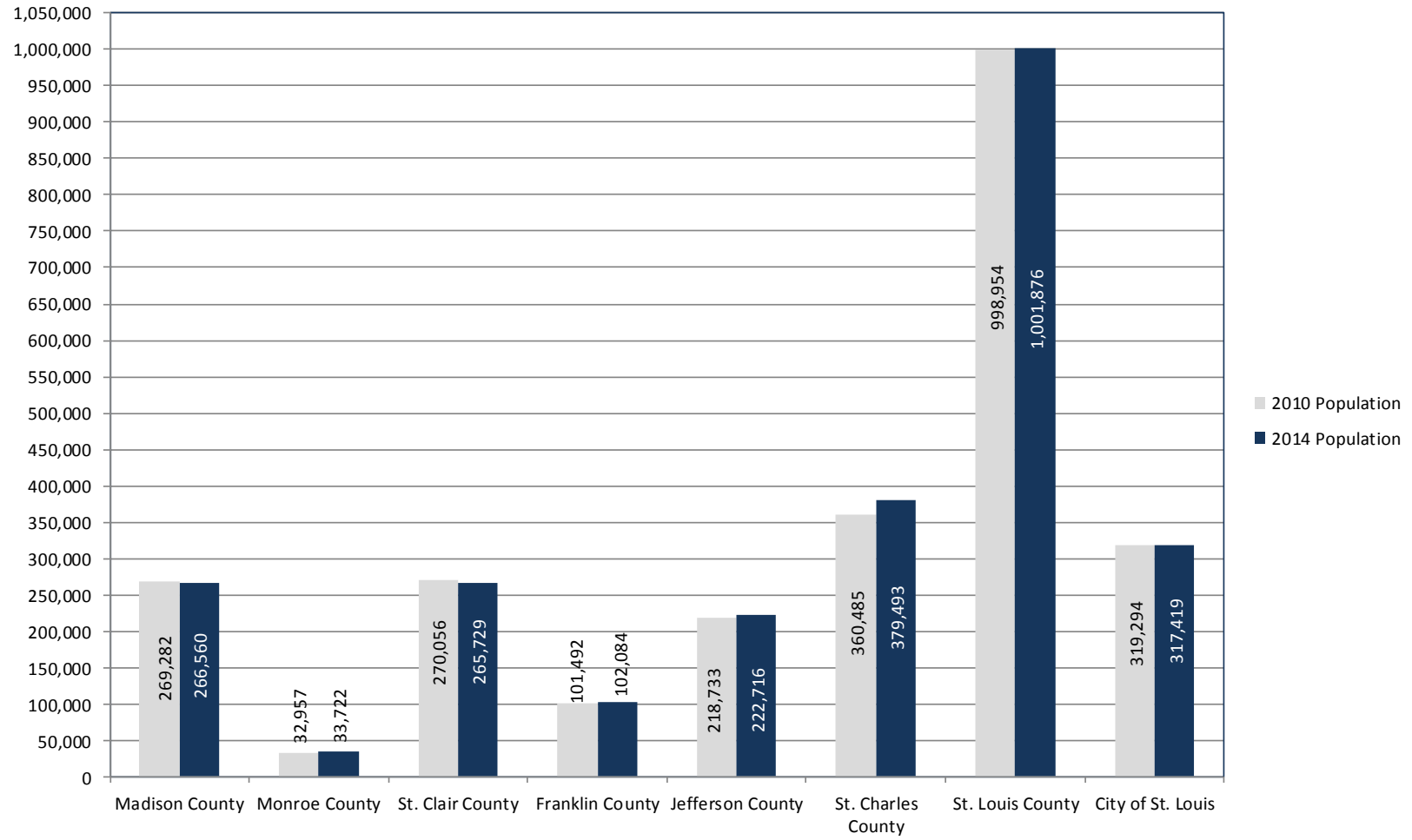
IV. Demographic Profile of the St. Louis Region

