

**MEMORANDUM**

**TO:** Genesee Transportation Council Members & Alternates  
**FROM:** James Stack, Executive Director JS  
**DATE:** June 23, 2022  
**SUBJECT:** Adopting the *Title VI/Nondiscrimination Implementation Plan* / Proposed Resolution 22-17

The purpose of *Title VI/Nondiscrimination Implementation Plan* is to document policies and expectations to ensure continuous compliance with Title VI of the Civil Rights Act of 1964 and additional nondiscrimination authorities and executive orders.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based upon race, color, national origin in any program or activity of an entity that receives Federal-aid. Since then, other nondiscrimination authorities and executive orders protect against discrimination based on gender, age, disability, low-income status, and limited English proficiency in any program or activity of an entity that receives Federal-aid.

This Title VI Implementation Plan and additional documentation related to Title VI includes:

- A policy statement describing GTC's commitment not to discriminate based on race, color, national origin, sex, age, disability, limited English proficiency, or income status when carrying out programs or activities conducted by the agency, its contractors, or subrecipients of Federal assistance.
- A summary of GTC's organization showing how agency staff support the program and resolve issues.
- A summary showing how GTC monitors, reviews, and reports compliance measures including employee training and deliberate community outreach to protected groups that are traditionally underrepresented in participating in transportation decisions.
- A summary showing the process and procedures for handling complaints of alleged discrimination as well as the policy for contractors, consultants, or sub recipients of Federal-aid who fail to comply with Title VI program requirements.

The Planning Committee recommended approval of proposed Resolution 22-17 at its May 12, 2022 meeting.

The following items are provided for your consideration:

1. **Proposed Resolution 22-17** (*Adopting the Title VI/Nondiscrimination Implementation Plan*)
2. [Draft Title VI/Non-Discrimination Plan](#)

***Recommended Action***

*Approve Resolution 22-17 adopting the Title VI/Nondiscrimination Implementation Plan.*

**GENESEE TRANSPORTATION COUNCIL**

**RESOLUTION**

**Resolution 22-17    Adopting the *Title VI/Nondiscrimination Implementation Plan***

**WHEREAS,**

1. Title VI of the 1964 Civil Rights Act and subsequent federal legislation direct the fair treatment and meaningful involvement of all people—regardless of race, color, national origin, disability, age, gender, or income status—in programs and activities receiving Federal funds, including transportation funds;
2. The United States Department of Transportation (USDOT) requires public agencies, including GTC, to develop a Title VI Plan that addresses how an agency integrates nondiscrimination practices in its planning, public participation, and decision making.
3. USDOT has provided additional guidance and clarity about what Metropolitan Planning Organizations, including GTC, must include in their Title VI Plans since GTC adopted its Environmental Justice, Title VI, and Americans with Disabilities Act Involvement Plan in 2012;
4. GTC staff prepared the Title VI Nondiscrimination Implementation Plan in compliance with the most current Federal directives and guidance to avoid, minimize, or mitigate disproportionately adverse impacts of transportation projects and investments on persons not traditionally well-represented in the transportation policy, planning, and investment decision making processes; and
5. Said Plan has received the federally-required approval of the New York State Department of Transportation and has been reviewed by GTC staff and member agencies through the GTC committee process and found to be worthy of guiding activities conducted by or on behalf of GTC.

**NOW, THEREFORE, BE IT RESOLVED**

1. That the Genesee Transportation Council hereby adopts the *Title VI/Nondiscrimination Implementation Plan* effective immediately

**CERTIFICATION**

The undersigned duly qualified Secretary of the Genesee Transportation Council certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Genesee Transportation Council held on June 30, 2022.

Date \_\_\_\_\_

\_\_\_\_\_  
CHRISTOPHER REEVE, Secretary  
Genesee Transportation Council

# TITLE VI/NONDISCRIMINATION IMPLEMENTATION PLAN

JUNE 2022



## **GENESEE TRANSPORTATION COUNCIL**

The Metropolitan Planning Organization for the Genesee-Finger Lakes Region



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# 2022 GTC Title VI/Nondiscrimination Implementation Plan

## Executive Summary

Genesee Transportation Council (GTC) is the designated Metropolitan Planning Organization or MPO responsible for transportation planning and decision-making in the Genesee-Finger Lakes Region, which includes Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, Wyoming, and Yates counties in New York State. The MPO devises solutions to regional transportation problems; this involves addressing other related important issues, such as land use, air quality, energy, economic development, and safety. Like other MPOs, GTC develops long-range transportation plans and a short-range capital program of specific projects to fund with federal transportation funds. For each of these planning products, the MPO's duty is to engage many stakeholders in the decision-making process.

GTC does not own, maintain, or operate transit or other transportation facilities. The Rochester Genesee Regional Transportation Authority (RGRTA) is the public transportation operator in eight of the nine Counties. Yates County partners with Steuben County (beyond GTC region) to provide public transportation to residents.

Each year, the federal government distributes or apportions highway and transit funding to MPOs or State Transportation Departments to carry out planning and capital projects. The New York State Department of Transportation (NYSDOT) distributes federal funds to MPOs and other subrecipients to administer highway-related plans and programs.

Since GTC is a subrecipient of federal metropolitan planning funds from both the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), GTC is required to comply with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination based on upon race, color, and national origin. Other nondiscrimination authorities and executive orders provide protection against discrimination based on gender, age, disability, low-income status, and limited English proficiency.

To ensure continuous compliance with Title VI, the U.S. Department of Transportation established reporting requirements for federal-aid recipients under different scenarios. FHWA and FTA each have requirements that are acknowledged in this document.

Additionally, this Plan includes the following appendices with supporting information:

- A Title VI Assurances document (Appendix A)
- Title VI Complaint Form- (Appendix B)
- Annual Title VI Report (Appendix C)
- Notice to the Public (Appendix D)
- FTA Log of Investigations, Complaints, and Lawsuits (Appendix E)

- Public Participation Plan (Appendix F)
- Summary of Public Outreach Activities (Appendix G)
- Limited English Proficiency Plan (Appendix H)
- Disadvantaged Business Enterprise Plan (Appendix I)
- Equal Employment Opportunity Plan (Appendix J)
- GTC Board Resolution approving Title VI Program (Appendix K)

## Title VI/Nondiscrimination Policy Statements

### **GTC's Commitment to the Public**

The Genesee Transportation Council (GTC) assures that no person shall, on the grounds of race, color, national origin, disability, age, gender, or income status, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. GTC further assures 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.

### **En Español**

El Consejo Genesee de Transporte asegura que ninguna persona, por motivos de raza, color, nacionalidad, discapacidad, edad, sexo o situación económica, será excluida de participar en ningún programa o actividad, ni se le negarán los beneficios de los mismos, ni será objeto de discriminación de ningún tipo. El GTC, (por sus siglas en inglés) asegura además que se hará todo lo posible para asegurar la no discriminación en todas las actividades de sus programas, ya sea que esos programas y actividades estén financiados por el gobierno federal o no.

It is also the policy of GTC to ensure that none of its programs, policies, and other activities have disproportionate adverse effects on minority and low-income populations. GTC identifies minority and low-income communities from US Census data. GTC takes a proactive approach to engage minority and low-income communities and encourage their full and fair participation in the transportation decision-making process.

In addition, GTC will offer meaningful access to services for persons with Limited English Proficiency.

In the event GTC distributes federal-aid funds to another agency as a subrecipient, GTC will include Title VI language in all written agreements and will monitor for compliance.

GTC is responsible for initiating and monitoring Title VI activities, preparing required reports and other GTC responsibilities as required by 23 CFR 200 and 49 CFR 21.

## Title VI Notice to Public

The Genesee Transportation Council (GTC) has an evolving process to elicit and solicit public participation from all stakeholders without regard to race, color, national origin, sex, age, disability, limited English proficiency, or income status.

The following statement appears prominently in English and Spanish on the GTC website <https://www.gtcmpto.org/title-vi>

*The **Genesee Transportation Council** hereby gives public notice that it is the **Genesee Transportation Council's** policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, gender, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the **Genesee Transportation Council** receives federal financial assistance.*

*Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the **Genesee Transportation Council and host agency, Rochester Genesee Regional Transportation Authority (RGRTA)**. Any such complaint must be in writing and filed with the Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from this office at no cost to the complainant on our website <https://www.gtcmpto.org/title-vi> or by calling (585) 232-6240.*

En Español:

El Consejo de Transporte de Genesee por la presente notifica públicamente que la política del Consejo de Transporte de Genesee es garantizar el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de los Derechos Civiles de 1987, y los estatutos y reglamentos relacionados en todos los programas y actividades. El Título VI exige que ninguna persona en los Estados Unidos de América sea excluida de la participación, se le nieguen los beneficios o sea sometida a discriminación por motivos de raza, color, género u origen nacional en cualquier programa o actividad para la que el Consejo de Transporte de Genesee reciba asistencia financiera federal.

Cualquier persona que crea haber sido agraviada por una práctica discriminatoria ilegal en virtud del Título VI tiene derecho a presentar una queja formal ante el Consejo de Transporte de Genesee y la agencia anfitriona, la Autoridad Regional de Transporte de Rochester Genesee (RGRTA, por sus siglas en inglés). Cualquier queja de este tipo debe ser por escrito y presentada al Coordinador del Título VI dentro de los ciento ochenta (180) días siguientes a la fecha del presunto hecho discriminatorio. Los formularios de denuncia de discriminación del Título VI pueden obtenerse en esta oficina sin costo alguno para el denunciante en nuestro sitio web <https://www.gtcmpto.org/title-vi> o llamando al (585) 232-6240.

