May 2019

Title VI
PROGRAM

EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

Board Approved 6/27/2018, Updated 5/30/2019

East-West Gateway Council of Governments (EWG) 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, 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 EWG 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 EWG. Any such complaint must be in writing and filed with EWG'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 EWG's website at www.ewgateway.org/titlevi or call (314) 421-4220 or (618) 274-2750.

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Table of Contents

Section		Page
Executive Summary		ii
Acronyms		*iii*
I.	Introduction, Public Outreach & Background	1
II.	Title VI Policy, Processes & Procedures	8
III.	Public Involvement & Language Assistance	11
IV.	Demographic Profile	14
V.	Mobility Needs & Transportation Planning	28
VI.	Distribution of Public Transportation Funding	36
VII.	Pass-Through Funding & Subrecipient Assistance	46

Appendices

1 Title VI Assurance
2 Title VI Notice to the Public
3 Title VI Complaint Procedures
4 Public Involvement Plan – *updated 5/30/2019*
5 LEP Plan
6 Committees
7 Board Approval Documents
8 Maps[1]

Form[2]

Title VI Nondiscrimination Complaint Form

[1] Full-size PDF versions of the maps are available online at: www.ewgateway.org/titlevi.

[2] The fillable form is available separately online 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 (EWG) is the St. Louis metropolitan area's federally designated metropolitan planning organization (MPO) and, as such, EWG is a federal-aid recipient. EWG's Title VI Program reflects, EWG's commitment to nondiscrimination in all of its programs and activities. EWG developed this 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 EWG's data analysis, this Title VI Program provides the strategies and processes that EWG uses to ensure that its programs and activities are implemented in a nondiscriminatory manner. Specifically, it includes:

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

Questions regarding this 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

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Acronyms

BOD	Board of Directors
BSD	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
EWG	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
TIP	Transportation Improvement Program
UPWP	Unified Planning Work Program

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I. Introduction, Public Outreach & Background

A. Introduction

East-West Gateway Council of Governments (EWG) 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. EWG 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 EWG. In order to accomplish this goal, EWG 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 EWG'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.[4] 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 EWG's programs or activities. Finally, this Title VI Program outlines the strategies and tools that EWG 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, EWG conducted outreach to the public to obtain feedback. The draft Title VI Program was open for public comment between February 26, 2018 and March 26, 2018. EWG held two open houses to take comments and answer questions.

EWG 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 EWG's Local Government Briefings (LGB) newsletter
- Providing information through EWG'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 EWG'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 EWG's service area. EWG's LGB is an electronic newsletter that is distributed weekly and has approximately 1,650 subscribers.

The notice regarding the draft Title VI Program was included in each of the March 1 through March 22, 2018 editions of the LGB. The public was notified when each LGB was available through EWG's Twitter and Facebook pages.

[4] 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

EWG also put information about the draft Title VI Program on its website. The homepage on EWG's website included an announcement about the public comment period and directed visitors to the information / feedback page that EWG 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, EWG staff created an announcement card that requested feedback on the draft Title VI Program and provides information about the open houses. EWG 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.

EWG distributed the draft Title VI Program to several specific groups along with a request for feedback. These groups will include: EWG's Executive Advisory Committee, EWG'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.

EWG held two open houses to present the draft Title VI Program to the public. The open houses were held on March 12, 2018 at the St. Louis Public Library, Schlafly Branch in the city of St. Louis, Missouri and on March 13, 2018 at the Illinois Department of Transportation's office in Collinsville, Illinois. Both open houses were conducted from 5:00 p.m. to 7:00 p.m. EWG 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). EWG staff was available to provide information about the program and answer questions. Following the close of the comment period and completion of FTA's review, the final Title VI Program was presented to EWG's Board of Directors for approval.

C. Background

1. *East-West Gateway Council of Governments*

(a) History & Background

EWG was formed in 1965 as a regional council of governments serving the eight county, bi-state St. Louis region (the Region). EWG's service area spans approximately 4,500 square miles and includes the following counties[5]:

Missouri Counties	Illinois Counties
City of St. Louis[6]	Madison
Franklin	Monroe
Jefferson	St. Clair
St. Charles	
St. Louis	

EWG'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 EWG. 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 EWG's Board of Directors (the BOD).

EWG is also the federally designated MPO for the Region. As the MPO, EWG 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.

EWG'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.

[5] A demographic profile of the Region is provided in Section IV.
[6] The city of St. Louis, Missouri is an independent city not within a county; however, for EWG'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

EWG 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 – Bi-State Development (BSD). The BOD oversees EWG's planning efforts and selects / approves the initiatives and projects that will receive federal funds from EWG'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 EWG's long-range transportation plan (currently, *Connected2045)*.

The BOD's membership is comprised of both voting and non-voting members, as dictated by EWG'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.[7] EWG encourages BOD members to select appointees that best reflect the diversity of the Region.

A list of current BOD members can be found on EWG's website at: www.ewgateway.org/about-us/who-we-are/board-of-directors/.

(ii) Committees

In addition to EWG'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. EWG 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.).

EWG does not select the membership for the EAC or the four subject-matter committees; however, EWG 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 online at: www.ewgateway.org/about-us/who-we-are/committees/ and www.stl-starrs.org/AboutUs/BOD/bod.htm. A description of each committee and its membership is also provided in Appendix 6.

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

(c) Staff Responsibilities

EWG has over 50 staff persons who are supervised by an Executive Director. EWG's staff includes many types of professionals including, but not limited to: planners, accountants, and engineers. An organizational chart that reflects EWG's departments is provided below.

EWG Organization Chart

Each EWG 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 EWG 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 EWG have policies and procedures in place to ensure that EWG'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 EWG'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) and environmental justice (EJ). The statutes, regulations, executive orders, and guidance described below govern EWG'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.
- ***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.
- ***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.
- ***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

[8] Read the full text at: www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20938.pdf.

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 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 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]

[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.
[12] A full description can be found at: www.fhwa.dot.gov/environment/environmental_justice/ej_at_dot/orders/order_56102a/index.cfm.
[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, EWG 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 EWG'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) and other related nondiscrimination statutes and regulations, EWG assures that 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 under any EWG program or activity. EWG 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. EWG includes nondiscrimination language in all written agreements with its subrecipients, contractors, and consultants and will monitor programs and activities for compliance. EWG's Title VI Coordinator is responsible for initiating and monitoring Title VI 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, EWG 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. EWG ensures this compliance through the actions described below.

1. Title VI Notification

EWG has developed a Title VI "Notice to the Public" in both a full text and an abbreviated form. EWG inserts its notice in all significant publications that are distributed to the public. EWG 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

EWG has developed a series of brochures and cards that inform people about their rights under Title VI, and related nondiscrimination statutes. EWG makes these brochures available in print at public meetings and in the agency's lobby. These brochures can be found on EWG's website at: www.ewgateway.org/titlevi.

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

**Document available in English and Spanish*

D. Complaint Procedures

EWG 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 EWG in relation to any program or activity administered by EWG or its subrecipients, consultants, or contractors. EWG's complaint procedures apply to matters related to Title VI and the regulations / rules that govern providing meaningful access to LEP persons. A copy of the Title VI Complaint Procedures is provided in Appendix 3. EWG also has a Title VI Nondiscrimination Complaint Form available in fillable PDF and printed format. The Title VI Complaint Procedures and the Title VI Nondiscrimination Complaint form are available in English and Spanish on EWG's website at: www.ewgateway.org/titlevi.

E. Complaints, Investigations & Lawsuits

EWG's Title VI Coordinator maintains a list of complaints, investigations, and lawsuits that are filed alleging discrimination on the basis of race, color, or national origin. 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.

EWG has had no Title VI complaints, investigations, or lawsuits filed since the date that EWG's previous Title VI Program was approved (in 2015).

F. Subrecipients, Consultants & Contractors

EWG 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, EWG'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 EWG 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

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

III. Public Involvement & Language Assistance

A. Public Involvement

EWG works diligently to ensure that residents in the Region are provided an opportunity to participate in the agency's programs and activities, including EWG's planning processes. EWG'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. EWG'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, EWG schedules open houses and focus groups in coordination with these organizations in an effort to provide disadvantaged persons accessible opportunities to be involved in EWG's processes and express their needs.

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

1. Public Involvement Plan (PIP)

EWG's PIP 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 EWG decisions and encourage residents' continual involvement in EWG's planning and community building programs. *Community Connections* was developed with broad input from the community and EWG staff. The PIP includes strategies and goals that EWG uses to maximize public involvement. Goal 4 in the PIP specifically addresses how EWG will ensure Title VI compliance in its public outreach efforts.

EWG's BOD adopted an updated PIP in May 2019. A copy of the PIP is provided in Appendix 4 and can be found on EWG's website at: www.ewgateway.org/titlevi. EWG will ensure that the most current version of the PIP is included in this Title VI Program, as the PIP may be updated from time-to-time.

[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 EWG's last Title VI Program was approved (in 2015), EWG has engaged in numerous outreach efforts[16] as part of its planning processes, including:

Project	Outreach Type(s)
Great Streets	Open houses / public meetings (17)
Northside / Southside Expansion Study	Open houses (3) Stakeholder meetings (40) Community meetings / group presentations (25)
Coordinated Human Services Transportation Plan	Stakeholder meetings (2) Informational workshop (1)
Our Missouri Waters	Public workshops (12)
OneSTL (Regional Plan for Sustainable Development)	Public workshops (7) Conference (1) Staff presentations / event tabling (13) Stakeholder meetings (8)
TIP / Air Quality Conformity	Open houses (13) Public workshop (7) Online chat (2) Facebook live open house (1) Listening sessions (3) Online comments
Where We Stand, 7th Edition	Public meetings (2) Staff speaking engagements (2) Workshop (1)
FHWA / FTA Certification Review	Public meeting (1)
Other Outreach*	
Title VI	Local govt. workshop (1)
St. Louis Regional Freight District	Stakeholder meeting (1) Workshops / forums (2)
St. Louis Regional Emergency Response Resource Project	Staff presentations (3)

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

[16] The outreach efforts described above are current through January 31, 2018.

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

B. Language Assistance

EWG 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 EWG'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, EWG is responsible for ensuring that its LEP constituents have meaningful access to EWG's programs and activities. To ensure compliance, EWG 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 1.2 percent of households and 2.2 percent of persons), EWG is mindful of the LEP persons in the Region and recognizes that the concentration of LEP residents varies across EWG'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 (e.g. Monroe County). EWG is prepared to meet any language need that arises and to respond appropriately to any requests that EWG receives for language assistance. EWG is also prepared to provide oral interpretation and written translation of documents, as well as oral interpreters for public outreach events. EWG's website includes a Google Translate feature that enables LEP residents to access the agency's online information. As described in Section II, Part C #2, EWG makes Spanish-language documents available online and in printed format; these documents include: Title VI brochure, LEP brochure, Title VI Just the Facts card, LEP Just the Facts card, Title VI Complaint Procedures, and Title VI Nondiscrimination Complaint Form. Additionally, EWG 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 EWG in its data analysis.

IV. Demographic Profile of the St. Louis Region

A. Background

EWG maintains and analyzes statistical data on the demographic characteristics of the Region. This information is used throughout EWG's program areas and planning processes to inform the research conducted by the agency, the recommendations made to EWG's BOD, and EWG's planning decisions. Every three years as part of the Title VI Program update, EWG reviews its demographic data to determine if there have been any changes in the population that necessitate an adjustment to EWG's strategies in order to provide meaningful access to agency programs and activities to any new or growing demographic groups. EWG'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. EWG staff conducted both a data analysis and a spatial analysis[18] of the data for each of the following demographic groups: elderly persons,[19] LEP persons,[20] low-income persons[21], the minority population,[22] persons with a disability,[23] and zero-vehicle households (mobility needs).[24] The data used for these analyses were drawn from 2016 5-Year American Community Survey (ACS) (2012 – 2016) conducted by the U.S. Census Bureau (Census).[25] The level of data used for each group is presented below.

