

TITLE VI PROGRAM

As required by the Federal Transit Administration

June 2024 Update



Metropolitan Washington
Council of Governments

TITLE VI PROGRAM

Approved by the COG Board of Directors on June 12, 2024.

ABOUT COG

The Metropolitan Washington Council of Governments (COG) is an independent, nonprofit association that brings area leaders together to address major regional issues in the District of Columbia, suburban Maryland, and Northern Virginia. COG's membership is comprised of 300 elected officials from local governments, the Maryland and Virginia state legislatures, and U.S. Congress.

CREDITS

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ACCOMMODATIONS POLICY

Alternative formats of this document are available upon request. Visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

TITLE VI NONDISCRIMINATION POLICY

The Metropolitan Washington Council of Governments (COG) operates its programs without regard to race, color, and national origin and fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations prohibiting discrimination in all programs and activities. For more information, to file a Title VI related complaint, or to obtain information in another language, visit www.mwcog.org/nondiscrimination or call (202) 962-3300.

El Consejo de Gobiernos del Área Metropolitana de Washington (COG) opera sus programas sin tener en cuenta la raza, el color, y el origen nacional y cumple con el Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y reglamentos relacionados que prohíben la discriminación en todos los programas y actividades. Para más información, presentar una queja relacionada con el Título VI, u obtener información en otro idioma, visite www.mwcog.org/nondiscrimination o llame al (202) 962-3300.

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TITLE VI PROGRAM

Introduction

The Federal Transit Administration (FTA) requires that the Metropolitan Washington Council of Governments (COG), as a Designated Recipient of the FTA Section 5310 Enhanced Mobility program, “document compliance with DOT’s Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA.”¹

COG also has a Title VI Plan which includes policies and procedures to ensure nondiscrimination in all COG and TPB programs and services (available at <https://www.mwcog.org/documents/2021/05/27/title-vi-plan-to-ensure-nondiscrimination-in-all-programs-and-activities-cog-tpb/> - also available on the mwcog.org website, search “Title VI”). While there is overlap between the Title VI Plan and Title VI Program, the Plan includes required elements for the U.S. Federal Highway Administration (FHWA), FTA, and other Federal agencies. The Title VI Program is specific to the USDOT FTA requirements as outlined in Circular FTA C 4702.1B (<https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/title-vi-requirements-and-guidelines-federal-transit>). For this document, the location of FTA-required items for a Title VI Program are listed on page 3. The Program includes general requirements for a Title VI Program and the requirements for Metropolitan Planning Organizations (MPOs). The TPB serves as the MPO for the Metropolitan Washington region.

COG is committed to assuring that no person shall, on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100-259), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity. COG 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.

COG is a regional planning organization. COG is the one entity in the metropolitan Washington region that regularly brings leaders together to develop solutions to the region's major challenges. COG prepares plans enabling the region to receive federal funding, provides members with research and data to inform decision-making, and offers a wide range of programs, including commuter services, cooperative purchasing, and technical assistance and grants. As a regional planning entity, the benefits provided by COG and its boards and committees are primarily educational/information-based and support local, regional and state governance. COG does not own or maintain any facilities other than its office space which it leases. COG implements the FTA Section 5310 program for the DC-MD-VA Urban area, and COGs only subrecipients are through this program.

RELATIONSHIP BETWEEN COG AND THE TPB

¹ Title Vi Requirements and Guidelines For Federal Transit Administration Recipients. FTA C 4702.1B. October 1, 2012. Page III-1. www.fta.dot.gov/legislation_law/12349_14792.html

The Metropolitan Washington Council of Governments (COG) was established in 1957 by local cities and counties to deal with regional concerns including growth, housing, the environment, public health and safety - as well as transportation. COG is an independent, nonprofit association comprised of 24 local governments surrounding our nation's capital, plus area members of the Maryland and Virginia legislatures, the U.S. Senate, and the U.S. House of Representatives. The metropolitan Washington region covers approximately 3,500 square miles and includes more than 5.9 million people and 3.5 million jobs.

COG serves as the administrative agent for the National Capital Region Transportation Planning Board (TPB) under an agreement with the Transportation Departments of Maryland, Virginia, and the District of Columbia. The TPB was created in 1965 by the region's local and state governments to respond to federal highway legislation in 1962 that required the establishment of a "continuing, comprehensive, and coordinated" transportation planning process in every urbanized area in the United States. The TPB is designated as this region's Metropolitan Planning Organization (MPO) by the Governors of Maryland and Virginia and the Mayor of Washington, D.C. based upon an agreement among the local governments. Although the TPB is an independent body, its staff is provided by COG's Department of Transportation Planning. COG administers a federally-approved annual Unified Planning Work Program (UPWP) in conjunction with the TPB in accordance with federal requirements. The USDOT Federal Highway Administration and Federal Transit Administration jointly certified the federal transportation planning process, including a Title VI Plan and Title VI Program review, on June 2, 2023.

It is important to note that COG and the TPB do not own or operate any transit system. Because of this, the TPB operates as a planning agency.

The MPO/TPB does not pass through any funding or have any subrecipients.

Policy Statement

COG Title VI Policy Statement

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Clark Mercer, Executive Director

6/12/24
Date

LIST OF FTA-REQUIRED ELEMENTS FOR A TITLE VI PROGRAM AND PAGE LOCATION

Requirement	Page Number
A copy of the recipient's Title VI notice to the public that indicates the recipient complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted	5
A copy of the recipient's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form	8
A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.	15
A public participation plan and a summary of outreach efforts made since the last Title VI Program submission.	16 and Appendix A
A copy of the recipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.	19 and Appendix B
Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.	20
Description of efforts the primary recipient uses to ensure subrecipients are complying with Title VI, as well as a schedule of subrecipient Title VI program submissions.	22
If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted.	N/A
Board Resolution or minutes approving Title VI Program.	27
A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate.	28
A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.	32
Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a designated recipient.	Pages 33 to 36

<p>An analysis of impacts that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.</p>	<p>37</p>
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Title VI Notice to the Public

In order to comply with 49 CFR Section 21.9(d), the COG shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. For more information on COG's nondiscrimination obligations, contact COG's Title VI Officer, Clark Mercer, care of Simone Ellis, at sellis@mwkog.org or (202) 962-3263. The paragraph below will be inserted into all significant publications that are distributed to the public. The text will be placed permanently on the COG website at <https://www.mwkog.org/nondiscrimination> and in public areas of COG's offices.

The Metropolitan Washington Council of Governments (COG) operates its programs without regard to race, color, and national origin and fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations prohibiting discrimination in all programs and activities. For more information, to file a Title VI related complaint, or to obtain information in another language, visit www.mwkog.org/nondiscrimination or call (202) 962-3300.

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Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI may file a formal complaint with COG's Title VI Officer by completing and signing COG's Title VI Complaint Form. A formal complaint must be submitted in writing within 180 calendar days from the date of the alleged occurrence or when the alleged discrimination became known to the complainant. Complaints should be mailed to Title VI Officer, Metropolitan Washington Council of Governments, 777 North Capitol Street NE, Suite 300, Washington, DC 20002.

A person may also file a complaint directly with the appropriate state agency or the Federal Transit Administration at the following:

Virginia:

Civil Rights Division Administrator
Virginia Department of Transportation
1401 E. Broad St.
Richmond, VA 23219
Telephone: (804) 786-2730
Toll free: (888) 508-3737
Fax: 804-371-8040

(TTY/TDD 711)

OR

U.S. Department of Transportation
Federal Highway Administration
Virginia Division
Office of Civil Rights
400 N. 8th St., Suite 750
Richmond, VA 23219

Maryland:

Maryland Department of Transportation
Title VI Program Manager

Office of Diversity and Equity
7201 Corporate Center Drive
Hanover, Maryland 21076

Office of Fair Practices
Maryland Transit Administration
6 Saint Paul Street

Baltimore, Maryland 21202
Web: www.mta.maryland.gov

Telephone: (410) 767-3944

District of Columbia:

District Department of Transportation
Office of Civil Rights
55 M Street, SE, Suite 400
Washington, DC 20003
Telephone: (202) 673-6813
Fax: (202) 727-1013

Federal Transit Administration:

FTA Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

LOCATIONS OF WHERE THE NOTICE IS POSTED

The Title VI notice in English and Spanish is posted in the following locations:

- In the COG Board Room where it is visible to members of the public;
- On the bulletin board in the Office of Human Resources; and
- Throughout the COG offices on three bulletin boards on both the 2nd and 3rd floor.

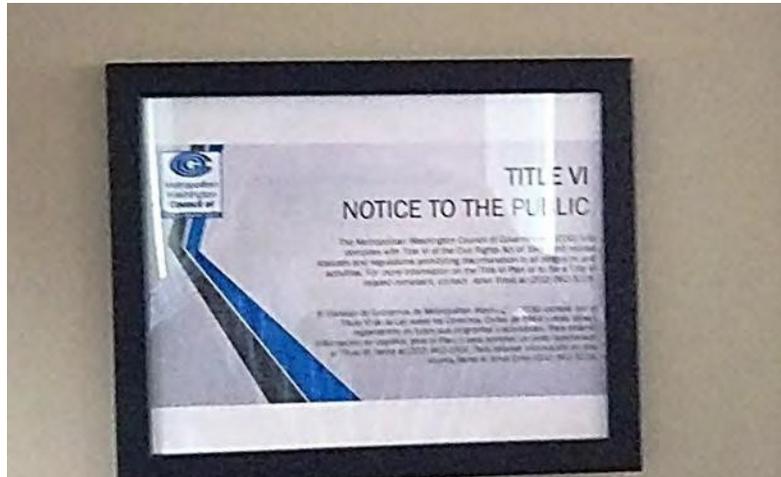


Figure 1: COG's Title VI Notice to the Public as Displayed in the Board Room.

The notice is also posted on COG's website at www.mwcog.org/nondiscrimination

Instructions to the Public on How to File a Discrimination Complaint

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 (including its Disadvantaged Business Enterprises (DBE) and Equal Employment Opportunity (EEO) components), Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by COG or its sub-recipients, consultants, and/or contractors, intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Officer or the appropriate Title VI Coordinator may be utilized for resolution, at any stage of the process. The Title VI Officer will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination may file a formal complaint with COG's Title VI Officer by completing and signing COG's Title VI Complaint Form. A formal complaint must be submitted in writing within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:
 - Complaint shall be in writing and signed by the complainant(s) and submitted using COG's Title VI Complaint Form. (Form follows this section)
 - Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
 - Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident. Additional pages may be submitted with the completed and signed Title VI Complaint Form.
 - Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. In order to establish the intent to proceed, the complainant is required to mail a signed, original copy of the fax or e-mail transmittal for COG to be able to process it.
 - Complaints received by telephone will be entered into a log listing time, date, and complainant. Complainants will be requested to file a complaint in writing and will be directed to the website or other templates for a complaint form.
2. COG will acknowledge receipt of the complaint within 5 business days. Upon receipt of the complaint, the Title VI Officer will refer the matter to the General Counsel who will determine its

jurisdiction, acceptability, and need for additional information in order to advise as to whether COG will accept the complaint for investigation. As appropriate, the complaint will be sent to the state DOT and federal agencies. COG will assume jurisdiction and will investigate and adjudicate the case. COG will notify appropriate state or federal agencies of complaints against COG or the TPB. In special cases warranting intervention to ensure equity, these agencies may assume jurisdiction and either complete or obtain services to review or investigate matters.

3. COG will determine if it accepts the complaint for investigation and notify the complainant and respondent within 10 business days of receipt of the complaint in writing. In order to be accepted, a complaint must meet the following criteria:
 - o The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
 - o The allegation(s) must involve a covered Title VI discrimination such as race, color, national origin, or retaliation.
 - o The allegation(s) must involve a program or activity of a Federal-aid recipient, sub-recipient, contractor, or, in the case of ADA allegations, an entity open to the public.
 - o The complainant(s) must accept reasonable resolution based on COG's administrative authority (reasonableness to be determined by COG).
4. A complaint may be dismissed for the following reasons:
 - o The complainant requests the withdrawal of the complaint.
 - o The complainant repeatedly fails to respond to requests for additional information needed to process the complaint.
 - o The complainant cannot be located after reasonable effort.
5. Once COG accepts a complaint for investigation, the complaint will receive a case number and will then be logged in the records of COG or the agency referred to identifying its basis and alleged harm, and the race, color, and national origin of the complainant.
6. In cases where COG assumes the investigation of the complaint, COG will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of COG's written notification of acceptance of the complaint to furnish their response to the allegations.
7. In cases where COG assumes the investigation of the complaint, within 40 calendar days of the receipt of the complaint, the General Counsel, with assistance from the appropriate Title VI Coordinator, will prepare an investigative report for review by the Executive Director (Title VI Officer). The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
8. The General Counsel and the appropriate Title VI Coordinator will discuss the report and recommendations with the Executive Director within ten (10) calendar days of completion of the investigation. The Executive Director shall make COG's disposition of the complaint.
9. Upon COG disposition, a copy of the complaint will be forwarded to the appropriate State DOT and FTA Division Office.
10. COG will notify the parties of its disposition in writing.
11. COG will cooperate with the State DOT and FTA regarding investigation and disposition of the complaint by the State DOT or FTA, if either entity determines to conduct its own investigation.

If information is needed in another language, contact (202) 962-3300.
Para obtener información en otra idioma, llame al (202) 962-3300.

TITLE VI/ DISCRIMINATION COMPLAINT FORM

Section I

Name: _____

Address: _____

Telephone Numbers:

(Home) _____ (Work) _____

Electronic Mail Address: _____

Accessible Format Requirements?

Large Print _____ Audio tape _____

TDD _____ Other _____

Section II

Are you filing this complaint on your own behalf?

Yes _____ No _____

[If you answered "yes" to this question, go to Section III.]

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party. _____

If you are filing on behalf of a third party, have you obtained the permission of the aggrieved party?

Yes _____ No _____

Section III

Have you filed this complaint with any other federal, state or local agency, or with any federal or state court?

Yes_____No_____

If Yes, please list:

Federal agency_____

State Agency_____

Local Agency_____

Federal Court_____

Have you filed a lawsuit regarding this complaint? Yes_____No_____

If you answered “yes” to either of the two previous questions, please provide a copy of the complaint form or lawsuit.

[Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the court, and COG will not take action.]

Name of office or department you believe discriminated against you:

Office or Department _____

Name of Individual (if applicable) _____

Address _____

City _____ State _____ Zip Code _____

Telephone _____

Basis(es) for complaint, check all that apply:

- Race Color National Origin Gender Disability

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Please sign here: _____ Date: _____

[Note - We cannot accept your complaint without a signature.]

You may attach any written materials or other information that you think is relevant to your complaint.

Please mail your completed form to: Title VI Officer, Metropolitan Washington Council of Governments, 777 North Capitol Street NE, Suite 300, Washington, DC 20002

Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by COG or its sub-recipients, consultants, and/or contractors, intimidation or retaliation of any kind is prohibited by law, may file a formal complaint with COG's Title VI Officer by completing and signing COG's Title VI Complaint Form. A formal complaint must be submitted in writing within 180 calendar days from the date of the alleged occurrence or when the alleged discrimination became known to the complainant.

Complaints should be mailed to Title VI Officer, Metropolitan Washington Council of Governments, 777 North Capitol Street NE, Suite 300, Washington, DC 20002.

A person may also file a complaint directly with the appropriate state agency or the Federal Transit Administration at the following:

Virginia:

Civil Rights Division Administrator Virginia
Department of Transportation Civil Rights
Division
1401 E. Broad St. Richmond, VA 23219
Telephone: (804) 786-2085
Toll free: (888) 508-3737; (TTY/TDD 711)

U.S. Department of Transportation Federal
Highway Administration Virginia Division
Office of Civil Rights
400 N. 8th St., Suite 750
Richmond, VA 23219 Maryland:

Maryland

Maryland Department of Transportation Title
VI Program Manager
Office of Diversity and Equity 7201 Corporate
Center Drive Hanover, Maryland 21076

Equal Opportunity Compliance Programs
Maryland Transit Administration
6 Saint Paul Street Baltimore, Maryland
21202 Web: mta.maryland.gov
Telephone: (410) 539-3497 (TTY)

District of Columbia:

District Department of Transportation Office of
Civil Rights
55 M Street, SE, Suite 400
Washington, DC 20003
Telephone: (202) 673-6813
Fax: (202) 671-0650

Federal Transit Administration:

FTA Office of Civil Rights
Attention: Complaint Team East Building, 5th
Floor – TCR 1200 New Jersey Ave., SE
Washington, DC 20590

Alternative formats of this form can be made available upon request. Visit www.mwcog.org/accomodations or call (202) 962-3300 or (202) 962-3213 (TDD).

List of Any Public Transportation-Related Title VI Investigations, Complaints, or Lawsuits Filed

No Title VI investigations, complaints or lawsuits have been filed in conformance with required processes against either the Metropolitan Washington Council of Governments or the National Capital Region Transportation Planning Board. There have not been any since COG's last Title VI Program submission in 2018.

Public Participation Plan and Summary of Outreach Efforts

The TPB's Participation Plan is provided in Appendix A and is also available at www.mwcog.org/documents/2020/10/21/tpb-participation-plan-outreach-public-comment-tpb/. The plan confirms and describes the TPB's commitment to transparent communications and engagement with the public and with relevant agencies to support the regional transportation planning process. This includes communications and engagement to inform developing the federally required Long-Range Transportation Plan and the Transportation Improvement Program (TIP).

The plan articulates the TPB's policy for public participation. It describes how members of the public can get involved and demonstrates how staff will work to meet and exceed federal requirements. Most importantly, the plan guides TPB staff interactions with the public so their public-facing work can: 1) reach as many people as inclusively as possible, and 2) collect meaningful input and build support to inform TPB plans and programs, and aid in decision making.

The Participation Plan is required under federal laws and regulations pertaining to metropolitan planning. The plan builds on previous efforts designed to encourage participation in the TPB process and provide reasonable opportunities for residents and other interested agencies to be involved in the metropolitan transportation planning process.

As required by federal regulations, the Participation Plan was developed in consultation with interested parties that include: residents of the Washington region, representatives of people with disabilities, users of public transportation, users of bicycle and pedestrian facilities, and transportation and planning agencies in the Washington region. In addition, federal regulations required the plan to be released for a minimum public comment period of 45 calendar days before it is adopted by the TPB.

An evaluation of the TPB's public participation activities, completed in November 2022, provided recommendations for improving future outreach and communications efforts, including findings that will improve engagement with historically disadvantaged communities. While activities outlined in the Participation Plan are broadly applied to Washington area residents and community members, including Title VI populations, several activities in the plan are designed to specifically reach minority populations and other constituencies that are traditionally underserved, including people with disabilities, low-income populations, and others. Some of these activities are described below.

SUMMARY OF PUBLIC INVOLVEMENT ACTIVITIES SINCE THE LAST TITLE VI PROGRAM SUBMISSION

The following provides a summary of public involvement activities since COG's last Title VI Program submission, which was in 2021. Public comment is one of the most basic ways for the public to participate in the TPB process. The requirements and procedures for public comments are described in the TPB's Participation Plan, which is Appendix A of this document. There are basically four types of interaction with members of the public: monthly TPB meeting comment opportunities, Advisory committee activities, federal document outreach requirements, newsletter/social media activities, and specific surveys or data collection activities. Varying levels of outreach occur for each individual activity.

The extent of the outreach depends on available resources and timing. The level of outreach varies. Outreach that has minimal resources available includes evaluating the items through the advisory

committees and using our extensive mailing lists to convey information. Maximum outreach would typically involve consultant support and a concentrated effort to reach these populations, for example, which would occur when an extensive survey is underway.

Monthly TPB Meetings: Agenda Item 1

Each month, when TPB meets, Item 1 provides the public with an opportunity to comment on current TPB actions and activities.

Advisory Committees

The Access for All Advisory Committee (AFA) advises the TPB on transportation issues, programs, policies, and services that are important to low-income communities, minority communities and people with disabilities. Details on the AFA can be found [here](#). The AFA was established in 2001 to advise the TPB on transportation issues, programs, policies, and services important to traditionally underserved communities, including low-income populations, underrepresented communities, people with limited English proficiency, people with disabilities, and older adults. The AFA is one of the ways TPB staff and Board members interact with and obtain feedback from Title VI populations. AFA committee membership is composed of community leaders from around the region, including individuals, representatives of nonprofit groups and other advisory committees. Ex-Officio members work for a state or local agency, a transit provider, or are a private provider of transportation services. The AFA is chaired by a TPB member who makes regular reports to the TPB on AFA issues and concerns. The AFA meets four to five times a year. The month following each AFA meeting, the TPB is provided a written and oral report on the AFA agenda items and issues raised by members. The AFA provides feedback and is notified of public comment periods, throughout the process of updating the Metropolitan Transportation Plan.

The Community Advisory Committee (CAC) is an appointed group of people from throughout the Washington metropolitan region who represent diverse viewpoints on long-term transportation policy. The CAC is comprised of at least five (5) members from DC, Maryland, and Virginia with nine (9) additional members that incorporate the perspective of communities in TPB member jurisdictions. The mission and membership can be found [here](#).

Comment on Federally Required Plans and Programs

The TPB engages in specific public outreach with long range planning activities rather infrequently. These activities are typically associated with the development of the Long-Range Transportation Plan, called Visualize 2045. Plan updates occur once every four (4) years. Visualize 2045 is the federally required long-range transportation plan for the Washington metropolitan region and was approved in Summer of 2022. The next plan update is underway, called Visualize 2050. In developing any long-range plan, the TPB pursues a range of public engagement activities that include outreach targeted to traditionally underrepresented and low-income communities. The last major outreach effort was in 2020 – 2021, when TPB conducted the Voices of the Region Survey.

As part of the latest plan update, Visualize 2050, TPB staff launched a supplemental public comment form to collect project-specific comments on the Visualize 2045 project list. In addition, staff collected comments about Visualize 2050 via email, voicemail, and letter. This feedback was shared monthly with the TPB and Technical Committee as comments were received during 2023. This could be considered “medium” level outreach. There are no major outreach activities planned

yet for Visualize 2050, however, some additional outreach will likely be conducted for the final approval of the Visualize 2050 in 2025, which have not yet been identified. The concerns of traditionally underrepresented and low-income communities are receiving special attention in Visualize 2050, which is scheduled to be approved in 2025. Throughout 2023 and 2024, the TPB has been engaging in outreach activities designed to report the opinions of the region's residents and articulate the kinds of transportation improvements that can have a meaningful impact on people's lives.

The TPB holds 30-day public comment periods for federally required plans, including the Metropolitan Transportation Plan and Transportation Improvement Program ("TIP"), and other plans of regional significance. Two 30-day public comment periods are held during the course of developing the Long-Range Transportation Plan and TIP. Both comment periods are announced online and in print.

Electronic notices are made by email, social media, and postings to the COG website. The Title VI notice is included in the public comment email notices and on the online comment form in both English and Spanish. Notices are printed in in the Washington Post and the newspaper Afro-American, with the Title VI notice in English and Spanish. An ad is also placed in Spanish for the Washington Hispanic newspaper. TPB staff also present the context for these public comment periods to the AFA and the Community Advisory Committee ("CAC").

TPB News, Social Media, and Live Streaming

The TPB publishes a twice-a-month newsletter, called TPB News, that provides brief, timely summaries of recent TPB research, analysis, outreach, and planning in the Washington region. These summaries are written to be accessible to a non-technical audience.

The TPB monthly meetings are live streamed on the internet, and the recordings are archived, allowing the public to listen either live or to past meetings remotely.

The TPB website, which was comprehensively updated in 2016, provides a one-stop-shop for information about regional transportation planning and the roles and responsibilities of the TPB. The site also offers clear information about how to submit public comment and to more broadly get involved in transportation planning. The site also features Spanish-language articles and background information about regional transportation planning and the TPB.

Visit: <https://www.mwcog.org/transportation/>

Surveys and/or Data Collection Efforts

Two additional surveys will occur over the next two (2) years. The Regional Travel Survey (RTS) is a survey conducted among regional households to better understand the characteristics of residents and their travel behavior, regardless of their travel mode, in the Washington region. The RTS will begin in 2025 and be carried out over multiple years. Beginning in 2024, TPB will also coordinate regional Transit On-Board Surveys (TOBS) among the more than 20 public transit operators in the region. A TOBS is a survey of public transportation users conducted to better understand the characteristics, preferences, and travel choices made by public transit users in the region. Data collected from both the RTS and the various on-board surveys will be used as part of TPB's travel demand forecasting process and in other regional analyses of regional travel trends.

The Commuter Connections Program engages in a survey every three (3) years. Also a marketing campaign activity produces select literature in Spanish, including a regional bike map and Bike to Work Day event flyer. Spanish ads are placed in target markets, such as Spanish-speaking radio stations (e.g., El Zol) and occasionally in publications.

The Commuter Connections and Reach a Ride Spanish hotlines receive call from commuters requesting assistance.

Plan for Providing Language Assistance to Persons with Limited English Proficiency

The Language Assistance Plan is provided in Appendix B. A summary of the Plan is provided below.

COG's Accommodations Policy describes how language access is provided by COG and the TPB. The policy states that translation services are available upon request for meetings that are open to the public. The policy is published on the COG website at www.mwcog.org/accommodations along with translations of the policy in Spanish, French, Korean, Vietnamese, Amharic and Chinese.

The following is a list of some of the COG and TPB efforts made to provide language access:

- Advertise public comment periods in Spanish language news publications.
- Provide survey forms and web applications in multiple languages.
- Provide Spanish-speaking facilitators at forums and outreach effects.
- Hire bilingual staff members.
- Google Translate is available on all COG webpages.
- Provide Spanish versions of key web pages.