GTC ensures compliance with Title VI, and endeavors to educate the public of their rights to participate in the transportation decision-making process under discrimination protections afforded to them under laws, regulations, and authorities. This flyer is prominently posted in the GTC office, the GTC website and community engagement hub website and is shared on social media throughout the year.

## GENESEE TRANSPORTATION COUNCIL NOTICE OF NONDISCRIMINATION POLICY

The Genesee Transportation Council (GTC) hereby gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, and related statutes and regulations in all programs and activities requiring that no person in the United States of America shall, on the grounds of race, color, gender, or national origin, age, disability, limited English proficiency, or income status be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with GTC and host agency, Rochester Genesee Regional Transportation Authority (RGRTA).

For more information on the civil rights program, and the procedures to file a complaint, visit <https://www.gtcmpo.org/title-vi>, send email to [contactgtc@gtcmpo.org](mailto:contactgtc@gtcmpo.org), send a letter to the administrative office at 50 West Main St, Suite 8112, Rochester, NY 14614, or by call (585) 232-6240. If information is needed in another language, please contact us.

GTC includes a standard message in press releases, project webpages, mass e-mails, and other communications offering to provide services for people to participate.

*GTC will provide accommodations for anybody who wishes to participate in this planning project/program despite disability or proficiency in English. Please contact GTC at (585) 232-6240 or send email to [contactgtc@gtcmpo.org](mailto:contactgtc@gtcmpo.org) to arrange for auxiliary aids or language services.*

## Complaint Procedure

GTC's host agency is the Rochester Genesee Regional Transportation Authority (RGRTA), which shares responsibility in handling complaints related to discrimination under Title VI. The RGRTA Board of Commissioners approved their *2020-23 Title VI Program Plan* on November 5, 2020.

The general complaint form, in English and Spanish, and the complaint procedures appear on [www.myRTS.com/titleVI](http://www.myRTS.com/titleVI). The following information about the complaint process appears on the GTC website <https://www.gtcmpo.org/EJTitleVI> directing complainants to RGRTA.

If you believe you have been subjected to discrimination under Title VI, you may file a complaint with the Rochester Genesee Regional Transportation Authority (RGRTA), GTC's host agency.

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, gender, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- <https://www.myrts.com/titleVI>
- (585) 288-1700
- [www.myRTS.com/contact-us](http://www.myRTS.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with Federal Transit Administration, Office of Civil Rights, by calling 888-446-4511 or by writing to 1200 New Jersey Avenue SE, Washington, DC 20590. <https://www.transit.dot.gov/content/contact-us-fta-office-civil-rights>

Or Title VI complaints may be filed with Federal Highway Administration, Office of Civil Rights, by calling 202-366-0693 or via email at [FHWA.TitleVIcomplaints@dot.gov](mailto:FHWA.TitleVIcomplaints@dot.gov) or by writing to 1200 New Jersey Avenue, SE, Washington, DC 20590.

*Note: The Complaint Form is Appendix B.*

The procedure explains how to obtain the RGRTA Title VI Complaint Form, get language or disability assistance, and file the Complaint using USPS mail, using the online "Contact Us" tool, or through in-person delivery. The procedure includes directions for filing a Title VI Complaint, information about non-retaliation and the Freedom of Information Act, and an explanation of the requirements for a complete Title VI Complaint.

If transit-related Title VI Complaints, lawsuits, or investigations naming RGRTA or its subsidiaries occur, RGRTA will maintain a list of them in accordance with 49 CFR §21.9(b). This list would include the date the investigation, lawsuit, or complaint was filed, a summary of the allegation(s), the status of the investigation, lawsuit, or complaint, and responsive actions taken by RGRTA. The General Counsel and Manager of Loss Prevention shall maintain this list in accordance with Legal Affairs' established procedure found in Exhibit 5.

## List of Discrimination-Related Investigations, Complaints or Lawsuits

GTC has not received a complaint, nor is aware of investigations or lawsuits related to discrimination.

See the NYSDOT Public Transportation Programs Title VI Investigations, Complaints & Lawsuits Log. (Appendix E)

## GTC's Federal Aid Recipient Status

The Reporting Requirements described in Appendix L of FTA Circular 4702.1B, define the four types of recipients of Federal financial assistance:

- ***Designated Recipients, (GTC)***
- *Direct Recipients,*
- *Primary Recipients, and*
- ***Subrecipients. (GTC)***

### **Designated Recipient Status**

The New York State Governor designated GTC, to serve as a ***Designated Recipient***, granting authority to suballocate apportioned federal funds to *Direct Recipients* (ex. transit agency, state agencies, municipalities, etc.) in a manner that does not discriminate based on race, color, or national origin.

Since GTC receives no actual funds in this role as ***Designated Recipient***, GTC has no responsibility for Title VI reporting requirements. The Title VI reporting responsibility shifts to the *Direct Recipient* that receives their federal funding directly.

### **Subrecipient Status**

GTC receives federal metropolitan planning funds from the state through a reimbursement process becoming a ***subrecipient***. As a subrecipient, GTC must submit a Title VI Program to the State.

The State of New York is the *Direct Recipient* of federal metropolitan planning funds. The New York State Department of Transportation is the *Primary Recipient* and is responsible for reporting to FTA and monitoring Title VI compliance of the MPO. The MPO submits compliance reports to the New York State Department of Transportation annually.

Learn more about the reimbursement process and the cooperative agreement, signed December 7, 2021, that provides for the funding of transportation planning activities described in an approved Unified Planning Work Program (UPWP.) Hyperlink to the GTC website:

<https://www.gtcmppo.org/node/494>

For information about federal fund sources from FHWA and FTA, see the UPWP Revenues section of [2022-2023 UPWP](#) on page 16 and Table 2 FY 2022-23 FHWA & FTA Grant Summaries on page 106.

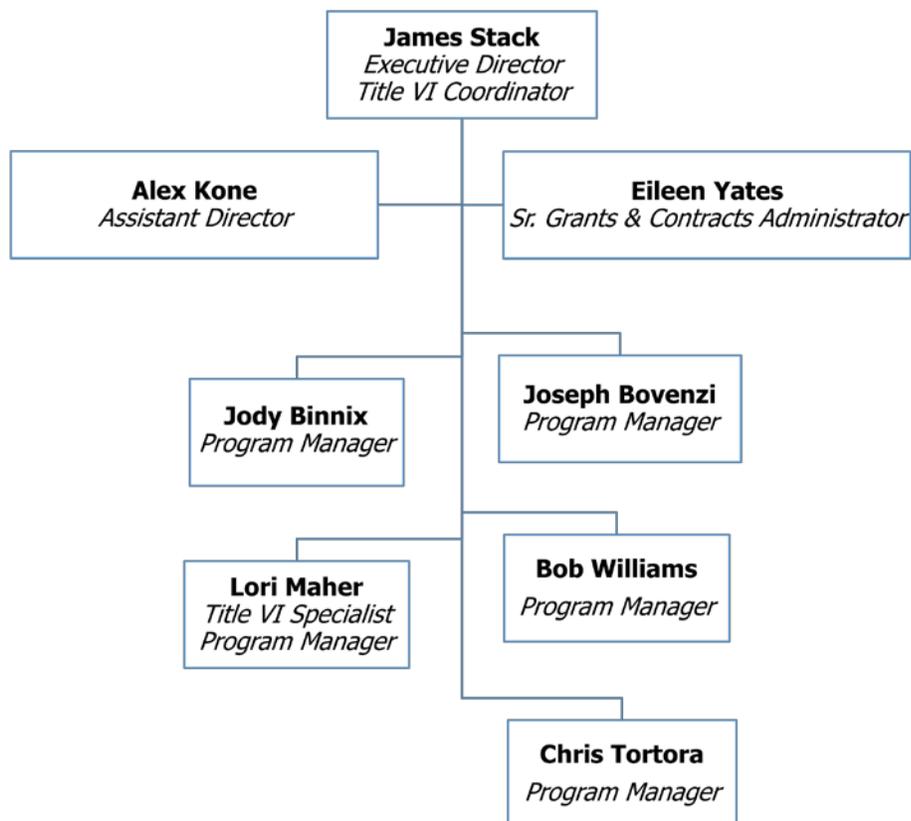
## GTC Organization and Reporting Structure

### Title VI Coordinator Designation and Responsibilities

GTC is governed by a 27-member Board, which is supported by an Executive Committee, Planning Committee, and other committees authorized to monitor development of the GTC's federally-required work projects – Long Range Transportation Plan (LRTP,) Unified Planning Work Program (UPWP,) and Transportation Improvement Program (TIP) as well as temporary committees to deal with specific issues.

A staff of eight provides professional and technical support to the Board and its committees. The staff's Executive Director reports directly to the Board.