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

[18] Full-page versions of the maps that are described in Section IV can be found online at www.ewgateway.org/titlevi.
[19] Elderly is defined as those persons aged 65 years and older.
[20] 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.
[21] 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).
[22] 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/orders/order_56102a/index.cfm for the full definitions). EWG 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.
[23] EWG used the Census' definition of disability. More information about this definition can be found at: www.census.gov/topics/health/disability/guidance/data-collection-acs.html. This is the most recent Census data available.
[24] 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. The full definition can be found in the 2016 ACS Subject Definitions document that can be accessed here: www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/.
[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 square miles in the St. Louis metropolitan area. The U.S. Census population estimate for the Region was 2,590,553 in 2016, an increase of 0.8 percent since the 2010 estimate. Although the Region has had slow but positive growth in recent years, the Region experienced a slight population loss from 2015 to 2016. St. Louis County has the largest population (998,581, in the 2016 estimate), while Monroe County has the lowest population of the Region's eight counties (about 34,000 people). Table 1 shows the level of population change experienced by each of the eight counties in the Region for the period 2010 – 2016.

Table 1. St. Louis Region's Population and Population Change Between 2010 and 2016

		2010 Population	2011 Population	2012 Population	2013 Population	2014 Population	2015 Population	2016 Population	Population Change, 2010-2016	Percent Change, 2010-2016
St. Louis Region		**2,571,253**	**2,576,526**	**2,580,253**	**2,583,542**	**2,588,538**	**2,592,084**	**2,590,553**	**19,300**	**0.8**
ILLINOIS	Madison County	269,282	268,552	268,083	267,246	266,637	266,071	265,759	-3,523	-1.3
ILLINOIS	Monroe County	32,957	33,229	33,321	33,547	33,684	33,893	34,068	1,111	3.4
ILLINOIS	St. Clair County	270,056	270,001	268,612	266,807	265,587	264,079	262,759	-7,297	-2.7
MISSOURI	Franklin County	101,492	101,615	101,335	101,733	102,029	102,382	102,838	1,346	1.3
MISSOURI	Jefferson County	218,733	219,724	220,185	221,288	222,660	223,908	224,226	5,493	2.5
MISSOURI	St. Charles County	360,485	365,262	369,102	374,196	379,894	385,171	390,918	30,433	8.4
MISSOURI	St. Louis County	998,954	998,999	1,000,530	1,000,778	1,001,207	1,001,705	998,581	-373	0.0
MISSOURI	St. Louis City	319,294	319,144	319,085	317,947	316,840	314,875	311,404	-7,890	-2.5

Source: U.S.Census Population Estimates. Estimates are for July 1 of each year.

IV. Demographic Profile of the St. Louis Region

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

The data show that most residents in the Region: live in households that have incomes above the poverty line (87.2 percent) and access to a vehicle (91.6 percent), are non-Hispanic whites (72.6 percent), are proficient in English (98.7 percent), are not elderly (85.3 percent), and are not disabled (87.8 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	Elderly Persons		LEP Persons		Low-Income Persons		Minority Population		Persons with a Disability		Zero-Vehicle Households	
			#	%	#	%	#	%	#	%	#	%	#	%
St. Louis Region		**2,586,993**	**380,424**	***14.7***	**53,904**	***2.2***	**323,379**	***12.8***	**708,357**	***27.4***	**312,793**	***12.2***	**86,676**	***8.4***
ILLINOIS	Madison County	266,759	41,614	*15.6*	2,651	*1.1*	34,400	*13.2*	37,903	*14.2*	32,917	*12.5*	6,970	*6.5*
ILLINOIS	Monroe County	33,703	5,392	*16.0*	107	*0.3*	1,480	*4.4*	1,124	*3.3*	3,373	*10.1*	466	*3.6*
ILLINOIS	St. Clair County	265,569	36,649	*13.8*	3,791	*1.5*	46,059	*17.6*	99,876	*37.6*	33,441	*12.9*	9,786	*9.5*
MISSOURI	City of St. Louis	316,030	36,027	*11.4*	10,487	*3.6*	81,916	*26.7*	180,962	*57.3*	48,268	*15.5*	29,945	*21.4*
MISSOURI	Franklin County	102,063	15,922	*15.6*	564	*0.6*	12,057	*12.0*	4,695	*4.6*	12,347	*12.2*	2,074	*5.2*
MISSOURI	Jefferson County	222,453	29,586	*13.3*	1,494	*0.7*	24,089	*10.9*	11,614	*5.2*	28,479	*12.9*	3,728	*4.5*
MISSOURI	St. Charles County	379,856	50,141	*13.2*	6,103	*1.7*	22,765	*6.1*	45,537	*12.0*	36,635	*9.7*	4,754	*3.4*
MISSOURI	St. Louis County	1,000,560	165,092	*16.5*	28,707	*3.0*	100,613	*10.3*	326,646	*32.6*	117,333	*11.9*	28,953	*7.2*

Source: U.S. Census 2016 5-Year American Community Survey.

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

Based on a tract-level analysis, the largest concentration of low-income persons, minorities, and zero-vehicle households 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 (56.4 percent or 182,529 households). Nearly 59,000 zero-vehicle households, two thirds of the Region's total, live in the city of St. Louis or St. Louis County. Similarly, over 500,000 members of racial or ethnic minorities, more than 70 percent of the Region's total, live in the city of St. Louis or St. Louis County. When examined as a proportion of a county's population, the city of St. Louis has more low-income persons (26.7 percent), more zero-vehicle households (21.4 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 (4.4 percent) and living in zero-vehicle households (3.6 percent) and the lowest proportion of minority residents (3.3 percent) (see Table 3).

Table 3. St. Louis Region, Low-Income Persons, Minority Population & Zero-Vehicle Households

		Total Population	Low-Income Persons		Minority Population		Zero-Vehicle Households	
			#	%	#	%	#	%
St. Louis Region		**2,586,993**	**323,379**	***12.8***	**708,357**	***27.4***	**86,676**	***8.4***
ILLINOIS	***Madison County***	***266,759***	***34,400***	***13.2***	***37,903***	***14.2***	***6,970***	***6.5***
	Monroe County	33,703	1,480	*4.4*	1,124	*3.3*	466	*3.6*
	St. Clair County	***265,569***	***46,059***	***17.6***	***99,876***	***37.6***	***9,786***	***9.5***
MISSOURI	***City of St. Louis***	***316,030***	***81,916***	***26.7***	***180,962***	***57.3***	***29,945***	***21.4***
	Franklin County	102,063	12,057	*12.0*	4,695	*4.6*	2,074	*5.2*
	Jefferson County	222,453	24,089	*10.9*	11,614	*5.2*	3,728	*4.5*
	St. Charles County	379,856	22,765	*6.1*	45,537	*12.0*	4,754	*3.4*
	St. Louis County	***1,000,560***	***100,613***	***10.3***	***326,646***	***32.6***	***28,953***	***7.2***

Source: U.S. Census 2016 5-Year American Community Survey.

Maps 1 through 3 show the spatial analysis of low-income persons, minorities, and zero-vehicle households in the Region.[26]

[26] County-level maps of low-income persons, minority population, and zero-vehicle households for each of the eight counties in the Region can be found online at www.ewgateway.org/titlevi.

Low-Income Persons, 2012-2016

St. Louis Metropolitan Area

January 2018

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

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

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Minority Population, 2012-2016

St. Louis Metropolitan Area

January 2018

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

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

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Council of Governments

Zero-Vehicle Households, 2012-2016

St. Louis Metropolitan Area

January 2018

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

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

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Council of Governments

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, 92.2 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 less than three 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.[27] Not surprisingly, the Region also ranks low (47th out of 50) on foreign born population, and on limited English proficiency (LEP) households (49th out of 50). Table 5 through 7 show the 50 largest metropolitan areas in the U.S., ranked according to Asian population, Hispanic or Latino population, foreign born population and LEP households.[28]

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	Non-Hispanic Asian American	Non-Hispanic Other[1]	Total Minority
St. Louis Region		**2,586,993**	**72.6**	**19.6**	**2.9**	**2.5**	**2.4**	**27.4**
ILLINOIS	Madison County	266,759	85.8	8.2	3.0	0.9	2.0	14.2
	Monroe County	33,703	96.7	0.3	1.5	0.7	0.9	3.3
	St. Clair County	265,569	62.4	29.7	3.8	1.4	2.7	37.6
MISSOURI	City of St. Louis	316,030	42.7	47.8	3.9	3.0	2.6	57.3
	Franklin County	102,063	95.4	0.9	1.6	0.5	1.5	4.6
	Jefferson County	222,453	94.8	1.0	1.8	0.7	1.7	5.2
	St. Charles County	379,856	88.0	4.4	3.1	2.3	2.2	12.0
	St. Louis County	1,000,560	67.4	23.5	2.7	3.8	2.6	32.6

Source: U.S. Census 2016 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.

[27] 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 EWG's website at: www.ewgateway.org/research-center/where-we-stand/.

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

IV. Demographic Profile of the St. Louis Region

Table 5. Non-Hispanic Asians Population (Percent of Total Population)

1	San Jose	33.2
2	San Francisco	24.5
3	Los Angeles	15.2
4	Sacramento	12.5
5	Seattle	12.3
6	San Diego	11.3
7	New York	10.5
8	Washington	9.7
9	Las Vegas	9.2
10	Boston	7.3
11	Houston	7.2
12	Riverside	6.3
13	Minneapolis	6.2
14	Chicago	6.2
15	Portland	6.1
16	Dallas	6.0
17	Philadelphia	5.5
18	Atlanta	5.4
19	Austin	5.2
20	Baltimore	5.2
	United States	**5.2**
21	Raleigh	5.1
22	Hartford	4.5
23	Orlando	4.1
24	Detroit	3.9
25	Denver	3.8
26	Virginia Beach	3.7
27	Salt Lake City	3.6
28	Jacksonville	3.6
29	Columbus	3.6
30	Richmond	3.6
31	Phoenix	3.6
32	Milwaukee	3.4
33	Charlotte	3.2
34	Tampa	3.2
35	Oklahoma City	3.1
36	Buffalo	2.9
37	Providence	2.9
38	New Orleans	2.8
39	Indianapolis	2.7
40	Kansas City	2.6
41	Nashville	2.5
42	Miami	2.4
43	**St. Louis**	**2.4**
44	San Antonio	2.3
45	Cincinnati	2.2
46	Pittsburgh	2.1
47	Cleveland	2.1
48	Memphis	2.0
49	Louisville	1.8
50	Birmingham	1.3

Source: U.S. Census 2016 5-Year American Community Survey.

Table 6. Hispanic or Latino Population (Percent of Total Population)

1	San Antonio	54.8
2	Riverside	49.5
3	Los Angeles	45.0
4	Miami	43.4
5	Houston	36.3
6	San Diego	33.1
7	Austin	31.9
8	Las Vegas	30.4
9	Phoenix	30.2
10	Dallas	28.2
11	Orlando	28.1
12	San Jose	27.3
13	New York	23.8
14	Denver	22.8
15	San Francisco	21.8
16	Chicago	21.6
17	Sacramento	21.0
18	Tampa	17.8
19	Salt Lake City	17.4
	United States	**17.3**
20	Washington	14.9
21	Hartford	13.9
22	Oklahoma City	12.4
23	Providence	11.6
24	Portland	11.4
25	Atlanta	10.4
26	Boston	10.3
27	Raleigh	10.3
28	Milwaukee	10.2
29	Charlotte	9.6
30	Seattle	9.6
31	Philadelphia	8.8
32	Kansas City	8.7
33	New Orleans	8.4
34	Jacksonville	7.9
35	Nashville	6.8
36	Indianapolis	6.4
37	Virginia Beach	6.2
38	Richmond	5.6
39	Minneapolis	5.6
40	Cleveland	5.3
41	Baltimore	5.3
42	Memphis	5.2
43	Buffalo	4.6
44	Louisville	4.3
45	Birmingham	4.2
46	Detroit	4.2
47	Columbus	3.8
48	Cincinnati	2.9
49	**St. Louis**	**2.9**
50	Pittsburgh	1.6

Source: U.S. Census 2016 5-Year American Community Survey.