Key documents will be translated upon request. Staff arrange for the translation of materials through coordination with the Office of Public Affairs and Human Resources staff who maintain a list of qualified companies that provide translation services.

The website for the Metropolitan Washington Council of Governments, including the Department of Transportation Planning's subsection of that website, can be translated into over 50 different languages. Staff incorporated Google Translate translation capability into the development of this website as a cost-efficient means of making sure that the information contained on the website is accessible to individuals with limited-English proficiency and the non-English speaking public.

At key times during the planning process, the TPB publishes notifications in local newspapers (e.g. announcement of the opportunity to comment on the Long-Range Transportation Plan and Air Quality Conformity Determination). A notification is published in several newspapers, including a notification written in Spanish for the Spanish-language news publications, as well as the Afro-American.

Outreach strategies for the annual Street Smart pedestrian and bicyclist safety campaign, that is coordinated by TPB, include radio, video, newspaper and transit advertising. These advertising

efforts are focused on educating motorists, pedestrians and bicyclists to improve safety. Materials are produced in both English and Spanish.

Racial Breakdown of Transit-related, Non-elected Planning Boards, Advisory Councils, or Committee Members

The table below depicts the racial and ethnic breakdowns of the two (2) transit-related, non-elected advisory committees, the Access for All Advisory (“AFA”) Committee and the Community Advisory Committee (“CAC”). This information is collected from the applications for membership and is based on voluntary responses.

The Access for All Advisory committee advises the TPB on issues and concerns of traditionally underserved communities, including low-income populations, underrepresented communities, people with limited English proficiency, people with disabilities, and older adults. The Community Advisory Committee promotes public involvement in transportation planning for the region and provides independent, region-oriented citizen advice to the TPB.

A racial breakdown for the National Capital Region Transportation Planning Board (“TPB”) is not included because the board is appointed by various authorities in the State of Maryland, the Commonwealth of Virginia and the District of Columbia, and neither COG nor TPB staff have a role in selecting or encouraging members.

EFFORTS TO ENCOURAGE PARTICIPATION BY TRADITIONALLY UNDERSERVED COMMUNITIES ON COMMITTEES

The Access for All Advisory Committee encourages participation by traditionally underserved communities through its core objective of advising the TPB on issues and concerns of low-income populations, underrepresented communities, people with limited English proficiency, people with disabilities, and older adults.

The TPB’s Community Advisory Committee (CAC) actively seeks to include and engage traditionally underrepresented communities as part of its diverse membership. As part of an effort to increase inclusivity, the TPB in 2020 revised the structure and role of the CAC. Changes included: 1) changing the committee name from Citizen Advisory Committee to Community Advisory Committee; 2) updating the committee’s mission to reflect the TPB’s commitment to equity; 3) making meetings more accessible by hosting a mix of in-person and online meetings; 4) increasing the term-length to two-years; 5) providing more training for members 6) clarifying member expectations; 7) updating the committee structure; and 8) updating the process for selecting members based on selection criteria.

According to the new structure, 15 members of the CAC are selected equally based on three state-level jurisdictions (five from each state). Nine additional members are selected to incorporate the perspective of communities in TPB member jurisdictions and provide an opportunity to ensure that the committee reflects the region’s racial and ethnic diversity as well as different perspectives from people with different ages and different experiences getting around the region. The new CAC selection criteria include: TPB member jurisdiction, service on CAC, familiarity with transportation planning, residence in an Equity Emphasis Area, demographics, and community leadership experience.

Table 1: Race and Ethnicity of Members and Alternates of COG’s Transit-Related Committees

	Access for All (AFA) Advisory Committee		Community Advisory Committee (CAC)		Total Regional Population
Race					
	Number	Percentage	Number	Percentage	Percentage
American Indian or Alaska Native	0	0%	0	0.0%	0.2%
Asian	4	17%	2	8.3%	10.8%
African American	6	26%	6	25%	26.1%
Native Hawaiian or Other Pacific Islander	1	4%	0	0.0%	0.1%
White	12	52%	11	45.8%	44.0%
Some other race	1	4%	2	0.83%	0.4%
Ethnicity (Hispanic / Latino)					
Hispanic or Latino	2	15%	3	12.5%	16.3%

Description of Efforts to Ensure Subrecipients Comply with Title VI and Schedule of Subrecipient Title VI Program Submissions

COG is the Designated Recipient for the Section 5310 Enhanced Mobility Program. The Enhanced Mobility Program Management Plan specifies how COG ensures subrecipients comply with Title VI and is summarized below.

COG assists its subrecipients in complying with the Title VI regulations, as outlined in FTA Circular C4702.1B, in the following ways:

- For applicants of the Enhanced Mobility program, COG/TPB outlines Title VI requirements in the grant application and at pre-application conferences. The Enhanced Mobility Application states that “All subrecipients of FTA funds are required to have a Title VI Program to ensure nondiscrimination and to resubmit it every 3 years during the duration of a project.”
- COG provides Title VI Plan and Complaint Status Report templates to all subrecipients. COG requires that each subrecipient submit a Title VI Plan with the following sections and components before COG seeks FTA approval for funding and before COG issues a contract (or subgrant agreement) to the subrecipient:
 - Overview of Transportation Services Provided by the Subrecipient;
 - Policy Statement and Authorities;
 - Nondiscrimination Assurance to COG;
 - Plan Approval Document (resolution, board minutes, etc.);
 - Organization and Title VI Program Responsibilities (Title VI Coordinators, annual updates, written policies and procedures (etc.);
 - General Reporting Requirements:
 - Requirement to Provide a Title VI Notice to the Public;
 - Title VI Complaint Procedures and Complaint Form (subrecipient’s procedures for notifying the public of Title VI rights, instructions on how to file a discrimination complaint and procedures for how a complaint is handled and reported);
 - Procedures for Handling and Reporting Investigations/Complaints and Lawsuits
 - Transportation-Related Title VI Investigations, Complaints and Lawsuits;
 - Public Outreach and Involvement (Public Participation Plan and Summary of Public Outreach and Involvement Activities;
 - Access for Limited English Proficient (“LEP”) Persons (Language Assistance Plan, including a 4-factor analysis, and how the subrecipient will address the needs of non-English speakers);
 - LEP Implementation Plan;
 - Minority Representation on Planning and Advisory Boards;
 - Requirements of Transit Providers (if applicable).

- COG notifies subrecipients in writing, at the time of award, that any allegations made in writing regarding discrimination in service or employment, including Section 504 and ADA regulations, shall be immediately reported to COG and investigated by the subrecipient. COG will coordinate with the subrecipient in order to ensure appropriate actions are being taken to resolve the complaint.
- COG incorporates Title VI requirements into its contract with subrecipients. The contract references Circulars applicable to the subgrant award, including FTA Circular C4702.1B, and the Standard Terms and Conditions section of the contract also address Civil Rights requirements.

COG monitors its subrecipients to ensure compliance with FTA Circular C4702.1B, by:

- Collecting Title VI Plans from all grant award subrecipients at time of award.
- Reviewing Title VI Plans for compliance and working with subrecipients for needed updates or changes.
- Collecting Title VI complaint status reports as part of required subrecipient quarterly reporting to COG.
- Tracking triennial due dates for updated Title VI Plans by the Grant Manager. See schedule below, representing the current status of Title VI Plans for all subrecipients with active projects.
- Holding a grantee training each funding cycle, that covers Title VI requirements for subrecipients to comply with Title VI regulations and providing documentation to grantees of COG's process for ensuring all subrecipients are in compliance.
- Reviewing compliance with Title VI requirements during site visits, which are conducted at least once over the life of the project. Due to the COVID-19 pandemic, site visits were suspended in 2020 but resumed in 2023. See table below, which shows COG's site visit checklist for Title VI requirements.

COG'S RECORD KEEPING AND SELECTION PROCESS FOR SECTION 5310 ENHANCED MOBILITY

As the Designated Recipient of Section 5310 Enhanced Mobility funds for the Washington DC-VA-MD Urbanized Area, COG maintains a record of Enhanced Mobility funding requests received from private companies, non-profit organizations, State or local governmental authorities, and Indian tribes. COG maintains records of which applications were accepted and declined for funding. A question on COG's application for funding identifies the populations served by the applicant and thus, as required in FTA circular C4702.1B, COG can identify those applicants that would use grant program funds to provide assistance to traditionally underserved populations.

COG's competitive selection process ensures equitable distribution of funds, by using a uniform scoring process that is applied to all applicants, under the purview of an independent and objective Selection Committee. COG also ensures that the application process is not a barrier to applicants from traditionally underserved communities by ensuring that agencies that serve traditionally underserved communities receive notice of the funding opportunity. This is accomplished by distributing the solicitation notice widely, using community groups involved in the Access for All Advisory Committee to spread the word, hosting of pre-application conferences in central locations in D.C., Suburban Maryland and Northern Virginia in accessible venues, and in making staff available

to provide technical assistance to any interested applicant. Staff can provide technical assistance in Spanish should that be requested.

SCHEDULE OF SUBRECIPIENT TITLE VI PROGRAM SUBMISSIONS

The following table provides COG's schedule for subrecipient Title VI Program submissions. All active subrecipients as of June 2024 are included. This schedule is maintained by the grant manager. Typically, the grant manager will notify subrecipients with active grants 120 days prior to the expiration date that a new Title VI Program is due in 60 days, and 30 days prior to the expiration date. However, due to multiple vacancies in the grant manager position since 2022, many of the Title VI plans are in need of an update. A new grant manager hired in May 2024 is expected to prioritize gathering updated plans from subrecipients.

Table 2: Schedule of COG's Subrecipient Title VI Plan Submissions and Expirations

Subrecipient – Enhanced Mobility	Title VI Plan	
	Date	Status
Boat People SOS	5/15/23	Active thru 5/15/26
CHI Centers, Inc.	3/6/20	Update in-process
Capitol Hill Village	5/21/24	Active thru 5/21/27
Chinese Culture and Community Service Center	5/28/23	Active thru 5/28/26
City of Hyattsville	3/2/20	Update in-process
City of Rockville	6/6/22	Active thru 5/31/25
Coach Transportation, Inc. (DBA Koach)	2/15/22	Active thru 12/31/25
Community Support Services	11/30/20	Update in-process
Dulles Area Transportation Association	2/9/22	Active thru 12/31/25
ECHO	5/14/23	Active thru 5/14/26
Easterseals Serving DC/MD/VA	9/8/20	Update in-process
Fairfax County Neighborhood and Community Services	7/25/23	Active thru 7/25/26
Jewish Council for the Aging	6/30/20	Update in-process
Montgomery County Department of Transportation	3/1/23	Active thru 3/1/26
New Horizons Supported Services	5/30/23	Active thru 5/30/26
Opportunities, Inc.	3/17/22	Active thru 12/31/25
The Arc of Northern Virginia	7/21/21	Active thru 6/30/24

The Arc of Prince George's County	2/1/21	Update in-process
The Arc of Prince William County	9/27/21	Active thru 12/31/24
Transportation General	2/28/20	Update in-process
Yellow Cab Transportation	1/1/22	Active thru 12/31/24

Table 3: Site Visit Checklist

<p>Title VI Policy/Plan (display, open cases, log, notification, action)</p>
Subrecipient provides and describes written Title VI Plan
Title VI Policy/Plan includes Policy Statement and Authorities
Title VI Policy/Plan includes Non-discrimination Assurance
Title VI Policy/Plan includes Complaint Form and Procedures
Title VI Policy/Plan includes Complaint Status Report
Title VI Policy/Plan includes Language Assistance Plan (LAP) – see also LAP section below
Title VI Policy/Plan identifies Title VI officer and responsibilities
Title VI Policy/Plan includes public outreach and participation
COG confirms that information on Title VI is publicly posted and notes location(s)
COG reviews current Complaint Status log and notes any need to report per FTA regulations
<p>Language Assistance Plan or Policy (display, open cases, log, notification, action)</p>
Subrecipient provides and describes written Language Assistance Plan (LAP)
LAP Plan includes identification of LEP persons who speak English “less than very well”
LAP Policy/Plan includes language assistance measures to translate service information to identified LEP groups
LAP Policy/Plan includes staff training
LAP Policy/Plan includes method(s) for providing public notice of LEP services available
LAP Policy/Plan includes annual review of LEP plan

ADOPTION OF CONSENT AGENDA ITEMS

June 2024

A. RESOLUTION APPROVING UPDATES TO COG'S TITLE VI PLAN AND PROGRAM

The Board will be asked to adopt Resolution R15-2024 updating COG's Title VI Plan and Title VI Program, which outlines how COG and the TPB ensure nondiscrimination in all programs and activities. The Program was prepared pursuant to the requirements of Title VI of the Civil Rights Act of 1964, and to comply with Federal Transit Administration (FTA) grant recipient guidelines. The Plan was prepared pursuant to FHWA requirements. The Program must be updated and submitted to the FTA for approval every three (3) years. The Program and Plan are reviewed annually to ensure federal compliance. COG staff intends to continue to update these documents as often as necessary to make the documents “living” and a useful resource for the public. These updates include revised text, more recent Census data on low-income, minority and limited-English speaking populations, and a description of outreach efforts to these populations. COG's Executive Director and General Counsel have reviewed the updates and recommend approval.

RECOMMENDED ACTION: Adopt Resolution R15-2024.

NOTE: The final documents will be published on the COG website before Board adoption. To view the full Title VI Plan and Program, please visit: <https://www.mwcog.org/documents/titlevi>

Demographic Profile

This section is a demographic profile of the metropolitan Washington area including identification of the locations of minority and low-income populations in the aggregate. This demographic profile provides data from the 2018-2022 American Community Survey (“ACS”) on the numbers and spatial locations for minority population groups in the metropolitan Washington region.

The population groups used to create the demographic profile in this document are defined as:

- Low-Income Population
 - Individuals whose income is 150 percent or below the poverty line.
 - 1 person = \$22,320 per year
 - 4 people (2 adults and 2 related children under 18) = \$46,018 per year
- Persons with Disabilities include individuals with any type of physical, sensory, and/or cognitive disability. For individuals under 5, hearing and vision difficulty is used to determine disability. Individuals between 5 and 14 also include cognitive, ambulatory, and self-care difficulties. Individuals 15 years of age and older includes all five categories, as well as, independent living difficulty.
- Older Adults are individuals 65 years of age and over.
- Limited English Speakers include individuals who speak English less than “very well.”
- Black or African American refers “to a person having origins in any of the black racial groups of Africa,” including Afro-Caribbean.
- Asian refers “to a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.”
- Hispanic or Latino refers to “people who classified themselves in one of the specific Spanish, Hispanic, [or]Latino categories listed on the Census 2010 questionnaire” no matter the racial category selected.
- For this analysis, American Indian and Alaskan Native and Native Hawaiian or Other Pacific Islander population were not considered as Census data shows these population groups represent less than 1% of the Washington region.

The geographic area includes the Transportation Planning Board (“TPB”) planning area as shown below.

Figure 2: TPB Planning Area



More than twelve percent (12%) of residents were classified as low-income (shown in the figures below). In the same year, more than eight percent (8%) of persons had a disability and over thirteen percent (13%) of people were 65 years of age and over. Individuals with Limited English Proficiency make up more than eleven percent (11%) of the population.

The maps starting on pages XX show the spatial locations of minority population groups in the region overlaid with the major transit projects planned for the 2022 Update to Visualize 2045.

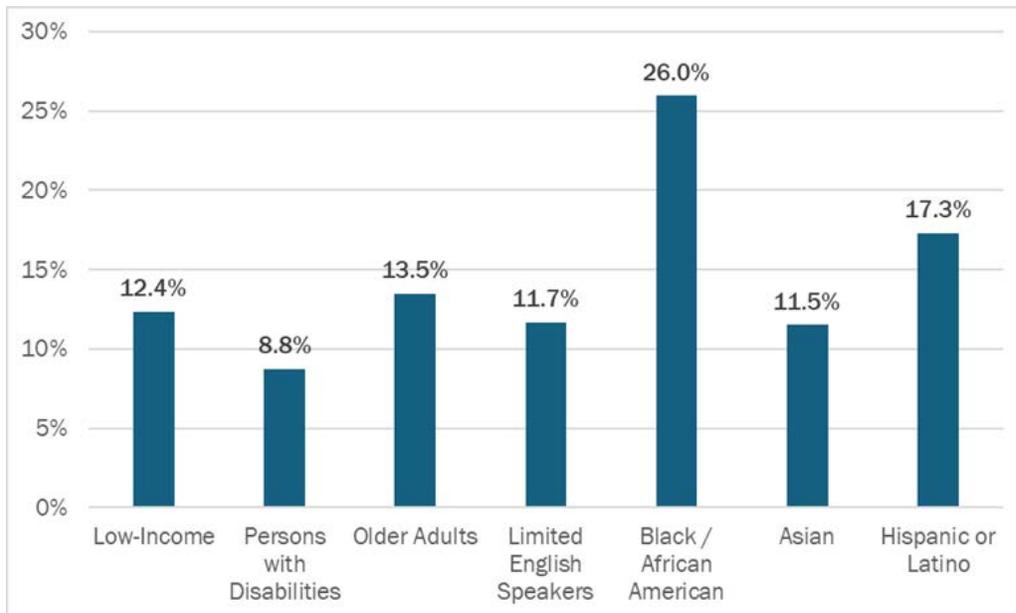
Table 4: Regional Demographic Profile of Transportation-Disadvantaged Populations in the Washington Region, 2018-2022

Population Group	Region	Percent of Region (1)
<i>Low-Income (2)</i>	689,666	12.4%
<i>Persons with Disabilities (3)</i>	490,110	8.8%
<i>Older Adults</i>	764,928	13.5%
<i>Limited English Speakers (4)</i>	620,974	11.7%
<i>Black or African American</i>	1,472,056	26%
<i>Asian</i>	651,982	11.5%
<i>Hispanic or Latino</i>	981,138	17.3%

Source: 2018-2022 U.S. Census American Community Survey: numbers are for the TPB Planning Area (see definition above).

- 1) Due to each groups' unique sampling, "Percent of Region" will not compute with Total Population.
- 2) "Low-income" is commonly defined as income below 150 percent of the poverty level. For a family of four an annual income of \$46,018 or below is considered low-income.
- 3) Includes individuals with a physical, sensory, and/or cognitive disability.
- 4) Limited English Proficiency includes individuals who speak English less than "very well."

Figure 3: Regional Demographic Profile of Transportation-Disadvantaged Populations in the Washington Region, 2022



Source: 2018-2022 U.S. Census American Community Survey: numbers are for the TPB Planning Area (see definitions above).

Procedures Identifying the Mobility Needs of Traditionally Underserved Populations and the Resulting Considerations within the Planning Process

The TPB has several procedures and methods for identifying the mobility needs of traditionally underserved communities and for considering those needs within the planning process. As referenced earlier in this document, the TPB's Public Participation Plan outlines the strategies for including and considering the mobility needs of traditionally underserved communities in the planning process, and can be found in Appendix A. The methods the TPB uses for inclusive planning are also described below.

EQUITY EMPHASIS AREAS

In 2018, the National Capital Region Transportation Planning Board (TPB) identified Equity Emphasis Areas and examined the impact of Visualize 2045 on these Areas. This work was a continuation of the 2016 deep dive into the region's demographics, which resulted in the TPB adopting an "Equity Emphasis Areas" map for the first time. These maps help identify the mobility needs of minority and low-income populations. These communities are small geographic areas that have concentrations of low-income and/or minority populations. The TPB's two public advisory committees, the CAC and AFA, reviewed and provided comments on the development of the Equity Emphasis Areas.

The Equity Emphasis Areas were used to analyze the 2022 Update to Visualize 2045 metropolitan transportation plan for disproportionately high and adverse impacts on low-income and minority populations by comparing accessibility to jobs by automobile and transit in the Equity Emphasis Areas versus the rest of the region in 2045. The Environmental Justice and Title VI Analysis of Visualize 2045 is attached as "Appendix C".

Additionally, the Equity Emphasis Areas are used in other COG and TPB planning activities and have been made available to local jurisdictions to assist them in considering equity in initiatives, such as housing, education, health care, and greenspace.

REGIONAL TRAVEL SURVEY

The TPB also uses surveys to identify the mobility needs of minority and low-income populations. Approximately every ten years the TPB surveys the region and asks households to share information about their usual travel patterns, as well as, to complete a detailed travel diary for one randomly assigned weekday. The 2017/2018 Regional Travel Survey is complete and documentation and data from the survey were released in early 2021. For every regional household travel survey, outreach efforts are made to ensure that the survey sample includes minorities and people with limited incomes. The demographics of survey respondents are closely tracked to ensure adequate participation rates. TPB staff had survey materials translated into Spanish and partnered with non-profit organizations, such as Casa de Maryland, Inc., to increase participation by Spanish-speaking households.

The survey provides critical inputs into the travel models the TPB uses to forecast future travel patterns and vehicle emissions. These models aid regional planning and decision making by showing how long-range transportation plans are likely to affect travel patterns and travel conditions.

The survey can be found online here: <https://www.mwcog.org/transportation/data-and-tools/household-travel-survey/>

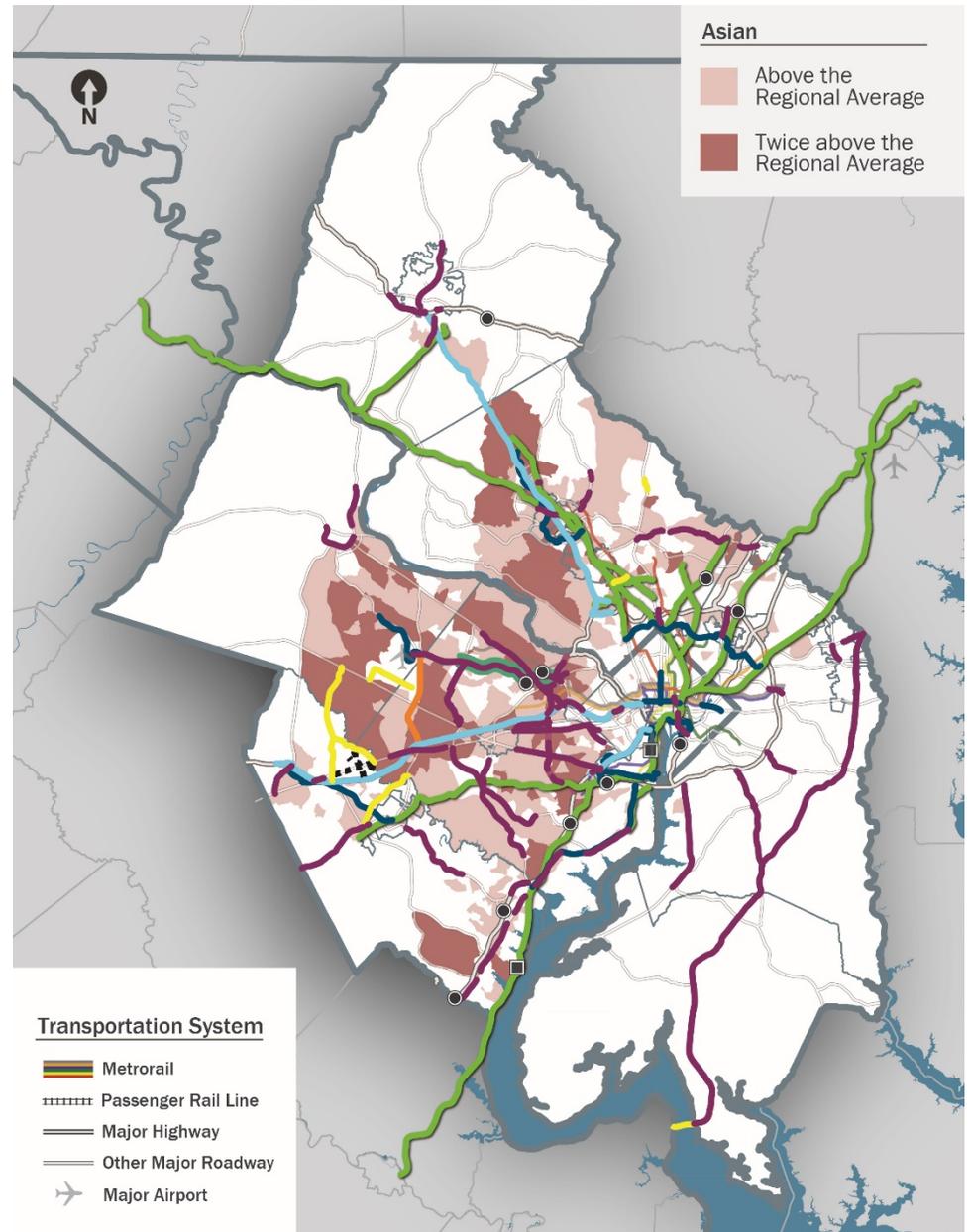
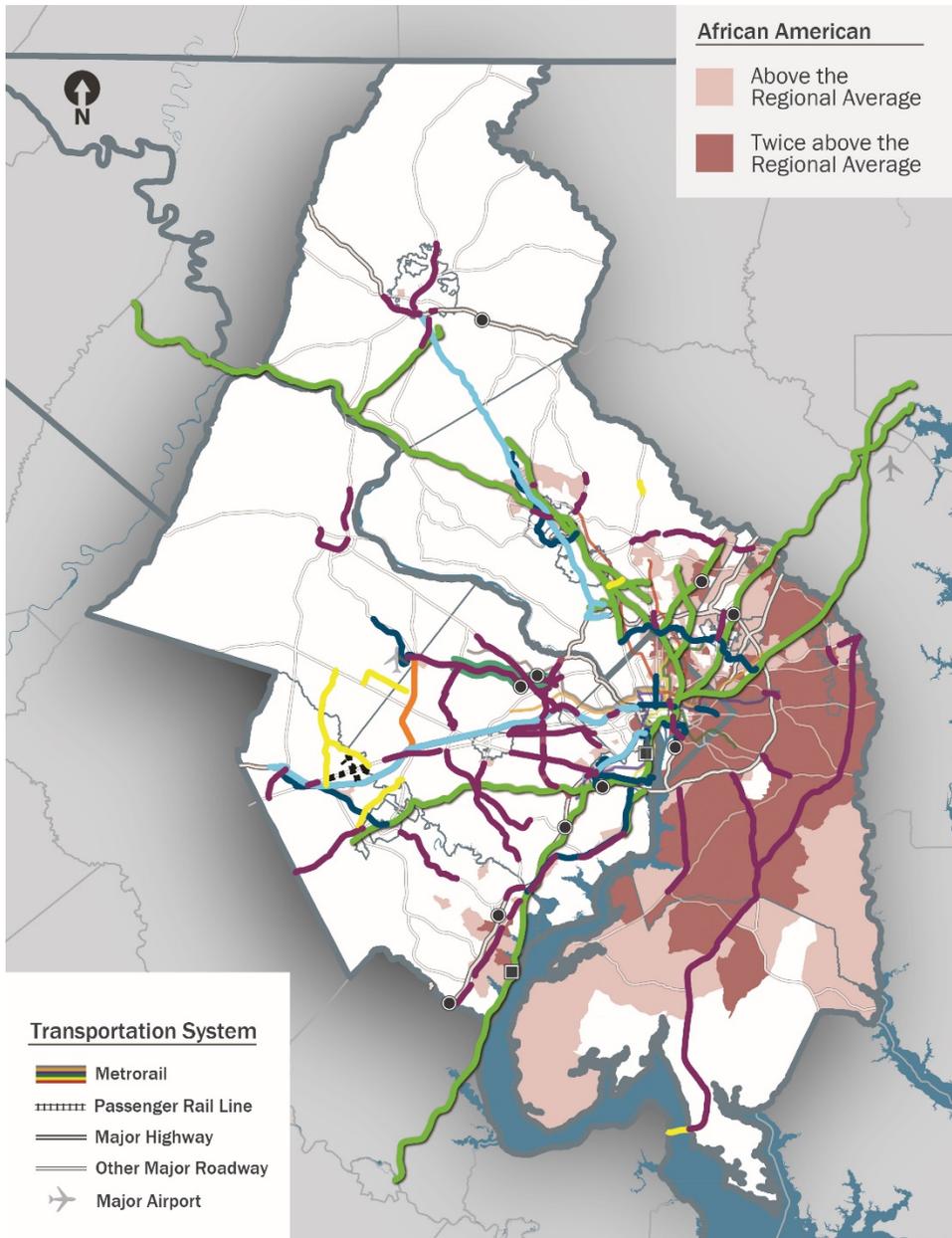
The TPB will be engaging in a new Regional Travel Survey starting in FY 2024 and continuing through FY 2025.