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

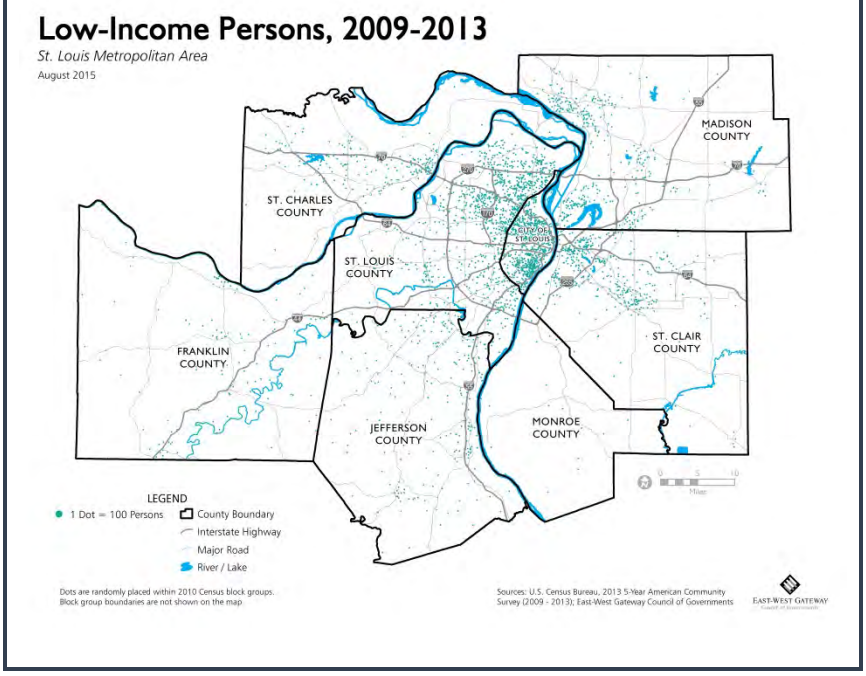


Figure 3. St. Louis