## GTC Staff Organization & Responsibilities



The Executive Director is responsible for overall implementation of GTC's Title VI/Nondiscrimination Program. Typically, the staff person responsible for Public Engagement is designated the Title VI Coordinator. He/she is responsible for initiating, monitoring, and ensuring GTC's compliance with the Title VI requirements including:

- ◆ Ensuring all GTC program administration is compliant with Title VI.
- ◆ Monitoring progress, implementation, and compliance issues.
- ◆ Coordinating data collection supporting GTC nondiscrimination activities, including statistical data (i.e., race, color, national origin, gender, age, disability, low-income status, and language proficiency) for use in planning and monitoring by GTC, its member agencies, consultants and the public.
- ◆ Disseminating Title VI program information to GTC employees, beneficiaries, and the public and, where appropriate, in languages other than English.
- ◆ Ensuring inclusion of appropriate Title VI language in contracts and studies.
- ◆ Providing Title VI language, provisions, and advertising-related requirements, as applicable, to any consultants under direct contract with GTC.
- ◆ Facilitating staff training programs on Title VI, fundamental principles of Environmental Justice and other statutes related to nondiscrimination.
- ◆ Ensuring projects conducted by or on behalf of GTC 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.
- ◆ Ensuring the full and fair participation by all potentially affected communities in the transportation decision-making process.
- ◆ Preventing the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.
- ◆ Identifying, investigating, and eliminating discrimination when found to exist in connection with GTC programs. Seek the cooperation of the sub recipient in correcting deficiencies and provide the technical assistance and guidance needed to comply voluntarily. When a sub recipient fails or refuses to voluntarily comply with requirements within the allotted period, the GTC will submit a copy of the case file to NYSDOT's Office of Diversity and Inclusion or the FHWA or the FTA and a recommendation that the sub recipient be found in noncompliance.
- ◆ Preparing an annual Title VI Report, which evaluates the effectiveness of GTC's Title VI program and related efforts, by documenting accomplishments over the past year and establishing goals for the forthcoming year.
- ◆ Staying current on federal and state laws, rules, regulations, guidelines, and other resources pertaining to GTC's Title VI program.
- ◆ Reviewing and updating the Title VI/Nondiscrimination Plan every two years as required.

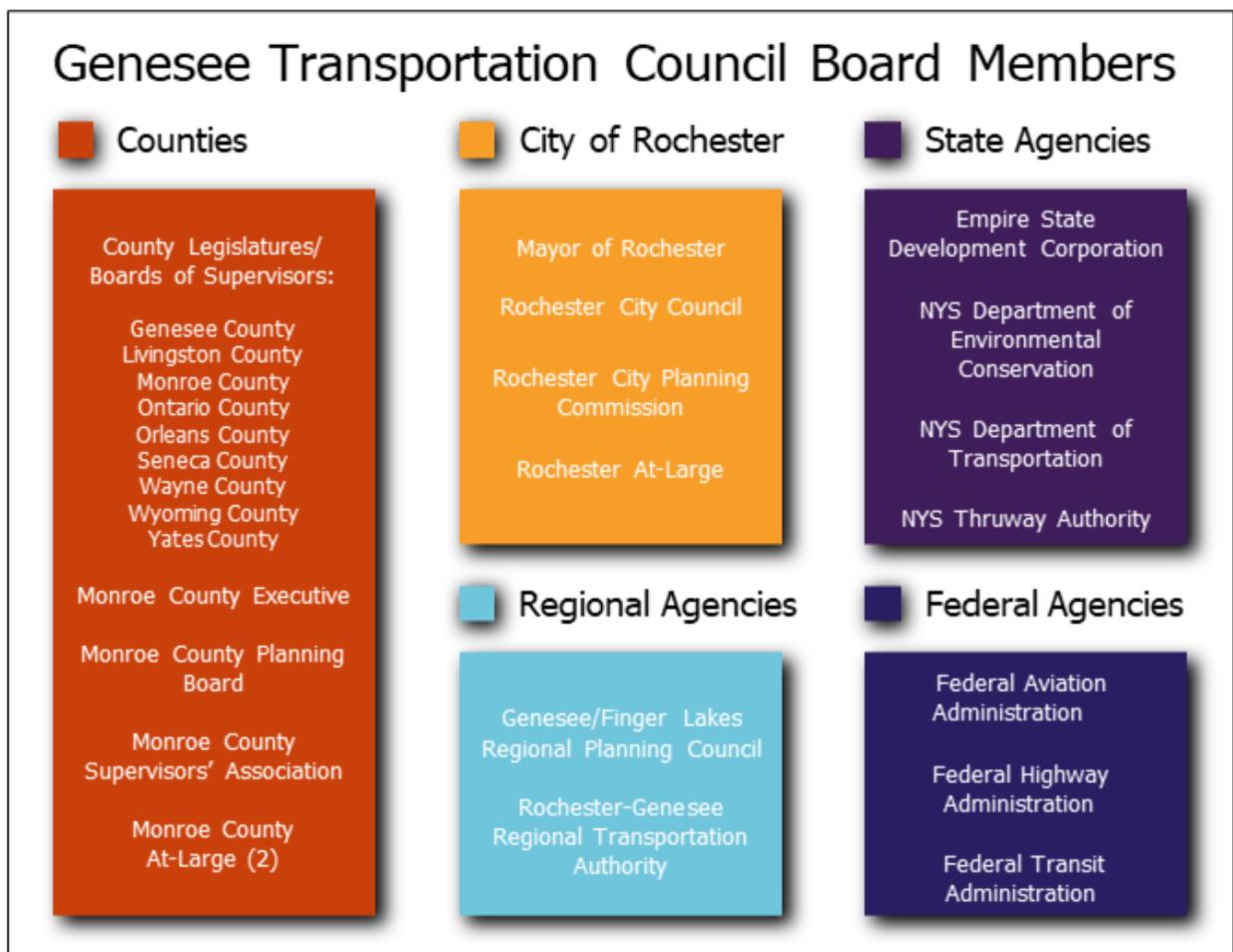
Contact Information: Lori Maher, GTC Title VI Coordinator  
50 West Main Street, Suite 8112, Rochester, NY 14612  
(585) 232-6240 | [LMaher@gtcmpo.org](mailto:LMaher@gtcmpo.org)

## Committee Membership

GTC does not have transit-related committees or similar bodies. However, GTC does have a Board that serves as the Policy Committee, and a Planning Committee. Membership is defined in the GTC By-Laws and are Ex-Officio or designated by Ex Officio Members. A table depicting the racial breakdown of the membership does not exist. The inclusion of elected and appointed officials is intended to represent diverse transportation needs across the nine-county planning area.

The 27 members of the GTC Board, the governing body of GTC, are comprised of elected officials from the nine counties of the region, the City of Rochester, and representatives of other local, regional, state, and federal agencies. GTC Board Officers are elected from among the members.

Each member of the GTC Board appoints a representative, typically a transportation or planning professional, to the Planning Committee. Its purpose is to provide professional and technical recommendations to the GTC Board.



## Title VI Training

GTC staff receives periodic training from our host agency, RGRTA. In October 2020, GTC staff participated in the training covering Creating a Culture of Well-Being and Inclusion, Harassment prevention, the EEO Policy and more.

The Title VI Coordinator also attends frequent professional development sessions offered through national and local industry channels.

When working with municipal sponsors or member agencies, to administer UPWP-funded planning projects, information about Title VI and Environmental Justice are clearly emphasized in the UPWP Guidelines.

*“FHWA and FTA place requirements on the use of these planning funds consistent with federal and state regulations including, but not limited to, Titles 23 and 49 of the Code of Federal Regulations, Title VI of the Civil Rights Act of 1964, and Executive Order 12898 regarding Environmental Justice. In addition, GTC has additional requirements to further ensure a fair, equitable, and cooperative transportation planning process in the region.”*

GTC provides specific language describing expectations to sponsors administering UPWP projects with a public involvement aspect early the project schedule. Additionally, GTC includes its policy about Environmental Justice.

*Meetings should be designed for attendance by all residents in the project area. Efforts must be made to identify interested parties prior to conducting the public meetings. Applicants should try to engage groups that have not traditionally been involved in transportation projects but have a vested interest in the outcome of the project. Applicants must respond to the impact of a project on minority, disabled, and low-income populations.*

### *Environmental Justice*

*It is GTC's policy to actively consider and include the disadvantaged populations of the region — low-income, minority, limited-English proficiency, disabled — in compliance with the letter and spirit of Environmental Justice. Environmental Justice is the term given to a series of federal laws and directives designed to ensure that transportation facilities and services do not have a disproportionately negative effect on any group regardless of race, color, national origin, disability, age, gender, or income status.*

## GTC Public Engagement Plan

The GTC Public Engagement Plan (PEP), adopted in February 2021, details the public engagement policies and guidelines to ensure public and transportation system stakeholders have a reasonable opportunity to participate in and make meaningful, informed comments through the metropolitan planning process. The PEP describes how the public can learn of opportunities to participate in key decision points in multiple, accessible, in-person and virtual formats with adequate notice. The PEP details public engagement procedures for GTC staff, member agencies, and sponsors administering projects and programs by or on behalf of GTC. It provides parameters to manage expectations while sustaining flexibility to meet diverse and individual needs across the region. A description of each opportunity will provide a definition and purpose, public participation process, publicity, accessibility and accommodations, contingency plans, updates and amendments, and additional references.

Each opportunity includes GTC's accessibility commitment.

For example, under GTC Board meetings, the PEP states, "In-person GTC Board meetings are held in meeting rooms that are accessible to all people. Meeting rooms will be held in buildings in proximity to a transit route. Publicity materials should include notice that accommodations will be provided for anybody to participate in the meeting despite disability or proficiency in English, upon request."