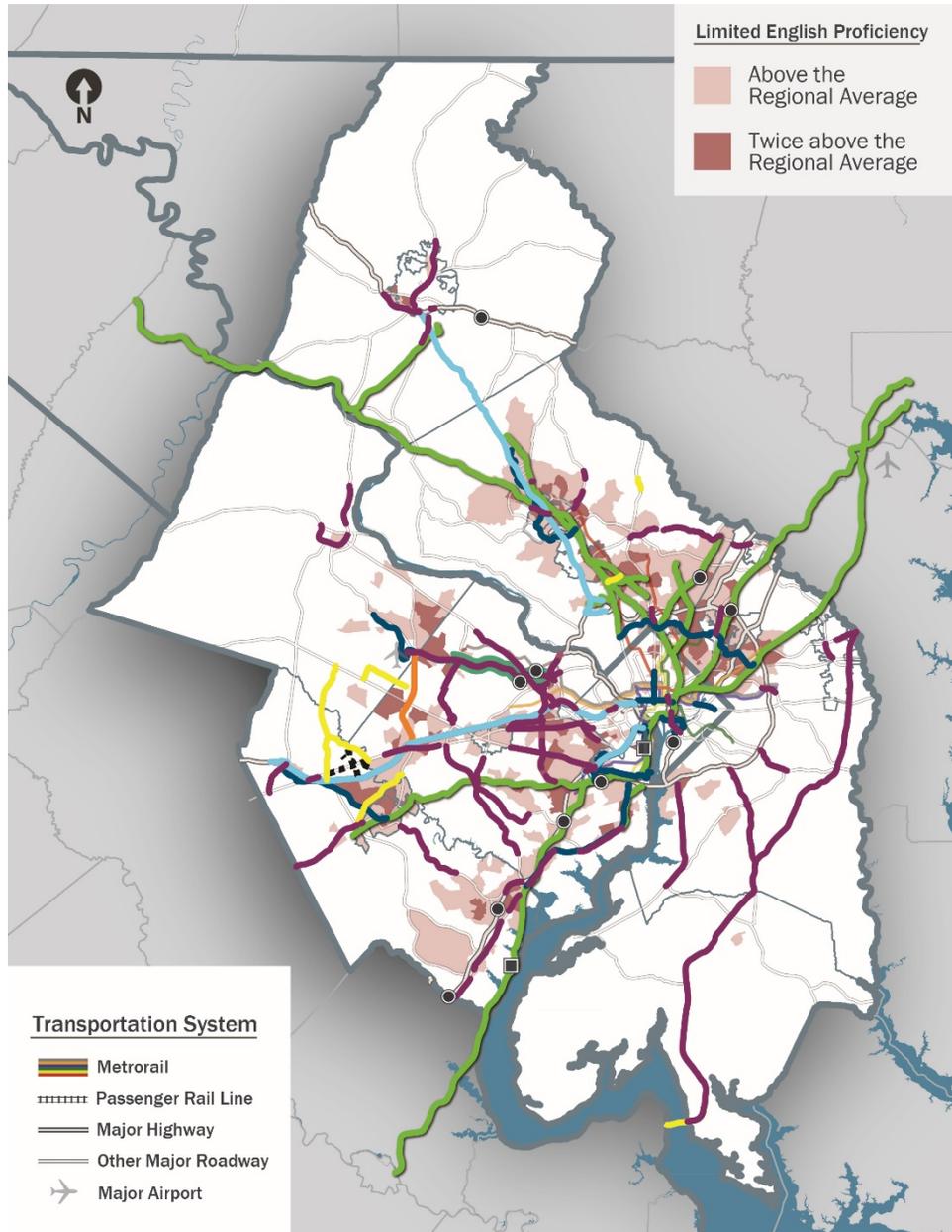
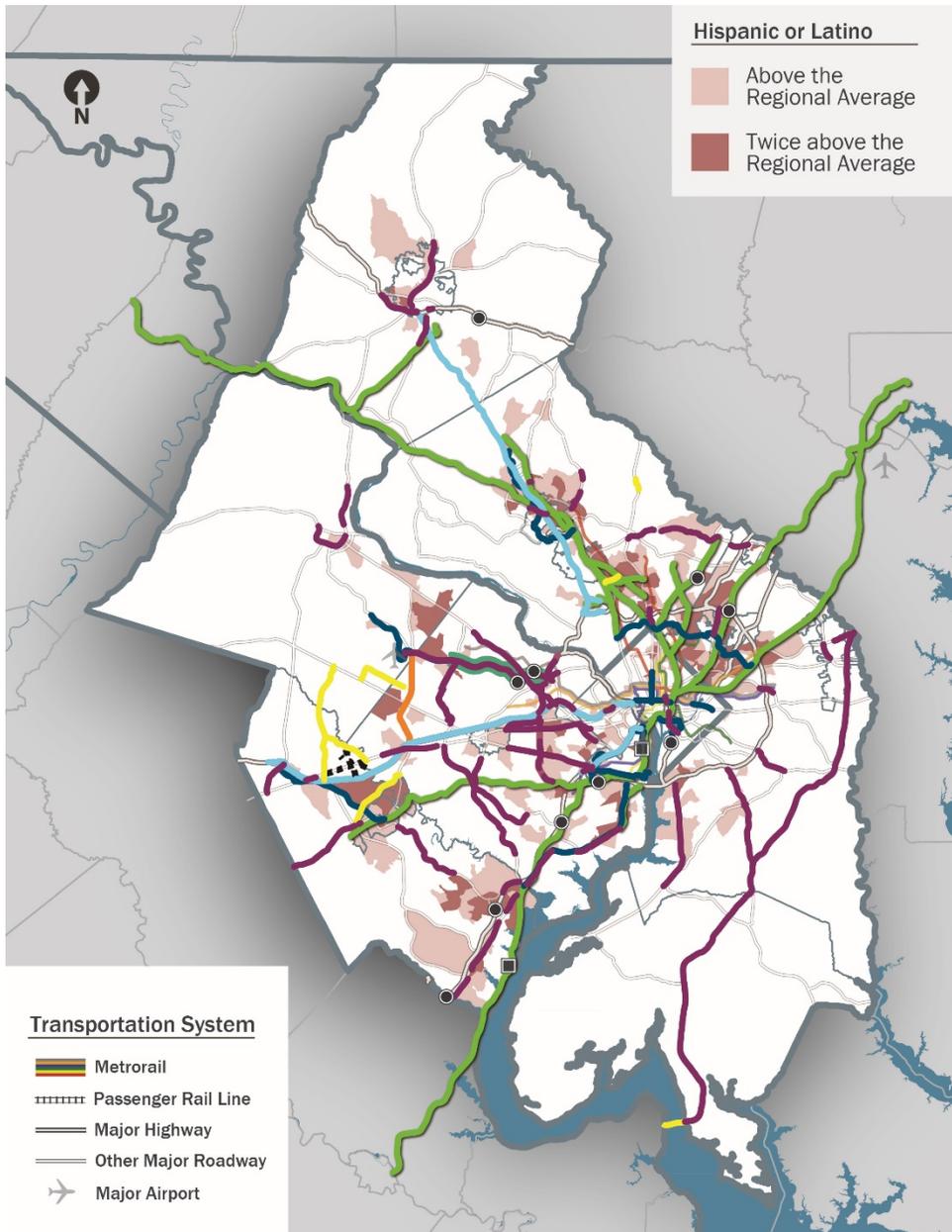
COORDINATED HUMAN SERVICE TRANSPORTATION PLAN

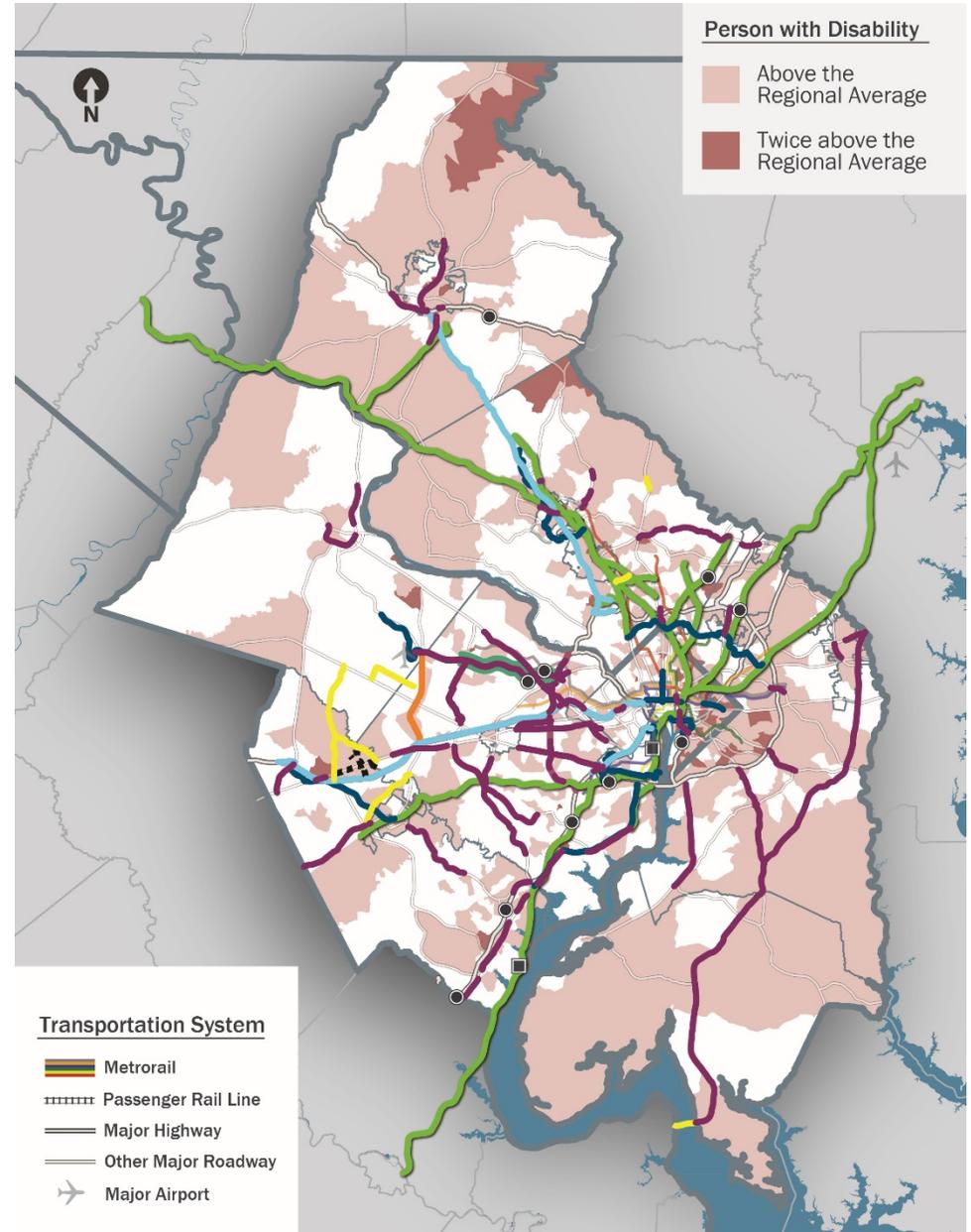
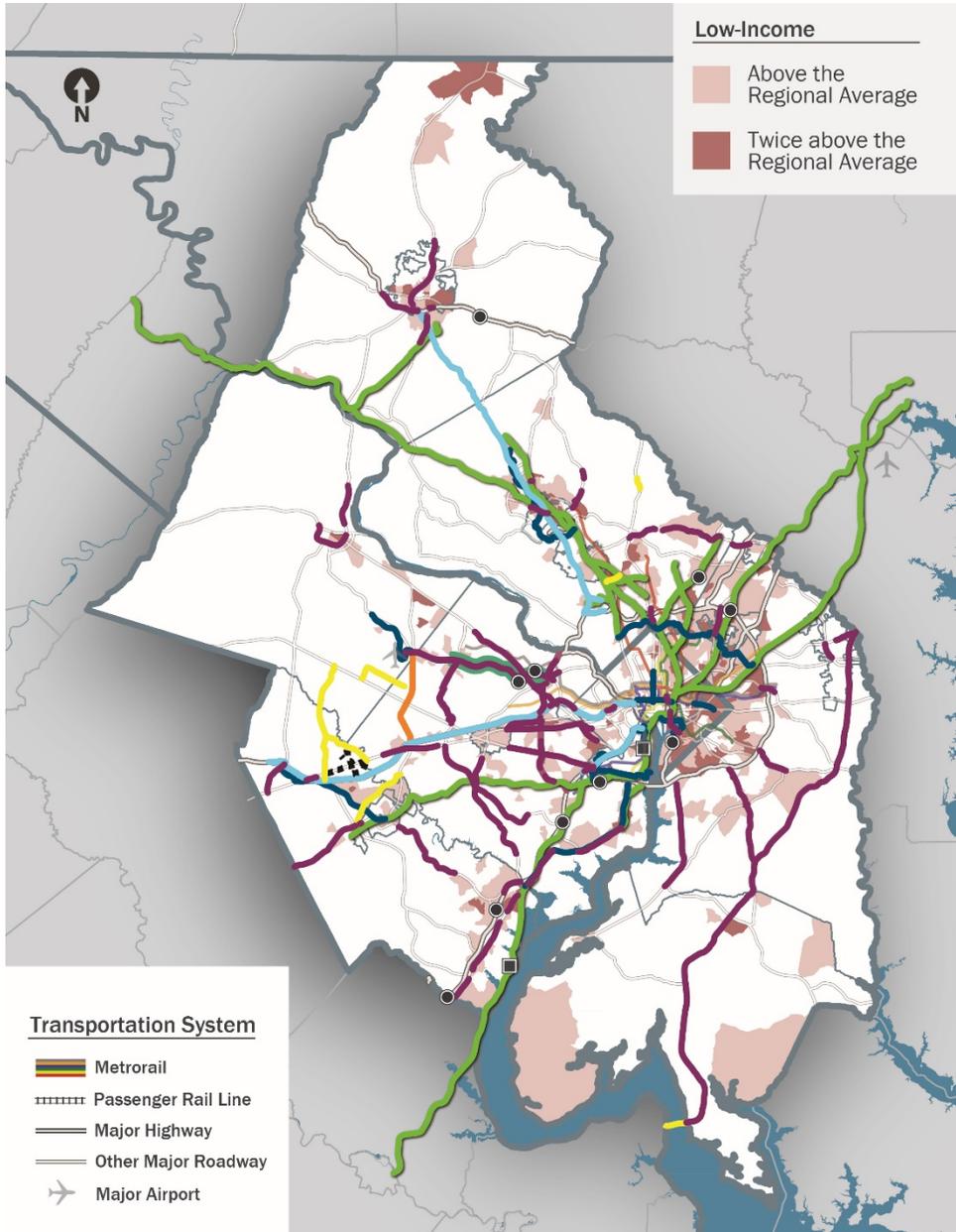
The TPB's Coordinated Human Service Transportation Plan, updated every four (4) years, guides the implementation of Federal Transit Administration's (FTA's) Section 5310 Enhanced Mobility Program for Individuals with Disabilities and Older Adults. One of the elements of the Coordinated Plan is the identification of unmet transportation needs of traditionally underserved communities. The Access for All Advisory Committee participates in updated to the Coordinated Plan by identifying significant unmet transportation needs and potential strategies to address those needs. The unmet needs and strategies guide the development of priority projects for Section 5310 Enhanced Mobility funding. The 2023 Coordinated Plan can be found at: www.mwcog.org/documents/2018/12/19/update-to-the-coordinated-human-service-transportation-plan-for-the-national-capital-region-access-to-jobs-afa-enhanced-mobility/ and an update will be completed, in consultation with the AFA, in 2027.

Demographic Maps by Census Tract

This section includes regional demographic maps of transportation-disadvantaged populations, and the definitions are on page 25. The maps overlay the percent minority and non-minority populations as identified by ACS data at the Census tract level. Minority populations are identified when the percent of a tract population is above the regional average. In addition, Census tracts with populations with an above average concentration and under 200 people per square mile are noted.







Impacts of the Distribution of State and Federal Funds for Public Transportation Purposes

The TPB regularly conducts an analysis of how the benefits and burdens of the long-range plan are distributed among low-income and minority populations versus the general population. The performance analysis for the 2022 Update to Visualize 2045 includes an analysis of the accessibility and mobility gains and losses across minority and low-income population groups utilizing the demographic profile described above. Accessibility and mobility are measured in terms of the number of jobs and hospitals accessible within 45 minutes by transit and auto modes as well as commute times to jobs and hospitals by auto and transit modes. This analysis specifically looks at how accessibility will change between the current condition and the planning horizon year as a result of the implementation of the projects in the 2022 Update to Visualize 2045, as well as projected population and employment growth. The accessibility and mobility changes are analyzed for disproportionate adverse impacts on transportation-disadvantaged groups. The TPB's Access for All Advisory Committee reviews the analysis and provides comments.

The analysis can be found at: https://visualize2045.org/wp-content/uploads/2023/02/Visualize-2045-Update_Appendix-N-Environmental-Justice-Analysis-Final.pdf

APPENDIX A: PUBLIC PARTICIPATION PLAN

TPB PARTICIPATION PLAN

2020 Update



National Capital Region
Transportation Planning Board

TPB PARTICIPATION PLAN - 2020 UPDATE

October 2020

ABOUT THE TPB

The National Capital Region Transportation Planning Board (TPB) is the federally designated metropolitan planning organization (MPO) for metropolitan Washington. It is responsible for developing and carrying out a continuing, cooperative, and comprehensive transportation planning process in the metropolitan area. Members of the TPB include representatives of the transportation agencies of the states of Maryland and Virginia and the District of Columbia, 24 local governments, the Washington Metropolitan Area Transit Authority, the Maryland and Virginia General Assemblies, and nonvoting members from the Metropolitan Washington Airports Authority and federal agencies. The TPB is staffed by the Department of Transportation Planning at the Metropolitan Washington Council of Governments (COG).

CREDITS

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ACKNOWLEDGEMENTS

Special thanks to TPB committees and other stakeholders for providing in-depth review and comment. The Citizens Advisory Committee and Access for All Advisory Committee were particularly instrumental in producing this document.

ACCOMMODATIONS POLICY

Alternative formats of this document are available upon request. Visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

TITLE VI NONDISCRIMINATION POLICY

The Metropolitan Washington Council of Governments (COG) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations prohibiting discrimination in all programs and activities. For more information, to file a Title VI related complaint, or to obtain information in another language, visit mwcog.org/nondiscrimination or call (202) 962-3300.

El Consejo de Gobiernos del Área Metropolitana de Washington (COG) cumple con el Título VI de la Ley sobre los Derechos Civiles de 1964 y otras leyes y reglamentos en todos sus programas y actividades. Para obtener más información, someter un pleito relacionado al Título VI, u obtener información en otro idioma, visite mwcog.org/nondiscrimination o llame al (202) 962-3300.

CONTACT INFORMATION

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PREFACE

This Participation Plan states the National Capital Region Transportation Planning Board's (TPB) commitment to transparent communications and engagement with the public and with relevant agencies to support the regional transportation planning process. This includes communications and engagement to inform developing the Long-Range Transportation Plan and the Transportation Improvement Program (TIP).

The plan articulates the TPB's policy for public participation. It describes how members of the public can get involved and demonstrates how staff will work to meet and exceed federal requirements. Most importantly, this plan guides TPB staff interactions with the public so their public-facing work can: 1) reach as many people as inclusively as possible, and 2) collect meaningful input and build support to inform TPB plans and programs, and aid in decision making.

This Participation Plan is required under federal laws and regulations pertaining to metropolitan planning. The plan builds on previous efforts designed to encourage participation in the TPB process and provide reasonable opportunities for residents and other interested agencies to be involved in the metropolitan transportation planning process.

As required by federal regulation, TPB staff developed the plan in consultation with interested parties, including residents, representatives of people with disabilities, users of public transportation and bicycle and pedestrian facilities, and affected public agencies. In addition, federal regulations require the plan to be released for a minimum public comment period of 45 calendar days before it is adopted by the TPB.

ABOUT THE TPB

The National Capital Region Transportation Planning Board (TPB) is designated under federal law as the Metropolitan Planning Organization (MPO) for the Washington region. As an MPO, the TPB brings together key decision makers to coordinate planning and funding for the region's transportation system. The TPB relies on advisory committees and participation from interested parties in order to make informed decisions.

The TPB was created in 1965 by the region's local and state governments to respond to federal highway legislation in 1962 that required the establishment of a "continuing, comprehensive, and coordinated" transportation planning process in every urbanized area in the United States. The TPB's membership includes key transportation decision makers in the metropolitan Washington region. The board includes local officials— mayors, city council members, county commissioners/board members, and others—as well as representatives from the state transportation agencies, the Washington Metropolitan Area Transit Authority (WMATA), and the state legislatures. The TPB also includes non-voting representatives from key federal agencies, the Metropolitan Washington Airports Authority, and the National Capital Planning Commission.

The TPB became associated with the Metropolitan Washington Council of Governments (COG) in 1966. Local cities and counties established COG in 1957 by to deal with regional concerns including growth, housing, environment, public health and safety—as well as transportation. Although the TPB is an independent body, its staff is provided by COG's Department of Transportation Planning.

The TPB prepares plans and programs that the federal government must approve in order for federal-aid transportation funds to flow to the Washington region. In particular, federal law and regulations relating to the work of MPOs require the TPB to adopt a long-range transportation plan and the six-year Transportation Improvement Program (TIP). The TPB must also ensure compliance with other federal laws and requirements, including federal air quality conformity requirements.

In addition to ensuring compliance with federal laws and requirements, the TPB performs many other functions, including acting as a regional forum to coordinate policy making and providing technical resources for transportation decision makers. The TPB receives input and guidance from advisory committees that include members of the public, special interest groups, and jurisdictional staff.

HOW TO USE THIS PLAN

This plan clarifies the TPB's commitment to transparent and open collaboration with the public and renews the TPB's commitment to equity. The plan seeks to highlight a practical approach to public participation. The actionable information in the plan varies based on the user's relationship to the TPB.



Public Guide

If you are a member of the public, including individuals, community groups, non-profits, advocacy groups, and others, please consult with the Public Guide. It walks you through the ongoing and predictable ways that you can interact with and get involved with the TPB. It also connects you to where you can learn about future activities and get involved locally.

Staff Guide

If you work for the TPB, consult the Staff Guide. This guide walks you through the process for determining whether your work activity requires or would benefit from public participation. This guide also presents a workflow, or a series of questions, that need to be answered in order to develop a plan for interacting with the public as part of your activity.

Federal Guide

If you want to learn about federal requirements (23 CFR 450.316) for the TPB's participation activities – whether you are staff, a regular participant in the TPB process, or a member of the public – consult the Federal Guide.