Table 7. Foreign Born Population (Percent of Total Population)

1	Miami	39.4
2	San Jose	37.5
3	Los Angeles	33.6
4	San Francisco	30.2
5	New York	28.7
6	San Diego	23.5
7	Houston	22.9
8	Washington	22.3
9	Las Vegas	22.0
10	Riverside	21.6
11	Sacramento	18.1
12	Dallas	17.8
13	Boston	17.7
14	Chicago	17.7
15	Seattle	17.5
16	Orlando	16.9
17	Austin	14.6
18	Phoenix	14.3
19	Atlanta	13.4
	United States	**13.2**
20	Providence	13.1
21	Hartford	13.0
22	Tampa	12.9
23	Portland	12.5
24	Denver	12.2
25	Salt Lake City	12.0
26	Raleigh	11.8
27	San Antonio	11.8
28	Philadelphia	10.3
29	Minneapolis	10.0
30	Baltimore	9.9
31	Charlotte	9.6
32	Detroit	9.3
33	Jacksonville	8.4
34	Oklahoma City	8.1
35	Nashville	7.6
36	New Orleans	7.4
37	Richmond	7.3
38	Columbus	7.3
39	Milwaukee	7.1
40	Indianapolis	6.4
41	Kansas City	6.4
42	Virginia Beach	6.4
43	Buffalo	6.1
44	Cleveland	5.6
45	Louisville	5.1
46	Memphis	5.0
47	**St. Louis**	**4.5**
48	Cincinnati	4.3
49	Birmingham	3.9
50	Pittsburgh	3.7

Source: U.S. Census 2016 5-Year American Community Survey.

Table 8. Limited English Proficiency (Percent of Households)

1	Miami	15.3
2	Los Angeles	12.5
3	San Jose	10.9
4	New York	10.4
5	Houston	9.6
6	San Francisco	9.2
7	Dallas	7.4
8	Las Vegas	7.3
9	San Diego	7.1
10	Riverside	7.0
11	San Antonio	6.3
12	Chicago	6.2
13	Orlando	6.2
14	Boston	6.0
15	Sacramento	5.5
16	Providence	5.4
17	Austin	5.2
18	Hartford	5.0
19	Washington	4.8
20	Seattle	4.6
	United States	**4.5**
21	Phoenix	4.4
22	Tampa	4.0
23	Atlanta	3.9
24	Philadelphia	3.7
25	Denver	3.7
26	Portland	3.4
27	Salt Lake City	3.4
28	Minneapolis	3.0
29	Charlotte	3.0
30	New Orleans	2.9
31	Oklahoma City	2.8
32	Raleigh	2.8
33	Detroit	2.5
34	Indianapolis	2.4
35	Nashville	2.4
36	Milwaukee	2.4
37	Cleveland	2.3
38	Kansas City	2.2
39	Baltimore	2.1
40	Columbus	2.1
41	Jacksonville	2.1
42	Richmond	1.9
43	Buffalo	1.8
44	Louisville	1.6
45	Virginia Beach	1.5
46	Memphis	1.5
47	Birmingham	1.3
48	Cincinnati	1.2
49	**St. Louis**	**1.1**
50	Pittsburgh	1.0

Source: U.S. Census 2016 5-Year American Community Survey.

Similar to the measures described above, while the number of LEP persons in the Region is very low (approximately 54,000 residents or 2.2 percent), there are certain areas within the Region that have a higher number of LEP residents. Table 9 and Map 4 show that most of the Region's LEP residents live in the city of St. Louis and St. Louis County (approximately 39,000 persons or 73 percent).[29]

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

		Persons Over Age 5	LEP Persons Over Age 5		Total Households	LEP Households	
		#	#	%	#	#	%
St. Louis Region		**2,429,479**	**53,904**	***2.2***	**1,027,717**	**12,020**	***1.2***
ILLINOIS	Madison County	250,981	2,651	*1.1*	107,014	435	*0.4*
	Monroe County	32,006	107	*0.3*	13,030	0	*0.0*
	St. Clair County	248,611	3,791	*1.5*	102,672	884	*0.9*
MISSOURI	City of St. Louis	295,039	10,487	*3.6*	140,116	2,957	*2.1*
	Franklin County	95,762	564	*0.6*	40,197	92	*0.2*
	Jefferson County	208,657	1,494	*0.7*	82,308	210	*0.3*
	St. Charles County	356,160	6,103	*1.7*	140,664	964	*0.7*
	St. Louis County	942,263	28,707	*3.0*	401,716	6,478	*1.6*

Source: U.S. Census 2016 5-Year American Community Survey, Tables S1602 and C16001.

[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."

[29] Maps of LEP persons for each of the eight counties in the Region can be found online at www.ewgateway.org/titlevi.

LEP Persons, 2012-2016

St. Louis Metropolitan Area

January 2018

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, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

Of the languages spoken by the Region's LEP residents, Spanish is the most common at 32.2 percent of the Region's LEP population. The next two most common languages spoken by LEP persons are Serbo-Croatian (Bosnian)[30] and Chinese, both of which have a much lower prevalence than Spanish, at about 13 percent and 11 percent of the Region's total LEP population, respectively.

Although LEP persons who speak Spanish, Bosnian, and Chinese represent the largest number of LEP residents, all of these groups make up a very low proportion of the Region's total population, as follows:

- Spanish - 0.7 percent
- Bosnian – 0.3 percent
- Chinese – 0.25 percent

A more in-depth analysis of the Region's LEP population is provided in EWG's LEP Plan in Appendix 5.

Chart 1. St. Louis Region, Proportion of LEP Population by Language Spoken

Source: U.S. Census 2016 5-Year American Community Survey.

[30] Serbo-Croatian (Bosnian) is included in the Russian, Polish, or other Slavic languages group. Staff analyzed the data from the U.S. Census Bureau and determined that a majority of this language group were Bosnian speakers. More detailed information about this analysis is provided 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 14.7 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. Maps 5 and 6 depict the geographic dispersion of elderly persons and persons with one or more disabilities.[30]

[30] County-level maps of elderly persons and persons with a disability for each of the eight counties in the Region can be found online at www.ewgateway.org/titlevi.

Persons with a Disability, 2012-2016

St. Louis Metropolitan Area

January 2018

Dots are randomly placed within 2010 Census tracts.
Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments

V. Mobility Needs & Transportation Planning

A. Background

As the MPO for the Region, EWG 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 EWG 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. EWG 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 EWG'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, EWG relies upon a data-driven analytical process, which is described in more detail in Part B below. EWG 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 EWG'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 2018 – 2021), and the Coordinated Human Services Transportation Plan (CHSTP). In addition to these specific planning documents, EWG 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 EWG'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 EWG's planning process, the LRTP, the TIP, the CHSTP, and the UPWP are presented to the public for review and comment. A description of the public engagement process is described in EWG'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 EWG BOD for approval and adoption.

B. Environmental Justice Areas

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

Demographic Group	Definition of "High Concentration"	Percentage Used
Elderly Persons	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 22.2% of the population in the tract is persons who are aged 65 years or older
Low-income Persons (poverty)	The tract[32] has a poverty rate[33] that is three times the Region's average poverty rate for all tracts	More than 38.3% of the population in the tract are persons who meet the definition of low-income
Minorities	The tract has a population that is more than half minority[34]	More than 50% of the population in the tract is persons who belong to a minority group
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 20.1% of the population in the tract is persons with one or more disabilities
Zero-Vehicle Households (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 27.4% of the population in the tract live in zero-vehicle households

[32] Tract refers to Census tract. The definition of tract can be found on the Census' website, in Chapter 10 at: www2.census.gov/geo/pdfs/reference/GARM.

[33] The calculation that EWG 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.

[34] The calculation that EWG 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.

As the data pertains to the analysis conducted for the current LRTP, EWG used data from the 2012 5-Year ACS (2008 – 2012) and for the current TIP EWG used data from the 2016 5-Year ACS (2012 – 2016). Based on this analysis, EWG determined the percentage of each county that is an EJ Area. Madison and St. Clair counties in Illinois and the city of St. Louis and St. Louis County in Missouri had the highest proportion of Census tracts that were classified as an EJ Area.

From 2012 to 2016, the percentage of the Region that is classified as an EJ Area increased slightly. Based on the 2016 5-Year ACS (2012 – 2016), Madison and St. Clair counties in Illinois and the city of St. Louis and St. Louis County in Missouri remained as the four jurisdictions with the highest proportion of EJ Areas. St. Clair County and the city of St. Louis experienced an increase in EJ Area percentage, while Madison County and St. Louis County experienced a decrease.

Table 10. Environmental Justice Areas, 2012 to 2016[1]

		Total Tracts	2012			2016		
			Non-EJ Tracts	EJ Tracts	% EJ Area[2]	Non-EJ Tracts	EJ Tracts	% EJ Area[2]
St. Louis Region		**570**	**380**	**190**	**33.3**	**378**	**192**	**33.7**
ILLINOIS	***Madison County***	***61***	***50***	***11***	***18.0***	***51***	***10***	***16.4***
	Monroe County	6	6	0	0.0	6	0	0.0
	St. Clair County	***60***	***37***	***23***	***38.3***	***34***	***26***	***43.3***
MISSOURI	***City of St. Louis***	***106***	***40***	***66***	***62.3***	***37***	***69***	***65.1***
	Franklin County	17	17	0	0.0	17	0	0.0
	Jefferson County	42	40	2	4.8	41	1	2.4
	St. Charles County	79	76	3	3.8	74	5	6.3
	St. Louis County	***199***	***114***	***85***	***42.7***	***118***	***81***	***40.7***

Source: U.S. Census, 2012 and 2016 5-Year American Community Surveys.

[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.

Map 7 shows the EJ Areas in the Region. Franklin County in Missouri and Monroe County in Illinois currently have no EJ Areas.[34]

[34] County-level maps of the EJ Areas in the six counties in the Region that have EJ Areas can be found online at: www.ewgateway.org/titlevi.

Map 8 shows the census tracts in the Region that have above-median percentage for each EJ demographic characteristic used for EWG's EJ analysis. These characteristics and the percentages can be found in the table on page 29.

C. Metropolitan Transportation Plan (the LRTP)

In accordance with federal law, EWG adopts a metropolitan transportation plan (the LRTP) every four years. EWG'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 EWG as it prioritizes funding for all modes of transportation – including public transportation, freight, bicycle, pedestrian, and paratransit.

The EWG 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 EWG's transportation planning and programming addresses mobility needs, EWG 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, EWG 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. EWG'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 EWG used to develop *Connected2045* and highlights EWG'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.[36]

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

[36] 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 EWG's website at: www.ewgateway.org/transportation-planning/long-range-planning/.

transportation needs[37] 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 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.[38]

EWG'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 EWG and EWG staff evaluates the applications according to criteria based on the Region's ten guiding principles from the LRTP[39], and federal performance-based planning requirements.[40]

As stated above, EWG ensures that its transportation planning and programming address the mobility needs of EJ populations through the TIP application and project evaluation process. EJ is addressed under the Support Neighborhoods & Communities guiding principle. Projects that are located in EJ areas earn points based on the type of EJ population. The highest points are earned for projects that are within areas with high concentration of low-income persons or minorities.[41] Medium points are assigned for projects that are within areas with high concentration of zero-vehicle households. The lowest points are assigned for projects located in areas with high concentration of seniors or persons with a disability. Projects that are located in EJ areas will not earn points if the project imposes a burden on the population of the area. Burdens may include disruption of community cohesion, adverse employment effects, decline in tax base or property values, displacements, increased noise and/or emissions, diminished aesthetics, and disruption to business or access to transit.