The PEP includes expectations for the public to participate in federally funded projects and studies. For each Planning/Policy categorized project, the project partner (Sponsor,) will develop and present a project Scope of Work articulating the public involvement component. The public involvement plan should list the basic goals, communication strategies, publicity, and implementation schedule for soliciting meaningful community input. GTC specifically provides guidance emphasizing expectations.

"The project sponsor is responsible for publicizing the outreach activity and opportunity to participate to a broad audience. The sponsor should identify interested parties and relevant stakeholders, including groups traditionally underrepresented, to inform them of the opportunity to participate. Methods of publicity should include traditional news media, and electronic formats including websites, social media, email lists, and other appropriate methods to reach the targeted audience. Publicity materials should include notice that accommodations will be provided for anybody to participate in the meeting despite disability or proficiency in English, upon request."

The PEP includes a list of federal and state regulations, including laws, executive orders, and authorities concerning civil rights.

## Summary of Outreach Activities:

Once GTC began to integrate and leverage smart technology and virtual tactics to meet the needs of a community regardless of the social limitations, the agency began to facilitate open and accessible public engagement more effectively by closing the engagement gap for under-represented populations.

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*When GTC was forced to pivot to virtual outreach strategies during the pandemic, staff quickly realized the silver lining that there is a slew of people with a genuine interest in being engaged, but less inclined to attend the town hall style meeting.*

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Not only have outreach activities improved quantitatively, but more methods to collect, analyze and report data pertaining to actual participants has boosted GTC's engagement overall quality, setting new goals for more diverse engagement.

Notably, GTC can now target social media campaigns to specific demographics, conduct surveys, and ask for voluntary demographic information in a way that has never been available.

A running list of outreach activities since January 2019 is included in Appendix G. The table details the project name, date, sponsor, location, type of outreach, specific outreach efforts to engage underrepresented groups and other notes and comments.

In summary, from April 2020 through April 2022, GTC and project sponsors using metropolitan planning funds from GTC have conducted, at a minimum, the following:

- Virtual Meetings: *(Note: Statistics may be less as some actions were performed in a testing environment.)*
  - Hosted 35 Virtual meetings that were livestreamed for public observation despite social limitations
  - Engaged with 460 virtual meeting attendees
  - Heard and captured 45 voice mail recordings or in-meeting speakers
  - Sent specific email campaign messages to 13,300 individuals.

## Analysis of the MPOs transportation system investments

Excerpt taken from 2020 - 2024 Transportation Improvement Program - Nondiscrimination and Title VI Considerations

To identify and proactively address any potential concerns about the equity of investments in the transportation system, GTC staff developed a process to assess the impacts of the transportation projects included in the 2020-2024 TIP on minority, low-income, and limited English proficiency (LEP) populations. This section presents the results of this assessment.

Title VI prohibits discriminatory practices in programs and activities receiving federal funds. Title VI is an abbreviated way of referring to the requirements of the federal Civil Rights Act of 1964 and other legislation that direct the fair treatment and meaningful involvement of all people, including environmental justice considerations. Executive Orders 12898 and 13166 require federal agencies to make achieving environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high, and adverse human health or environmental effects of their programs, policies, and activities on minority, low-income, and LEP populations.

There are three fundamental principles at the core of Environmental Justice:

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

As recipients of federal-aid dollars, MPOs such as GTC are required to identify and address the Title VI implications of their planning processes and investment decisions. GTC incorporates Title VI in all of its transportation planning activities, recognizing that such consideration improves both the planning and decision-making processes and the results of these activities.

Title VI does not prescribe specific methods or processes for ensuring environmental justice in transportation planning. The analyses presented below represent GTC's best efforts to determine whether the benefits and burdens of the transportation projects in this TIP are distributed equitably among minority, low-income, and LEP populations and non-minority, non-low-income, and non-LEP populations.

### Analysis Methodology

It is recognized that transportation projects may have an impact beyond their immediate project limits. For this reason, geographic proximity analyses were used to determine how the location of the transportation projects in this TIP correlate to the location of minority, low-income, and LEP populations.

The data on minority, low-income, and LEP populations is derived from the 2013-2017 American Community Survey 5-year estimates. The data was analyzed at the census tract level, which is the smallest geographic area at which race, income, and language data are available. The percentages of these populations were calculated for each census tract within the TIP Region. Percentages were

then compared to averages for the TIP Region as a whole, using the regional averages as thresholds for determining whether or not an individual census tract should be considered as having above average concentrations of minority, low-income, or LEP populations.

Using this methodology, the following thresholds were developed:

- Above average concentration of minority population in households: 28.0% or more of the population in a census tract was from a minority group (i.e., non-white and/or Hispanic).
- Above average concentration of low-income population: 17.3% or more of the population in a census tract was at or below the poverty level.
- Above average concentration of LEP households: 3.0% or more of the households in a census tract reported their ability to speak English as “Not well” or “Not at all” (i.e., Limited English Proficiency).

The census tracts that exceeded the thresholds were identified in a Geographic Information System (GIS). The GIS was used to determine how many of the transportation projects in the TIP lie within or on the boundaries of these census tracts.

Projects located in Seneca and Yates counties are not included in this analysis as projects in these counties are programmed by NYSDOT-Region 3 and NYSDOT-Region 6, respectively.

Only those transportation projects with a *specific location* (i.e., “*mapped*” projects) were included in these analyses. For example, an intersection improvement project is specific to one location (mapped), while the purchase of new buses serves multiple transit routes over a large area (not mapped). The impacts of projects that are not mapped, including most of the public transportation and TSMO projects and programs, are generally spread over a county, several counties, or the region. There are 52 mapped project locations within EJ areas of concern with a total cost (federal share only) of approximately \$167 million.

### Analysis Results

The census tracts flagged as having above average concentrations of minority population encompassed 57 percent of the region’s minority population. Of the 108 mapped project locations in this TIP, 29 (27 percent) are located in or on the boundary of these census tracts. These 29 project locations have a combined cost (federal share) of approximately \$113 million, or 32 percent of the total.

The census tracts flagged as having above average concentrations of low-income population encompassed 58 percent of the region’s low-income population. Of the 108 mapped project locations in this TIP, 43 (40 percent) are located in or on the boundary of these census tracts. These 43 project locations have a combined cost (federal share) of approximately \$147 million, or 42 percent of the total.

The census tracts flagged as having above average concentrations of LEP households encompassed 76 percent of the region’s LEP households. Of the 108 mapped project locations in this TIP, 38 (35 percent) are located in or adjacent to these census tracts. These 38 projects have a combined cost (federal share) of approximately \$136 million, or 39 percent of the total.

Each mapped project located within or on the boundary of an environmental justice area of concern was evaluated as to its likely benefits and impacts on the minority, low-income, and LEP populations

in the region. Projects were evaluated based on their effects on accessibility, mobility, congestion, safety, and recreational opportunities using the scale presented below.

The table below presents the results of the evaluation of benefits and impacts of the 52 mapped project locations in environmental justice areas included in the *2020-2024 TIP*.

**Table 6. - Project Impacts**

Impact	Number of Project Locations:	Total Federal Share:
Significantly Negative:	0	\$0
Moderately Negative:	0	\$0
Marginally Negative:	0	\$0
Neutral:	44	\$137,652,346
Marginally Positive:	8	\$29,683,890
Moderately Positive:	0	\$0
Significantly Positive:	0	\$0
Totals:	52	\$167,336,236

The federal share figures shown in the table above are adjusted for inflation based on the years in which the projects are scheduled (FFYs 2020 -2024), based upon estimates in current year (2019) dollars.

The results suggest that minority, low-income, and LEP populations in the region should receive equitable shares of the benefits arising from the transportation projects in the *2020-2024 TIP* while not being subjected to inequitable shares of any of the burdens.

*\*Note: The 2024-2027 TIP is being developed and will include an updated analysis. It is expected to be adopted in Summer 2022.*

## GTC's Ongoing Activities to Reduce Barriers

It has been the GTC's long-standing practice to ensure nondiscrimination and to ensure that transportation decision-making considers the needs of people protected under Title VI and other nondiscrimination authorities.

GTC's overarching policies and actions increasingly focus on making environments usable for all people, as well as removing specific barriers.

### GTC Website

The GTC webpage [www.gtcmpo.org](http://www.gtcmpo.org) is accessible for all users, including those who use screen readers or other aides in full compliance with Section 504 of the 1973 Rehabilitation Act (29 USC 790). The website has a built-in option to enlarge text and website language translation (utilizes the Google Translate tool for literal translations of individual pages.)

### Virtual Engagement

While online engagement has led to dramatic increases in participation overall, Pew Research Center statistics underscore the need to provide more traditional/offline options to supplement every initiative:

- 27% of Americans 65 years or older do not use the internet.
- 17% of Americans who make \$30,000/annually or less does not use the internet.
- 15% of minority groups do not use the internet.

Through the PublicInput platform, every survey can be converted into text message format, language can be translated through a built-in translation tool, and comments can be collected via email, online, or with a voicemail inbox.

During public meetings, the public can access the audio portions of online public meetings with a toll-free phone number, speak with the project team in real-time, or leave a recorded voice message before or after a meeting in any language.

People can access and participate in the meeting by visiting the meeting website on a home computer or mobile device without having to download and learn any separate video conference platforms. By facilitating this broad range of synchronous and asynchronous formats, people of every educational and socioeconomic background, as well as members of the workforce who are unable to participate in meetings in real time are given the freedom to participate at their convenience.