PARTICIPATION POLICY

The Participation Policy provides the foundation for all the TPB's interactions with the public so that it can reach as many people as inclusively as possible while collecting meaningful input, building support for TPB plans and programs, and aiding in decision making.

This Participation Policy chapter consists of four parts. The Policy Statement articulates the TPB's commitment to making its process and products accessible to everyone who lives in metropolitan Washington. The Policy Goals state what the TPB is trying to achieve through its public-facing work. The Principles for Engagement declare the TPB's values for interacting with the public. Finally, the Constituencies for Engagement describe three target audiences to help staff focus information and participation activities.

Policy Statement

It is the TPB's policy to provide public access and involvement under a collaborative planning process in which the interests of all TPB constituencies are reflected and considered. It is the TPB's intent to make both its policy and technical processes inclusive of and accessible to all constituencies.

The TPB believes that public input into its process is valuable and makes its products better. Regional transportation planning cannot, and should not, be based simply upon technical analysis. The information derived from public involvement is essential to good decision making.

Policy Goals

The Policy Goals describe what the TPB is trying to achieve through its participation activities. When planning public-facing work, staff should use these goals to set desirable outcomes, and then refer to the goals when evaluating their work.

- **Engage different audiences effectively using a variety of tools.** The TPB will disseminate information and solicit input using different tools and conduits. Engagement activities will be conducted in ways that are tailored to specific constituencies, ranging from active participants to the general public.
- **Provide clear and open access to information and participation opportunities.** The TPB will work to improve access to technical and planning information and, where appropriate, tailor that information to be accessible to more constituencies. Opportunities for participation in TPB meetings and in committee meetings will be clearly defined and provided at each meeting.
- **Gather input from diverse perspectives.** The TPB will encourage participation from diverse constituencies and will provide for discussion about transportation issues that are responsive to the interests of different constituencies. In addition to encouraging input from people with different racial, ethnic, and linguistic backgrounds, the TPB will seek the perspectives of people who use all transportation modes and come from all areas of the region.

- **Give consideration to input received and respond meaningfully.** The TPB will give thoughtful consideration to how public input might affect its decisions and how input might improve TPB plans and products. The TPB will acknowledge the comments that were received and how they were considered.
- **Promote a regional perspective.** The TPB will communicate how regional transportation planning plays a vital role in coordinating planning activities on many levels. The TPB will also work to connect the public to where their input can have the biggest impact, which is often on the local or state level.

Principles for Engagement

The Principles for Engagement state TPB values around informing and engaging the public. These principles recognize that most people who are impacted by transportation decisions are not technical experts and that being inclusive means meeting people where they are. These principles guide engagement and point towards the Policy Goals without specifying those goals or the means to achieve them.

- **Equity perspective** – Staff strive to incorporate an equity perspective into their work activities so that work acknowledges and seeks to accommodate different contexts, experiences, and abilities. This equity perspective is informed by COG’s Title VI Plan and Program, the TPB Equity Statement¹, and the TPB’s Equity Emphasis Areas. It acknowledges past inequities and barriers to involvement and seeks to be more just.
- **Plain language** – Staff strive to use plain language and prepare their materials in a variety of ways. This will make TPB work accessible and understandable to as many people as possible and serve as a foundation for meaningful participation
- **Early and continuing participation** – Staff strive to maximize public input by involving the public early in planning processes. Staff also strive to involve the public throughout processes to create repeat interactions with the public. This will help foster transparency and keep the public up to date and aware of future opportunities to learn more and to participate.
- **Timely response** – Staff strive to acknowledge receipt of public input in a timely manner and provide information about how public input will be used. This will build trust by demonstrating the value and purpose of input.
- **Clarity of Purpose** – Staff strive for clarity of purpose when planning public-facing work. This will help staff determine if the work is meant to inform, consult, or engage the public. This will also help the public understand their role in the TPB plan or activity and how their input will be used.

¹ Appendix C: TPB Equity Resolution

Constituencies for Engagement

The TPB acknowledges that not every person is aware of the TPB or has an understanding for how decisions are made at the regional, state, and local levels. To make sure that TPB participation efforts are most effective, it is important to tailor communications and outreach to different constituencies.

The constituencies below are grouped according to varying levels of engagement in regional transportation planning process and awareness of regional transportation issues.

- **Active participants** are both knowledgeable about transportation policy issues in general, as well as the TPB's role in the regional transportation planning process. These individuals and organizations already actively participate in the TPB process and have an extensive understanding of regional transportation issues and policy. Among others, this category includes the TPB's Citizens Advisory Committee (CAC), the Access for All (AFA) Advisory Committee, and graduates of the Community Leadership Institute.
- **Community leaders** have some knowledge of transportation policy issues but are less familiar with the TPB's role in the regional transportation planning process. They also may not be fully aware of the regional context underlying transportation challenges and experiences throughout the region. This group often includes community and opinion leaders who work at the local level.
- **The general public** has an inherent interest in transportation challenges but often possess little direct knowledge of transportation policy making. This group represents most of the region's population, although in some cases, it may also include local leaders or even elected officials who have limited exposure to transportation planning.

An equity perspective is vital for understanding how to work within these different constituencies. The TPB recognizes that each of these constituent groups include people of color, people with limited English proficiency, differing abilities, people with low incomes, and people of all ages, including youth and elders. Staff remain aware of the need to make extra efforts to engage these populations through information and participation.

PUBLIC GUIDE

Although this participation plan is primarily a guidebook for TPB staff to use in designing and implementing public engagement activities, it also articulates the TPB's commitment to an open and transparent planning process. The TPB and its staff are part of an ongoing partnership with the public, so this plan's policies and goals are meant to represent values that we share and are working toward.

The TPB recognizes that transportation planning is complex. Multiple levels of government and political interests are involved. This complexity can be intimidating and makes it difficult for the public to know where to begin. The following guide is an attempt to present high-level opportunities for the public to get informed and involved at the TPB. Staff also recognize that there are many seen and unseen barriers to participating in planning processes. You should reach out to staff if you are concerned that barriers to your involvement are not being addressed. Staff contact information is often included on document and on the web if you are not sure who to ask.

If you are looking for practical tips for getting involved, there are many ways you can be part of the TPB process. The next few pages describe how the region's residents can follow TPB activities, learn about key issues, provide comments, and otherwise get involved in the TPB's work.

Get Informed

There are a variety of ways to stay informed about what is going on at the TPB and in the region. You can attend meetings of the board or one of its subcommittee, read about regional transportation issues through TPB publications, or follow us on social media.

TPB MEETINGS

The TPB meets once a month except in August. The meetings are held at the COG offices, although during the pandemic of 2020, they have been conducted on a virtual-only basis. They are open to the public for observation and comment and usually take place on the third Wednesday of the month at noon. The TPB's agenda and meeting materials are posted on the website six days before the monthly meeting. Meeting materials, meeting recordings, and a live stream of the meeting can be found at mwcog.org/tpbmtg. Anyone may subscribe to an email list to receive the agenda and materials when they are posted. You may subscribe or update your subscription here: mwcog.org/subscribe/.

TECHNICAL SUBCOMMITTEES

The TPB's subcommittees focus on specific subject matter like public transit, freight, bicycle and pedestrian issues, travel forecasting, and other topics. Subcommittee meetings bring together technical experts from local and state agencies and inform TPB work and processes. To find out more about the subcommittees, visit mwcog.org/tpbtech.

TPB NEWS

TPB News is a bimonthly newsletter and blog that shares information about what is happening with the TPB and COG's Department of Transportation Planning. TPB News covers issues going before the board, staff work, committee work, how to get involved, and deep dives into various programs and

federal requirements. TPB News is one of the best ways to stay in the know about what is happening at the TPB. TPB News posts can be found on the COG website at mwcog.org/tpbnews.

COG WEBSITE

The website for the Metropolitan Washington Council of Governments, or COG, at mwcog.org is home to everything you need to know about the TPB. You can also find TPB News, events and meetings, documents and plans, and more. You may visit the COG website at mwcog.org.

SOCIAL MEDIA

Residents who want to get the latest information about TPB activities can follow us on Facebook (facebook.com/natcapregtpb) and Twitter (@[natcapregtpb](https://twitter.com/natcapregtpb)).

COMMUNITY LEADERSHIP INSTITUTE

The CLI is an educational program that encourages community leaders to get involved in transportation-related decision making at all levels. CLI participants learn to be regional transportation leaders by connecting the interests of their local communities, constituencies, and elected officials with the planning issues facing the entire metropolitan Washington region. Learn more about the CLI at mwcog.org/cli.

Follow Major Plans and Programs

These regional plans and programs are the primary focus of the TPB's work. Residents who want to be involved with the TPB's process will benefit from an understanding of how these plans are developed. Future updates will offer opportunities for public input and will be guided by the strategies and procedures for engagement that are laid out in this participation plan. Information about how to get involved in these planning activities can be found at mwcog.org/tpb.

VISUALIZE 2045

Visualize 2045 is the TPB's current federally mandated, long-range transportation plan for the National Capital Region. When it was approved in 2018, the plan represented a new kind of long-range transportation planning effort for our region. For the first time, in addition to including projects that the region's transportation agencies expect to be able to afford between now and 2045, the plan identified aspirational initiatives – projects, programs, and policies – that go beyond financial constraints. The plan is updated every four years. The TPB is scheduled to update Visualize 2045 in 2022. Extensive opportunities for public engagement will be available before its approval. Learn more at visualize2045.org.

TRANSPORTATION IMPROVEMENT PROGRAM

The TIP is a federally required document that describes the planned schedule in the next four years for distributing federal, state and local funds for state and local transportation projects. It includes highway projects, rail, bus and streetcar projects, and bicycle and pedestrian improvements, as well as maintenance funds and operational programs. The TPB's FY 2021-2024 TIP contains over 300 project records and more than \$15 billion in funding across the region. The TIP undergoes a public comment period before approval. Every two years the TPB also conducts a TIP Forum, an open public meeting where the state DOT's share information about their state funding documents. Learn more about the TIP at mwcog.org/TIP.

OTHER PLANS AND INITIATIVES

The TPB is always in the process of updating various plans. Some are focused on specific modes of transportation – such as freight or bicycle and pedestrian needs. Other initiatives focus on specific segments of the region’s population, such as planning activities to serve older adults and persons with disabilities. Public engagement in these planning activities can help them become more effective in meeting their desired outcomes.

Get Involved in the TPB

Once you’re informed, there are a variety of ways to be involved in regional transportation issues through the TPB or elsewhere.

EXPRESS YOURSELF FOR THE RECORD

Present your ideas during the TPB public comment period at the beginning of each board meeting. TPB meetings begin at 12 noon on the third Wednesday of each month (except August). To participate, call (202) 962-3315 or email TPBComment@mwkog.org. Meeting time and place is subject to change. Check the website for updates.

PUT IT IN WRITING

Send a letter or submit a written statement to key decision makers. You can submit a written statement to the TPB Comment form. You may also send your message by e-mail (TPBComment@mwkog.org) or regular mail (Transportation Planning Board, MWCOC, 777 N. Capitol St., NE, Washington, DC 20002).

APPLY TO SERVE ON A TPB ADVISORY COMMITTEE

The TPB has two advisory committees that provide insight from the region’s residents. The Citizens Advisory Committee provides independent, region-oriented citizen advice to the TPB on transportation plans and issues. The Access for All Advisory Committee (AFA) advises the TPB on transportation issues, programs, policies, and services important to low-income communities, people of color, people with limited English proficiency, people with disabilities, and older adults. The committee raises important issues to determine whether and how these issues might be addressed within the TPB process.

These advisory committees are called upon by TPB staff to provide specific input in the development of TPB plans and programs. They are frequently asked to provide a public perspective on materials before they go to the board. More broadly, these committees bring perspectives and ideas to light that shape TPB work over time.

You can get information about how to apply to serve on these committees on our website: mwkog.org/tpbcac and mwkog.org/tpbafa.

Get involved at the state and/or local levels

If you are interested in a specific project or issue, it is often most effective to get involved early in the planning process, which typically occurs at the local and state levels. Key decisions often must be

made before they come to the TPB. Many projects are formulated based on local needs. State agencies often work with locals to determine which projects to pursue. Here are some ways you can have an impact on transportation challenges facing the region outside of the TPB:

- Get information. Contact local, regional, and state transportation planning agencies to ask about projects in which you are interested. Find out how citizens are involved in these projects.
- Get out there. Attend public meetings on projects or plans. These sessions are often advertised in local papers or posted on the Internet by local or state agencies.
- Talk with decision makers. Contact elected officials or the staff at transportation agencies to request information about projects or plans. Find out how citizens can get involved.
- Work with your neighbors. Contact your neighborhood or civic association to see if their members are interested in a particular transportation issue and if they plan to take any action.
- Join a group. Join an organized group that is promoting a specific transportation project or is advocating broad policy changes regarding transportation investments in your community or across the region.

STAFF GUIDE

The Staff Guide is a tool that TPB staff will use as they start work on a new activity. The guide walks staff through a process of determining if their work has a public-facing component and if it is covered by any federal participation requirements. The workflow described in this chapter also helps staff plan for public participation that is in accordance with the TPB's Participation Policy and makes sure that the work can reach as many people as inclusively as possible while also collecting meaningful input, building support for TPB plans and programs, and aiding in decision making.

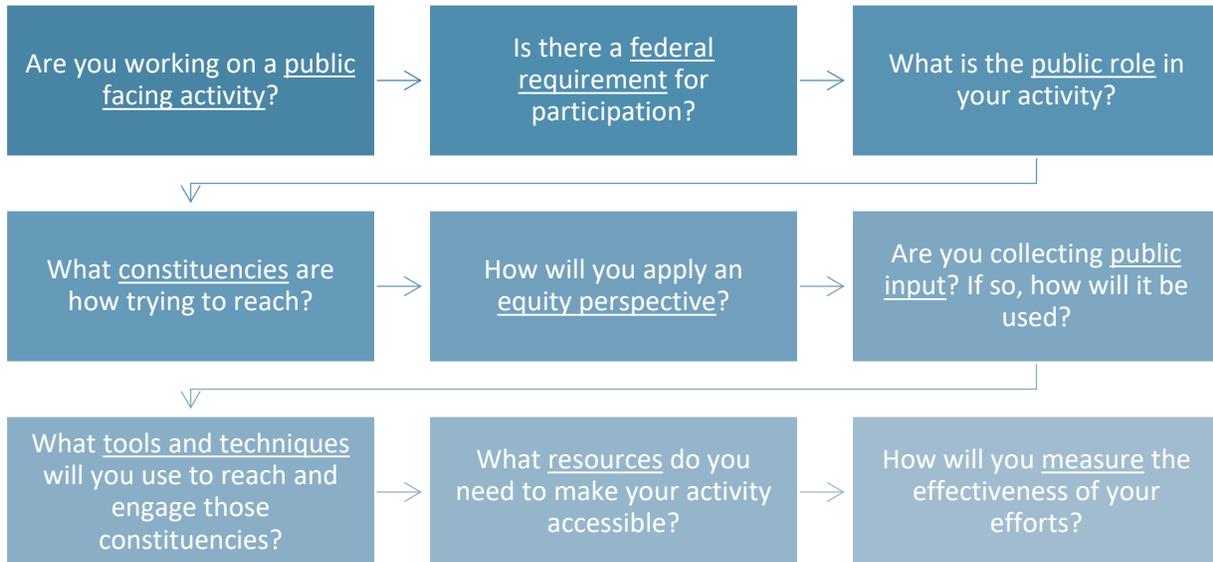
Not all the work led by TPB staff requires direct input from the public, but there is value in being clear about how technical work can inform the public. The TPB process is at its best when technical work, combined with input from an informed public, supports decision making.

Participation Workflow

This workflow walks staff² through a series of questions to ask themselves as they start a new activity. Each question is accompanied by a description and considerations to inform and provide context. The answers to these questions will outline an approach for how staff can work with the public in their activity. These questions will also help staff identify material and staffing resources to assist with their activity.

When staff start a new activity, they should spend time completing the Participation Workflow. This workflow walks them through questions they need to consider, helping them determine if their activity should include elements that inform or involve the public. Once completed, staff should take their answers and discuss with their team leader and, if possible, with members of the Participation Team. Working together they will make the determination about public information and involvement. Members of the Participation Team, other team leaders, and the director of transportation planning can also provide input into this process. Activities that have federal requirements must follow the participation guidance as described in regulations (23 CFR 450.316).

² The staff roles identified in this chapter's workflow can be broadly defined as follows: "TPB staff" is anyone who is responsible for an activity. "Team Leaders" are the managers who oversee staff who conduct the work outlined in the Unified Planning Work Program, which is the TPB's work plan. The "Participation Team" are the people who work in communications, outreach, and participation as part of the Plan Development and Coordination Team. For more detail on staff roles, refer to the Organization Chart (B-1) in the COG Title VI Plan.



1) ARE YOU WORKING ON A PUBLIC-FACING ACTIVITY?

If staff work is going to be presented to the TPB or committees, then it is considered a public-facing activity. Public-facing activities include all TPB activities, products, or events that the public has—or should have—the opportunity to review, participate in, or potentially influence. The audience for these activities may include one or more of the constituencies identified on page 6 of this plan—active participants, community leaders, and the general public.

Examples of public-facing activities include one-time events, like webinars, training programs, and public forums. They also include multi-faceted planning projects that offer a variety of opportunities over a period of time for public information and engagement. Such activities include developing and updating the TPB’s long-range transportation plan, as well as more specialized work such as the Regional Freight Plan or the Enhanced Mobility Program. And most obviously, public-facing work includes all materials that are publicly presented for discussion and official action.

Not all staff activities are public-facing, and in such cases, there may be no need for staff to proceed with this workflow. Such work may be purely technical, intended for internal use only, or designed to support larger activities. In other cases, such work may be conducted in collaboration with jurisdiction partners who take the lead on how public input will be framed.

However, even activities that are not public-facing may contribute to a plan or activity that directly impacts the public. Whenever possible, such materials should attempt to use plain language that is understandable to the public, as well as to elected officials who may not have technical backgrounds.

Are you working on a public-facing activity?		
Yes	No	Uncertain
If your work is public-facing, or informs a public-facing product, proceed to question 2.	If your work is not public-facing or does not impact the public, then you do not need to proceed through this workflow.	If you are uncertain whether your work is public-facing, then consult with your team leader or a member of the Participation Team.

2) IS THERE A FEDERAL REQUIREMENT FOR PARTICIPATION?

Some of the activities and processes overseen by TPB staff are federally required. These include developing the Long-Range Transportation Plan, currently known as Visualize 2045, and the Transportation Improvement Program, or TIP. See the Federal Guide for information about federal participation requirements.

Federal participation requirements are a starting point for some plans and activities. These requirements typically focus on the length of a public comment period. When resources are available, staff are encouraged to go beyond these requirements to achieve the Participation Goals.

Is there a federal requirement for participation?		
Yes	No	Uncertain
If your product does have federal requirements for participation, refer to the Federal Guide or Appendix B. Note those requirements and move on to Question 3.	If your work does not have federal participation requirements, please proceed to Question 3.	If you are uncertain whether there is a federal participation requirement for your work, consult with your team leader or the Participation Team.

3) WHAT IS THE PUBLIC ROLE IN YOUR ACTIVITY?

The International Association for Public Participation (IAP2) describes a spectrum for participation³ that ranges from informing the public, at the most basic level, all the way to empowering the public to shape outcomes, at the most involved level. In between these extremes there are opportunities to work with the public with different levels of intensity.

³ Public Participation Spectrum used with permission from IAP2. For more visit: iap2usa.org/cvs.



	<i>Inform</i>	<i>Consult</i>	<i>Involve</i>	<i>Collaborate</i>	<i>Empower</i>
Goal	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, and/or solutions.	To obtain public feedback on analysis, alternatives, and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
Public Promise	We will keep you informed	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

It is important for staff to decide where on this spectrum their activity fits. This will help set expectations with the public, TPB staff, jurisdiction and agency partners, in addition to committees and the board. Identifying the public role in an activity is important to help determine tools, techniques, and resources that will be utilized as part of the activity.

The three most common levels of participation at the TPB are inform, consult, and involve. If staff believe an activity would benefit from the additional forms of involvement that are identified on the IAP2 table – public collaboration or empowerment – they should talk with the Participation Team and their Team Leader.

Inform

If staff determine the public’s role is to be informed, they should focus their efforts on making the information they are sharing accessible. Staff should prepare materials using plain language and in a variety of formats. This means explaining complex information in simpler terms. Taking the time to explain concepts help people to better understand the information you are trying to convey. You may want to consult the Participation Team to figure out your key messages and create memorable phrases or slogans that will resonate with the public. Visualizations, maps, interactive maps, and videos are other tools that staff can use to make their materials accessible as they inform the public.

There are multiple ways for staff to inform the public. These might include:

- writing a blog post for TPB News and sharing it in an email newsletter
- sharing information through social media
- pursuing traditional media coverage
- sending information through TPB member jurisdictions, agencies, and other partners who can widely disseminate data and key messages
- using non-digital tools, including the US postal service, to reach people who may have limited internet access.

For some activities it is enough to only inform the public and not move on to more active engagement. When informing the public is the primary purpose, staff should work with the Participation Team to think about creative and innovative ways to do that.

Consult

If staff believe the public’s role in an activity is consultation, they should focus on how they want to solicit feedback in addition to making sure the information they are sharing is accessible and uses plain language. Feedback can be solicited through public comment periods, focus groups, and via comments on social media and other platforms.

When consulting with the public, staff should be clear at the beginning of the process about the type of feedback that is sought, the length of the opportunity, and how staff will summarize and use that feedback to inform decision making. As a best practice, staff should share with people who submitted feedback a summary of all feedback received and a description for how it was used in the activity.

For example, in announcing a public comment period for a plan update, staff might offer specific questions for the public to consider in crafting their input. The announcement should also let people know how long the comment period will be open and how commenters can find out how their comments were summarized and used in the final version of the plan.

Involve

If staff decide to get the public involved in an activity, they should focus on making sure there are multiple opportunities for the public to interact with information and provide feedback. At a minimum, staff should engage the public at the beginning of a process, mid-way through that process, and at the end to demonstrate how feedback has been used to inform decision making and the final product.

When involving the public, TPB staff often call upon the Citizens Advisory Committee and the Access for All Advisory Committee. These committees are comprised of members of the active public who are familiar with the TPB’s role in regional transportation planning and have a sophisticated understanding of transportation planning issues. The members of these groups can serve as conduits to their communities and can help to critically analyze public needs and identify solutions. For example, the committees have provided input that has fundamentally changed key TPB projects and programs, including ongoing regional safety planning and the inception of the Regional Transportation Priorities Plan.

With regular meeting schedules, these advisory committees are a natural fit for public involvement, however staff are encouraged to look beyond these advisory committees when involving the public, when possible. Thinking about how community leaders and the general public can be involved in a process will help make the public involvement more equitable.

What is the public role in your activity? What level of participation is appropriate?			
Inform	Consult	Involve	Uncertain
<p>If part of your activity is to inform the public, think about the what you’d like the public to know.</p> <p>Proceed to Question 4.</p>	<p>If you plan to consult with the public, think about which aspects of the activity require or would benefit from consultation.</p> <p>Proceed to Question 4.</p>	<p>If you plan to involve the public, think about the aspects of your activity that are best suited for regular interactions with the public.</p> <p>Proceed to Question 4.</p>	<p>If you are uncertain the public role in your activity, then consult with your team leader or a member of the Participation Team.</p>

4) **WHAT CONSTITUENCIES ARE YOU TRYING TO REACH?**

The Participation Policy describes constituencies with whom the TPB strives to engage on public-facing activities. Staff should identify which of these constituencies need to learn about or be engaged in a staff activity. To learn more about these groups, consult the Constituencies for Engagement on page 6.

When identifying constituencies, it is also important to recognize that groups have different constraints or barriers to participation. List those constraints and barriers so that you can refer to them in Step 7 when selecting tools and techniques.

Active participants are both knowledgeable about transportation policy issues in general, as well as the TPB's role in the regional transportation planning process. When working with the active public, staff should take the following into consideration:

- Recognize and support the vital contributions of individuals and groups who are already active in the TPB process.
- Engage with and tap into the active public's expertise and commitment (both individuals and groups) to inform the TPB's decision making.
- Support the active public in their efforts to disseminate information about regional transportation planning to their communities.
- Members of the TPB's two advisory committees are considered active participants. They understand the MPO process and provide direct feedback on TPB materials and activities. These committees can be called upon to provide public input once per project or before materials go to the board. These committees are also able to provide ongoing input throughout a process.

Community leaders have some knowledge of transportation policy issues but may not be familiar with the TPB's role in the regional transportation planning process. When working with community leaders, staff should take the following into consideration:

- Provide information and knowledge about regional transportation issues that will empower community leaders to positively affect transportation decision making at local and state levels.
- Engage community leaders as conduits to disseminate information about regional transportation issues at a grass roots level.
- Encourage community leaders to get involved in the regional transportation planning process at the TPB.
- Provide opportunities for cross-jurisdictional networking.

The general public has an inherent interest in transportation challenges but often possesses little direct knowledge of transportation policy-making structures. When working with the general public, staff should take the following into consideration:

- Make available basic information on regional transportation and land-use challenges to create a more informed public.

- Increase the capacity of the general public to understand transportation and land-use issues so that some of them might become community leaders or active participants.
- Understand that most members of the general public may not have the time or inclination to become more engaged in transportation planning activities. Therefore, outreach activities for interested people should focus on basic issues, not planning processes or institutions.

5) HOW WILL YOU APPLY AN EQUITY PERSPECTIVE?

The constituencies described in Question 4 are differentiated according to their levels of knowledge and past involvement in the TPB. But when determining how to tailor outreach, it is equally important for staff to consider an equity perspective in deciding how to develop and implement engagement activities.