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 EWG in 2008 and is updated every four years. The most recent version of the CHSTP was developed and adopted in 2016. 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. The Section 5310 – *Enhanced Mobility for Seniors and Persons with Disabilities* program is currently federally-funded through the FAST Act and the funding is provided to governmental or non-

[37] 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.
[38] A full list of the programs funded through the TIP can be found in the FY 2018-2021 TIP, on pages 5-9 (printed) / 15-19 (*.pdf), which can be found on EWG's website at: www.ewgateway.org/transportation-planning/transportation-improvement-program/.
[39] A description of each priority can be found on page 11 (printed) / 15 (*.pdf) of the LRTP, see www.ewgateway.org/transportation-planning/long-range-planning/.
[40] The guiding principles can be found on page 10 of the LRTP, see www.ewgateway.org/transportation-planning/long-range-planning/.
[41] In the Region, low-income communities and communities with high proportions of minority groups are strongly correlated, see Section IV.

profit entities that provide transportation services to seniors and individuals with disabilities.[42] During the development of the 2016 CHSTP, EWG undertook a comprehensive assessment of the transportation needs of disadvantaged individuals and identified unmet transportation needs.[43] Based on this analysis, the CHSTP's Stakeholder Committee identified several issues with the Region's existing transportation services and developed strategies and activities 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. Projects are evaluated based on its responsiveness in addressing the gaps identified in the CHSTP, the sponsor's experience and management capacity, coordination efforts and demonstrated partnerships, benefits and promotion to the target population, and how efficiently the sponsor provides the transportation service.

F. Unified Planning Work Program

EWG'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 EWG 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, EWG's work also addresses the regional planning priorities that are expressed in the LRTP. The UPWP describes EWG'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[44] and multi-modal transportation planning[45]. Regional travel demand modeling and system evaluation informs all of the planning work conducted by EWG 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. EWG'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 EWG'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.

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[42] 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.

[43] A description of this analysis can be found in the CHSTP on EWG's website at: www.ewgateway.org/transportation-planning/coordinated-human-services/.

[44] FY 2018 UPWP Work Element 1.01 addresses regional travel demand modeling and system evaluation. The FY 2018 UPWP can be found on EWG's website at: www.ewgateway.org/about-us/what-we-do/planning-initiatives/upwp/.

[45] FY 2018 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 BSD, 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, EWG 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 Map 9).[46] Additionally, a majority of the Region's minority residents live in areas that are served by public transit (see Map 10).

[46] County-level maps of the transit system and EJ Areas in the six counties in the Region that have EJ Areas can be found online at: www.ewgateway.org/titlevi.

Environmental Justice Areas with One Mile Transit Buffer, 2012-2016

St. Louis Metropolitan Area

January 2018

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 Stop
- 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, 2016 5-Year American Community Survey (2012 - 2016); Metro; Madison County Transit; St. Charles Area Transit; East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments

Percent Minority Population with One Mile Transit Buffer, 2012-2016

St. Louis Metropolitan Area

January 2018

Data is depicted by 2010 Census tracts.
Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); Metro; Madison County Transit; St. Charles Area Transit; East-West Gateway Council of Governments

Maps 11 through 14 depict the EJ Areas in Madison and St. Clair counties in Illinois and the city of St. Louis and St. Louis County in Missouri, which have the highest proportion of EJ Areas of all the counties in the Region, and the areas in each jurisdiction that are within one mile of a transit stop.

Environmental Justice Areas, 2012-2016

Madison County, Illinois

January 2018

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 Stop

Municipal Boundary

County Boundary

Major Road

River / Lake

0 5 10
Miles

Data is depicted by 2010 Census tracts. Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

Environmental Justice Areas, 2012-2016

St. Clair County, Illinois

January 2018

Data is depicted by 2010 Census tracts.
Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016);
East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments

Environmental Justice Areas, 2012-2016

City of St. Louis, Missouri

January 2018

Data is depicted by 2010 Census tracts.
Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016);
East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments

Environmental Justice Areas, 2012-2016

St. Louis County, Missouri

January 2018

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016);
East-West Gateway Council of Governments

EAST-WEST GATEWAY
Council of Governments

VI. Distribution of Public Transportation Funding

Madison and St. Clair counties in Illinois and the city of St. Louis and St. Louis County in Missouri have the highest proportion of EJ Areas of all the counties in the Region and these jurisdictions receive more than 99 percent of the federal and state public transportation funding in the Region. Tables 11a through 11c show the distribution of federal and state transit funding in the Region. Table 11a shows the distribution of public transportation funding for projects that are implemented within a single county's boundary. All of federal and state public transportation funds for single county projects are expended on projects that serve EJ Areas; with the largest percentage being expended on projects in the four jurisdictions with the highest percentage of EJ Areas.

Table 11a. St. Louis Region Public Transportation Funding[1] Distribution for Single-County Projects[2]

		% Minority Population	% EJ Areas	Federal		State	
				Dollars	Percent	Dollars	Percent
St. Louis Region		**27.4**	**33.3**	**$118,930,031**	**100.0**	**$2,540,988**	**100.0**
ILLINOIS	***Madison County***	***14.2***	***18.0***	***$31,231,742***	***26.3***	***$0***	***0.0***
	Monroe County	3.3	0.0	$0	0.0	$0	0.0
	St. Clair County	***37.6***	***38.3***	***$16,838,231***	***14.2***	***$2,364,738***	***93.1***
MISSOURI	***City of St. Louis***	***57.3***	***62.3***	***$50,708,963***	***42.6***	***$0***	***0.0***
	Franklin County	4.6	0.0	$0	0.0	$0	0.0
	Jefferson County	5.2	4.8	$1,104,680	0.9	$0	0.0
	St. Charles County	12.0	3.8	$583,975	0.5	$0	0.0
	St. Louis County	***32.6***	***42.7***	***$18,462,440***	***15.5***	***$176,250***	***6.9***

Source: FY 2018 - 2021 Transportation Improvement Program, U.S. Census, 2016 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] Single-County Projects refer to projects that are implemented within one county's boundary.

VI. Distribution of Public Transportation Funding

Table 11b shows the distribution of public transportation funding for multi-county and multi-state projects. Almost 100 percent of the federal public transportation funding and 100 percent of the state public transportation funding is expended on multi-county and multi-state projects that serve EJ Areas; with the largest percentage of these funds being expended on projects in the four jurisdictions with the highest percentage of EJ Areas.

Table 11b. St. Louis Region Public Transportation Funding[1] Distribution for Multi-County / Multi-State Projects[2]

		% Minority Population	% EJ Areas	Federal		State	
				Dollars	Percent	Dollars	Percent
St. Louis Region		**27.4**	**33.3**	**$339,407,753**	**100.0**	**$6,242,466**	**100.0**
ILLINOIS	***Madison County***	***14.2***	***18.0***	***$352,858***	***0.1***	***$0***	***0.0***
	Monroe County	3.3	0.0	$11,913	0.0	$0	0.0
	St. Clair County	***37.6***	***38.3***	***$90,040,518***	***26.5***	***$2,059,252***	***33.0***
MISSOURI	***City of St. Louis***	***57.3***	***62.3***	***$124,386,215***	***36.6***	***$2,091,607***	***33.5***
	Franklin County	4.6	0.0	$73,369	0.0	$0	0.0
	Jefferson County	5.2	4.8	$73,369	0.0	$0	0.0
	St. Charles County	12.0	3.8	$276,174	0.1	$0	0.0
	St. Louis County	***32.6***	***42.7***	***$124,193,338***	***36.6***	***$2,091,607***	***33.5***

Source: FY 2018 - 2021 Transportation Improvement Program, U.S. Census, 2016 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] Multi-County / Multi-State Projects refer to projects that are implemented in more than one county or that are implemented in both Illinois and Missouri. The funds for these projects are proportioned equally across the jurisdictions involved in the project (i.e. the funding for a project that spans both the city of St. Louis and St. Clair County is divided 50/50 between the two jurisdictions).

VI. Distribution of Public Transportation Funding

Table 11c shows the total distribution of federal and state public transportation funding for the Region. More than 99 percent of the Region's federal and 100 percent of the Region's state public transportation funding is distributed to entities that provide services to EJ Areas; with the largest percentage of the funds being expended on projects in the four jurisdictions with the highest percentage of EJ Areas.

Table 11c. St. Louis Region Public Transportation Funding[1] Distribution for All Projects

		% Minority Population	% EJ Areas	Federal		State	
				Dollars	Percent	Dollars	Percent
St. Louis Region		**27.4**	**33.3**	**$458,337,784**	**100.0**	**$8,783,454**	**100.0**
ILLINOIS	***Madison County***	***14.2***	***18.0***	***$31,584,600***	***6.9***	***$0***	***0.0***
	Monroe County	3.3	0.0	$11,913	0.0	$0	0.0
	St. Clair County	***37.6***	***38.3***	***$106,878,749***	***23.3***	***$4,423,990***	***50.4***
MISSOURI	***City of St. Louis***	***57.3***	***62.3***	***$175,095,178***	***38.2***	***$2,091,607***	***23.8***
	Franklin County	4.6	0.0	$73,369	0.0	$0	0.0
	Jefferson County	5.2	4.8	$1,178,049	0.3	$0	0.0
	St. Charles County	12.0	3.8	$860,149	0.2	$0	0.0
	St. Louis County	***32.6***	***42.7***	***$142,655,778***	***31.1***	***$2,267,857***	***25.8***

Source: FY 2018 - 2021 Transportation Improvement Program, U.S. Census, 2016 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.

VII. Pass-Through Funding & Subrecipient Assistance

A. Background

As a primary recipient[47] of FTA funding, EWG 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 EWG uses to pass through funding is described in Part B and the process that EWG uses for application review is described in Part C.

B. Pass-Through Funding

EWG sub-grants federal funding to local entities in a non-discriminatory manner. EWG'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 EWG'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, EWG 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, EWG examines the relevant EWG plan / program to ensure that the subrecipient's work is consistent with these regional requirements. As it pertains to the federal funding that EWG receives through MoDOT and IDOT, EWG submits its sub-awards to MoDOT and IDOT for approval, as required.

C. Subrecipient Assistance

EWG 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. EWG has developed and disseminates a TIP Application Workbook and a Section 5310 Application Workbook that describes the application process for each program.[48] EWG 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. EWG staff provides technical assistance to potential applicants through workshops and one-on-one meetings (if requested). A description of the technical assistance that EWG staff currently provides to applicants is described below.[49]

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[47] Primary recipient is defined in FTA Circular 4701.2B, Chapter I, Part 5(x).

[48] 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 EWG's website at: www.ewgateway.org/transportation-planning/competitive-transportation-programs/section-5310/. The TIP Application process is described in the TIP Application Workbook that is issued during the TIP application cycles. Prior years' TIP application workbooks can be found on the STP-S, CMAQ, and TAP pages on EWG's website at: www.ewgateway.org/transportation-planning/transportation-improvement-program/competitive-transportation-programs/.

[49] 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 EWG staff for review prior to the final application deadline. • EWG staff holds one-on-one meetings with applicants to discuss the preliminary application, the project, and answer any questions that the applicant may have. • EWG 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 EWG staff, as well as staff from MoDOT, IDOT, and others, to discuss the applicant's project and project application. • EWG 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
• EWG 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 BSD, MoDOT, and IDOT. • EWG 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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APPENDICES

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Appendix 1: Title VI Assurance

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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 Fixing America's Surface Transportation (FAST) Act, Pub. L. 114-94 and the Moving Ahead for Progress in the 21st Century Act (MAP-21), Pub.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, national origin, religion, sex, disability, or age 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.

Appendix 1: Title VI 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.

James M. Wild	6-27-18
James M. Wild, Executive Director	**Date**

Appendix 1: Title VI Assurance

Part A

Pursuant to #3 above, East-West Gateway Council of Governments (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, national origin, religion, sex, disability, or age, 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, national origin, religion, sex, disability, or age. ***[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, national origin, religion, sex, disability, or age. Such action shall include, but is not 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]***; as well as 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, national origin, religion, sex, disability, or age 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, national origin, religion, sex, disability, or age 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 – Title VI, DBE & Other Nondiscrimination Requirements ("Appendix IV"), which is attached to this Agreement and is 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 EWG & ***[Name of Contractor / Sub-Grantee]*** Agreement, Title VI, DBE & Other Nondiscrimination Requirements" 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

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

Appendix 1: Title VI Assurance

> 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 EWG & [*Enter Contractor / Sub-Grantee Name*] Agreement

Title VI, DBE & Other Nondiscrimination Requirements [*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, disability, or age. 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, disability, or age, 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, disability; or age 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, age, 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, national origin, sex, disability, or age.

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 one of the entities described in Paragraph XX of the Agreement. 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.