### Participation Data and Engagement Analysis

To ensure understanding of the diversity and equity in our engagement, GTC now has tools to collect specific demographic information, that has been voluntarily provided by the participant, and compare to census data or environmental justice maps to inform future outreach strategies including geo-targeted outreach or community-based partnerships.

It should be noted that GTC is at the beginning of curve to collect and analyze provided data and will see improvements in participation, data, and results in future reports.

According to the Engagement Dashboard GTC (since activating PublicInut.com in March 2020 through April 2022) has:

Engaged with approximately 960 Participants

- Received approximately 6,270 responses to survey questions
- Received approximately 1,590 comments via multiple
- Counted about 16,000 page views in 1 or more of about 30 specific topics and projects.

Contact Database

- GTC has approximately 2,000 names/emails in our contact database broken down into about 120 Subscriber Lists include elected officials, regulatory agencies, business groups, neighborhood associations, advocacy groups, health and human service agencies, and other groups that serve underrepresented, protected, demographic groups across our 9-county planning area.
- Additionally, 73 custom segments are used to target outreach campaigns, including many demographic segments with data provided voluntarily by participants.

Demographic Breakdown

Note: The following three categories (Age, Gender, and Race) are the standard demographic questions that have been previously available to offer to survey participants to voluntarily answer upon submitting surveys. The PublicInput.com platform recently expanded to include additional demographic questions, as the US Census does, including national origin, disability, income, and zip code.

Age Range

Age Under 18	5
Ages 18-25	1
Age 23-35	16
Age 36-45	19
Age 46-55	28
Age 56-65	28
Ages 66-75	25
Age over 75	6
Prefer Not to Answer	2

Gender

Male	69
Female	33
Prefer Not to Answer	2

Race

White	85
Asian	0
Black or African-American	4
Hispanic, Latino, or Spanish	5
American Indian or Alaska Native	2
Native Hawaiian or Other Pacific Islander	0
Other	2
Race or Prefer Not to Answer	5

## Consultant Contracts Activities

GTC executes contracts with consultants for specific projects or activities. The standard language incorporated into these contracts requires that the consultants comply with all applicable federal, state, and local laws, rules, ordinance, and regulations always.

Contract provisions will include nondiscrimination and equal opportunity employment language that GTC may not discriminate in any programs or services based on race, color, sex, or national origin.

GTC will include Disadvantaged Business Enterprise (DBE) Clauses and a copy of the Affidavit of Nondiscrimination Form F that would be signed by relevant parties in Requests for Proposals/Qualifications.

GTC will include Title VI assurance and provision language in all federally funded consultant contracts, including Appendix A of the USDOT Standard Assurance (USDOT Order 1050.2).

GTC will follow applicable Disadvantaged Business Enterprise (DBE) and Small Business Enterprise goals in designated projects and proactively seek to achieve those goals (23 USC 304 and 49 CFR 26.)

The technical assistance and guidance provided by the Title VI Coordinator and GTC staff is intended to support voluntary compliance by GTC consultants. When a consultant fails or refuses to comply with GTC's recommendations, GTC will send a deficiency letter to the consultant documenting recommended remedial actions.

Consultants placed in a deficiency status will be given reasonable time, not to exceed 90 days after the receipt of the deficiency letter, to voluntarily correct deficiencies. If a consultant fails or refuses to comply voluntarily with requirements within the allotted timeframe, GTC will submit copies of the case, with a recommendation that the consultant be found in noncompliance, to the New York State Department of Transportation, the Federal Transit Administration, and the Federal Highway Administration.

## Reporting Title VI Accomplishments and Activities

GTC submits a Title VI Report citing accomplishments and activities for the previous year to NYSDOT in the following areas:

- Public Outreach and Participation
- Americans with Disabilities Act (ADA)
- Limited English Proficiency (LEP)
- Environmental Justice (EJ)
- Data Collection and Analysis
- Document Review
- Training
- Complaints/self- monitoring
- Goals for next year

Highlights of 2020 and 2021 were engaging the public virtually on core work products and assisting our planning study partners to maintain momentum during the COVID-19 pandemic.

GTC conducted most of its public outreach using the PublicInput.com Integrated Community Engagement Software, procured in April 2020. This web-based software system provides a platform to manage the public engagement process to host virtual public meetings and offer options for all people to participate in projects and programs.

There are several key features related to equity:

- Embedded live stream video of the meeting
- Real-time, multilingual closed captions for livestreamed virtual public meetings feature that automatically supports 108 languages.
- Built-in language translator
- Ability to create unique emails and text messages for each project
- Options for people to access the audio portions of online public meetings with a telephone and toll-free phone number, speak with the project team in real-time, leave recorded voice message at any time in any language
- Access and participate in the meeting with a home computer or mobile device by typing in the chat box or sending longer e-mails

Additionally, GTC can collect and analyze specific demographic information for future outreach strategies including geo-targeted outreach and a dynamic database that grows with every interaction.

More than two dozen UPWP projects progressed in 2020 and 2021 seeking input to identify conditions and needs, or to present recommendations using a variety of outreach platforms. GTC assisted about 10 project teams to conduct virtual outreach using PublicInput.com. Consulting firms used other virtual meeting tools on the other projects.

GTC adopted a new Public Engagement Plan in February 2021 after an extensive virtual participation process.

In April 2021, GTC added the Equity Mapping Tool to PublicInput.com license. This tool provides custom mapping layer overlays sourced from the Environmental Protection Agency's (EPA) EJSCREEN

which helps plan outreach efforts and publish reports that demonstrate our engagement in Environmental Justice communities including Limited English Proficiency, Low income, Minority, and Education levels.

In August 2021, the GTC Board adopted the Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan Update. FTA requires that a Coordinated Plan must be developed “through a process that includes participation by seniors, individuals with disabilities, representatives of public, private and nonprofit transportation and human service transportation providers, and other members of the public.” The update also compared demographic information, inventoried available services, and assessed needs and conditions observed during previous plan development to best note trends and identify potential future needs and service gaps.

Goals for next year:

- Expand the use of the PublicInput.com platform to manage public outreach for both internal work and projects conducted by member agencies and transportation planning partners.
- Continue to monitor and maintain stakeholder lists and seek opportunities to engage with populations of interest.
- Seek further opportunities to engage with the Tonawanda Seneca Nation
- Seek further opportunities to engage with organizations that work with traditionally underrepresented populations.
- Participate in training opportunities to better understand how to conduct a more inclusive planning process.

GTC expects to develop and adopt the FFY 2023-2027 Transportation Improvement Program in the summer of 2022. As part of the program development, GTC staff will conduct a screening of potential impacts on identified Environmental Justice areas. The draft program will be made available for a 30-day public comment period. Outreach to EJ areas will be a specific activity.

*Note: The full report for the Federal Fiscal Year (October 1, 2020 through September 30, 2021) is included in Appendix C.*

## Authorities and Citations

The following is a compilation of the federal regulations, statutes, and orders that together create the legal requirements for nondiscrimination within the GTC:

- Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.9 and 49 CFR 21).
- The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).
- The 1970 Uniform Act (42 USC 4601 to 4655) prohibits unfair and inequitable treatment of persons displaced or property to be acquired as a result of federal-aid programs and projects.
- Section 504 of the 1973 Rehabilitation Act (29 USC 790) prohibits discrimination on the basis of physical or mental disability.
- The 1973 Federal-aid Highway Act (23 USC 324) prohibits sex/gender discrimination.
- The 1975 Age Discrimination Act (42 USC 6101) prohibits age discrimination.
- Executive Order 12898 on Environmental Justice prohibits discrimination based on minority or income status.
- Executive Order 13166 on Limited English Proficiency prohibits discrimination based on how well a person speaks English.

## Demographic Data and Analysis

*Note about source data: Not all information displayed in the following section analyzing regional demographics is from the same source or year. GTC performed relevant data analysis, pertaining to low income and disability, during the development of the Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan Update, adopted in August 2021, referred to as 2021 Coordinated Plan. That data and analysis is included in this Plan, where appropriate. It mostly cites contemporary data, referred to as the 2019 estimate, sourced from the U.S. Census Bureau's American Community Survey (ACS) 2015-2019 five-year estimate at the block group scale. Data from other sources shown in tables or maps is labeled appropriately. View the full [Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan](#) on the GTC website for more information.*

### Region Overview

This region, encompassing approximately 4,700 square miles and with a population of approximately 1.2 million people, includes Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, Wyoming, and Yates Counties.

Compared to the 2011 estimate, the 2019 population estimate for the Genesee-Finger Lakes Region shows a slight decline of less than one percent from 1,214,716 to 1,205,380. This decline comes while New York State's population rose by 1.4% over the same period. When examining change at the county level, seven of the nine, with the exceptions of Ontario and Monroe Counties, experienced population decline. Decline as a percentage was led by Orleans County (4.9%) while Wyoming, Wayne, and Genesee Counties also shrank by more than three percent.