An equity perspective will sharpen staff's attention on those who may not have been historically engaged by the TPB. These include people of color, people with limited English proficiency, people with differing abilities, low-income people, and people of all ages. Staff need to put extra effort, attention, and resources into reaching out to members of these communities to overcome the lack of effort from the TPB in the past. Specifically, staff should think about and think through how an activity may impact traditionally underserved communities, or populations living in Equity Emphasis Areas.⁴

In looking through the equity lens, it will be helpful to consider the following:

- Staff should acknowledge past mistakes when working with groups that have been left out of the planning process and voice a commitment to do better.
- Staff should acknowledge barriers to participation and offer accommodations to help overcome those barriers.
- Staff should think about how to adapt their work to make it accessible despite these barriers.
- Staff should recognize that people in this group are part of the constituencies described in the previous step (active participants, community leaders, general public), so the considerations for reaching out to those groups also apply here.

Equity in Virtual Engagement

Limited access to the internet is an example of an everyday barrier to participation. As the world becomes increasingly reliant on digital communications, it can be easy to forget that some people do not have computers at home or otherwise cannot readily access the internet.

Extra efforts are needed to make sure these people are not left out. For example:

- Staff should include the MWCOG/TPB mailing address and phone number— not just website links and emails addresses— in documentation whenever possible.
- When appropriate, staff should print and distribute copies of key documents instead of relying solely on internet distribution.

⁴ Equity Emphasis Areas (EEAs) are small geographic areas with above average concentrations of minority and low-income populations. The EEAs have been approved by the TPB to be the primary tool for regional Environmental Justice analysis.

- As meetings increasingly become virtual, staff should seek out ways to get input from people on the other side of the digital divide who cannot participate in such sessions online.

How will you apply an equity perspective to your activity?	
If you have thoughts on how you can apply an equity perspective to the activity share those ideas with your team leader and the Participation Team.	Uncertain
	If you are uncertain about how to apply an equity perspective to your activity, consult with your team leader or a member of the Participation Team.

6) ARE YOU COLLECTING PUBLIC INPUT? IF SO, HOW WILL IT BE USED?

The Participation Policy states that public input into TPB work makes its products better. This can only happen if there is a plan for how to incorporate public input into an activity or work product. The decision about collecting public input is related to the public’s role in the activity (Question 3). If the public’s role is primarily to be informed, then there may be no need to collect public input. If the public role is consultation, involvement, or something more extensive, then it is important to plan for collecting, summarizing, and using input.

Before deciding the tools and techniques to use to collect input, staff need to decide when input will be collected and what resources are available. This decision should be informed by the Principles for Engagement on page 5, which calls upon staff to offer early and ongoing participation. The public’s role in the activity will help determine when and how often public input will be collected. If the public’s role is consultation, then input will likely be collected once toward the end of an activity. However, if the public’s role is involvement, then it is important to collect input early and throughout a process.

Here are some key points to consider:

- **Take enough time.** Regardless of how often input is solicited, staff should ensure that adequate time is built into the outreach process so that staff and decision makers can fully consider the comments received and use that input to potentially make changes in final products and decisions.
- **Be clear about how you will use input.** Of course, until comments are received, it will be hard to know whether and how they might specifically affect final products and decisions. Nonetheless, staff should be as precise as early as possible in describing the ways in which input will be synthesized and potential changes that might result. In some cases, it might be helpful to flag issues or decisions that could be particularly subject to change based on the public input received.
- **Show how input was used in the past.** Staff may also want to highlight ways in which input is made and continues to make a difference in engagement activities. For example, public forums and workshops have indirectly influenced the course of TPB planning. For example, concerns about regional growth patterns that were expressed in public forums led to the creation of the Transportation Land-Use Connections (TLC) Program. More recently, the survey and public forums conducted for Visualize 2045 highlighted the public’s desire for

more reliability in the transportation system, a theme that was ultimately highlighted in the long-range transportation plan approved in 2018.

- Follow up to let people know they were heard.** When possible, staff should follow up with the public to let them know how their comments and input were used in the final product. Again, such follow-up activity can be time-consuming and therefore, it will require advance planning and must be prioritized. But **closing the loop** with residents who have participated in TPB planning activities will strengthen public support for changes the TPB is seeking to promote and it will encourage individuals and community groups to participate again in future TPB public engagement efforts.

Are you collecting public input? If so, how will it be used?		
Yes	No	Uncertain
If you are collecting public input, think about the format of that input. How will that be input be summarized and shared? How will that input be used?	If your activity does not require input, proceed to Question 6.	If you are uncertain whether you will be collecting public input, or how it will be used, consult with you team leader or the Participation Team.

7) WHAT TOOLS AND TECHNIQUES CAN YOU USE TO REACH AND ENGAGE THOSE CONSTITUENCIES?

There are a variety of tools and techniques available to TPB staff as they plan to inform and engage the public. Staff should consider who their audience is and what kind of participation they are seeking, and then consider which tools may be best to reach that constituency.

The tools and techniques that staff utilize should be responsive to the public’s role in an activity, the constituencies that staff are trying to reach, and whether staff plan to collect public input. There is no one tool or technique that can be broadly applied to reach all audiences. The most effective approaches to information sharing and engagement with the public use multiple tools and techniques to meet as many people as possible.

Even if you have used a tool in the past, you should reevaluate its effectiveness in reaching your desired audience. You might also consider using new tools and techniques, which are being developed all the time. Staff should consider the benefits and drawbacks of new tools before moving forward with their use. It is a good idea to consult with the Participation Team and your team leader before proceeding to make sure resources are available and timing works.

The COVID-19 pandemic in 2020 accelerated the deployment of virtual meeting tools and other forms of online engagement. The effects of these changes can be both positive and negative. On one hand, virtual engagement can increase participation, particularly from people who are reluctant or too busy to attend live events. Online accessibility tools also can be used to accommodate people with diverse physical, cognitive, and sensory abilities and needs. But online engagement can sometimes leave out people with limited access to the internet. And as staff are called upon to host more public interactions in online and virtual spaces, the need for responsiveness is especially important but often challenging.

When selecting a mix of tools and techniques to help reach and engage the public, refer to the list of constraints and barriers you identified in Step 4. Think about how those tools and techniques can be used to accommodate or overcome those constraints and barriers.

Examples of tools and techniques include:

- **Public comment periods** are one of the most basic ways for the public to participate and for staff to collect input. Public comment periods typically last 30 days. During public comment periods the materials are provided online for the public to review. They can then submit their comments via online form or by mail. At the conclusion of the comment period, staff summarize the comments received and write draft responses to comments. Sometimes, these responses are written in collaboration with jurisdiction and agency partners. The staff's summary and response document is typically shared with the board before a plan or other board action is approved. Although public comment periods are often held towards the end of an activity, they can also occur at the beginning or in the middle of its development.
- **Open or ongoing opportunities to comment** are less formal than a traditional public comment period and can occur via a form on a website or a box in the back of a room during a public meeting. This type of comment is less about soliciting specific input on an activity, and more about creating an opportunity for the public to share general thoughts on an activity or process. Open and ongoing comment opportunities are best suited for supplementing other ways to collect input from the public. Even though this type of outreach is often more open-ended than other approaches, staff should still develop a plan on how the information is going to be collected, used, and shared.
- **Public meetings** provide staff a unique opportunity to share information with and hear back directly from the public in real-time. Public meetings are meetings where the public is the primary audience and typically start with a presentation that provides context for a planning activity, before proceeding with presentations that dive deeper into activity content. Following this information sharing with the public, there is often an opportunity to collect feedback. This feedback can be collected in a variety of ways, including an open forum in which people queue up and ask questions, dividing the audience into small groups for discussion, or activities in which people interact with the material via maps and other means and provide feedback directly to staff. A variation on a public meeting, called an open house, presents information on posters positioned throughout the room. During the event staff and the public mingle to answer questions and solicit input.
- **Online public meetings** provide flexibility when planning public meetings where the public is the primary audience. They allow for people from across the region to attend without having to travel. They also provide an opportunity to host meetings at non-traditional times to allow for participation from people who are not available during the day or early evening when public meetings are typically held. In order to minimize barriers to participation, staff should select online tools that are familiar to the communities they are trying to reach. Polls and small group breakouts are a few ways to keep people engaged and to collect feedback during online meetings. Staff should recognize that not everyone in the region has access to the internet or a computer and that participating in online meetings may not be an option for these people. To overcome this, staff can distribute phone numbers for calling in, or partnering with non-profits or other community groups to help provide an internet connection or alternative.
- **Publications** provide information about the TPB process, projects, and programs. Publications can take several forms, from short articles that explain a topic, to more detailed white papers and reports that explore a topic in depth. TPB staff publish reports and white papers via the website,

and articles through TPB News. Publications can be printed, but increasingly they are shared in a digital format. Other techniques can be incorporated into publications to make them more accessible, including visualizations and maps. If the public’s role is to be informed, then publications can be an effective way to do that. If the public’s role is more involved, publications can support other tools and techniques.

- **Multimedia** is another way to provide information about the TPB and its projects and programs. Multimedia includes videos, interactive story maps and webpages, and can include other formats like audio. Multimedia materials support activities by presenting information in a way that may be more accessible to people with different abilities and non-native English speakers.
- **Trainings** provide a more in-depth opportunity to inform the public. Whether conducted online or in person, trainings allow for presentations, discussions, and activities that allow participants to apply what they have learned. One example of a training is the Community Leadership Institute, in which community leaders from across the region come together to learn about transportation planning on the local, state, and regional levels. The institute punctuates presentations with activities through which participants apply what they have just learned. Other examples of trainings include webinars and online workshops.
- **Surveys and polls** are used to collect input from many people. While surveys and polls can be open to the public, they are especially useful if they provide a statistically significant and representative sample of responses.
- **Focus groups** provide an in-depth opportunity to learn about a community's thoughts and opinions on a topic. Qualitative research through focus groups can be used to supplement opinion research obtained through surveys. Focus groups can also be effective means for gathering input from communities that are more difficult to reach.

Do you know what tools and techniques you can use to reach constituencies?	
Yes	No
Consider who your audience is and what kind of participation you are seeking, and then consider which tools may be best to reach that constituency. Even if you have used a tool in the past reevaluate its effectiveness in reaching your desired audience. It is a good idea to consult with the Participation Team and your team leader before proceeding to make sure resources are available and timing works.	If you don't know what tools and techniques are most appropriate for your activity, consult with your team leader and the Participation Team.

8) WHAT RESOURCES DO YOU NEED TO MAKE YOUR ACTIVITY ACCESSIBLE?

TPB staff work is often technical. Making complicated concepts and materials accessible to the public requires effort. Reaching out to the public requires skills and knowledge outside the daily responsibilities of most TPB staff. The TPB’s Participation Team specializes in the skills that can be used to assist staff with public-facing activities.

It is important for TPB staff to identify the need for public engagement and reach out to the Participation Team as early as possible. This will ensure that resources are available and there is plenty of time to coordinate to ensure timely completion. If time and budget allow, consultants can also be brought on to assist. Staff and consultants can help plan and run an activity, contribute visualizations and maps, design surveys, and conduct outreach, among other things.

The following resources are just some examples of ways that the Participation Team and consultants can assist with a public-facing activity.

- **Assistance with planning and running participation events** – The TPB has conducted a variety of participation events over the years, ranging from basic online webinars to deliberative forums with hundreds of participants and live polling. There are many tasks that go into hosting an in-person or online event. Staff can provide support with scheduling, identifying appropriate audiences, collecting feedback, preparing materials, and more.
- **Facilitating discussions** – Focus groups and targeted interviews can result in high-quality qualitative input. With advance notice, staff or consultants can help staff prepare questions for facilitated discussions, as well as helping to identify appropriate participants and schedule the discussions.
- **Conducting outreach to disadvantaged communities** - It can be challenging to engage people in the region who are not traditionally involved in transportation issues, such as residents with limited English skills or those who do not have reliable access to the Internet. Reaching out to groups beyond the “usual suspects” requires time and skills. If a work activity may impact people or seeks to solicit input from people in these hard-to-reach groups, it is important to call upon someone who has the skills to help incorporate that group into the activity.
- **Designing graphics and visualizations** – Complex topics can sometimes be easier to understand if they are presented in a visual way. Graphical elements like photographs, charts, timelines, and more can be used to explain projects, processes, and more. For graphics and visualizations to be effective, it is important to have a clear message in mind for a specific audience. Designing graphics and visualizations can take time, and sometimes may require special expertise.
- **Developing maps and interactive story maps** – Transportation projects often have a geographical element. Visualizing planned changes to infrastructure and infrastructure improvements can help the public better understand the content of plan or activity. Developing maps takes time and requires data resources, often from jurisdiction partners. Make sure that there is enough time set aside to coordinate with staff to develop maps.
- **Writing, editing, and publishing blog posts** – One of the most common ways that TPB staff share their work with the public is through blog posts published in TPB News. These posts, written in plain language, provide a high-level of summary TPB work that is more accessible than memos and technical documents. Staff can provide writing and editing assistance. The COG Office of Communications may also be able to help raise awareness of work produced. The Communications Center on COG’s intranet provides staff resources for all types of writing.
- **Producing videos or other media content** – Videos provide another way to explain complex ideas in an accessible format. Videos can include narration, illustration, and animation to help explain complex or new ideas. Audio is another medium for sharing TPB work. Producing videos and audio can be time consuming and resource intensive.

Do you need additional resources to make your activity accessible?		
Yes	No	Uncertain
If you need additional resources work with your team leader to make sure there is budget available. Also consult with the people you'd like assistance from you make sure they have time and capacity.	If your activity does not require any additional resources, proceed to Question 9	If you are uncertain whether activity would benefit from utilizing additional resources, consult with your team leader or the Participation Team.

9) HOW WILL YOU MEASURE THE EFFECTIVENESS OF YOUR EFFORTS?

Evaluation is necessary for organizational improvement. Taking time to reflect on what went well with an activity and what can be improved is fundamental to becoming more effective over time. During recent certification reviews of the TPB's planning process, federal partners encouraged staff to develop a more robust evaluation for their participation activities.

This question in the workflow has two steps. Before beginning the activity, staff should think about what success looks like for their activity, and then think about how they will evaluate their activity. Once the activity is completed staff should reflect upon their answers to the evaluation questions and develop recommendations for future activities.

Before the activity begins

Evaluation starts when planning an activity. The answers to the previous questions in the workflow effectively outline the approach for interacting with the public for an activity (Planning Questions). Once those questions have been answered, staff need to take a moment to think about what success will look like and how it can be measured (Evaluation Questions).

Staff should set aside the answers to these questions and share them with the Participation Team. They should be used to design the public-facing components of their activity. The evaluation questions should be referenced as a guide to ensure that the public activity is going well.

Topic	Planning Questions What are you going to do to inform or engage the public?	Evaluation Questions: How will you know if you are successful?
Constituency	Which policy constituency or constituencies is staff trying to reach for this activity?	Once the activity is completed, how will staff know they've reached this constituency?
Public Role	What is the public's role in the activity?	Once the activity is completed, how will staff know if the public fulfilled that role?
Tools and Techniques	What tools and techniques will staff use to work with the public?	Once the activity is completed, how will staff know if these tools and techniques were effective?
Input	What type of input is staff seeking and how will it be used?	Once the activity is completed, how will staff know that they've received the type of input they sought? Was staff able to use this input as planned?
Equity	How will staff apply an equity perspective in this activity?	Once the activity is completed, how will staff know that it has been equitable?

After the activity is completed

Once an activity is completed, it is important to take time to conduct an evaluation. Staff should get together with the people that worked on the activity and briefly reflect on the list of planning and evaluation questions.

The discussion should start with a review of expected outcomes that references the answers to the planning and evaluation questions recorded before the activity began. The discussion should proceed with an overview of what happened. Staff should compare the results of the activity against the expected outcomes and ask themselves: What went well? How can future success be built upon what went well? What didn't work as expected? And what could be improved?

Beyond the benefits of reflection, the purpose of this discussion is to identify recommendations for future activities and to identify lessons learned for things that should be avoided.

Documenting and sharing this discussion with staff will help to ensure that staff are always working to improve the efficiency and effectiveness of their public participation.

Training

Following approval of this plan, TPB staff will be trained on how to use the Participation Policy and Staff Guide to identify activities that have a public-facing component and how to plan for informing and involving the public. This training will also cover the federal requirements (23 CFR 450.316) for participation for MPOs. Trainings will occur by team, as outlined in the Organization Chart in the Title VI Plan (B-1). After staff have been trained, additional trainings will occur annually to acquaint new staff with the Participation Plan and provide a refresher for staff who have already received the training.

In addition to training on the Participation Plan, TPB staff will receive additional training as outlined in the COG Title VI Plan and Program.

The team leader for the Plan Development and Coordination Team will oversee plan implementation and training.

Participation Evaluation

In addition to evaluating individual participation activities, more comprehensive evaluations of the TPB's public engagement activities will occur on a regular basis. These will include an annual Public Participation Impact Statement and a third-party review, which will occur every four years.

Evaluations will include dashboards tracking TPB participation activities and make recommendations for how to improve participation efforts. In addition to qualitative input drawing from the evaluation questions (Participation Workflow Step 9), evaluations will use data to show numbers of participation activities, participation levels, and demographics (when available). When possible and appropriate, the TPB's public participation activities should be evaluated using a combination of indicators, not simply with one measure.

REGULAR EVALUATION

Once a year, the Participation Team will prepare a Public Participation Impact Statement that will evaluate participation activities over the year. This statement will be shared with the advisory committees, the Technical Committee, and the board. By documenting and evaluating participation activities and sharing them with key stakeholders, these statements will demonstrate both staff efforts to improve the effectiveness of their public interactions and staff commitment to approaching public participation from an equity perspective.

The Public Participation Impact Statement will summarize the evaluation summaries written for each participation activity and include data about communications activities to support participation, a summary of social media engagements, and a summary of unsolicited comments received. This statement will also include a preview of anticipated activities in the following six-month period.

The impact statements will be timed to inform the annual development of the Public Involvement Program Element of the Unified Planning Work Program (UPWP).

QUADRENNIAL EVALUATION

Every four years, staff will engage consultants to conduct an in-depth evaluation of participation activities. The timing of this evaluation should be scheduled to inform future updates of the Participation Plan and major participation activities like updates to the long-range transportation plan.

FEDERAL GUIDE

Many of the TPB's planning activities have their origins in federal law and regulation. The TPB is designated under federal law as a Metropolitan Planning Organization or MPO. Among other things, MPOs are required to develop long-range transportation plans (in our region, that plan is currently called Visualize 2045) and Transportation Improvements Programs (TIPs).

Public participation requirements are part of the federal rules guiding these core planning functions (23 CFR 450.316), as well as others. Key elements of those requirements are described below. Appendix B includes the statutory and regulatory language behind these requirements.

The TPB and its staff are committed to meeting these requirements.

Metropolitan Planning Organizations

Federal law requires each metropolitan region with a population of more than 50,000 residents to designate a metropolitan planning organization (MPO) to develop transportation plans for the region. For Metropolitan Washington, the TPB is our region's MPO. The law requires each MPO to create a public participation plan for providing the public a reasonable opportunity to be involved in the transportation planning process.

Transportation Legislation and Regulations

Section 134 of title 23, United States Code, amended by the most recent federal transportation reauthorization act, Fixing America's Surface Transportation (FAST) Act, includes provision for public participation in the development of transportation plans.

Federal regulations, which elaborated on the FAST Act, specify that the planning process should meet certain standard, at a minimum. Those standards are summarized below and quoted in Appendix B:

- **Adequate time:** Provide adequate public notice of public participation activities and time for public review and comment at key decision points, including a reasonable opportunity to comment on the long-range transportation plan and the TIP.
- **Access to information:** Provide timely notice and reasonable access to information about transportation issues and processes.
- **Visualization:** Employ visualization techniques to describe long-range transportation plans and TIPs.
- **Internet postings:** Make public information (technical information and meeting notices) available on the internet and through other electronic means.
- **Convenient & accessible meetings:** Hold public meetings at convenient and accessible locations and times.

- **Demonstrated consideration of comments:** Demonstrate explicit consideration and response to public input received during the development of the long-range transportation plan and the TIP.
- **Underserved communities:** Seek out and consider the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services.
- **Follow-up comment opportunities:** Provide an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and “raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts.”
- **Work with the states:** Coordinate with the statewide transportation planning public involvement and consultation processes.
- **Evaluation:** Periodically review the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.
- **Documentation of comments:** Develop a summary, analysis, and report on the comments received and how they were considered as part of the development of the long-range transportation plan and the TIP.

Federal regulations also require the planning process to provide reasonable opportunity for interested parties to be involved in the metropolitan planning process. The regulations specify these interested parties as follows:

- Individuals
- affected public agencies
- representatives of public transportation employees
- public ports
- freight shippers
- providers of freight transportation services
- private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program)
- representatives of users of public transportation
- representatives of users of pedestrian walkways and bicycle transportation facilities
- representatives of the disabled
- other interested parties

More specifically, the regulations say that in developing long-range transportation plans and TIPs, MPOs should consult with and, whenever possible, coordinate with agencies and officials responsible for other planning activities within the metropolitan planning area that are affected by transportation, including:

- state and local planned growth

- economic development
- tourism
- natural disaster risk reduction
- environmental protection
- airport operations
- freight movements

For direct text from relevant federal laws and regulations, see Appendix B.

Other Laws and Regulations

Other key federal laws and regulations provide guidance for the TPB's public participation process. They are summarized below. Direct excerpts from these laws and regulations are provided in Appendix B.

TITLE VI: NONDISCRIMINATION IN FEDERALLY FUNDED PROGRAMS

Title VI of the Civil Rights Act of 1964 and its amendments (Title VI) prohibit excluding people from participating in or being discriminated in any federally funded program or activity on the basis of race, color, or national origin. Other federal laws further expand legal protection from discrimination, including the Federal aid Highway Act of 1973, the Age Discrimination Act of 1975, the Rehabilitation Act of 1973, and the Americans with Disability Act of 1990.

ENVIRONMENTAL JUSTICE

Executive Order 12898 in 1994 reinforced the provisions of Title VI and expanded its provisions to environmental justice for the environmental and health conditions in minority and low-income communities. Executive Order 12898 provides: "Each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

PERSONS WITH LIMITED ENGLISH PROFICIENCY

Executive Order 13166 requires improved access to federal programs for people who are limited in their English proficiency. The order requires federal agencies to provide assistance to federal fund recipients to provide reasonable access to those users of federal programs with limited English proficiency.

NONDISCRIMINATION

The TPB's Participation Plan identifies and describes the TPB's policies and approach for inclusive public participation and ensures access to the transportation planning process for low-income and minority populations.

COG and the TPB are committed to assuring that no person shall, on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights

Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

COG 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. COG and TPB's nondiscrimination policies and practices apply to not only the population groups included under the Title VI of the Civil Rights Act of 1964 (people of all races, colors, national origin, and genders) but also to people with disabilities, those with low-incomes, persons with limited English proficiency, and people of all ages and ethnicities.

The COG Board of Directors' "Title VI Plan to Ensure Nondiscrimination in all Programs and Activities" was developed to document the efforts COG undertakes on a continual basis to ensure compliance with Title VI and related statutes regarding nondiscrimination and environmental justice. The Plan includes a Title VI Policy Statement, Title VI Assurances, organization and compliance responsibilities, nondiscrimination complaint procedures. It also describes how the TPB ensures that Title VI requirements, including Environmental Justice considerations, are met.

Because COG acts as the administrative agent for the TPB, the COG Title VI Plan and Program apply to the TPB as well. As a matter of long-standing TPB policy and a requirement of federal law, the regional transportation planning process must make special efforts to consider the concerns of traditionally underserved communities, including low-income and minority communities and people with disabilities.

Putting Federal Requirements in Context

Meeting federal requirements is essential. The metropolitan planning process that the TPB undertakes on a continuing basis has its origins in federal law and regulation. Continued funding for this process is contingent upon the faithful implementation of these federal laws and regulations.

However, federal participation requirements are just a starting point for plans and activities. They do not prohibit more extensive participation activities that are specifically tailored to our regional needs. As described throughout this document, the TPB is committed to a robust course of action in implementing participation practices that not only meet federal requirements, but also seek to make our regional transportation system more responsive to the needs of our residents today and for decades to come.

APPENDIX A: PUBLIC COMMENT PERIODS & COMMENT POLICIES

For items on which the TPB will formally act by way of vote, the TPB will share information about the proposed action items.

PUBLIC COMMENT PERIODS

Public comment periods will be governed by the following procedures:

- For federally **required plans and programs**, including the Long-Range Transportation Plan (called Visualize 2045), the Transportation Improvement Program (TIP), the Public Participation Plan, associated air quality conformity analyses, and other documents, the following procedures are conducted, per federal requirements, at a minimum:
 - The length of public comment periods will be as follows:
 - A period of at least 45 days prior to the approval of the Public Participation Plan;
 - A period of at least 30 days prior to the approval of all other federally required plans and programs.
 - Development and consideration of written responses to comments received.
 - The TPB shall provide an additional opportunity for public comment if the final Long-Range Transportation Plan or TIP differs significantly from the version that was made available for public comment by the TPB and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts.
 - When significant written and oral comments are received on the draft Long-Range Transportation Plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency consultation process required under the EPA transportation conformity regulations (40 CFR part 93), a summary, analysis, and report on the disposition of comments shall be made as part of the final Long-Range Transportation Plan and TIP.
- For **major regional plans and policy** documents that are not specifically governed by federal requirements, the following procedures are followed:
 - Public comment period of at least 30 days prior to the approval of documents.
 - Development and consideration of written responses to comments received.
 - The TPB shall provide an additional opportunity for public comment, if the final plan or policy document differs significantly from the version that was made available for public comment by the TPB and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts.