Region, Zero-Vehicle Households, 2009 – 2013

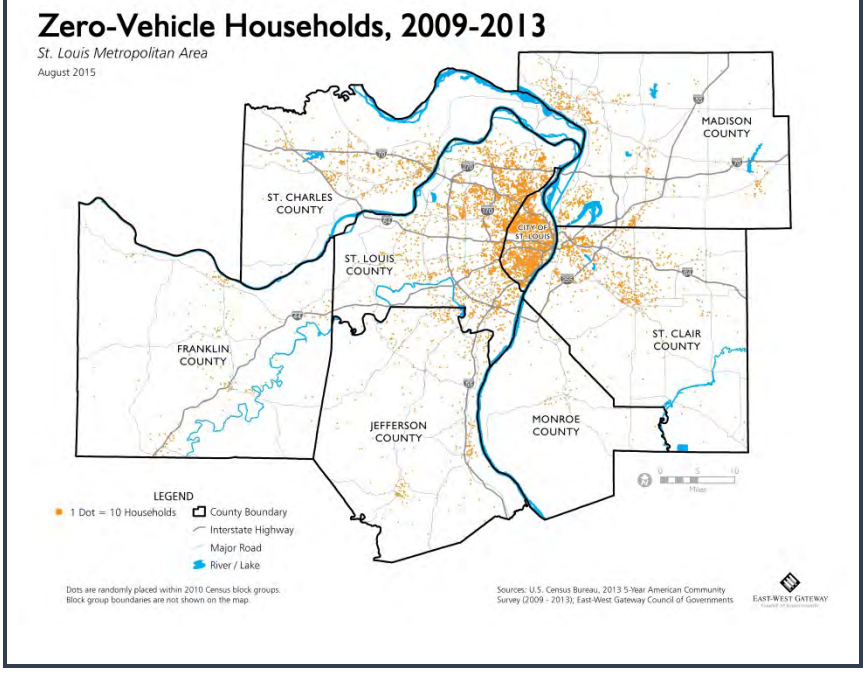
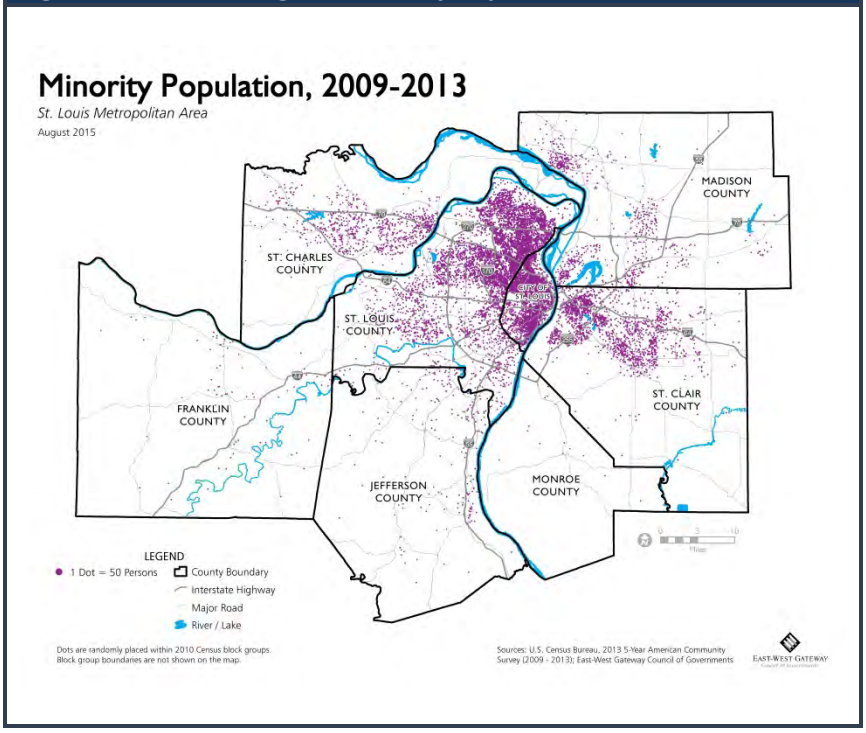