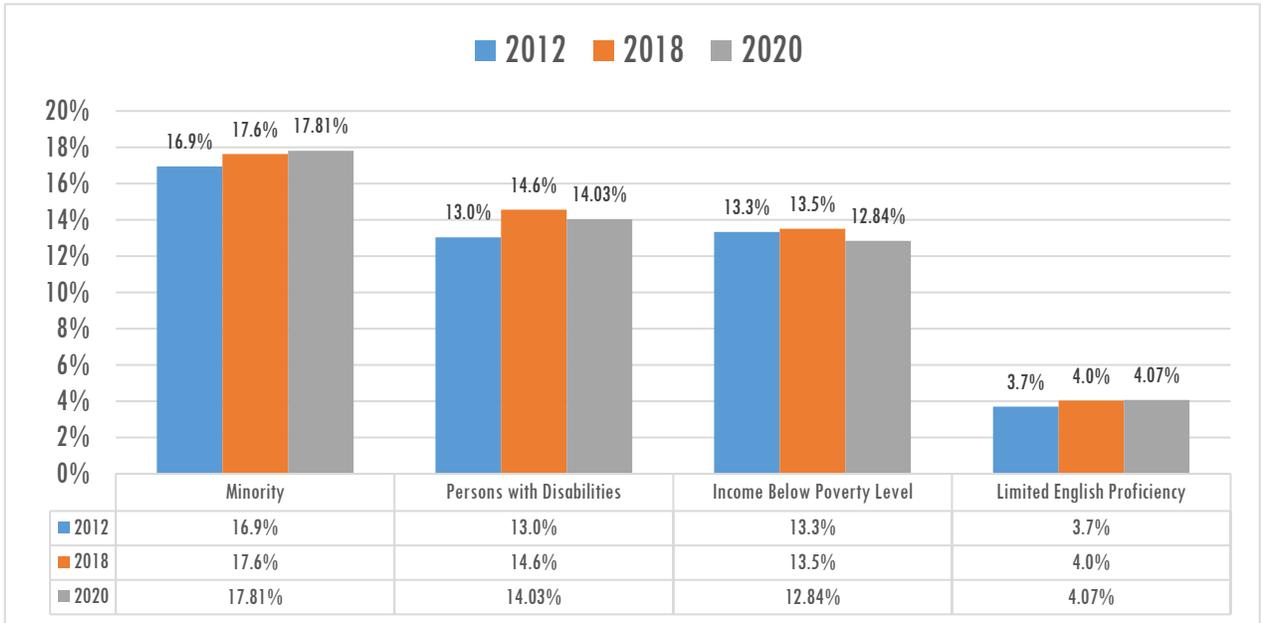
As the regional population has largely stagnated, the proportion of older adults has grown significantly. Those 60 years of age or older now comprise over 24 percent of the total population versus approximately 19 percent in 2011. Likewise, the regional share of persons aged 20 to 64 with disabilities has increased from 10.7 percent to 12.1 percent during the same timeframe. The percentage of regional households whose income falls below the poverty line has remained steady (12.6%.)

*Excerpt from Genesee-Finger Lakes Region Coordinated Public Transit-Human Services Transportation Plan Update (Adopted August 2021)*



Consistent with EJ guidelines, GTC identifies four groups that are typically underrepresented in the transportation planning process:

1. Minorities
2. Persons with Low Income Status
3. Persons with Limited English Proficiency
4. Persons with Disabilities



## Minorities

The U.S. Census defines minorities as people of African, Asian, Hispanic or Latino, Native Alaskan, or Native American origin.

In the nine-county Genesee-Finger Lakes Region, minority populations reside in each county. The highest percent across the region are Black or African American alone, at 10.6%, followed by Hispanic or Latino (of any race) at 6.8%. Monroe County has the highest concentration of people with minority status with 113,538 (15.5%) Black or African American and 63,631 (8.5%) Hispanic or Latino of any race. The chart on the next page shows an overview of demographics by race from the 2018 American Community Survey (5-Year Estimates). This information is important to consider when developing specific community engagement plans.

The U.S. Census Bureau must adhere to the 1997 Office of Management and Budget (OMB) standards on race and ethnicity that guide the Census Bureau in classifying written responses to the race question:

White – A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Black or African American – A person having origins in any of the Black racial groups of Africa.

American Indian or Alaska Native – A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment.

Asian – A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Native Hawaiian or Other Pacific Islander – A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

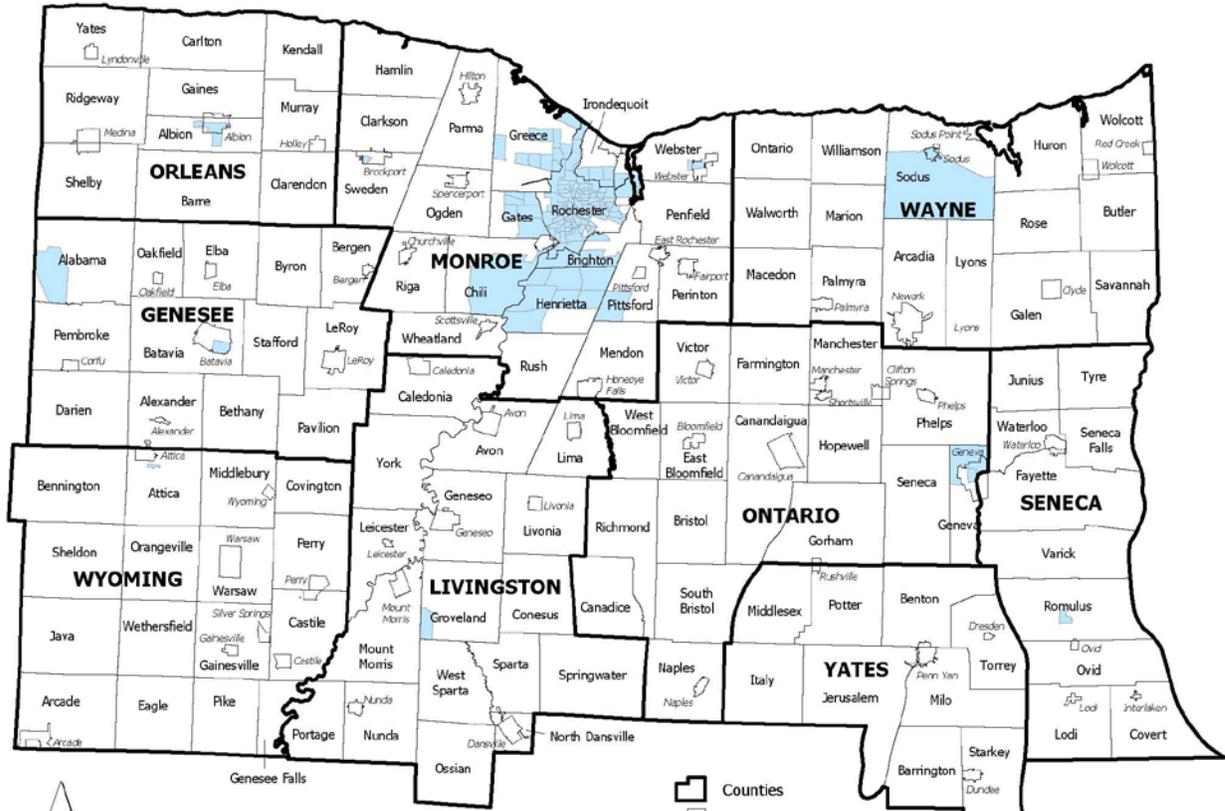
Note: The 1997 OMB standards permit the reporting of more than one race. An individual's response to the race question is based upon self-identification.

### Race (by County)

County	Genesee	Livingston	Monroe		Ontario	Orleans	Seneca	Wayne	Wyoming	Yates	Region
			(All)	City							
Total Population	57,554	63,218	743,084	206,075	109,774	40,624	34,295	90,103	40,027	24,981	1,203,660
White (non Hispanic or Latino)	51,937	56,956	519,765	73,762	98,238	34,890	30,307	80,435	35,921	23,646	932,095
	90.2%	90.1%	69.9%	35.8%	89.5%	85.9%	88.4%	89.3%	89.7%	94.7%	77.4%
Black or African American alone	1,251	1,646	105,359	76,516	2,322	2,342	1,655	2,145	1,809	243	118,772
	2.2%	2.6%	14.2%	37.1%	2.1%	5.8%	4.8%	2.4%	4.5%	1.0%	9.9%
American Indian or Alaska Native alone	409	142	1,040	515	203	131	125	51	88	4	2,193
	0.7%	0.2%	0.1%	0.2%	0.2%	0.3%	0.4%	0.1%	0.2%	0.0%	0.2%
Asian alone	462	672	26,849	6,693	1,456	231	265	755	182	164	31,036
	0.8%	1.1%	3.6%	3.2%	1.3%	0.6%	0.8%	0.8%	0.5%	0.7%	2.6%
Native Hawaiian or Other Pacific Islander alone	0	53	203	55	27	0	7	4	0	7	301
	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Hispanic or Latino (of any race)	1,959	2,401	67,590	40,021	5,390	2,081	1,244	4,087	1,341	555	86,648
	3.4%	3.8%	9.1%	19.4%	4.9%	5.1%	3.6%	4.5%	3.4%	2.2%	7.2%

Source: 2016-2020 American Community Survey, Table B03002

# Above Average Concentration of Minority Population by Census Tract, 2020



\* Census 2020 data were used to calculate the percentage of minority (non-white and/or hispanic) population within each census tract in the region. Tracts with a percentage of minority population higher than the regional average are considered to have an above average concentration of this population.

- Counties
- Municipalities
- Above Average Concentration of Minority Population

## Persons with Low-Income Status

Persons with low-incomes are defined as having an income at or below the federal poverty level. The federal government measures poverty according to a set of income thresholds that vary by different factors.