- For other Action Items before the TPB, the following participation procedures will be conducted at a minimum:
 - Materials will be posted electronically (on the TPB website and announced by email notification) six days before the TPB meeting.
 - Materials will be reviewed at the TPB Technical Committee by representatives from regional jurisdictions.

ONGOING OPPORTUNITIES TO COMMENT

For other items and activities, the TPB provides an opportunity for public comment via mail, email, and on the TPB website. The TPB also provides access to documents in advance of all meetings to provide an opportunity to comment.

To ensure that reasonable public access is provided to technical and policy information used in the TPB process, members of the public will be invited to review reports and other technical information (other than proprietary software or legally confidential data).

The TPB will encourage dissemination of information through the following means:

- Post all publicly available TPB documents on the TPB website, and otherwise seek opportunities to make suitable reports and technical information available through the TPB website.
- Distribute relevant reports and technical information free of charge at meetings of the TPB and its committees and subcommittees.

OPEN PUBLIC MEETINGS

The TPB will invite members of the public to participate in the review of technical work programs and analysis through attendance at meetings of the TPB Technical Committee and other TPB subcommittees, and at regular monthly meetings of the TPB.

To provide opportunities for public participation at these meetings, the TPB will use the following methods:

- A period of time will be dedicated at the beginning of each TPB meeting for public comment on transportation issues under consideration by the TPB and provide follow-up acknowledgment and response as appropriate.
- At least one formal public meeting will be conducted during the development process for the TIP.
- When possible, all meetings will occur at the MWCOG offices located at 777 N. Capitol St NE. These facilities are ADA-compliant, provide assisted hearing technology, and are accessible by fixed-route transit.

- Meetings may also be hold online, or in a hybrid in-person / online format. When a meeting has an online component, information needs to be made available describing how the public can join the meeting and documentation provided before or during the meeting needs also to be available online. Such online meeting opportunities may become particularly necessary in times of national crisis, such as the pandemic of 2020.

APPENDIX B: FEDERAL LAW & REGULATIONS

METROPOLITAN PLANNING ORGANIZATIONS

Federal law requires each metropolitan region with a population of more than 50,000 residents to designate a metropolitan planning organization (MPO) to develop transportation plans for the region. MPOs must develop long-range transportation plans and transportation improvement programs through a performance-driven, outcome-based approach to planning. The law also requires each MPO to create a participation plan for providing the public a reasonable opportunity to be involved in the transportation planning process.

United States Code, 23 U.S.C. 134, 23 U.S.C. 150, 49 U.S.C. 5303; Code of Federal Regulations, 23 CFR §§450.310, 450.316

TRANSPORTATION LEGISLATION AND REGULATIONS

Section 134 of title 23, United States Code, amended by the federal transportation reauthorization act, Fixing America's Surface Transportation (FAST) Act, includes provision for public participation in the development of a transportation plan. The FAST Act requires participation by interested parties, specifically:

Each metropolitan planning organization shall provide citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan.

23 U.S.C. 134(i)(6)(A).

Federal regulations elaborate on the FAST Act's public participation requirements and define the requirements for a public participation plan:

- (a) The MPO shall develop and use a documented participation plan that defines a process for providing individuals, affected public agencies, representatives of public transportation employees, public ports, freight shippers, providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program), representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.
 - (1) The MPO shall develop the participation plan in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for:
 - (i) Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;

- (ii) Providing timely notice and reasonable access to information about transportation issues and processes;
 - (iii) Employing visualization techniques to describe metropolitan transportation plans and TIPs;
 - (iv) Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
 - (v) Holding any public meetings at convenient and accessible locations and times;
 - (vi) Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;
 - (vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;
 - (viii) Providing an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts;
 - (ix) Coordinating with the statewide transportation planning public involvement and consultation processes under subpart B of this part; and
 - (x) Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.
- (2) When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency consultation process required under the EPA transportation conformity regulations (40 CFR part 93, subpart A), a summary, analysis, and report on the disposition of comments shall be made as part of the final metropolitan transportation plan and TIP.
- (3) A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.
- (b) In developing metropolitan transportation plans and TIPs, the MPO should consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation (including State and local planned growth, economic development, tourism, natural disaster risk reduction, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities. In addition, the MPO shall develop the metropolitan transportation plans and TIPs with due consideration of other related planning activities within the metropolitan area, and the process shall provide for the design and delivery of transportation services within the area that are provided by:
- (1) Recipients of assistance under title 49 U.S.C. Chapter 53;
 - (2) Governmental agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and
 - (3) Recipients of assistance under 23 U.S.C. 201-204.
- (c) When the MPA includes Indian Tribal lands, the MPO shall appropriately involve the Indian Tribal government(s) in the development of the metropolitan transportation plan and the TIP.

- (d) When the MPA includes Federal public lands, the MPO shall appropriately involve the Federal land management agencies in the development of the metropolitan transportation plan and the TIP.
- (e) MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under §450.314.

Code of Federal Regulations, 23 CFR §450.316.

TITLE VI: NONDISCRIMINATION IN FEDERALLY FUNDED PROGRAMS

Title VI of the Civil Rights Act of 1964 and its amendments (Title VI) prohibit excluding people from participating in or being discriminated in any federally funded program or activity on the basis of race, color, or national origin. Other federal laws further expand legal protection from discrimination, including the Federal Aid Highway Act of 1973, the Age Discrimination Act of 1975, the Rehabilitation Act of 1973, and the Americans with Disability Act of 1990.

Civil Rights Act of 1964, 42 U.S.C. 200

ENVIRONMENTAL JUSTICE

Executive Order 12898 in 1994 reinforced the provisions of Title VI and expanded its provisions to environmental justice for the environmental and health conditions in minority and low-income communities. Executive Order 12898 provides:

Each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (1994).

PERSONS WITH LIMITED ENGLISH PROFICIENCY

Executive Order 13166 requires improved access to federal programs for people who are limited in their English proficiency. The order requires federal agencies to provide assistance to federal fund recipients to provide reasonable access to those users of federal programs with limited English proficiency.

Executive Order 13166, Improving Access to Services for Person with Limited English Proficiency (2000).

APPENDIX C: TPB EQUITY RESOLUTION

TPB R1-2021
July 22, 2020

NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 NORTH CAPITOL STREET, NE
WASHINGTON, DC 20002

RESOLUTION TO ESTABLISH EQUITY AS A FUNDAMENTAL VALUE AND INTEGRAL PART OF ALL TRANSPORTATION PLANNING BOARD'S WORK ACTIVITIES

WHEREAS, the National Capital Region Transportation Planning Board (TPB) has been designated as the Metropolitan Planning Organization for the Washington Metropolitan Area by the Governors of Maryland and Virginia and the Mayor of the District of Columbia; and

WHEREAS, the work of the TPB has been guided by its policy documents starting with the TPB Vision statement through the Visualize 2045 Aspirational Initiatives, which emphasize multi-modal, affordable, and safe mobility options to promote prosperity, accessibility, livability, and sustainability throughout the region, as espoused in COG's Region Forward Vision; and

WHEREAS, the TPB Vision, adopted in 1998, embraced equity as a key principle by, among other things, calling for a transportation system that would "provide reasonable access at reasonable cost to everyone in the region"; and

WHEREAS, the TPB in 2017 identified Equity Emphasis Areas, which are geographically defined places in the region with high concentrations of minority and low-income populations that should receive focused attention for transportation analysis and planning, at both the regional and local levels; and

WHEREAS, the TPB as part of its long-range plan development, uses the Equity Emphasis Areas as part of an Environmental Justice analysis to examine the impacts of the region's transportation investments on minority and low-income population groups; and

WHEREAS, the TPB promotes transportation projects and programs in disadvantaged communities by giving focused attention to programs including TPB's Equity Emphasis Areas, Transportation/Land Use Connections and Transportation Alternatives; and

WHEREAS, the TPB seeks the input of traditionally underserved population groups through its Access for All Advisory Committee and its Citizens Advisory Committee; and

WHEREAS, the TPB believes equity is a fundamental value defined as the commitment to promote fairness and justice in the development and implementation of projects, programs and policies, achieved when all people are fully able to participate in the region's economic vitality, contribute to its readiness for the future, and connect to the region's assets and resources, and;

WHEREAS, the TPB member governments and agencies are increasingly committing to intentionally consider equity when making policies or delivering programs and services; and

WHEREAS, the TPB condemns inequitable treatment of any group of people, on any basis, and reaffirms its commitment to equity in all aspects of transportation planning and programming; and

WHEREAS, the TPB recognizes the history of racism in our country and how it has led to current day disparities in education, job attainment, housing, healthcare, and transportation access, as well as disproportionate incarceration rates for Black and Brown members of our communities, among other negative impacts; and

WHEREAS, the TPB recognizes that racial inequities have become institutionalized in the policies and practices of many agencies, governmental and otherwise; and

WHEREAS, the TPB condemns racial discrimination and inequity and commits to being non-racist, and significantly, also commits the TPB to actively oppose racism;

**NOW, THEREFORE, BE IT RESOLVED BY THE NATIONAL CAPITAL REGION
TRANSPORTATION PLANNING BOARD THAT:**

The TPB and its staff commit that our work together will be anti-racist and will advance equity including every debate we have, and every decision we make as the region's MPO; and

The TPB affirms that equity, as a foundational principle, will be woven throughout TPB's analyses, operations, procurement, programs, and priorities to ensure a more prosperous, accessible, livable, sustainable, and equitable future for all residents; and

We recognize past actions that have been exclusionary or had disparate negative impacts on people of color and marginalized communities, including institutionalized policies and practices that continue to have inequitable impacts today, and we commit to act to correct such inequities in all our programs and policies.

Adopted by the National Capital Region Transportation Planning Board on July 22, 2020

APPENDIX D: ACCOMMODATIONS POLICY

It is the policy of the Metropolitan Washington Council of Governments (COG) to provide equal access for individuals with disabilities and those with limited English skills to programs, meetings, publications, and activities. Reasonable accommodations will be provided by COG upon request with reasonable advance notice. Reasonable accommodations may include translation services, modifications or adjustments to a program, publication, or activity to enable an individual with a disability or someone who does not speak English to participate. Examples include:

- Providing sign language interpreters or other language translation services. COG will make reasonable efforts to accommodate requests. This assumes COG is given adequate time to secure those services and services in a particular language are available within the requested time period;
- Providing meeting materials in alternative formats (such as translated materials in languages other than English, large print or electronic copies);
- Providing tables that are suitable for people using electric wheelchairs;
- Alerting security staff that persons with disabilities will need assistance to the meeting room;
- Alerting garage attendants that a person with a disability will need accessible parking spaces;
- Offering individuals, the ability to participate in meetings through conference calls and other accommodations, as necessary.

Meetings and Events

Translation services in sign language and languages other than English are available upon request with reasonable advance notice for meetings that are open to the public. Other accommodations, such as special seating requirements, can also be arranged. Please allow up to seven (7) business days to process your request. COG will make reasonable efforts to accommodate requests. This assumes COG is given adequate time to secure those services and services in a particular language are available with the requested time period.

Publications

Most publications are available on the website. Alternative formats of publications, including translated documents, are also available upon request. Please allow up to seven (7) business days to process your request.

Advance Notice Requested for Interpreting or CART Services

An individual needing a sign language interpreter, translator, or Communication Access Real-time Translation (CART) service to participate in a meeting or event should request the interpreter service at least seven (7) days in advance of the event. If the event is more than 12 interpreting hours, such as a two day conference, COG asks that the request be made 14 days in advance. Late requests will be handled based upon the availability of service(s).

To make a request:

Phone: (202) 962-3300

TDD: (202) 962-3213

Email: accommodations@mwcog.org

To read the Accommodations Policy in different languages, visit (mwcog.org/accommodations/). It is available in the following languages:

Spanish – Español

French – Français

Korean – 한국의

Vietnamese - tiếng Việt

Amharic - አማርኛ

Chinese -中国

We welcome comments on how to improve accessibility for users with disabilities. Please email us with suggestions.

Finding Alternative Formats of COG Publications

Publications can be found on the COG website in a variety of ways:

ON THE DOCUMENTS PAGE

Visit the Documents page to view publications in a variety of ways, including alphabetical and chronological order.

ON COMMITTEE PAGES

If you are looking for an agenda, report, letter, presentation, or other document from one of COG's committees, visit the Committees page. This page links to individual committees where you can find publications and meeting materials associated with that committee.

BY SEARCH

The search box found in the website header allows you to find publications using a variety of categories.

For additional assistance in finding specific publications, email the Office of Communications or call (202) 962-3300.



National Capital Region
Transportation Planning Board

Metropolitan Washington Council of Governments
777 North Capitol Street NE, Suite 300
Washington, DC 20002

mwcog.org/tpb

APPENDIX B: COG LANGUAGE ASSISTANCE PLAN

LANGUAGE ASSISTANCE PLAN

Accommodating Individuals with Limited English Proficiency (LEP) in All Programs and Activities

May 2024



Metropolitan Washington
Council of Governments

LANGUAGE ASSISTANCE PLAN: ACCOMMODATING INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY (LEP) IN ALL PROGRAMS AND ACTIVITIES

May 31, 2024

ABOUT COG

The Metropolitan Washington Council of Governments (COG) is an independent, nonprofit association that brings area leaders together to address major regional issues in the District of Columbia, suburban Maryland, and Northern Virginia. COG's membership is comprised of 300 elected officials from 24 local governments, the Maryland and Virginia state legislatures, and U.S. Congress.

CREDITS

Editors: Sergio Ritacco

ACCOMMODATIONS POLICY

Alternative formats of this document are available upon request. Visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

TITLE VI NONDISCRIMINATION POLICY

The Metropolitan Washington Council of Governments (COG) operates its programs without regard to race, color, and national origin and fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations prohibiting discrimination in all programs and activities. For more information, to file a Title VI related complaint, or to obtain information in another language, visit www.mwcog.org/nondiscrimination or call (202) 962-3300.

El Consejo de Gobiernos del Área Metropolitana de Washington (COG) opera sus programas sin tener en cuenta la raza, el color, y el origen nacional y cumple con el Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y reglamentos relacionados que prohíben la discriminación en todos los programas y actividades. Para más información, presentar una queja relacionada con el Título VI, u obtener información en otro idioma, visite www.mwcog.org/nondiscrimination o llame al (202) 962-3300.

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EXECUTIVE SUMMARY

The Metropolitan Washington Council of Governments (COG) is committed to ensuring meaningful access to its programs and activities by persons who are limited English proficient (LEP). A “four-factor” analysis, developed by the federal government, is used to help determine how to ensure reasonable and meaningful access to COG activities, including:

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

For the results of the four-factor analysis performed by COG, refer to Section II, which discusses and describes the LEP populations which are served directly by some COG programs, particularly the Transportation Planning Board (TPB). Most of the LEP persons who come in contact with COG and its programs do so at Board or Committee meetings which are open to the public or as applicants for employment with COG. COG has provided for Language Assistance services. Please refer to the adopted COG Annual Budget for the specified amounts allocated to Language Assistance (budget reflects the requirements made of COG for such services).

COG’s Accommodations Policy states that translation services are available upon request for meetings that are open to the public, for certain documents, and publications. Refer to COG’s Accommodations Policy for procedure and timeframes for submitting such requests. COG’s Accommodations Policy is translated into Spanish, French, Korean, Chinese (Mandarin), Vietnamese, and Amharic, and posted on the COG website. Further, the COG website can be translated into 130 different languages.

In addition to posting COG’s Accommodations Policy online and including a notice about accommodations on the committee webpages, COG includes the following language in its significant meeting announcements and agendas to notify the LEP populations of the availability of language assistance:

Reasonable accommodations are provided upon request, including alternative formats of meeting materials. For more information, visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

In major COG publications the following text is included to notify the LEP populations of the availability of alternative formats of the document:

Alternative formats of this document are available upon request. Visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

COG developed its Accommodations Policy to guide staff and outline how COG will provide certain services to accommodate people with special needs, including LEP. Staff having contact with the public will be trained by their supervisor regarding their obligations to provide meaningful access to information and services for LEP persons. Additionally, COG regularly provides diversity training for all employees.

This plan is periodically reviewed and updated. Refer to Section IV - Monitoring and Updating the Language Assistance Plan for additional information.

I. INTRODUCTION

Relationship between COG and the TPB

The Metropolitan Washington Council of Governments (COG) was established in 1957 by local cities and counties to deal with regional concerns including growth, housing, environment, public health and safety - as well as transportation. COG is an independent, nonprofit association supported by financial contributions from its participating local governments, federal and state grants and contracts, and donations from foundations and the private sector. Policies are set by the full membership acting through its board of directors which meets monthly to discuss area issues.

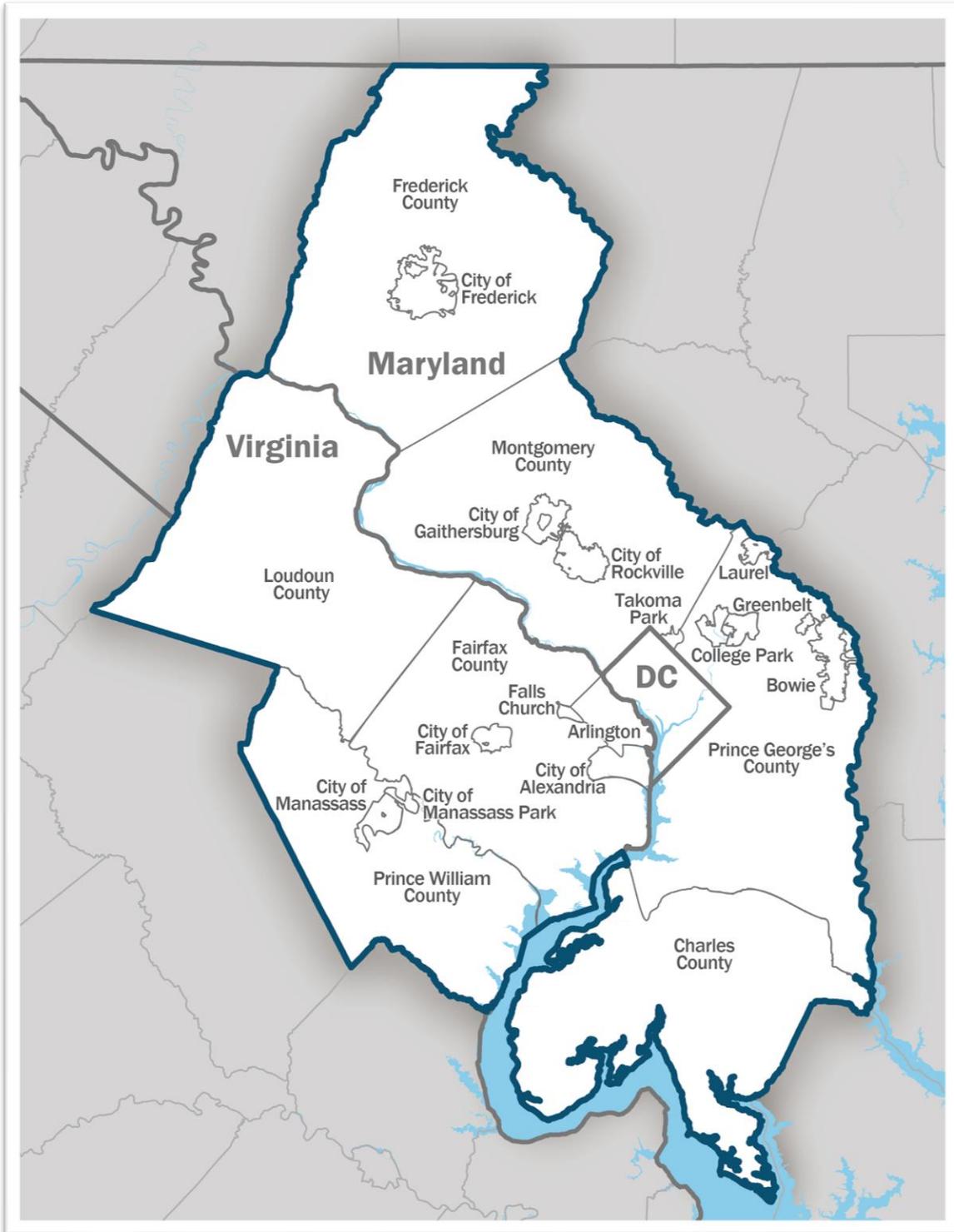
COG serves as the administrative agent for the National Capital Region Transportation Planning Board (TPB) under an agreement with the Transportation Departments of Maryland, Virginia, and the District of Columbia. The TPB was created in 1965 by the region's local and state governments to respond to federal highway legislation in 1962 that required the establishment of a "continuing, comprehensive, and coordinated" transportation planning process in every urbanized area in the United States. The TPB is designated as this region's Metropolitan Planning Organization (MPO) by the governors of Virginia and Maryland and the mayor of the District of Columbia based upon an agreement among the local governments. Although the TPB is an independent body, its staff is provided by COG's Department of Transportation Planning. COG administers a Unified Planning Work Program (UPWP) in conjunction with the TPB in accordance with the requirements of MAP-21, the Moving Ahead for Progress in the 21st Century Act (P.L. 112-141).

The National Capital Region Transportation Planning Board

The National Capital Region Transportation Planning Board is the official Metropolitan Planning Organization for transportation planning in the metropolitan Washington region, and serves as the transportation policy committee for the Metropolitan Washington Council of Governments. As the MPO for the region, the TPB carries out several important federal planning requirements, including the development of transportation plans and programs and analyzing the plans for compliance with federal regulations. The TPB Bylaws state: "the TPB shall be responsible for the development of policies of regional significance ... for the effective implementation of [the sections] of the United States Code concerning a metropolitan transportation planning process".

The TPB plans for an area that covers approximately 3,500 square miles and includes over 5.9 million people and over 3.7 million jobs. The TPB planning area is shown in Figure 1 below and includes the District of Columbia, Suburban Maryland (Frederick County, Montgomery County, Prince George's County, and Charles County, plus the cities of Bowie, College Park, Frederick, Gaithersburg, Greenbelt, Laurel, Rockville, and Takoma Park), and Northern Virginia (Arlington County, Fairfax County, Loudoun County, and Prince William County, plus the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park).

Figure 1: The TPB Planning Area



U.S. Department of Transportation (DOT) Requirements and Guidance on Language Access

FEDERAL TRANSIT ADMINISTRATION REQUIREMENTS FOR LANGUAGE ACCESS

In October 2012, FTA issued Circular C 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” which requires that recipients of Federal funds create a Language Assistance plan and provide meaningful language access to persons who are limited English proficient (LEP): “Consistent with Title VI of the Civil Rights Act of 1964, DOT’s implementing regulations, and Executive Order 13166, ‘Improving Access to Services for Persons with Limited English Proficiency’ (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP)”(chap. III-6).¹ Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be Limited English Proficient or “LEP.”

The COG/TPB Language Assistance Plan responds to the requirements in the Title VI Circular and provides the required elements of a Language Assistance Plan as described on page III-8 in the Circular, Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency

Executive Order 13166: “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121), Federal agencies are required to develop guidance on how recipients should, consistent with the DOJ LEP Guidance and Title VI of the Civil Rights Act of 1964, as amended, assess and address the needs of otherwise eligible limited English proficient (LEP) persons seeking access to the programs and activities of recipients.²

The U.S. DOT provided further guidance on how transportation agencies should address this Executive order in its policy guidance, summarized below.

U.S. DEPARTMENT OF TRANSPORTATION GUIDANCE TO RECIPIENTS ON SPECIAL LANGUAGE SERVICES TO LIMITED ENGLISH PROFICIENT (LEP) BENEFICIARIES

The U.S. Department of Transportation, Office of the Secretary, issued guidance to recipients of Federal transportation aid in 2001 as to the requirement to provide language access to limited English populations.

The guidance states that, “Title VI and its regulations require recipients to take reasonable steps to ensure ‘meaningful’ access to DOT recipients’ programs and activities. The key to providing meaningful access to LEP persons is to ensure that recipients and LEP beneficiaries can communicate effectively and act appropriately based on that communication. Thus, DOT recipients

¹ U.S. Department of Transportation. Title VI Requirements and Guidelines For Federal Transit Administration Recipients. FTA C 4701.1B. October 1, 2012 [http://www.fta.dot.gov/legislation_law/12349_14792.html]

² <http://www.gpo.gov/fdsys/pkg/FR-2000-08-16/pdf/00-20938.pdf>

should take reasonable steps to ensure that LEP persons are given adequate information and are able to participate effectively in recipient programs and activities, where appropriate.”³

This Language Assistance Plan was developed to demonstrate the commitment of COG and the TPB to ensure meaningful access, as described in the Executive Order and the U.S. DOT guidance, to all programs and activities by LEP persons.

The TPB’S PROACTIVE APPROACH TO PUBLIC INVOLVEMENT

In order to ensure that the TPB’s planning process identifies the needs of transportation-disadvantaged population groups, the TPB has developed a proactive approach to public involvement.

TPB staff held an interactive dialogue with members of the public during development of the TPB Participation Plan, which was adopted in December 2007 and last updated in 2020. The central concept of the Participation Plan is that there are three constituencies for the TPB, each having a different level of knowledge and familiarity with the TPB and the transportation decision-making process:

Active participants are both knowledgeable about transportation policy issues in general, as well as the TPB’s role in the regional transportation planning process. These individuals and organizations already actively participate in the TPB process and have an extensive understanding of regional transportation issues and policy..

Community leaders have some knowledge of transportation policy issues but are less familiar with the TPB’s role in the regional transportation planning process. They also may not be fully aware of the regional context underlying transportation challenges and experiences throughout the region.

