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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Title VI Nondiscrimination Complaint Form

[1] The appendices are available separately online at: www.ewgateway.org/titlevi.
[2] Full-size PDF versions of the maps are available online at: www.ewgateway.org/titlevi.
[3] 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
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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

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

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

0 5 10 Miles

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

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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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.