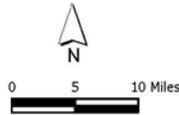
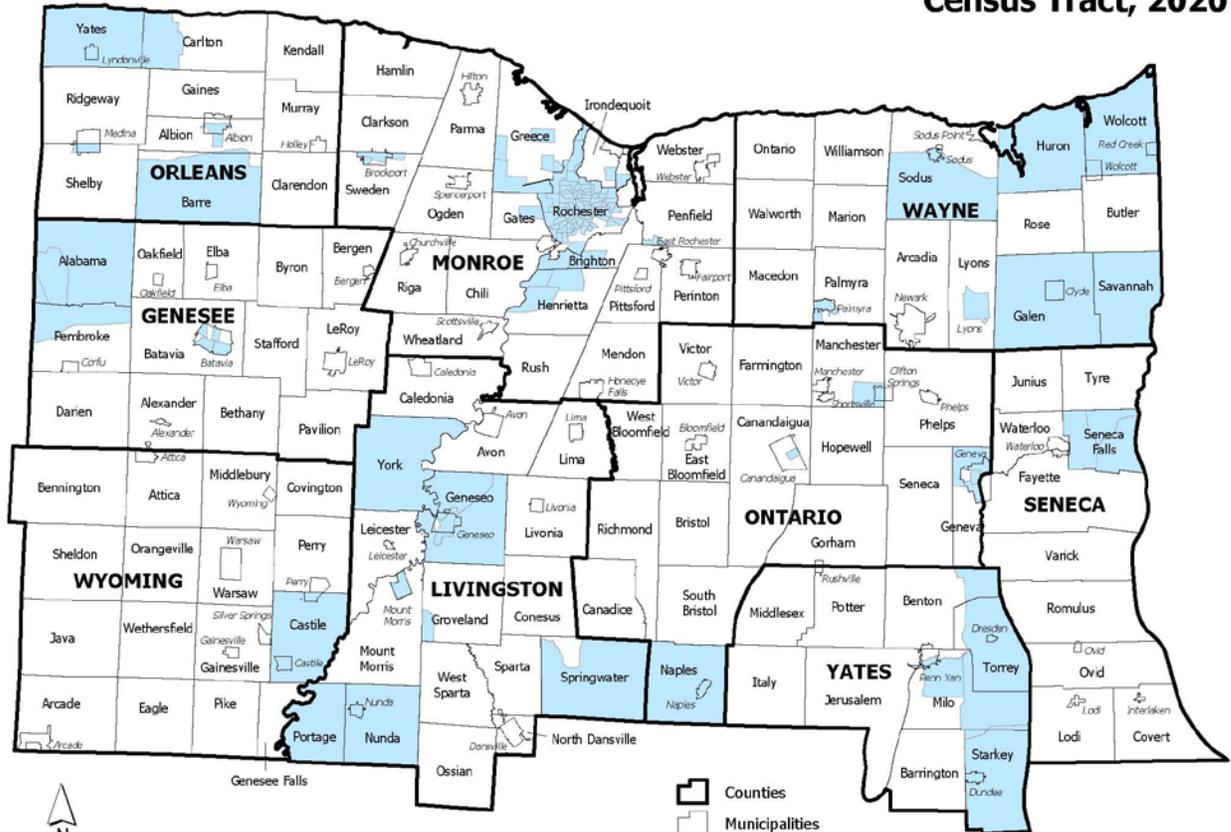
According to the 2020 American Community Survey, 149,469 (12.84 %) of the people in the nine-county Genesee-Finger Lakes Region are living at or below the poverty rate. As the following chart shows, the number of people in poverty is considerably higher in Monroe County, with about two-thirds of the regional total, but is still prevalent in all the remaining counties. This information is important to consider when formulating and implementing community engagement plans across the region.

### Persons with Low-Income Status (by County)

County		Population for whom poverty status is determined	Below poverty level	% Below poverty level
Genesee		56,683	6,109	10.8%
Livingston		57,301	7,233	12.6%
Monroe	Countywide	717,966	101,065	14.1%
	City of Rochester	197,451	59,953	30.4%
Ontario		106,375	9,619	9.0%
Orleans		37,843	5,223	13.8%
Seneca		31,337	3,761	12.0%
Wayne		89,004	9,979	11.2%
Wyoming		37,484	3,262	8.7%
Yates		23,775	3,218	13.5%
<b>Region</b>		<b>1,157,768</b>	<b>149,469</b>	<b>12.9%</b>

Source: 2016-2020 American Community Survey, Table S1701

# Above Average Concentration of Population Living Below Poverty-Level by Census Tract, 2020



\* 2020 Census ACS data were used to calculate the percentage of population living below poverty level within each census tract in the region. Tracts with a percentage of below-poverty-population higher than the regional average are considered to have an above average concentration of this population.

- Counties
- Municipalities
- Above Average Concentration of Below-Poverty Population

The demographic data from the 2021 Coordinated Plan showing low income and disability data, divides the larger region into three sub-regions to improve legibility of demographic spatial analysis. Monroe County comprises one sub-region. The Eastern Sub-Region contains Wayne, Ontario, Yates, and Seneca counties while the Western Sub-Region covers Orleans, Genesee, Wyoming, and Livingston counties. The color breaks of demographic maps are consistent between sub-regions within each category of disadvantaged populations.

**Monroe County Sub-Region**

Monroe County is home to the highest number and percentage of low-income households in the region. The highest densities of low-income households are concentrated within the City of Rochester, though certain block groups in suburban Towns and Villages are also home to dense clusters of households with income below the poverty line.

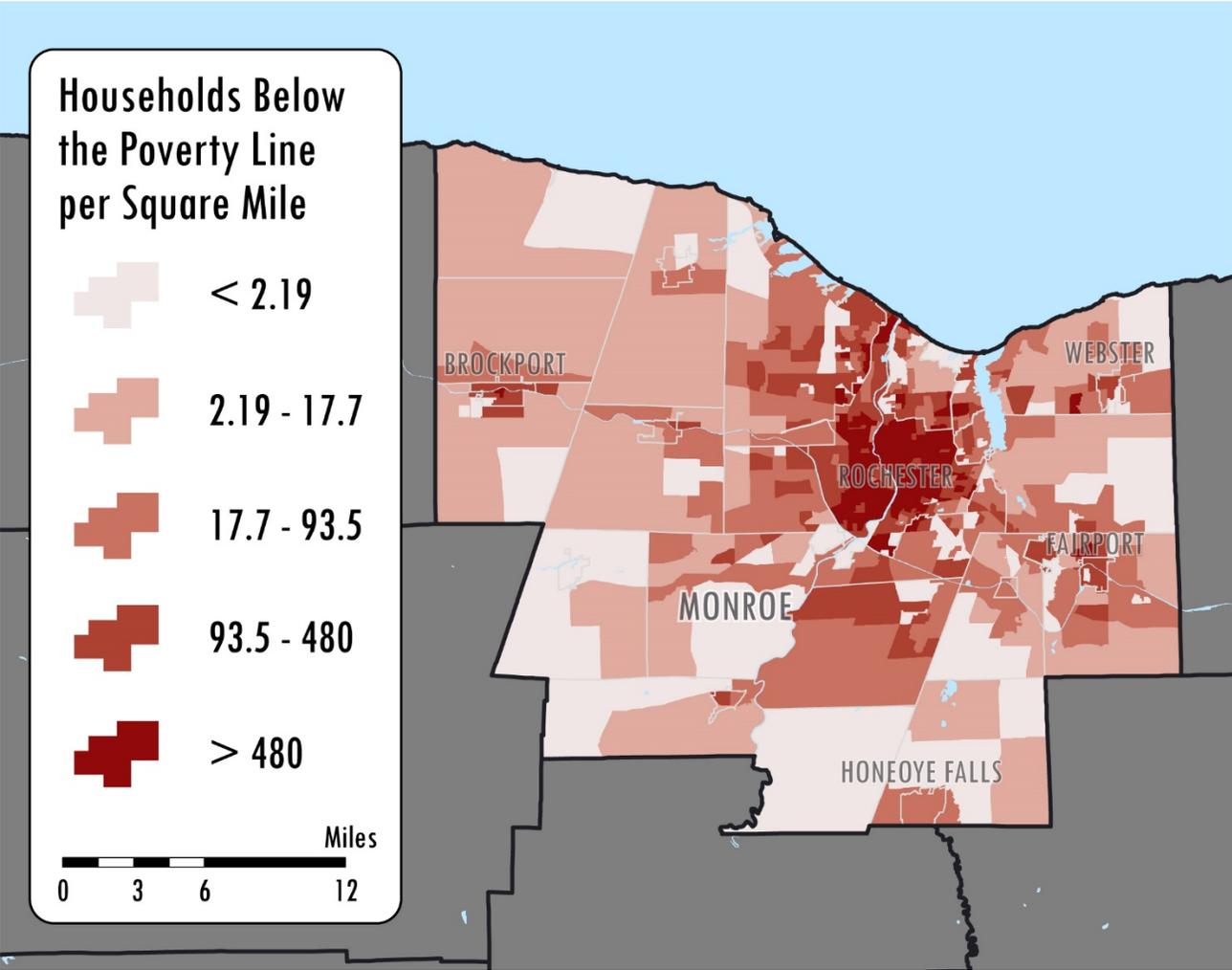


Figure 3 – Density of Households Below the Poverty Line – Monroe County

### Western Sub-Region

While the population of all counties of the Western Sub-Region decreased, the number of low-income households diverged according to the data. Livingston and Orleans Counties are home to a greater proportion of households with income below the poverty line than the region. Densities of low-income households comparable to the highest found in the larger region are only found in Batavia and Geneseo. Densities that correspond to relatively high need can be found in Medina, Albion, Oakfield, Warsaw, Perry, Mt. Morris, and Dansville.