The **general public** has an inherent interest in transportation challenges but often possess little direct knowledge of transportation policy making.

The TPB Participation Plan⁴ is based upon the fundamental premise that in order to most effectively use its resources the TPB must tailor its outreach to these three different groups. The TPB works in a number of ways to engage traditionally disadvantaged communities, including the LEP community, in these three constituency groups, including, an Equity principle that states: “Staff strive to incorporate an equity perspective into their work activities so that work acknowledges and seeks to accommodate different contexts, experiences, and abilities. ... It acknowledges past inequities and barriers to involvement and seeks to be more just.”

The **TPB Access for All (AFA) Advisory Committee** was specifically created by the TPB to proactively address Title VI and Environmental Justice and involve minority communities, including LEP, low-income communities, and persons with disabilities in the transportation planning process.⁵ The AFA

³ <http://www.justice.gov/crt/about/cor/lep/dotlep.php>

⁴ <https://www.mwcog.org/documents/2020/10/21/tpb-participation-plan--outreach-public-comment-tpb/>

⁵ <https://www.mwcog.org/tpbafa/>

was established in 2001 to advise the TPB on transportation issues, programs, policies, and services that are important to minority communities, low-income communities, and people with disabilities. The mission of this committee is to identify concerns for these traditionally transportation disadvantaged communities and to determine whether and how these issues might be addressed within the TPB planning process. AFA membership includes elected officials, transportation planners, community-based organizations, local advocacy groups, and interested citizens. Its diverse membership covers all three constituency groups identified in the TPB Participation Plan. The AFA has identified needs for improved access to transit information and the TPB has helped with such improvements through coordination with the Washington Metropolitan Area Transit Authority.

II. DETERMINING REASONABLE ACCESS: FOUR-FACTOR ANALYSIS

In accordance with Title VI of the Civil Rights Act and the U.S. Department of Transportation Circular FTA C 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” recipients are required to take “reasonable steps to ensure meaningful access to their programs and activities by LEP persons.” The guidance recommends that the following four-factor analysis be used to help determine how to ensure reasonable and meaningful access to COG and TPB activities:

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

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

LANGUAGES SPOKEN IN THE REGION

The U.S. Census Bureau’s American Community Survey (ACS) 2018-2022 5-year averages provide the most current source of information on those with limited English skills. The ACS asks what language is spoken at home and if English is spoken less than “very well.” Data from the ACS shows more than 32% of the region’s population speaks a language other than English at home and 12% of the region’s population speaks English less than “very well.” The languages other than English most often spoken at home are Spanish, Other Indo-European languages, Other and unspecified languages (including Amharic), Other Asian and Pacific Island languages, and Chinese, as shown in Figure 2 and 3.⁶

⁶ Determinations to identify a specific language is primarily due to the size of the population within the geographic area, in this case, the TPB Planning Area. As a result, three aggregate categories of like languages are included (Other Indo-European languages, Other and unspecified languages, and Other Asian and Pacific Island languages) and may separate out an individual language if and when it’s population is significantly large enough.

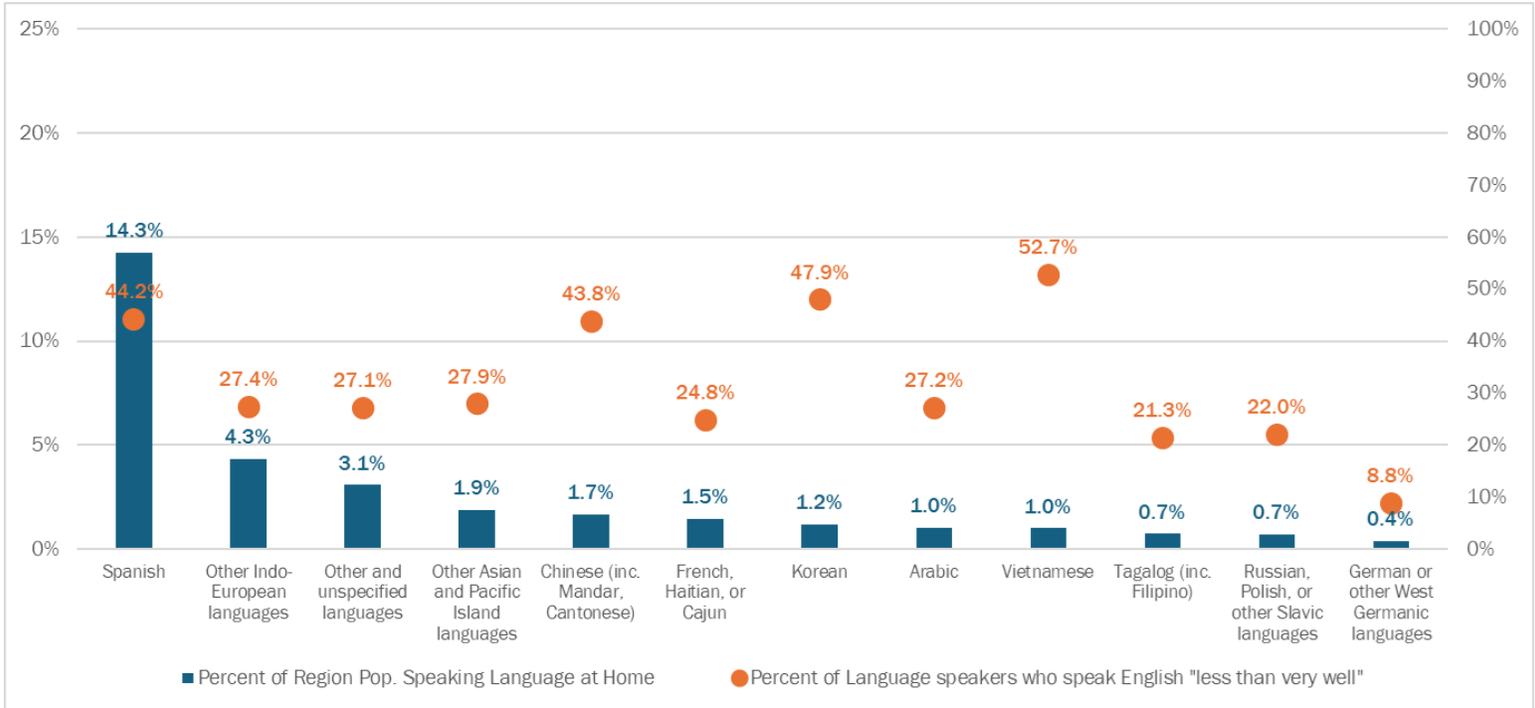
Other Indo-European languages is defined as including Haitian, Italian, Portuguese, German, Yiddish, Greek, Russian, Polish, Serbo-Croatian, Ukrainian or other Slavic languages, Armenian, Persian, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Telugu, Tamil, and Malayalam.

Other and unspecified languages is defined as including Navajo, Other Native languages of North America, Hebrew, Amharic, Somali, or other Afro-Asiatic languages, Yoruba or other languages of Western African, Swahili or other languages of Central, Eastern, and Southern Africa, and Other and unspecified languages.

Other Asian and Pacific Island languages is defined as including Japanese, Hmong, Khmer, Thai, Lao, Other languages of Asia, Tagalog, Ilocano, Samoan, Hawaiian, or other Austronesian languages.

Detailed information on languages, including definitions, can be found at U.S. Census: <https://www.census.gov/topics/population/language-use/about.html>

Figure 2: Rates of languages other than English most often spoken at home in the Metropolitan Washington Region



Source: U.S. Census Bureau; American Community Survey, 2018-2022 American Community Survey 5-Year Averages, Table C16001; This figure includes the TPB's planning area.

Figure 3: Estimates of total number of persons who speak a language other than English at home in the Metropolitan Washington Region

Languages Spoken at home	Total	Total who also speak English "less than very well"
Spanish	750,8029	334,843
Other Indo-European languages	230,506	63,056
Other and unspecified languages	164,087	44,513
Other Asian and Pacific Island languages	100,859	28,134
Chinese (incl. Mandarin, Cantonese)	88,993	38,952
French, Haitian, or Cajun	77,791	19,329
Korean	63,021	30,210
Vietnamese	53,390	28,134
Arabic	55,192	15,003
Tagalog (incl. Filipino)	39,821	8,498
Russian, Polish, or other Slavic languages	37,974	8,352
German or other West Germanic languages	21,786	1,925

Source: U.S. Census Bureau; American Community Survey, 2018-2022 American Community Survey 5-Year Averages, Table C16001; This figure includes the TPB's planning area.

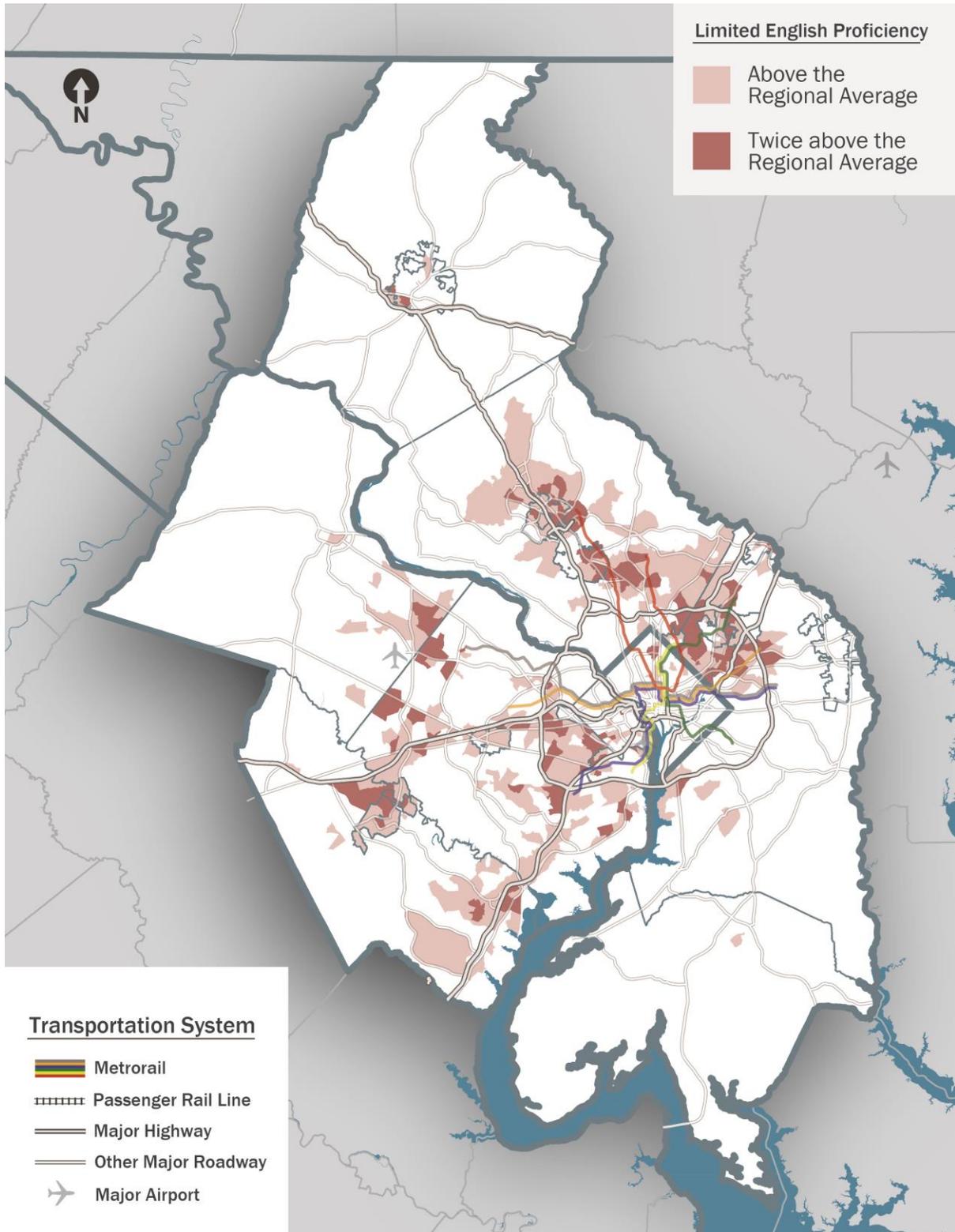
With more than 706,000 residents speaking Spanish at home, it is the most spoken non-English language in the region. Based on this information, it is most likely that special language services provided would need to accommodate people who speak Spanish. The region includes various other non-English speaking groups, too, with greater rates of limited English proficiency among the population. According to ACS data, home speakers of Spanish, Chinese, Korean, and Vietnamese have greater than forty percent of their respective populations that also speak English “less than very well” (see Figure 2). Special language services for these groups would need consideration, too.

Spatially, LEP populations in the region are geographically dispersed throughout the region, as shown in Figure 4. Regional information about LEP language access may be more useful at smaller geographic areas to help transportation planning staff understand the demographic profiles of the communities they operate in within the region.

HOW LEP PERSONS INTERACT WITH COG AND THE TPB

COG and the TPB do not provide direct transportation services to the region’s residents, but rather serve as forums for regional stakeholders, decision makers, and residents to participate in planning and policy setting. Direct public transportation services include Metrorail, Metrobus, MetroAccess and local transit providers. The TPB’s Access for All Advisory Committee includes representatives of limited English-speaking communities and advises the TPB on language access issues related to transportation. LEP persons are invited to participate in public meetings and committees, comment on work being completed, and participate in region-wide surveys and outreach efforts under COG and TPB. Materials are translated upon request so that they are available to those with limited English ability.

Figure 4: Distribution of limited English-speaking populations by U.S. Census Tract



Source: U.S. Census Bureau; American Community Survey, 2018-2022 American Community Survey 5-Year Averages, Table C16001.

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

Since COG and the TPB are not direct service providers, the frequency of LEP persons interacting with agency programs is quite low. Although all committee materials, publications, and public documents are made available in other languages upon request, there are very few requests submitted in a given year. Issues pertaining to LEP persons are discussed at quarterly meetings of the TPB's Access for All (AFA) Advisory Committee, but those who represent LEP population groups normally participate in English.

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

The activities that COG and the TPB engage in are not essential for LEP persons to go about their daily lives in the same way as direct service providers, such as Metrobus, Metrorail and local bus services. These activities include mostly policy level work and coordination between decision makers that represent the jurisdictions in the region. However, in order address the needs of all region's residents, participation from all population groups is encouraged. When conducting studies and surveys, and when public comment is welcome, LEP persons are often specifically sought out to participate in order to gather a diversity of opinions.

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

COG and the TPB have reviewed resources available and costs for language assistance based on past requests and expenditures. The result of this analysis shows that approximately \$10,000 per year is available for language assistance, and that the costs have not exceeded \$10,000 per year, as shown below. Resources available:

- In-house staff speak Spanish and can provide phone assistance and translate short notices or phrases;
- An administrative budget for foreign language interpreters, document and website translation (approximately \$10,000 per year);
- Free website translation through Google Translate.

Costs:

- Translation of key documents and websites (costs in the past have ranged from \$1,000 to \$5,000 per year);
- Translation of notices and ads (In-house staff);
- Limited support for answering phone calls and interpreting at meetings (in-house staff); and
- Language interpreters for meetings or focus groups (based on past requests, this has ranged from \$2,500 to \$5,000 per year).

III. PROVIDING LANGUAGE SERVICES

The Accommodations Policy⁷, included below, describes how language access is provided by COG and the TPB. The policy states that translation services are available upon request for meetings that are open to the public. The policy is published on the COG website at www.mwcog.org/accommodations along with translations of the policy in Spanish, French, Korean, Vietnamese, Amharic, and Chinese.

The following is a list of some of the COG and TPB efforts made to provide language access:

- Advertise public comment periods in Spanish language news publications.
- Provide survey forms and web applications in multiple languages.
- Provide Spanish-speaking facilitators at forums and outreach effects.
- Hire bilingual staff members.
- Google Translator is available on all COG webpages.
- Provide Spanish versions of key web pages.

The Commuter Connections program employs one full-time Spanish speaking employee that is available for their call center and assists staff with in-person contact and written communication in Spanish. Additionally, there is designated Spanish speaking staff in each COG department to handle calls from Spanish speakers.

The Commuter Connections program also periodically advertises their program via radio spots. These radio ads are broadcast in both English and Spanish.

Written language assistance

Key documents will be translated upon request. Staff arrange for the translation of materials through coordination with the Office of Communications and Human Resources staff who maintain a list of qualified companies that provide translation services.

The website for the Metropolitan Washington Council of Governments, including the Department of Transportation Planning subsection of that website, can be translated into over 130 different languages.⁸ Staff incorporated Google Translate translation capability into the development of this website as a cost-efficient means of making sure that the information contained on the website is accessible to LEP stakeholders and the interested non-English speaking public.

At certain times during our planning process it is required to publish notifications of TPB activities in local newspapers (e.g. announcement of the opportunity to comment on air quality conformity determination). When this is required, a notification is published in several newspapers, including a notification written in Spanish for the Spanish-language news publications.

⁷ <https://www.mwcog.org/accommodations>

⁸ <https://www.mwcog.org/transportation>

Outreach strategies for the annual Street Smart pedestrian and bicyclist safety campaign that is coordinated by the TPB include radio, video, newspaper and transit advertising.⁹ These advertising efforts are focused on educating motorists, pedestrians and bicyclists to improve safety. Advertising materials are produced in English and Spanish.

Additionally, the Commuter Connections website is provided in Spanish, to accommodate Spanish speaking customers' participation in ridesharing and other Commuter Connections programs.¹⁰

Training staff

Most COG staff members are not in public contact positions, however, those employees that do engage with the public receive direct training from their supervisor regarding their obligations to provide meaningful access to information and services for LEP persons. COG developed an Accommodations Policy to guide staff and outline how COG will provide certain services to accommodate people with special needs. Additionally, COG regularly provides diversity training for all employees.

In an effort to continuously improve the COG's overall compliance posture, nondiscrimination and LEP related training will be coordinated with the U.S. Department of Transportation, the Virginia Department of Transportation (VDOT), the Maryland Department of Transportation (MDOT) and the District Department of Transportation (DDOT) and made available to COG staff on an ongoing basis to ensure up to date knowledge of Title VI, other nondiscrimination statutes, and LEP guidance.

Providing notice to LEP persons

COG's Accommodations Policy is posted online and states that translation services are available upon request for meetings that are open to the public.¹¹ It is expressed that requests for such services are appreciated seven business days in advance of a meeting to process the requests.

COG includes the following language in its significant meeting announcements and agendas to notify the LEP population(s) of the availability of language assistance:

Reasonable accommodations are provided upon request, including alternative formats of meeting materials. Visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

In major COG publications the following text is included to notify the LEP population(s) of the availability of alternative formats of the document:

Alternative formats of this document are available upon request. Visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

⁹ <http://www.beststreetsmart.net>

¹⁰ <http://www.commuterconnections.org>

¹¹ <https://www.mwcog.org/accommodations>

The COG website includes a link to the Accommodations Policy and the Google Translate option on each webpage.

At certain times during the TPB planning process it is required to publish notifications of COG activities in local newspapers (e.g. announcement of the opportunity to comment on air quality conformity determination). When this is required, a notification is published in several newspapers, including a notification written in Spanish for the Spanish-language news publications.

IV. MONITORING, EVALUATING AND UPDATING THE LANGUAGE ASSISTANCE PLAN

The Language Assistance Plan as part of the Metropolitan Washington Council of Governments Title VI Plan will be reviewed annually by Title VI coordinators on the COG staff. This annual review will also include a review of whether existing assistance is meeting the needs of LEP persons and whether new documents, programs, services, and activities need to be made accessible for LEP individuals. Such guidance will also be based on consideration of the frequency of encounters with LEP language groups and the availability of resources.

The TPB Access for All (AFA) Advisory Committee annually reviews the significant changes to the long-range plan and provides input to the TPB regarding the transportation-related concerns of the people they represent, including LEP persons, people with disabilities, older adults, and economically disadvantaged populations. The AFA will also review significant changes to the Language Assistance Plan and provide feedback on which TPB activities are of most importance to LEP persons. The AFA reviewed COG's Accommodations policy in October 2014, and draft translations of the policy in Spanish, French, Korean, Vietnamese, Amharic and Chinese.

Additionally, as new data is made available on the demographics of the region and the resulting transportation needs (e.g., U.S. Census Data), this Language Assistance Plan will be reviewed and updated to respond to the needs of the region's growing and changing population.

APPENDIX C: ENVIRONMENTAL JUSTICE ANALYSIS OF THE 2022 UPDATE TO VISUALIZE 2045

visualize
2045 **A long-range
transportation plan
for the National
Capital Region**

APPENDIX N

Environmental Justice Analysis

January 19, 2023



National Capital Region
Transportation Planning Board

**ENVIRONMENTAL JUSTICE ANALYSIS
FOR THE 2022 UPDATE TO VISUALIZE 2045 LONG-RANGE TRANSPORTATION PLAN
FOR THE NATIONAL CAPITAL REGION**

January 2023

ABOUT VISUALIZE 2045 & THE TPB

Visualize 2045 is the federally required long-range transportation plan for the National Capital Region. It identifies and analyzes all regionally significant transportation investments planned through 2045 to help decision makers and the public “visualize” the region’s future.

Visualize 2045 is developed by the National Capital Region Transportation Planning Board (TPB), the federally designated metropolitan planning organization (MPO) for metropolitan Washington. It is responsible for developing and carrying out a continuing, cooperative, and comprehensive transportation planning process in the metropolitan area. Members of the TPB include representatives of the transportation agencies of the states of Maryland and Virginia and the District of Columbia, 24 local governments, the Washington Metropolitan Area Transit Authority, the Maryland and Virginia General Assemblies, and nonvoting members from the Metropolitan Washington Airports Authority and federal agencies. The TPB is staffed by the Department of Transportation Planning at the Metropolitan Washington Council of Governments (COG).

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ACCOMMODATIONS POLICY

Alternative formats of this document are available upon request. Visit www.mwcog.org/accommodations or call (202) 962-3300 or (202) 962-3213 (TDD).

TITLE VI NONDISCRIMINATION POLICY

The Metropolitan Washington Council of Governments (COG) operates its programs without regard to race, color, and national origin and fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations prohibiting discrimination in all programs and activities. For more information, to file a Title VI related complaint, or to obtain information in another language, visit www.mwcog.org/nondiscrimination or call (202) 962-3300.

El Consejo de Gobiernos del Área Metropolitana de Washington (COG) opera sus programas sin tener en cuenta la raza, el color, y el origen nacional y cumple con el Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y reglamentos relacionados que prohíben la discriminación en todos los programas y actividades. Para más información, presentar una queja relacionada con el Título VI, u obtener información en otro idioma, visite www.mwcog.org/nondiscrimination o llame al (202) 962-3300.

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INTRODUCTION AND SUMMARY

Introduction

The 2022 update to Visualize 2045 (herein Visualize 2045), the long-range transportation plan for the National Capital Region Transportation Planning Board (TPB), must be analyzed at the regional level for compliance with federal Environmental Justice (EJ) order. EJ analysis examines if Visualize 2045 would have a disproportionately high and adverse impact on “low-income” or “minority” populations. The TPB analysis of Visualize 2045 determined that the planned projects in the 2022 update of the plan would not have a disproportionately high and adverse impact on “low-income” and “minority” populations. This determination is based on the finding that the identified benefits and burdens in Equity Emphasis Areas (EEAs) would not be predominately borne nor appreciably more severe or greater in magnitude than the burdens experienced by persons in the rest of the region.

The results of this analysis meet applicable Environmental Justice guidance, policies, and regulations that the TPB is responsible for implementing as an agent of government that receives federal funding. Consistent with its commitment to establish equity as a fundamental value and integral part of all its work activities, the TPB will continue to provide a forum to further explore the findings of this analysis, through ongoing consultation with member jurisdictions, to enhance the equitable distribution of benefits and elimination of any burdens to “minority” and “low-income” populations groups.

Purpose and Requirements

FEDERAL REQUIREMENTS

In 1994, President Clinton signed Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” that further amplifies the requirements of Title VI and states that federal agencies must identify and address “disproportionately high and adverse human health and environmental effects, including social and economic effects, of their programs, policies, and activities on “minority” populations and “low-income” populations.”¹ Similar Orders from the U.S. Department of Transportation (DOT) in 1997 and the Federal Highway Administration in 1998 called upon those agencies to consider Environmental Justice in their programs, policies, and procedures.²

In August 2011, a Memorandum of Understanding signed by 17 federal agencies reinforced and renewed the federal government’s efforts in Environmental Justice.³ As a result, DOT, FHWA, and FTA, communicated additional guidance reinforcing their programs and policies related to Environmental Justice and improved requirements for engaging “low-income” and “minority”

¹ Executive Order 12898. February 11, 1994. “Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations.” Federal Register, Vol. 59, No. 32.

² U.S. Department of Transportation. April 1997. “Environmental Justice in Minority Populations and Low-Income Populations.” Order 5610.2.

United States Federal Highway Administration. 1998. “FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” Order 6640.23.

³ United States Environmental Protection Agency. August 4, 2011. “Memorandum of Understanding on Environmental Justice and Executive Order 12898.”

populations.⁴ The guidance defines three fundamental Environmental Justice principles that are consistent with the Executive and DOT Orders:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

The DOT Orders further defines “disproportionately high and adverse effect on minority and “low-income” populations” as an effect that:

1. Is predominately borne by a minority population and/or a low-income population, or
2. will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

For MPOs to meet EJ requirements, DOT guidelines suggest the following elements be included. This Appendix complete elements #3 through #5. The TPB’s Title VI Program provides a regional demographic profile of “low-income” populations and “minority” populations (see Title VI Program page 26). The TPB’s Participation Plan identifies and describes the TPB’s policies and procedures under element #2 to provide public access and involvement under a true collaborative planning process:⁵

1. A regional demographic profile of low-income populations and minority populations,
2. Documentation of public involvement activity as it relates to low-income and minority populations,
3. An analytical process and mapping,
4. Determination of any disproportionate and adverse impact on low-income and minority populations based on benefits and burdens identified in the analytical process, and
5. If present, a demonstration for how plans, programs, and projects can avoid or minimize disproportionately high and adverse effects.