Figure 4. St. Louis Region, Minority Population, 2009 – 2013



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

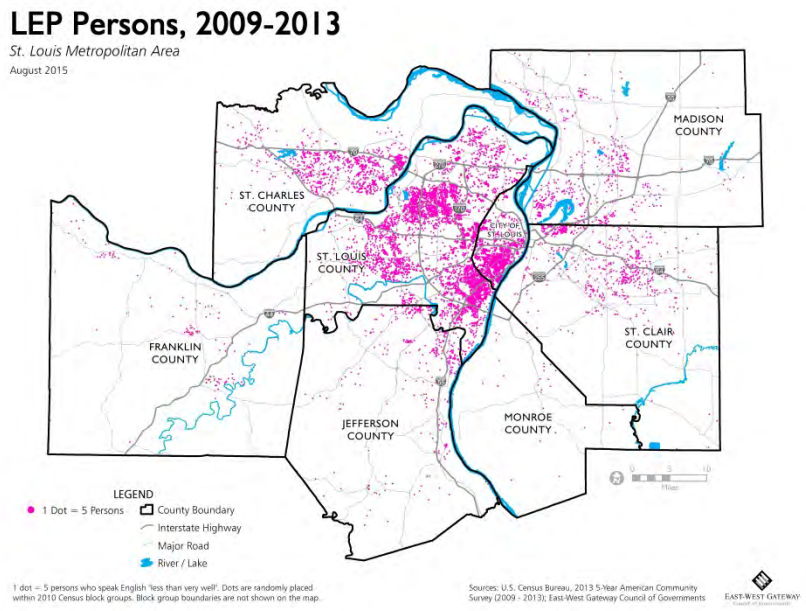


Figure 6. St. Louis Region, Elderly Persons, 2009 – 2013

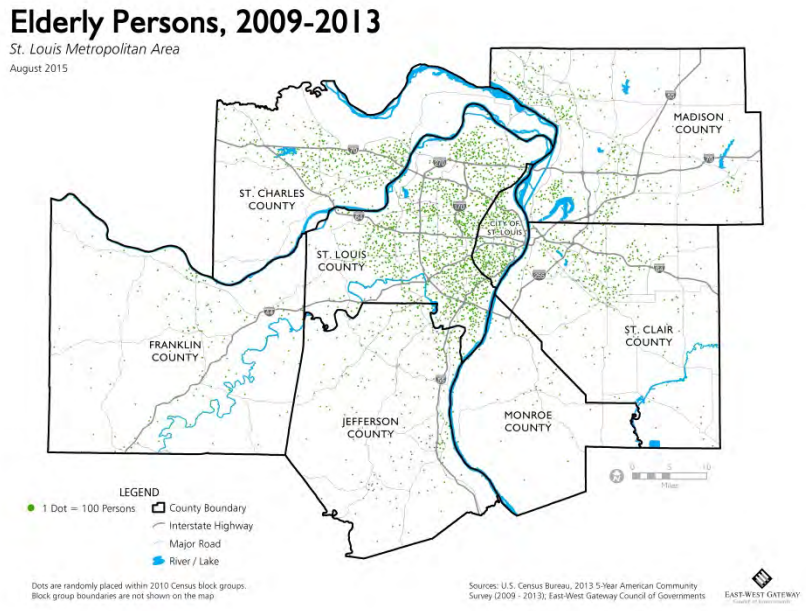
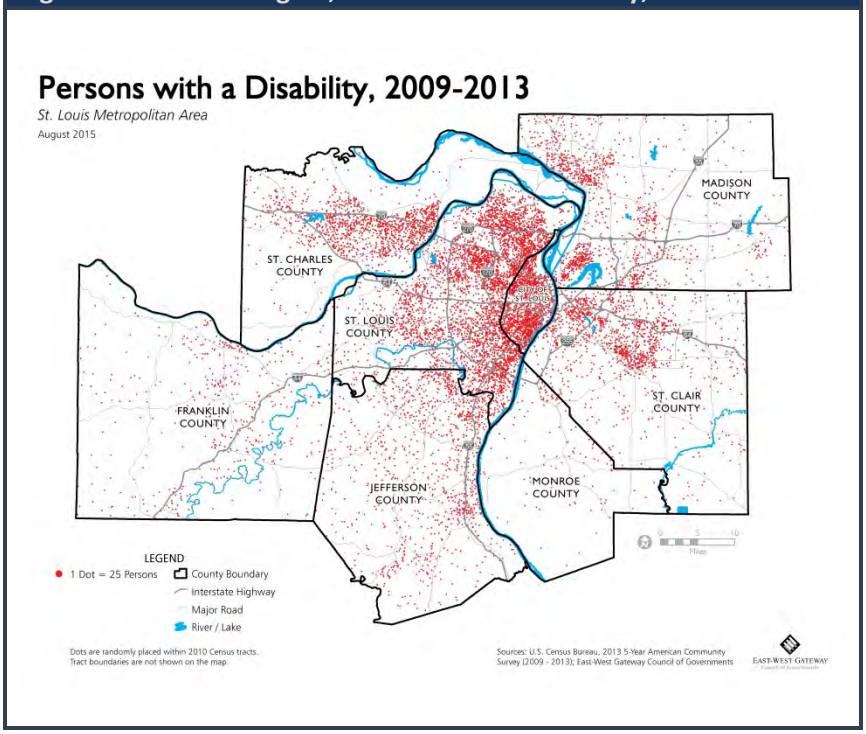