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Appendix 2:

Title VI Notice to the Public

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Appendix 2: Title VI Notice to the Public

East-West Gateway Council of Governments (EWG) 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 (EWG) 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, 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 EWG 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 EWG. Any such complaint must be in writing and filed with EWG'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 EWG's website at www.ewgateway.org/titlevi or call (314) 421-4220 or (618) 274-2750.

B. Abbreviated Form

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, or to obtain a Title VI Nondiscrimination Complaint Form, see www.ewgateway.org/titlevi or call (314) 421-4220 or (618) 274-2750.

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Appendix 3:

Title VI Complaint Procedures

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Appendix 3: Title VI Complaint Procedures

East-West Gateway Council of Governments (EWG) 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 EWG in relation to any program or activity administered by EWG or its subrecipients, consultants, or contractors. EWG's complaint procedure applies to matters related to Title VI of the Civil Rights Act of 1964 (Title VI) including 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. EWG 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 EWG'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 EWG'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 EWG's website at: www.ewgateway.org/titlevi. EWG 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

Appendix 3: Title VI Complaint Procedures

Alternative Languages & Formats

EWG 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, EWG 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 EWG through Relay Missouri (TTY): 771 or (800) 735-2966.[1]

[1] Additional information is available on Relay Missouri's website: www.relaymissouri.com/relaymo-services/tty/.

Appendix 3: Title VI Complaint Procedures

1. Submission of Complaint

Any individual or group may file a written complaint with EWG'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 EWG'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 8.

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 EWG'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 EWG 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 EWG 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 EWG 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, or retaliation, and
- A program or activity of EWG or one of EWG'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 EWG'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 EWG 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 EWG'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)[2], if applicable.

5. Requests for Reconsideration

If the complainant disagrees with EWG's response, he or she may request reconsideration. In order to request a reconsideration, the complainant must submit a written request to EWG within 15 calendar days after he or she received EWG'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 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 EWG's legal counsel prior to execution and must be signed by the parties, the Title VI Coordinator, and the Executive Director.

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

7. Submission of Complaint to Other Entities

If a complainant is dissatisfied with EWG'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 EWG'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/

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

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.transit.dot.gov/regulations-and-guidance/civil-rights-ada/civil-rightsada

Federal Transit Administration
Region VII and Region VIII
Bryon Rogers Building, Suite 13301, 1961 Stout Street
Denver, CO 80294-3004
Email: morgan.hecht@dot.gov
Phone: (303) 362-2416

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

Environmental Protection Agency
Office of Civil Rights (1201A)

1200 Pennsylvania Ave., NW
Washington, DC 20460
Phone: (202) 564-7272
Fax: (202) 501-1836
www.epa.gov/civilrights/

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

8. Confidentiality

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

9. Investigation Records

EWG 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 (EWG) 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 EWG'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: _____

Appendix 3: Title VI Complaint Procedures

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.

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Appendix 4: Public Involvement Plan

Updated 5/30/2019

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MAY 2019

Public Involvement Plan

EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

FINAL 05/29/2019

Appendix 4: Public Involvement Plan

A Note from Executive Director Jim Wild:

The East-West Gateway Council of Governments (EWG) is committed to providing meaningful opportunities for public involvement in regional decisions. The agency's transportation and community planning programs have a wide ranging impact on the St. Louis metropolitan area, affecting the economy, the environment, and the daily lives of residents. The broad scope of these projects and activities, undertaken by the agency on behalf of the region's residents and local governments, make public guidance and advice a critical consideration.

However, creating opportunities for members of the public to weigh in on topics of regional importance that feel authentic and consequential is a significant challenge. The rapid pace of the modern world can lead to a focus on only the most immediate concerns, which makes it difficult to engage on issues that have longer time horizons or don't occur in our own backyard. Too often when people do participate, they feel their voices are not heard and that their concerns are not addressed.

The East-West Gateway Public Involvement Plan sets forth strategies and procedures to address these obstacles and ensure all residents of the St. Louis metro area can participate in decision-making on regional issues. The plan establishes the expectations for how public involvement is incorporated into EWG's transportation planning and other processes, in line with guidance from the agency's federal funders. We take seriously our obligation to educate, inform, and involve. The Public Involvement Plan reflects our approach to this huge responsibility and contains specific goals and objectives our staff works to achieve.

The creation of this plan benefitted from the time and expertise of many people. For this update, we convened an advisory committee of community members as well as an internal focus group, both of which contributed valuable input. This plan provides a framework for building a culture of robust civic engagement, and we invite all of our partners and stakeholders to help us realize its mission of involving community members in regional planning decisions. By working together, we can create meaningful engagement opportunities that are accessible to everyone.

Jim Wild

Inside this plan you will find:

Regional Planning Matters 2
About East-West Gateway 3
The Public Involvement Planning Process 4
Mission and Vision of the Public Involvement Plan..... 6
Our Goals and Strategies..... 7
The Agency's Core Products 12
Overview of Current Engagement Practices 14
Conclusion..... 16
Title VI Program Policy ..... Back Cover

Regional Planning Matters

The process of regional planning often involves tackling big, complicated issues—how to make the region safer and more secure, how to increase the sustainability and resiliency of the region, or what infrastructure investments to make. With the many requests for our attention that bombard us on a daily basis, it can be hard to find the time to participate in conversations on these topics, especially when they don't always seem to affect us directly.

The Public Involvement Plan is a critical piece of our efforts to overcoming these obstacles to participation. The many different types of regional planning activities undertaken by the East-West Gateway Council of Governments and its partners have the potential to impact the entire St. Louis area, so it's imperative that the region's residents are engaged in the planning process.

Transportation Impacts Each of Us

EWG is responsible for a wide range of regional planning activities, but none are more highly visible than the process of distributing federal funds for transportation projects across the St. Louis region. Transportation has a tremendous impact on a broad array 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 and Missouri rivers, St. Louis Lambert International Airport and several regional airports, MetroLink (light rail) and MetroBus, 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 along with bus, rail, pedestrian, and bicycle projects, and ranges 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 the limited transportation funding made available by federal, state, and local resources to pay for projects. Our needs far outweigh our resources, so we must make tough decisions that balance many regional interests.

Your Voice Makes a Difference

The advice and input of stakeholders with diverse perspectives is an integral part of the decision-making process described above. EWG views "stakeholders" as a broad term that encompasses residents, business owners, municipal and county governments, environmental and civic organizations, and advocacy groups that represent the needs of underserved and underrepresented populations—including low-income, minority, elderly, and disabled persons.

The Public Involvement Plan lays out the methods EWG uses to make sure these stakeholders are informed and involved in regional issues and decisions. It is imperative, not only as a matter of federal law but of sound public policy, that EWG hears and considers their different sets of needs and interests. By engaging the region's residents, EWG ensures that the investments made by state and local governments align with the priorities of the public. We are committed to ensuring you have a voice in the planning process and hope you will join us in our efforts to make the St. Louis region a more prosperous, vibrant place.

About East-West Gateway

Who We Are

Formed in 1965, East-West Gateway Council of Governments brings together local elected officials from Missouri and Illinois to work together and make regional decisions on issues that cross jurisdictional boundaries. As the Metropolitan Planning Organization (MPO) for the St. Louis metro area, we also implement the region's federal transportation planning process.

EWG is governed by a 29-member board of directors compromised of local government representatives and residents from across the St. Louis region. The board works with the agency's executive director to define the initiatives, projects, and programs our staff accomplish.

The East-West Gateway Region

EWG covers the city of St. Louis and seven surrounding counties—Franklin, Jefferson, St. Charles, and St. Louis counties in Missouri; and Madison, Monroe, and St. Clair Counties in Illinois. This broad geographic reach is unique among the area's governmental organizations and helps EWG serve as a collaborative forum for planning and problem solving.

What We Do

Successful regional planning requires understanding and addressing the complex relationships between transportation and the region's economy, community, and environment. Accordingly, the work performed by EWG's staff covers a wide range of topics but can be separated into four broad categories.

Transportation Planning

EWG develops short- and long-range plans that decide how federal transportation funds are distributed among the region's local governments, transit providers, and other agencies. Any transportation projects that request and receive federal funds must be contained within these plans, which are approved by EWG's board of directors. In addition, the agency implements programs and projects related to the functional classification of roadways, bike/pedestrian planning, safety, congestion management, corridor planning, and freight.

Community Planning

The initiatives of the community planning department focus on environmental planning, public engagement, local government services, and hazard mitigation. EWG activities in this area include encouraging sustainable development, monitoring air and water quality, and building the capacity of the region's municipalities.

Regional Security

Through the St. Louis Area Regional Response System (STARRS), EWG brings together emergency management professionals and public safety agencies to develop plans and systems for preventing and responding to natural disasters, terrorist acts, and other incidents. STARRS also increases the effectiveness of these agencies by providing needed equipment and training.

Research and Analysis

EWG's research services department provides insight on issues identified as important to the fiscal, economic, and social well-being of the St. Louis region through data collection and analysis. The department also collaborates with local, state, and federal agencies on acquiring, maintaining, and distributing spatial data and maps.

The Public Involvement Planning Process

As the regional planning agency, our community and transportation planning activities impact every resident in the St. Louis metropolitan area. We are committed to involving everyone—including low-income, minority, elderly, and limited English proficient populations, and individuals living with disabilities—in regional discussions surrounding social, economic, environmental, community development, and transportation planning decisions. The map below illustrates where Environmental Justice census tracts are located in the St. Louis region. These are areas with an above median proportion of persons in poverty, persons with a disability, or elderly persons.

In addition, federal regulations require the incorporation of public involvement into the metropolitan transportation planning process. Specifically, the Fixing America's Surface Transportation Act (FAST Act) signed into law in 2015 outlines the federal requirements for public participation process and procedures. This plan meets these requirements and guides staff in their public involvement efforts to ensure meaningful engagement opportunities.

Public Involvement Plan Update Activities

EWG developed and approved the initial plan in 2014 as part of a year-long process that including establishing an advisory committee, reviewing meeting evaluations, consulting with agency staff, and conducting a public survey. In 2018, community engagement staff began the process of updating the plan and took the following actions:

- EWG's community engagement staff established a Public Involvement Plan Advisory Committee that represented key perspectives in the community. The Advisory Committee met three times throughout the process and provided feedback on how EWG could achieve the goals outlined in the plan.
- Community engagement staff also convened an internal agency focus group, comprised of EWG staff members who manage projects with major public involvement components. The objective of this staff committee was gather to input on what resources, tools, and processes are needed to accomplish EWG's public involvement goals.
- Community engagement staff reviewed agency's progress in pursuing the goals, objectives, and strategies established in the Public Involvement Plan. This assessment is included as part of the update to the plan.
- Comments from the 45-day public comment period were considered and incorporated.
- Community engagement staff presented the Public Involvement Plan draft to the EWG Board of Directors at its March 2019 meeting.

Thank you to our Public Involvement Plan Advisory Committee

Marie Elliot
Missouri Department of Transportation

Wayne Flesch
St. Louis County Senior Services

Kevin Jemison
Illinois Department of Transportation

Ch. Will Jordan
Equal Housing Opportunity Council

Kisha Lee
Bi-State Development

S.J. Morrison
Madison County Transit

Cordaryl "Pat" Patrick
St. Louis Economic Development Partnership

Betsy Solomon
Shepherd's Center of Webster/ Kirkwood

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

Derek Wetherell
Paraquad

Mission and Vision of the Public Involvement Plan

Mission

Create Meaningful Engagement Opportunities That Are Accessible to Everyone

Vision

EWG staff, in our commitment to include all residents 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 regional aspirations of residents.

Our Commitment to the Community

East West-Gateway Council of Governments understands the value of community. We understand that healthy, vibrant communities create a healthy and vibrant region. Our commitment to all communities in the region is simple: to ensure meaningful public engagement opportunities for all residents including low-income, minority, elderly, limited English proficient populations, and individuals living with disabilities. Public involvement in regional decisions surrounding regional security, transportation and community planning, and research programs ensures that EWG is tuned into the region's needs, wants, and desires. The connection between the region and the region's metropolitan planning organization is critical to its overall success.