Title VI Plan and Program

The Metropolitan Washington Council of Government (COG) and its Department of Transportation, as the administrative agent of the TPB (the region’s MPO): must meet a variety of Title VI requirements.

⁴ U.S. Department of Transportation. May 2, 2012. “Department of Transportation Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” Order 5610.2(a).

United States Federal Highway Administration. June 14, 2012. “FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” Order 6640.23A.

United States Federal Transit Administration. August 12, 2012. “Environmental Justice Policy Guidance for Federal Transit Administration Recipients.” FTA C 4703.1. Docket No. FTA-2011-0055.

⁵ United States Federal Highway Administration. April 1, 2015. “Environmental Justice Reference Guide.” Pg. 26.

Through its Title VI Plan and Program, COG and the TPB outline the nondiscrimination assurances and policies for all its programs and activities. COG's Title VI Plan, which encompasses the TPB, provides necessary policies and practices to ensure non-discrimination and compliance with FHWA and FTA Title VI requirements. These are available at mwcog.org/TitleVI.

DOT's Federal Transit Administration (FTA) requires COG, as a Designated Recipient of the FTA Section 5310 Enhanced Mobility program, to submit a Title VI Program to "document compliance with DOT's Title VI regulations by submitting a Title VI Program to its FTA regional civil rights officer once every three years or as otherwise directed by FTA".⁶ The Title VI Program is specific to the FTA requirements and includes general requirements for an MPO. These are available at mwcog.org/TitleVI.

TPB POLICY FRAMEWORK

The TPB Vision and the Regional Transportation Priorities Plan make up the regional policy framework meant to help guide transportation planning and decision-making in the Washington region, including considerations for fairness and accessibility.⁷ The TPB Vision states that "The Washington metropolitan region's transportation system will provide reasonable access at reasonable cost to everyone in the region." In addition, one of the three priorities in the TPB's Regional Transportation Priorities Plan is "Strengthen Public Confidence and Ensure Fairness" by pursuing greater accountability, efficiency, and accessibility for all people, with particular attention to accessibility for persons with disabilities, low incomes, and limited English proficiency.

Further, in July 2020, the TPB unanimously passed a resolution to codify TPB's sentiments on equity so that equity considerations are always a part of the conversation. The resolution resolves:

The TPB and its staff commit that our work together will be anti-racist and will advance equity including every debate we have, and every decision we make as the region's MPO; and

The TPB affirms that equity, as a foundational principle, will be woven throughout TPB's analyses, operations, procurement, programs, and priorities to ensure a more prosperous, accessible, livable, sustainable, and equitable future for all residents; and

We recognize past actions that have been exclusionary or had disparate negative impacts on people of color and marginalized communities, including institutionalized policies and practices that continue to have inequitable impacts today, and we commit to act to correct such inequities in all our programs and policies.

Several other TPB and COG policy documents and studies provide additional policy context. The TPB strongly encourages agencies to consider this regional policy framework as they develop and select projects and implement policies.

Public participation

The TPB's Participation Plan identifies and describes the TPB's policies and procedures to provide public access and involvement under a true collaborative planning process in which the interests of

⁶ Title Vi Requirements And Guidelines For Federal Transit Administration Recipients. FTA C 4702.1B. October 1, 2012. Page III-1.

⁷ TPB Policy Framework. October 2019. <https://www.mwcog.org/documents/2019/10/16/tpb-policy-framework/>

all of the stakeholders - public and private - are reflected and considered. Accordingly, it is the TPB's intent to make both its policy and technical process inclusive of and accessible to all of its stakeholders. The Participation Plan was last updated in 2020. The plan is available at mwkog.org/tpb-participation-plan/.

Two citizen committees regularly advise the TPB: The Citizens Advisory Committee (CAC) and the Access for All Advisory Committee (AFA). The CAC is a group of 15 people from throughout the Washington metropolitan region who represent diverse viewpoints on long-term transportation policy. The mission of the CAC is to promote public involvement in transportation planning for the region, and to provide independent, region-oriented citizen advice to the TPB on transportation plans and issues. The AFA is made up of community leaders from around the region and advises the TPB on issues and services that are important to “low-income” communities, “minority” communities, people with limited English skills, individuals with disabilities, and older adults.

Methodology

TPB staff developed an Environmental Justice analysis methodology which reflects two key elements:

- Phase 1: Identifying small geographic areas with higher-than-average concentrations of “low-income” populations, “minority” populations, or both. Labelled as Equity Emphasis Areas (EEA) to denote an emphasis to place on these areas while making transportation investment decisions. The TPB approved this methodology in March 2017 and the EEAs for this analysis were identified using this methodology in July 2022.
- Phase 2: Examining the projects in Visualize 2045 for changes in accessibility and mobility, using several different measures; determining if the changes were benefits or burdens; comparing benefits and burdens within EEAs relative to the rest of the region and determine if a disproportionately high and adverse impact on “low-income” and “minority” populations exists.

PHASE 1: EQUITY EMPHASIS AREAS

The TPB methodology to identify EEAs, approved by the TPB at its March 2017 meeting, relies on the most recently available U.S. Census Bureau data on income, race, and ethnicity to determine which Census tracts are considered Equity Emphasis Areas. For this analysis, tract-level data from the 2016-2020 5-year American Community Survey estimates for each of the following four population groups are used to identify areas that have above average concentrations of “low-income” populations, “minority” populations, or both, compared to the TPB planning area (see Figure 1).

- “Low-Income”: Individuals with household income less than one-and-a-half times the federal government’s official poverty threshold, depending on household size.⁸
- Black or African American: A person having origins in any of the Black racial groups of Africa.
- Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- Hispanic or Latino: A person of Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin regardless of race.

⁸ For example, income less than \$36,509 for a family of four would be considered low-income. For more info see: <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

Racial and ethnic “minority” populations identified by the U.S. Census includes American Indian and Alaska Native, Native Hawaiian and Pacific Islander, Some Other Race, and Two or More Races, that were not used for identifying Equity Emphasis Areas. Black or African American, Asian, and Hispanic or Latino were used as they represent the largest racial and ethnic “minority” populations in the study area.⁹ Further, statistical margin of errors for tract-level population estimates of these groups provided high levels of uncertainty for this regional analysis and were omitted for this reason, as well.

To identify tracts with above average concentrations of “low-income” or “minority” population groups, as well as to normalize and compare results across the four groups and the region, an Index Score was calculated for every tract in the region based on each group’s regional concentration in each tract. Index Scores for each population group were aggregated to reach an uncapped Total Index Score for each tract (see Table 1 and Table 2). Areas with Total Index Scores greater than or equal to 4.00 are considered Equity Emphasis Areas. A map of the identified areas is presented in Figure 1. An online interactive map is available with detailed data information at <https://gis.mwcog.org/webmaps/tpb/clrp/ej>.

Table 1: Scoring for Criteria 1 - “Low-Income” Population Concentration

RATIO OF CONCENTRATION (ROC or times the regional average)	INDEX SCORE
	“Low-Income” ¹⁰
Between 1.5 and 3.0	4.5 to 9.0
Greater than 3.0	9.0
Index Score	4.5 to 9.0
<input checked="" type="checkbox"/> Equity Emphasis Area (Total Index ≥ 4.00) <input type="checkbox"/> Not an Equity Emphasis Area (Total Index < 4.00)	

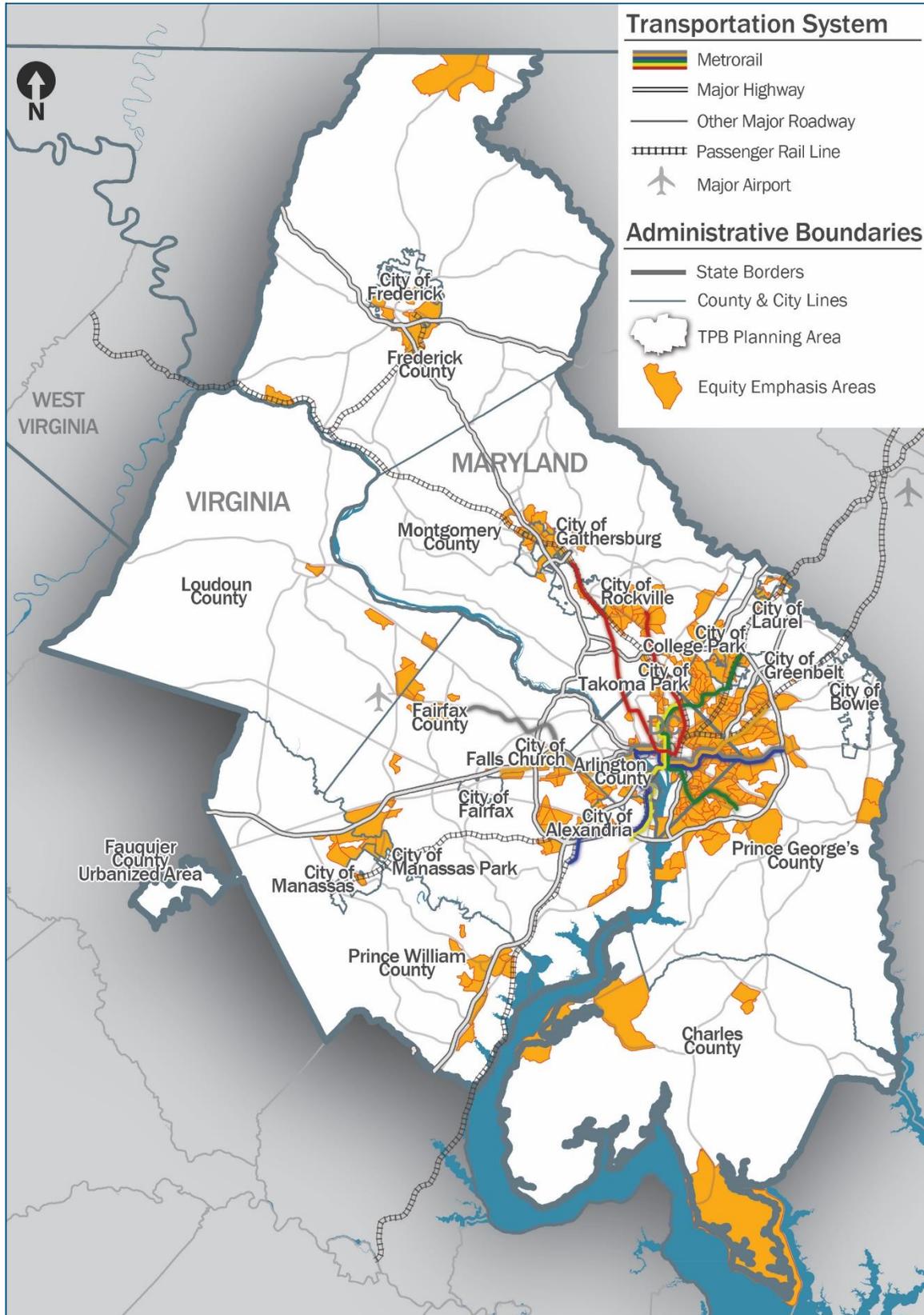
Table 2: Scoring for Criteria 2 - “Minority” Population Concentration and Secondary “Low-Income” Thresholds

RATIO OF CONCENTRATION (ROC or times the regional average)	INDEX SCORE			
	“Low-Income” ³	African American	Asian	Hispanic or Latino
Less than 1.0	0	0	0	0
Between 1.0 and 1.49	1.0 to 1.49			
Between 1.5 and 3.0	See Criteria 1 (4.5 to 9.0)	1.5 to 3.0	1.5 to 3.0	1.5 to 3.0
Greater than 3.0	See Criteria 1 (9.0)	3.0	3.0	3.0
Total Index Score	Index scores are totaled			
<input checked="" type="checkbox"/> Equity Emphasis Area (EEA) (Total Index ≥ 4.00) <input type="checkbox"/> Not an Equity Emphasis Areas (EEA) (Total Index < 4.00)				

⁹ Region is defined as the TPB Planning Area: <http://www.mwcog.org/transportation/tpb/jurisdictions.asp>.

¹⁰ The ROC for low-income is multiplied by three to determine the index score but capped at 9.0.

Figure 1: Equity Emphasis Areas and the TPB Planning Area



PHASE 2: ANALYSIS OF VISUALIZE 2045

Phase 2 of the Environmental Justice analysis of Visualize 2045 uses output from the TPB's travel demand model which forecasts where, when, and how people will travel around the region throughout the future years covered by the Visualize 2045. To make its predictions, the model relies on the latest regional population, household, and job growth forecasts prepared by COG, information on existing travel patterns from the TPB's 2017/2018 Regional Household Travel Survey, and the future transportation system laid out in Visualize 2045.¹¹

This analysis primarily compares changes in transportation system performance from 2023 (Today) to a future, labelled "2045 Plan-Build" scenario, using a variety of accessibility and mobility measures. The changes in mobility and accessibility are attributable to the planned transportation projects included under the plan's financially constrained element and the forecasts change in population and employment. The analysis also includes "2045 No-Build" scenario data, which represents a future in which no new transportation projects would be constructed, but anticipated population and job growth would still occur. This additional scenario allows the analysis team to better understand if the changes in accessibility and mobility measures are due to the impact of the transportation projects in Visualize 2045 or if they result from anticipated population and job growth.

The first step is to identify Transportation Analysis Zone-equivalencies for the U.S. Census tract-level Equity Emphasis Areas identified in Phase 1. Transportation Analysis Zone (TAZ) is the level of analysis used by the TPB for conducting the classic, "four-step" regional travel demand model.¹² Using a geographic information system, a TAZ is identified as an Equity Emphasis Area tract-level equivalent when its centroid is located within an Equity Emphasis Area tract. Additional staff review was completed to confirm these locations and make technical adjustments, when necessary.

Next, the TPB Planning Area as-a-whole, the aggregated TAZ-level EEA equivalents, and the aggregated rest of the region are used as unique geographies to calculate average accessibility and average mobility measures for the three identified scenarios. For accessibility measures, the average for an origin zone is calculated by averaging the number of opportunities (e.g., jobs) for all destination zones weighted by the household population of each zone. This "weighted-average accessibility" approach is consistent with the methodology used in the performance analysis of Visualize 2045.

Mobility measures are the average model-estimated commute travel times for the residents of Equity Emphasis Areas and for the rest of the region. This measure is based on the mode choice output and evaluates travel times for the specific EEA-based and non-EEA-based (rest of the region) commute trip origins and destinations generated by the model. All residents of Equity Emphasis Areas are included in calculations regardless of their income and race and ethnicity since model-generated output cannot be disaggregated to that level.

The analysis developed quantitative estimates for the above measures for three geographic areas: (1) the entire TPB planning area, (2) the Equity Emphasis Areas as a whole and for (3) the rest of the region (excluding the EEAs). These estimates were then examined to identify benefits and burdens in

¹¹ The results of this analysis use the following input data: MWCOG's Round 9.2 Cooperative Land-Use Forecasts and TPB's Version 2.4 Travel Demand Model. These findings are based on regional model estimates that come with a degree of uncertainty.

¹² Additional detail: <https://www.mwcog.org/transportation/data-and-tools/modeling/model-documentation/>

all three areas. For accessibility measures, a benefit is identified as an increase in average accessibility or an increase in the population with access to transit services between today and 2045. Conversely, a burden is identified when a decrease in average accessibility or a decrease in the population with access to transit services between today and 2045 is identified. For mobility measures, a benefit is identified when the average commute time or average travel time declines between today and 2045. A burden is identified when the average commute time or average travel time increases between today and 2045. Finally, results are considered marginal or within travel demand model margin of error if the “Plan Build” and/or “No-Build” results fall within +/- 1% from their base, “Today” scenario.

Using the results and established benefits and burdens, the final step is to determine if any of the estimated impacts, due to planned projects in Visualize 2045, results in a disproportionately high and significantly adverse impact on “low-income” and “minority” populations. The impact would be considered disproportionately high and significantly adverse when the adverse effect, or burden, is predominately borne by the Equity Emphasis Areas or will be suffered by the Equity Emphasis Areas and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the rest of the region.

LIMITATIONS

The methodology of this analysis is limited by available tools and data. Racial and ethnic groups tend to be undercounted in the U.S. Census surveying, relative to the general population. The number of individuals with disabilities may also be underestimated, because the Census relies on self-reports of disability status and some individuals may be reluctant to identify themselves as having a disability.

The analysis assumes that the areas identified as Equity Emphasis Areas today will remain unchanged in 2045. However, the location of these areas will most likely change by 2045 as changes in land uses, housing prices, and migration patterns alter the demographic profile of the region over the next 23 years. Given the multiple variables and the difficulties in predicting how these variables will change in this region in the future, the current geographic distributions are assumed to remain constant through 2045.

Finally, the measures used in the analysis are limited. To measure benefits and burdens of Visualize 2045, the analysis considers quantifiable aspects of the regional transportation system, such as the location of major highways and transit routes. The analysis does not consider more qualitative aspects of the system that affect the accessibility of the transportation system to “low-income” and “minority” populations. These may include:

- Safety and comfort
- Reliability
- Availability of off-peak service
- Availability of information and ease of use
- Language barriers

In addition, the analysis focuses specifically on the impact of the transportation system and the forecasted impact of Visualize 2045 on various accessibility and mobility measures. It does not consider non-transportation-related benefits and burdens, such as air, water, or noise pollution.

Environmental Justice Analysis Results

This analysis finds that implementing the projects in Visualize 2045 would not have a disproportionate and adverse impact on “low-income” and “minority” populations. This determination is based on the findings from the analysis documented in the Phase 2 methodology. Of the thirty-five measures analyzed, twelve measures had results marginal or within the travel demand models margin of error, seventeen measures identified benefits for both EEAs and the rest of the region, and six identified similar burdens for EEAs and the rest of the region (see Table 3). No measure identified a disparate impact that is predominately borne by a “minority” population and/or a “low-income” population or suffered by the “minority” population and/or “low-income” population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the “non-minority” population and/or “non-low-income” population.

Beyond the “disparate impact” requirement this analysis does identify notable findings for the TPB to consider in its long-range metropolitan transportation planning process. For auto-based travel, plan forecasts of more people and jobs locating in the region increases congestion and delay and impacts EEAs ability to access and travel to where jobs are increasing. For transit-based travel, accessibility and mobility are improving as the region maximizes the use of the existing system as well as adding more transit projects.

This analysis examines the impact of the projects in the constrained element along with the expected job and population growth in the region. When analyzing the impact of these two elements on the region’s transportation network together, on auto-based figures beyond the model’s margin of error, we find that EEAs often benefit slightly less and, if burdened, do so slightly greater. This is due to the limited positive impact of the planned roadway projects’ ability to accommodate expected increase in people and jobs, particularly as they locate to western portion of the regions. For transit-based figures, they improve for EEAs and the rest of the region as the region continues to add people and jobs near existing transit while also adding more transit to this region.

The region expects large growth of people and jobs by 2045, placing greater demand on the transportation system, adding 19 and 22 percent more by 2045, respectively. Activity Centers will contain 67% of all jobs and 35% of the population and more than a quarter of all people and half of all jobs will be close to High-Capacity Transit. Further, more of the new jobs we be in western portions of the region, further away from our larger EEA clusters, and the share of jobs in Activity Centers are more likely to be in the western side of the region and in non-EEAs rather than the eastern side or in EEAs. These changes in the location of people and jobs lead to a condition where job accessibility and mobility measures decline due to needing longer commutes through more congested roadways, even after accounting for the benefits associated from new transportation projects.

Examining the role of the transportation projects, the region’s financial obligations to maintain and operate the existing system limit the availability of funds for system expansions and enhancements. Funding available to expand the roadways systems leads to an additional five percent in roadway miles. As a result, the increase in people and jobs increases demand at rates greater than the improvements associated with the new roadway projects can accommodate, increasing delay and congestion for EEAs and non-EEAs and limiting benefits (improve accessibility or mobility) or identifying burdens on some roadway measures (decreases in accessibility or mobility).

For the transit network, a 27 percent increase in high-capacity transit miles compared to 2023 improves mobility and accessibility measure across most transit measures for EEAs and the rest of the region. The region is bringing online various transit projects and forecasting more people and jobs near existing high-capacity transit stations. As a result, both EEAs and the rest of the region are expected to see benefits to accessibility and mobility associated with various forms of transit travel.

Table 3: List of Environmental Justice Measures

<i>Measure</i>	<i>Geography</i>	<i>Time Period</i>	<i>Plan Impact</i>
<i>Access to All Jobs, Auto</i>	EEAs	AM Peak	Marginal or within Margin of Error
	Non-EEAs	AM Peak	Benefit
<i>Access to Retail Jobs, Auto</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Medical Care Facilities, Auto</i>	EEAs	AM Peak	Burden
	Non-EEAs	AM Peak	Burden
<i>Access to Higher Education, Auto</i>	EEAs	AM Peak	Burden
	Non-EEAs	AM Peak	Burden
<i>Access to All Jobs, Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Retail Jobs, Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Medical Care Facilities, Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Marginal or within Margin of Error
<i>Access to Higher Education, Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to All Jobs, Walk to Bus</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Retail Jobs, Walk to Bus</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Medical Care Facilities, Walk to Bus</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Marginal or within Margin of Error
<i>Access to Higher Education, Walk to Bus</i>	EEAs	AM Peak	Marginal or within Margin of Error
	Non-EEAs	AM Peak	Marginal or within Margin of Error
<i>Access to All Jobs, Walk to Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Retail Jobs, Walk to Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Medical Care Facilities, Walk to Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to Higher Education, Walk to Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>Access to All Jobs, Walk to Bus</i>	EEAs	OFF Peak	Benefit
	Non-EEAs	OFF Peak	Benefit
<i>Access to Retail Jobs, Walk to Bus</i>	EEAs	OFF Peak	Benefit
	Non-EEAs	OFF Peak	Benefit
<i>Access to Medical Care Facilities, Walk to Bus</i>	EEAs	OFF Peak	Marginal or within Margin of Error
	Non-EEAs	OFF Peak	Marginal or within Margin of Error
<i>Access to Higher Education, Walk to Bus</i>	EEAs	OFF Peak	Marginal or within Margin of Error
	Non-EEAs	OFF Peak	Marginal or within Margin of Error

Measure	Geography	Time Period	Plan Impact
<i>Access to All Jobs, Walk to Transit</i>	EEAs	OFF Peak	Benefit
	Non-EEAs	OFF Peak	Benefit
<i>Access to Retail Jobs, Walk to Transit</i>	EEAs	OFF Peak	Benefit
	Non-EEAs	OFF Peak	Benefit
<i>Access to Medical Care Facilities, Walk to Transit</i>	EEAs	OFF Peak	Benefit
	Non-EEAs	OFF Peak	Marginal or within Margin of Error
<i>Access to Higher Education, Walk to Transit</i>	EEAs	OFF Peak	Marginal or within Margin of Error
	Non-EEAs	OFF Peak	Benefit
<i>Change in Share of Population with Access to HCT</i>	EEAs	n/a	Benefit
	Non-EEAs	n/a	Benefit
<i>Change in Share of Pop. With Bus Service</i>	EEAs	AM Peak	Marginal or within Margin of Error
	Non-EEAs	AM Peak	Marginal or within Margin of Error
<i>Change in Share of Pop. With Bus Service</i>	EEAs	OFF Peak	Marginal or within Margin of Error
	Non-EEAs	OFF Peak	Marginal or within Margin of Error
<i>% Change in Avg. Commute Time, Auto</i>	EEAs	AM Peak	Burden
	Non-EEAs	AM Peak	Burden
<i>% Change in Avg. Commute Time, Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Marginal or within Margin of Error
<i>% Change in Avg. Access Time to Closest Med Facility, Auto</i>	EEAs	AM Peak	Burden
	Non-EEAs	AM Peak	Burden
<i>% Change in Avg. Access Time to Closest Med Facility, Auto</i>	EEAs	OFF Peak	Burden
	Non-EEAs	OFF Peak	Burden
<i>% Change in Avg. Access Time to Closest Med Facility, Transit</i>	EEAs	AM Peak	Burden
	Non-EEAs	AM Peak	Burden
<i>% Change in Avg. Access Time to Closest Med Facility, Transit</i>	EEAs	OFF Peak	Marginal or within Margin of Error
	Non-EEAs	OFF Peak	Burden
<i>% Change in Avg. Access Time to Closest Med Facility, Walk to Transit</i>	EEAs	AM Peak	Benefit
	Non-EEAs	AM Peak	Benefit
<i>% Change in Avg. Access Time to Closest Med Facility, Walk to Transit</i>	EEAs	OFF Peak	Benefit
	Non-EEAs	OFF Peak	Benefit

Conclusion

While this Environmental Justice analysis was conducted to meet federal requirements on transportation equity for “low-income” and “minority” populations, it can also contribute to important and ongoing transportation policy discussions for promoting the fair and equitable treatment of all individuals, including “low-income” population, racial and ethnic “minorities,” people with disabilities, and older adults. Equity Emphasis Areas will most likely change by 2045 as land-use, housing prices, and migration patterns alter the demographic profile of the region. As it is difficult to predict where changes will occur, the current geographic distributions are assumed to remain constant through 2045. As a result, it will be important for policy makers and future analysis to monitor how accessibility and mobility measures shift based on these assumptions.



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