Figure 7. St. Louis Region, Persons with a Disability, 2009 – 2013



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

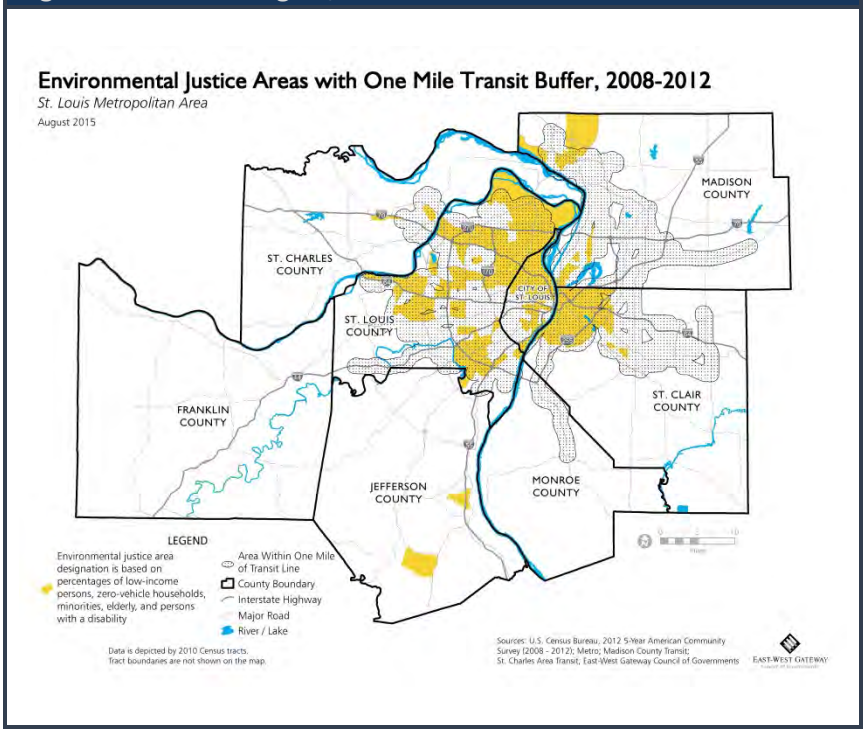
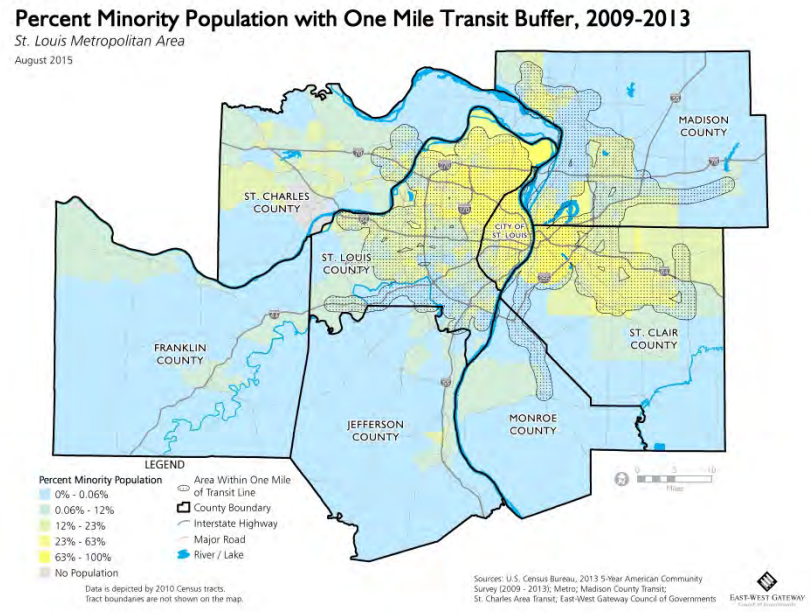


Figure 9. St. Louis Region, Minorities & Public Transit



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. • 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. • 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. • 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. • 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.

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