For EWG's public involvement efforts to be effective, the agency must earn the trust and respect of the region's residents. EWG establishes such trust and respect by being responsive to community needs, providing accurate and timely information, maintaining transparency in agency processes, and striving to explain the agency's activities using methods that are free from jargon and relatable to all cultures. Additionally, EWG convened an advisory committee comprised of regional practitioners to lend their expertise on how to maximize our interactions with the residents of this region. The Advisory Committee's input was incorporated into this Public Involvement Plan and helped further refine EWG's approach to community engagement in our region's transportation planning and other activities.

Goals and Strategies

To help translate the mission and vision of the Public Involvement Plan into action, EWG has created a set of six core goals, each with a series of objectives and strategies to achieve them. The community engagement team works with all agency staff to accomplish these goals and provide meaningful opportunities for the public to be involved in EWG's transportation and community plans.

The framework provided here is the core of the Public Involvement Plan. As part of the 2019 update, this section now includes a "progress update" that assesses each of the plan's 36 strategies as under review, ongoing or completed. The bulleted sections highlight additional context on the implementation of a particular strategy, and the "What We Heard" quotes reflect input received from our Advisory Committee and internal focus group.

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.**

What We Heard: "EWG should be intentional in their outreach efforts. Neighborhoods, communities, municipalities, and underserved populations should be invited by staff or a board member to attend public meetings or outreach opportunities."

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

➢ *Community engagement staff meet with planning staff ahead of major projects to map out engagement opportunities, discuss how to make it meaningful, and identify strategies for reaching underrepresented communities.*

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.	Under Review
Strategy C: EWG will collect data on how people get their information and provide feedback.	Ongoing

➢ *Comment cards and evaluations are regularly collected during engagement activities to solicit further public feedback.*

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

What We Heard: "It's not just quantitative. The quality of interactions are important as well and really looking at who you are hearing from."

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

➢ *The community engagement staff created a tracking tool that is completed by EWG staff following public involvement activities. The tracker was revamped in 2018 and is regularly reviewed for analysis of EWG's engagement efforts.*

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.	Complete

➢ *Newly revamped EWG website has dedicated section for community engagement, which includes links to the agency's event calendar, the Public Involvement Plan, and social media accounts.*

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

➢ *The agency publishes a weekly Local Government Briefings email newsletter that, while geared toward a municipal audience, contains announcements and information on EWG's plans and programs. Links to surveys, calls for public comment, and other engagement opportunities are regularly included in the newsletter.*

Strategy C: Create a monthly electronic update for email and print that specifically reports public involvement outcomes, opportunities, activities, and strategies.	Under Review

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.**

What We Heard:

"EWG needs to develop a known identity. Develop a 'road show' that is as generic as possible. Identify the staff members who would be willing and are comfortable doing presentations. EWG should develop and increase the level of social media technology. Decide which platform works best for the agency (Facebook, Twitter, Instagram, podcasts, Youtube videos)."

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.	Complete

➢ *EWG's website was completely rebuilt and relaunched in 2017 with a mobile-friendly design and a more intuitive layout. The new design includes a more robust events calendar and a searchable archive of agency documents, including meeting minutes and agendas.*

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

➢ *EWG has focused on building its presence on Twitter and Facebook with more regular content and updates, including hosting a "virtual open house" using Facebook Live. The videos produced for the annual Outstanding Local Government Achievement awards are now posted on the agency website and shared on social media.*

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

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

What We Heard: "The annual meeting and the morning sessions are great, I would like to see EWG continue to use the morning sessions or host other forums for regional conversations."

Strategy A: Develop creative programming, including speaker series, discussion forums, and expanded policy briefings.	Under Review
Strategy B: Identify new strategies for reaching people electronically including web meetings, online real-time question and answer sessions, interactive electronic open houses, and webinars.	Ongoing
➢ *EWG uses a variety of online tools for public involvement. This includes online chats through the St. Louis Post-Dispatch as part of the TIP public comment process, livestreaming public meetings and other events, use of web-based surveys, and investment in email marketing software.*	
Strategy C: Conduct effective, productive, and interactive meetings.	Ongoing
➢ *Community engagement staff frequently assist EWG planners with designing creative exercises for soliciting and gathering feedback. Large-format maps, post-it notes, small group discussions, and touchpad polling are among the tools and techniques employed.*	

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.	Ongoing
➢ *Community engagement staff have recently expanded their involvement with regional partners, such as participating in the HomegrownSTL Initiative, helping start the St. Louis chapter of Engaging Local Government Leaders (ELGL), and serving on Great Rivers Greenway's Equity Advisory Committee.*	
Strategy B: Serve as a matchmaker to help partners find the right resources.	Ongoing
➢ *EWG hosts project application workshops, holds information sessions on federal funding programs, releases technical guides for local planners, and provides other assistance to local government members. The Local Government Briefings newsletter also includes links to resources, tools, datasets, and grant opportunities relevant to municipalities in Missouri and Illinois.*	
Strategy C: Create a process under which EWG staff actively contacts and engages with new groups quarterly.	Under Review
Strategy D: Actively look for new partnership opportunities through sponsorship/ involvement in regional events.	Ongoing
➢ *EWG recently partnered with the St. Louis Association of Community Organizations, St. Louis Earth Day and local universities to have a presence at various events as part of the Long-Range Transportation Plan update.*	

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.	Under Review
Strategy B: Introduce staff to fundamental and advanced approaches and tools for effective public involvement.	Under Review

Goal 4

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

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

Strategy A: Posts EWG's policy statement regarding Title VI on the website along with the complaint procedure.	Complete
Strategy B: Title VI, ADA, and environmental justice materials will be available at EWG meetings.	Complete
Strategy C: EWG will offer translations of necessary materials and provide appropriate accommodations as requested. We will track all requests for accommodation.	Ongoing

➢ *Several agency documents are available in Spanish, including the Title VI brochure, Limited English Proficiency (LEP) brochure, Title VI Complaint Procedures, and Title VI Nondiscrimination Complaint Form.*

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.	Ongoing

➢ *Community engagement staff redesigned the weekly Local Government Briefings newsletter and began using an email marketing service to improve delivery and build the audience.*

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

➢ *The website redesign improved access to datasets and other research produced by EWG. In addition, EWG produces a reoccurring "Map of the Month," which features insightful analysis of regional issues and concerns using geographic data.*

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.	Ongoing
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	Ongoing
Strategy E: Create partnerships with public radio, news, and television outlets.	Under Review

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

What We Heard: "Create a written community engagement process that includes templates, strategies, and recommendations of engagement tools that are appropriate for a given plan."

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

➢ *Community engagement staff in consultation with program staff is exploring developing 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, and 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.	Ongoing

Goal 6

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

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

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

➢ *EWG staff use the activity tracker, a web-based survey created by the community engagement department, to document and evaluate all public involvement activities.*

Strategy B: Create a realistic evaluation policy and ensure that staff is capturing necessary and appropriate evaluation data.	Ongoing
Strategy C: Create an internal database to capture all evaluation data.	Complete

➢ *The information captured by the activity tracker is easily accessible and can be exported as reports for further analysis.*

Strategy D: Analyze the results of evaluative data on a regular basis to illustrate changes in participation, representative participation, and identify areas for improvement.	Ongoing
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.	Under Review
Strategy F: Implement an agency self-evaluation process of public involvement efforts annually.	Under Review

The Agency's Core Products

Public participation is a valuable tool used to shape plans that accurately reflect the goals and visions 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 public 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 sections 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 the one document that 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 policymakers on the Board of Directors, the agency's advisory committees, and our funding agencies to review and consider East-West Gateway's many activities. 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 any new activities, the Board can amend new work into the UPWP as part of its monthly meetings.

The implementation of the UPWP is a team effort. The complexity of our work frequently demands interdepartmental coordination, interdisciplinary research, and considerable involvement of members of the affected public and constituent interest groups.

The UPWP is supported by financial grants and in-kind resources from federal, state, and local government sources as well as nonprofit organizations and private foundations. EWG submits the UPWP to our funding agencies as a commitment to fulfill our legal obligations as the region's designated MPO. The document is also made available to our local governments and the public.

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

B. Long-Range Transportation Plan

The Long-Range Transportation Plan (LRTP) serves as a blueprint for the management of the region's transportation system. Developed every four years, the LRTP identifies transportation improvements over a 25- to 30-year period and articulates a range of regionwide transportation goals, policies, and strategies.

The principles and strategies included in the LRTP are carried out through a variety of short-range transportation plans and programs. Chief among these is the Transportation Improvement Program (TIP), which reflects more immediate 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 Transportation Plan, the Regional Freight Study, the Congestion Mitigation Process, and OneSTL: The Plan for Regional Sustainable Development.

EWG's Board of Directors oversees the development of short- and long-range transportation plans for the region and selects the federally and locally funded capital projects and operational initiatives that will best carry out the principles and strategies of the long-range plan. EWG develops the LRTP under certification from the U.S. Department of Transportation and under joint agreements among the states of Missouri and Illinois, the city of St. Louis, and the counties in the region: 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 lanes to existing streets, interchange construction or modification, improvements to intersections, transit amenities, and bicycle/pedestrian infrastructure. 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 the planning cycle and provides a more comprehensive view of the program for public information purposes.

Notice of public involvement activities and the 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, such as major investment studies. This plan specifies the strategies and techniques EWG staff will consider and employ in achieving the goals of the public participation process.

As part of the plan, EWG documents and assesses 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 the region's residents. This review of current practices and development of new strategies is informed by the board of directors, agency 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 region's designated metropolitan planning organization, 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 and updated as needed.

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

Overview of Current Engagement Practices

EWG has many approaches that are currently used to reach the public and garner input. The list below provides a broad overview of these public involvement practices.

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, and the Bicycle and Pedestrian Advisory Committee. 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. A few of the newer policy groups created to improve services in the region are the Coordinated Human Services Transportation Plan stakeholder committee, the Northside-Southside MetroLink Corridor Study advisory committee, and the Freight Working Group, which assisted with the creation of the St. Louis Regional Freightway.

Publications—Numerous regular publications are created to inform and educate the region's residents on various issues. Other materials are continuously developed to support citizen engagement as the need arises. Examples include:

- **Local Government Briefings:** This weekly email newsletter provides information on programs, grants, news, and other items relevant to the region's municipalities.
- **Where We Stand:** This strategic assessment of the St. Louis region ranks the St. Louis Metropolitan Area as compared to the country's 50 most populous metropolitan areas across a host of metrics in the areas of economic development, workforce and education, and crime and public safety.
- **Annual Public Officials Directory:** A reference guide for the city of St. Louis and seven surrounding counties containing contact information for key local government elected officials and personnel.
- **Know Your Rights:** This Title VI brochure series is 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. Updated with more accessible language in 2018.
- **Frequently Asked Questions about the TIP:** This brochure was updated in 2018 and breaks down the Transportation Improvement Program process.

Website and Social Media—In 2017, EWG launched a new, mobile-friendly website that provides a more user-friendly experience and improved access to data, meeting agendas, agency events, and project announcements. Any document that EWG puts out for public comment is posted to the website. All of EWG's plans, reports, final publications, RFPs, and minutes are also available. In addition, the agency regularly publishes content on its official Twitter and Facebook channels for continuous outreach and engagement.

The Outstanding Local Government Achievement Awards—Each year, EWG presents the Outstanding Local Government Achievement Awards to recognize the extraordinary work of municipal, county, public safety, and school district officials. Nominations are widely solicited from community organizations and individuals as well as 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 highlighting the progress in their communities.

Local Government Collaboration—EWG regularly collaborates with universities, professional groups, and other regional organizations to increase the capacity of the region's municipalities. The goal of these efforts is to provide training, technical assistance, and other resources to local government officials throughout the region.

Technical Assistance and Workshops—Council staff works with local governments, community organizations, and residents to recognize and pursue regional solutions and increase their effectiveness. EWG also hosts workshops that are open to the public in accessible settings on an array of regional issues or agency programs. This includes training and application review for municipalities and other organizations seeking federal funds from EWG.

Presentations and Community Outreach—EWG staff, by invitation, attends meetings of numerous civic, volunteer, business, neighborhood, and professional organizations to share information about the agency's work. Staff also regularly attends community events as part of engagement efforts for various agency plans and projects.

Mapping—EWG staff use geographic information systems (GIS) to develop maps that inform the public and our research partners. They produce a new map each month on different demographic trends that is made available on our website.

Research—EWG produces in-depth analysis of regional trends related to transportation planning, demographic changes, and sustainability planning. Staff use GIS applications and data from the U.S. 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 54 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 residents 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:

Roz Rodgers
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 4: Public Involvement Plan

Appendix 5: LEP Plan

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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' (EWG) 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, EWG is responsible for ensuring that its LEP constituents have meaningful access to EWG's programs and activities.

EWG promotes a positive and cooperative understanding of the importance of providing language assistance so that LEP persons can have meaningful access to EWG's programs and activities. To this end, EWG's LEP Plan analyzes the most recent data available regarding the Region's LEP population (see Part C – Four Factor Analysis). EWG 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 EWG 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 EWG's Four Factor Analysis (see Part C) show, in part, that the Region has a very low, overall LEP population (at 2.2 percent) and that EWG has infrequent contact with LEP persons. Based on the results of the Four Factor Analysis, EWG has determined that it will provide language assistance services on a case-by-case or as-needed basis.

EWG is prepared at all times to respond to each request for language assistance and to provide *reasonable* access to EWG'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 EWG's language assistance services please refer to Part D.

EWG'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 EWG 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 2012 – 2016.[2] This is the most recent dataset available that includes all of the data that EWG needed to conduct its analysis. The data that EWG 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 EWG's LEP Plan development is for EWG to conduct a "Four Factor Analysis" that EWG will use to determine whether it communicates effectively with LEP persons and will inform EWG'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 EWG's programs or activities. EWG's service area is the Region. As a planning agency, EWG does not have daily interaction with LEP persons; rather, EWG'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, EWG's analysis focuses on identifying those areas within the Region that have highest concentrations of LEP persons. EWG uses this data to identify LEP communities that may be part of EWG's

[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.

planning project service area so that EWG can conduct appropriate outreach and provide any LEP persons living in these communities meaningful access to EWG's planning efforts.

Based on EWG's analysis, the Region has very few LEP persons (53,904 persons or 2.2 percent of the Region's total population) and households (12,020 households or 1.2 percent of the Region's total household). Most LEP persons live in the city of St. Louis (10,487 persons) or St. Louis County (28,707 persons). Table 12 summarizes the data for LEP persons and households. Map 11 shows the spatial distribution of LEP persons in the Region.[4]

Table 12. St. Louis Region Limited English Proficient (LEP) Persons & Households[1]

		Persons Over Age 5	LEP Persons Over Age 5		Total Households	LEP Households	
		#	#	%	#	#	%
St. Louis Region		**2,429,479**	**53,904**	***2.2***	**1,027,717**	**12,020**	***1.2***
ILLINOIS	Madison County	250,981	2,651	*1.1*	107,014	435	*0.4*
	Monroe County	32,006	107	*0.3*	13,030	0	*0.0*
	St. Clair County	248,611	3,791	*1.5*	102,672	884	*0.9*
MISSOURI	City of St. Louis	295,039	10,487	*3.6*	140,116	2,957	*2.1*
	Franklin County	95,762	564	*0.6*	40,197	92	*0.2*
	Jefferson County	208,657	1,494	*0.7*	82,308	210	*0.3*
	St. Charles County	356,160	6,103	*1.7*	140,664	964	*0.7*
	St. Louis County	942,263	28,707	*3.0*	401,716	6,478	*1.6*

Source: U.S. Census 2016 5-Year American Community Survey, Tables S1602 and C16001.

[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."

[4] County-level maps of LEP Persons for each of the eight counties in the Region can be found online at: www.ewgateway.org/titlevi.

LEP Persons, 2012-2016

St. Louis Metropolitan Area

January 2018

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, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

Although EWG's interaction with LEP persons is very limited,[5] EWG'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 54,000 LEP persons, there are three language groups that are the most common: Spanish, Russian, Polish, or other Slavic (Slavic), and Chinese (which includes Cantonese and Mandarin). Spanish, Slavic, and Chinese language speakers make up more than half (57 percent) of the Region's LEP population with more than 30,000 people. These three language groups are also the only groups that make up more than 10 percent of the total LEP population (see Table 13a).

Nearly a third (32.2 percent) of the LEP population speaks Spanish. This represents 17,364 individuals, and is by far the largest LEP group in the Region. The next most common languages spoken by LEP persons are those in the Russian, Polish, or other Slavic language group, of which a majority speak Bosnian or Serbo-Croatian. Slavic speaking LEP persons represent approximately 13 percent of all LEP persons; with a total of 7,249 persons.

Because of the importance of the Bosnian population to the Region, it is necessary to attempt to disaggregate the "Russian, Polish, or other Slavic languages" category reported by the Census into component parts. The Census changed the manner in which it reports data for this group between 2015 and 2016. In the 2015 data, ACS reported separately on Russian and Serbo-Croatian, the latter of which is the most frequently spoken Slavic language in the Region. The 2016 ACS reports 7,249 individuals in the Slavic LEP category. The 2015 5-year ACS reported a similar number, 7,342, for all Slavic languages. Of this, 4,902, or 66.8 percent, were Serbo-Croatian speakers. Since there is considerable overlap between the 2011-2015 ACS and the 2012-2016 ACS, EWG determined that it is likely that a similar percentage of Slavic language speakers currently speak Serbo-Croatian. Thus, EWG estimated that there are approximately 5,000 Serbo-Croatian speakers with limited English proficiency in the Region.

Bosnians in the St. Louis Region

A civil war in the former Yugoslav republic of Bosnia-Herzegovina between 1992 and 1995 resulted in approximately 7,000 Bosnians relocating to the Region. Today, it is estimated that there are about 50,000 Bosnians in the St. Louis area. Map 17 shows LEP persons who speak Slavis languages, of which the Bosnians make up a large majority. The Bosnian community is concentrated in the cluster of points spreading from south St. Louis City to adjacent south St. Louis County.

Speakers of the Mandarin or Cantonese Chinese languages make up the third largest category of the LEP population. The Census estimates that there are nearly 6,000 LEP speakers of Chinese languages in the Region, making up 11 percent of all LEP persons.

Although the Spanish, Slavic, and Chinese 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, 0.3 percent for speakers of Slavic languages, and 0.25 percent for Chinese speaking LEP persons (see Table 13b).

[5] Since 2015, EWG has not had contact with any LEP persons.

Table 13a shows 12 languages and language groups for which the ACS provides data. In the Region, nearly a third (32.2 percent) of the LEP population speaks Spanish. Slavic speaking LEP persons represent approximately 13 percent of all LEP persons. Approximately 11 percent of the Region's LEP population speaks Chinese languages.

Table 13a. Language Spoken by LEP Population, by Language by County

		Spanish	Russian, Polish, or other Slavic languages	Chinese (incl. Mandarin, Cantonese)	Other Indo-European languages	Vietnamese	Other Asian and Pacific Island languages	Arabic	Other and unspecified languages	Korean	French, Haitian, or Cajun	German or other West Germanic languages	Tagalog (incl. Filipino)
St. Louis Region		**17,364**	**7,249**	**5,963**	**5,847**	**4,359**	**3,259**	**2,328**	**2,100**	**1,906**	**1,389**	**1,243**	**897**
ILLINOIS	Madison County	1,161	131	240	304	80	157	81	58	177	116	83	63
ILLINOIS	Monroe County	66	4	0	9	0	0	0	0	0	14	14	0
ILLINOIS	St. Clair County	2,019	92	177	131	307	247	52	89	221	152	198	106
MISSOURI	City of St. Louis	3,601	982	668	1,085	1,863	485	574	617	116	287	209	0
MISSOURI	Franklin County	221	4	136	67	17	24	16	23	0	4	52	0
MISSOURI	Jefferson County	585	319	38	67	189	26	22	13	32	44	62	97
MISSOURI	St. Charles County	2,630	360	416	681	226	558	192	125	316	237	206	156
MISSOURI	St. Louis County	7,081	5,357	4,288	3,503	1,677	1,762	1,391	1,175	1,044	535	419	475
Percent of Regional LEP		***32.2***	***13.4***	***11.1***	***10.8***	***8.1***	***6.0***	***4.3***	***3.9***	***3.5***	***2.6***	***2.3***	***1.7***

Source: U.S. Census 2016 5-Year American Community Survey.

Table 13b shows the percentage of the Region's population represented by the LEP population's different language groups. Spanish speakers with LEP represent 0.71 percent of the Region's population over the age of five. In the city of St. Louis, this group is more than one percent of the total population. In no other county does this group exceed one percent of the population. LEP speakers of Slavic languages all together comprise 0.30 percent of the Region's population. In the city of St. Louis, the Slavic LEP population makes up just over one third of one percent of the population. In no other county does this population exceed a third of one percent.

Table 13b. Percent of Population Over Age 5 that is LEP, by Language by County

		Spanish	Russian, Polish, or other Slavic languages	Chinese (incl. Mandarin, Cantonese)	Other Indo-European languages	Vietnamese	Other Asian and Pacific Island languages	Arabic	Other and unspecified languages	Korean	French, Haitian, or Cajun	German or other West Germanic languages	Tagalog (incl. Filipino)
St. Louis Region		**0.71**	**0.30**	**0.25**	**0.24**	**0.18**	**0.13**	**0.10**	**0.09**	**0.08**	**0.06**	**0.05**	**0.04**
ILLINOIS	Madison County	0.05	0.05	0.10	0.12	0.03	0.06	0.03	0.02	0.07	0.05	0.03	0.03
	Monroe County	0.21	0.01	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.04	0.04	0.00
	St. Clair County	0.81	0.04	0.07	0.05	0.12	0.10	0.02	0.04	0.09	0.06	0.08	0.04
MISSOURI	City of St. Louis	1.22	0.33	0.23	0.37	0.63	0.16	0.19	0.21	0.04	0.10	0.07	0.00
	Franklin County	0.23	0.00	0.14	0.07	0.02	0.03	0.02	0.02	0.00	0.00	0.05	0.00
	Jefferson County	0.11	0.00	0.07	0.03	0.01	0.01	0.01	0.01	0.00	0.00	0.02	0.00
	St. Charles County	0.16	0.09	0.01	0.02	0.05	0.01	0.01	0.00	0.01	0.01	0.02	0.03
	St. Louis County	0.28	0.04	0.04	0.07	0.02	0.06	0.02	0.01	0.03	0.03	0.02	0.02

Source: U.S. Census 2016 5-Year American Community Survey.

While the LEP persons who speak languages in the top three language groups are generally dispersed across the Region, the highest proportion of these LEP populations reside in the city of St. Louis, St. Charles County, and St. Louis County. St. Louis County has the largest proportion of Spanish, Slavic, and Chinese speaking LEP persons, at almost 55 percent or 16,276 persons. The city of St. Louis has the next highest proportion with more than 17 percent of LEP persons falling within these groups (5,251 persons). As shown in Table 14, each county within EWG's service area has at least some Spanish speaking LEP persons, while Slavic 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 Slavic speaking LEP persons, at 13.6 percent and 74 percent, respectively, and the highest proportion of the Region's Chinese speaking LEP persons at 11.2 percent and 72 percent, respectively.

Chart 2. Proportion of LEP Population, Top 3 Language Groups by County

Source: U.S. Census 2016 5-Year American Community Survey.

Table 14. Proportion of Spanish, Slavic Languages & Chinese Speaking LEP Populations by County

		Spanish		Russian, Polish, or other Slavic languages		Chinese (incl. Mandarin, Cantonese)		Total	
		#	%	#	%	#	%	#	%
St. Louis Region		**17,364**	**100.00**	**7,249**	**100.00**	**5,963**	**100.00**	**30,576**	**100.00**
ILLINOIS	Madison County	1,161	6.69	131	1.81	240	4.02	1,532	5.01
	Monroe County	66	0.38	4	0.06	0	0.00	70	0.23
	St. Clair County	2,019	11.63	92	1.27	177	2.97	2,288	7.48
MISSOURI	City of St. Louis	3,601	20.74	982	13.55	668	11.20	5,251	17.17
	Franklin County	221	1.27	4	0.06	136	2.28	361	1.18
	Jefferson County	585	3.37	319	4.40	38	0.64	942	3.08
	St. Charles County	2,630	15.15	360	4.97	416	6.98	3,406	11.14
	St. Louis County	7,081	40.78	5,357	73.90	4,288	71.91	16,726	54.70

Source: U.S. Census 2016 5-Year American Community Survey.

Maps 16 through 18 show the spatial distribution of Spanish speaking, Slavic speaking, and Chinese speaking LEP persons in the Region.

LEP Persons, 2012-2016

Russian, Polish or other Slavic Language Speakers

St. Louis Metropolitan Area

February 2018

1 dot = 5 Russian, Polish or other Slavic language speakers who speak English "less than very well". Dots are randomly placed within 2010 Census tracts. Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

LEP Persons, 2012-2016

Chinese Language Speakers (incl. Mandarin and Cantonese)

St. Louis Metropolitan Area

February 2018

1 dot = 5 Chinese (incl. Mandarin, Cantonese) language speakers who speak English "less than very well". Dots are randomly placed within 2010 Census tracts. Tract boundaries are not shown on the map.

Sources: U.S. Census Bureau, 2016 5-Year American Community Survey (2012 - 2016); East-West Gateway Council of Governments

EAST-WEST GATEWAY Council of Governments

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

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

Although EWG does not typically have frequent contact with LEP populations, EWG recognizes that there are communities in the Region that have high concentrations of LEP persons and that, if EWG undertakes a project in these communities, EWG may have an occasion to have more frequent contact with LEP persons. As part of its project planning process, EWG analyzes the community-level data to identify these LEP populations and take steps to include LEP persons in the project. EWG 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] EWG utilizes this list to conduct public outreach by sending these groups notifications about public meetings and other information about EWG'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. EWG is the metropolitan planning organization (MPO) for the Region. As described in Section V of the Title VI Program, EWG'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. EWG'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. EWG 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.

EWG must ensure that all segments of the Region's population, including LEP persons, have the opportunity to be involved in the planning process. EWG 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. EWG 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, EWG 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, EWG must examine the resources that it has available to provide meaningful access to LEP persons and the likely cost that EWG 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, EWG 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). EWG 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). EWG's significant documents are very lengthy and the cost to provide written translation of these documents is summarized in Table 15 below. Additionally, EWG 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 16 below. The total cost to EWG for providing this type of outreach as a regular or automatic service exceeds EWG's available budget.

Table 15. Average[1] Cost of Written Translation of Significant Agency Documents

	Est. # of Words[2]	Avg. Cost Per Word	Total Cost
TIP	20,000	$0.14	$2,800.00
Air Quality Conformity	55,000	$0.14	$7,700.00
UPWP	24,000	$0.14	$3,360.00
LRTP	45,000	$0.14	*$6,300.00*
Where We Stand	49,800	$0.14	$6,972.00
CHSTP	15,000	$0.14	$2,100.00
		Total Costs	***$29,232.00***

Source: State of Missouri, Office of Administration, state contracts for language services - master contract # CS170386.

[1] Written translation services are charged by the word and the price can range from $.11 - $.18 per word, depending on the organization providing the service (see Table 17 for a list of service providers). EWG used an average of the per word cost, which is $.14. The costs above do not include the cost of having the translated documents formatted or edited, which would cost, on average, $25.33 / hour. *The number of words will vary from year-to-year based upon actual content.*

[2] The estimated number of words for the TIP, Air Quality Conformity, and *Where We Stand* do not include numbers that would not need to be translated.

Table 16. Average[1] Cost of Oral Interpretation at Public Meetings

	Est. # of Hours	Avg. Cost Per Hour	Total Cost
LRTP	8	$46.69	$373.49
TIP & Air Quality Conformity	12	$46.69	$536.89
Other	10	$46.69	$466.86
		Total Costs	***$1,377.24***

Source: State of Missouri, Office of Administration, state contracts for language services - master contract # C315144. Contract 005 was excluded due to the vendor not participating in cooperative purchases and contracts 009 and 012 were excluded because the contract terms had expired.

[1] In-person oral interpretation services are charged by the hour and the price can range from $35 - $75 per hour, depending on the organization providing the service and the language needed (see Table 17 for a list of service providers). EWG used an average of the hourly cost for the Region. The number of hours required reflect the total number of hours that EWG staff typically spends at the public meetings for each event multiplied by the typical number of events EWG holds for that project. For example, for the 2018 - 2021 TIP & Air Quality Conformity, EWG held 5 open houses for 2 hours each, 1 online chat for an hour, and 1 Facebook live event for half an 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. EWG's Four Factor analysis shows that the Region has a low, overall LEP population and that EWG has infrequent contact with LEP persons; therefore, EWG has determined that it will provide language assistance services on a case-by-case or as-needed basis. EWG is prepared at all times to respond to each request for language assistance and to provide reasonable access to EWG'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 17 provides a list of organizations that can provide EWG these services.

Although EWG 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, EWG 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 EWG's service area. The materials that EWG will translate into Spanish include: (1) EWG'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 EWG's provision of free language assistance services. Translating these documents is a low-cost way for EWG to inform LEP persons about the protections afforded them under Title VI and provide LEP persons a way to request additional information or services. EWG will also place a statement on its website that informs visitors that EWG will provide language assistance services free of charge and upon request. This statement will be placed on EWG'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, EWG recognizes that the Region has certain areas with higher concentrations of LEP persons who may speak languages other than Spanish, so EWG has determined that it will take several low-cost or no-cost proactive steps to provide meaningful access to EWG's program, activities, and services to all LEP persons. These steps include:

- Utilizing bilingual EWG 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. EWG 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.

[7] The State of Missouri's Cooperative Procurement List can be found online at: http://archive.oa.mo.gov/purch/cgi/list.cgi.

- Working with local groups, citizens, and businesses that represent or work with LEP persons in order to identify appropriate strategies that EWG 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 EWG's LEP Plan.

Table 17. Language Assistance Providers*

Telephone Foreign Language Interpretation ($37 / hour)	
Corporate Translation Services, Inc. Vancouver, WA (360) 433-0426	Linguistica International Jordon, UT (801) 262-4550
Voiance Language Services LLC Tuscon, AZ (520) 745-6447	
Language Interpreter – Verbal ($47 / hour)	
All Access Interpreters LLC St. Louis, MO (314) 259-1010	Language Access Multicultural People St. Louis, MO (314) 842-0062
International Institute of Metropolitan St. Louis St. Louis, MO (314) 773-9090	Global Village Language Center St. Louis, MO (314) 989-9112
Bi-Lingual International Assistant Services St. Louis, MO (314) 645-7800	International Language Center St. Louis, MO (314) 647-8888
Language Translation – Written ($.14 / word; $25 / hour for editing and formatting)	
International Language Center St. Louis, MO (314) 647-8888	Language Access Multicultural People St. Louis, MO (314) 842-0062
Fox Translation Services Hummelstown PA (844) 369-8726	

Source: State of Missouri, Office of Administration, state contracts for language services - master contract #s C316047, C315144, and CS170386.

**Costs are averages across providers 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.*

E. Monitoring, Evaluating & Updating the LEP Plan

EWG 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.), EWG planning staff coordinates with EWG 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, EWG planning staff pays particular attention to this demographic characteristic. EWG 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.

EWG 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 EWG 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. EWG 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. EWG 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, EWG 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 EWG 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 EWG 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, EWG conducts a periodic assessment of LEP needs in the Region and the outreach strategies that EWG can use to engage the LEP community.

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

F. Staff Training

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

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

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Appendix 6: Committees

East-West Gateway Council of Governments (EWG) 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 online at: www.ewgateway.org/about-us/who-we-are/committees/ and www.stl-starrs.org/AboutUs/BOD/bod.htm. A description of each committee and its membership is also provided below. EWG does not select or appoint the members of these committees; however, EWG 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. EWG'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	
St. Louis Regional Chamber	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. 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, Municipal League of Metro St. Louis	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 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 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	
HeartLands Conservancy	

Air Quality Advisory Committee (AQAC) – The AQAC 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	St. Louis County Municipal League
Madison County Highway Department	Missouri Department of Natural Resources
St. Clair County Transit District	Illinois Environmental Protection Agency
Bi-State Development Agency d/b/a Metro	Missouri Department of Transportation
St. Charles County	Illinois Department of Transportation
St. Louis County	Federal Highway Administration
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'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	

Appendix 6: Committees

Non-Profit & Educational Organizations	
Missouri Prairie Foundation	Meramec River Recreation Association
St. Louis Earth Day	Regulatory Environmental Group for Missouri
Great River Environmental Law Center	HeartLands Conservancy
The Open Space Council	The Nature Conservancy
Sierra Club	NineNetwork of Public Media
Ozark Regional Land Trust	Southern Illinois University – Edwardsville
Magnificent Missouri	St. Louis University
America's Confluence	Public Policy Research Center (UMSL)
Missouri Coalition for the Environment	
Private Industry	
Boeing	Geosyntec Consultants
Mississippi Lime	EcoWorks Unlimited
Trinity Consultants	Hastings Engineering
Leverage Management Services	Lions CSG
M3 Engineering Group	Reitz & Jens, Inc.
SCI Engineering	Intuition and Logic
The Doe Run Company	Geotechnology
TRC Solutions	Terracon

St. Louis Area Regional Response System (STARRS) Board of Directors (BOD) – The STARRS BOD is a 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	St. Charles County Ambulance District MedStar Ambulance
HazMat	***Hospital Preparedness***
St. Louis City Fire Department	SSM Healthcare Missouri Department of Mental Health
Interoperable Communications	***Law Enforcement***
Eureka Fire Protection District St. Charles County, Missouri	St. Charles County Police Department St. Louis County Police Department
Public Health	***St. Area Regional Coalition of COADs***
Franklin County Health Department St. Louis County Health Department	Washington University Emergency Management Agency United Way of Greater St. Louis
Training & Exercise	***Urban Search & Rescue***
St. Louis County Department of Health St. Louis Metropolitan Police Department	Monarch Fire Protection District Cottleville Fire Protection District
ESF-8 Coordination	***Mass Fatality***
Missouri Baptist Hospital	City of St. Louis Emergency Management Agency

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

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Appendix 7:

Board Approval Documents

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Appendix 7: Board Approval Documents

RESOLUTION NO. 2018-1
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' 2018 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 2018 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 2018 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.

CERTIFICATION OF AUTHORIZING RESOLUTION NO. 2018-1

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 May 31, 2018.

James M. Wild
Name

Executive Director
Title

Signature

6-27-18
Date

EWGCOG Resolution 2018-1
Page 2 of 2

Appendix 8: Maps

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Appendix 8: Maps

As part of the Title VI Program update, EWG developed a series of maps that reflect a spatial analysis of the data used in the Title VI Program, including the limited English proficiency (LEP) Plan. These maps provide information about demographic characteristics of the Region's population such as elderly persons, environmental justice (EJ) areas, LEP persons (including LEP persons by language spoken), low-income persons, the minority population, persons with a disability, and zero-vehicle households. The data used in these maps is from the U.S. Census Bureau, 2016 5-Year American Community Survey (ACS) (2012-2016).

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.

A list of the maps is provided below. The maps are available for download on EWG's website at www.ewgateway.org/titlevi.

	# of Maps		
Topic	**Region**	**County**	**Total**
Elderly Persons	1	8	9
Environmental Justice (EJ) Areas	3	6	9
LEP Persons	13	8	21
Low-Income Persons	1	8	9
Minority Population	2	8	10
Persons with a Disability	1	8	9
Zero-Vehicle Households	1	8	9
Total	**22**	**54**	**76**

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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) 274-275 | www.ewgateway.org

Document Updates

EWG has updated the Title VI Program documents as described in the table below.

Date	Description
5/30/2019	Section III, Part 1 was updated to reference the updated Public Involvement Plan (PIP). Appendix 4: Public Involvement Plan was updated to reflect the PIP that was approved by EWG's Board of Directors on May 29, 2019.