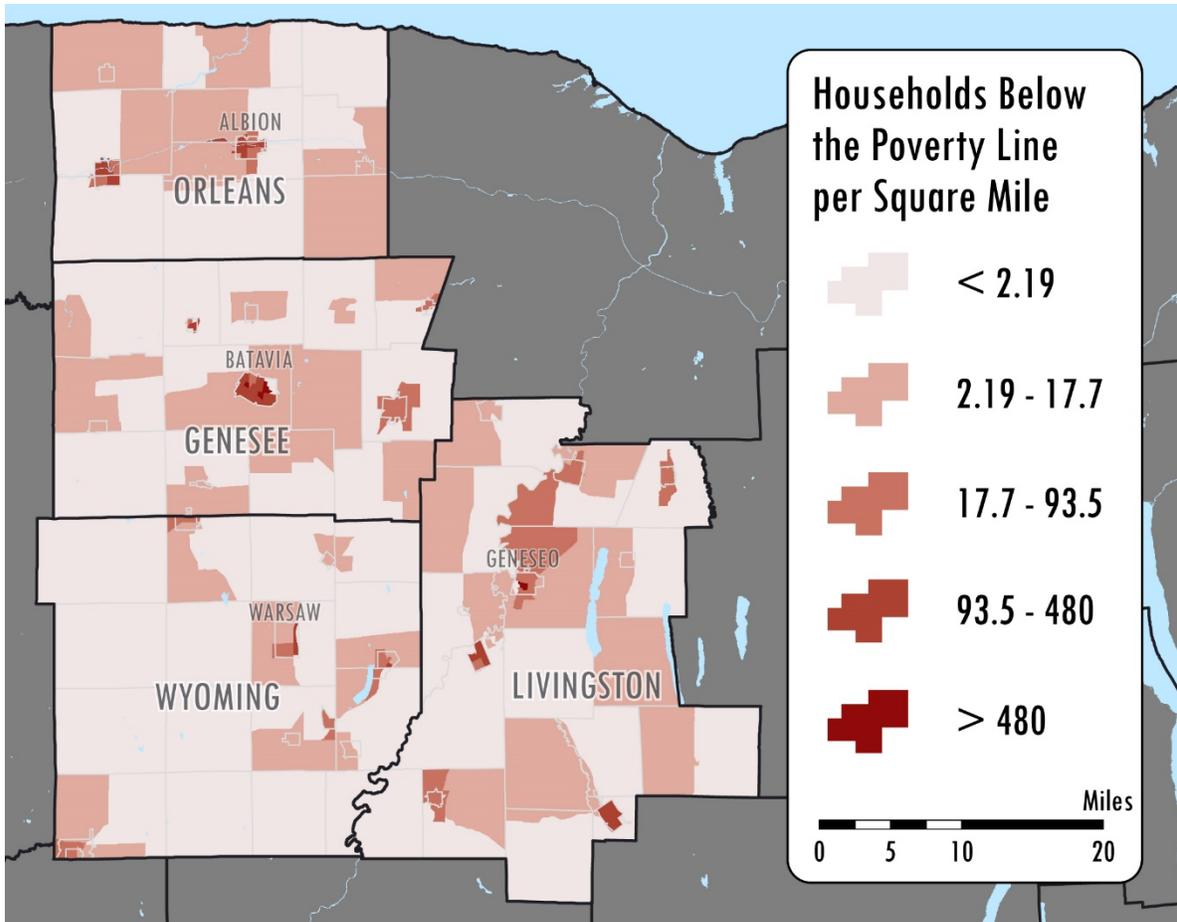


Figure 8 – Density of Households Below the Poverty Line – Western Sub-Region

### Eastern Sub-Region

As observed in the Western Sub-Region, the number and concentration of low-income households diverged according to the data. While no county in the Eastern Sub-Region is home to a greater proportion of low-income households than the region as a whole, Wayne and Seneca Counties experienced recent increases in the number and percentage of low-income households. Ontario and Yates Counties experienced a significant reduction in both the numbers. Densities of households whose income is below the poverty line that are comparable to the highest found in the larger region are found in small areas of Newark, Geneva, Canandaigua, and Seneca Falls. Densities that correspond to relatively high need can be found in these locations as well as in Sodus, Wolcott, Palmyra, Lyons, Clifton Springs, Penn Yan, and Dundee.

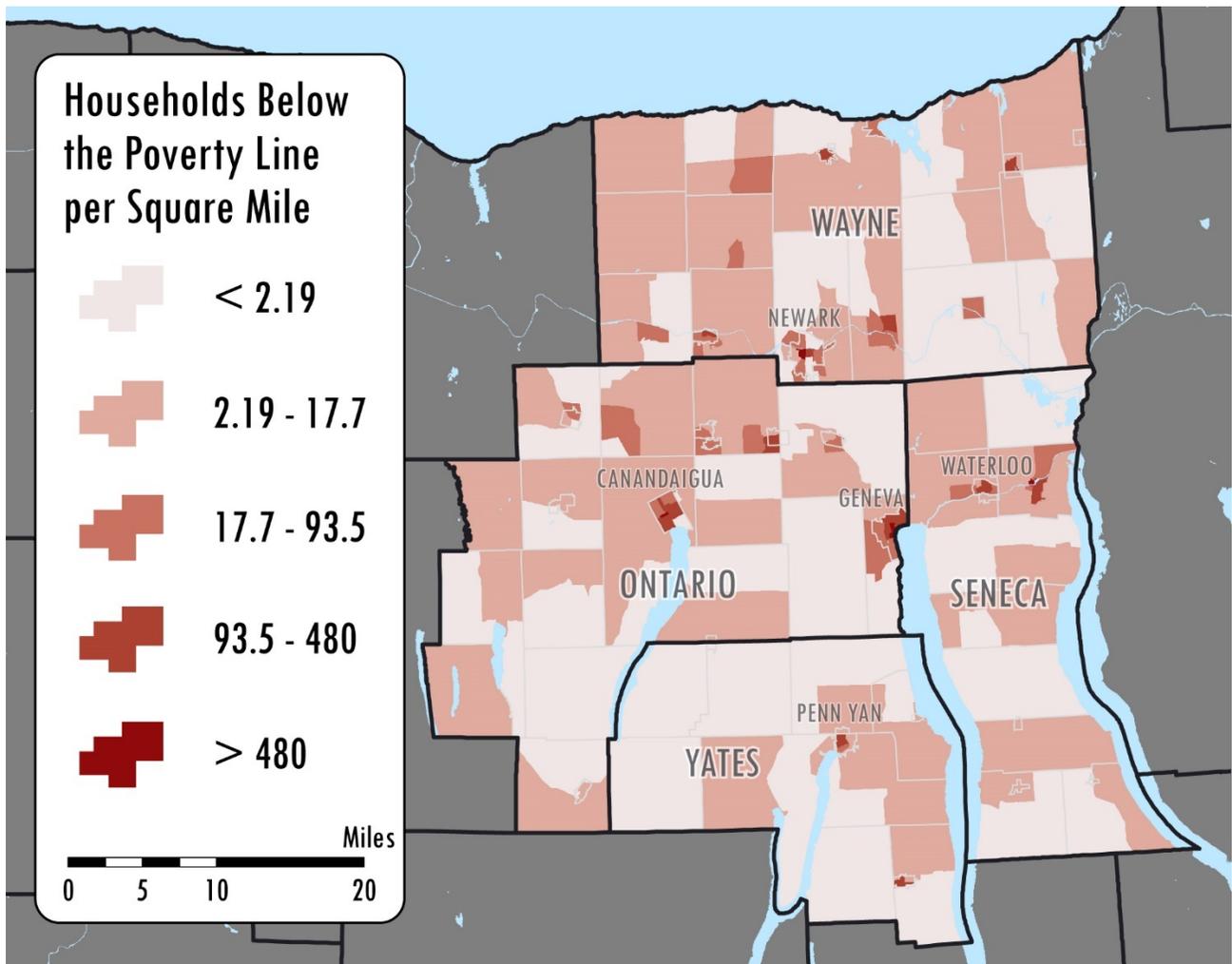


Figure 13 – Density of Households Below the Poverty Line – Eastern Sub-Region

## Persons with Disabilities

Persons with Disabilities is defined as a person having a disability in one of the following categories: Hearing, Visual, Cognitive, Ambulatory, Self-Care, and Independent Living Disability.

According to the 2020 American Community Survey, there are 166,091 (14.03 % of the total population) people with a disability. Specifically, 43,866 (3.71%) live with a hearing difficulty; 26,157 (2.21%) live with a vision difficulty; 66,567 (5.62 %) live with a cognitive difficulty; 77,604 (6.56%) live with an ambulatory difficulty; 28,668 (2.42%) live with a self-care difficulty; 58,544 (4.95%) live with an independent living difficulty.

This information is important to consider when formulating and implementing community engagement plans across the region.

### Persons with Disabilities (by County)

County		Total civilian non-institutionalized population	With a disability	Percent with a disability
Genesee		57,049	8,376	14.7%
Livingston		60,803	7,359	12.1%
Monroe	Countywide	735,790	103,459	14.1%
	City of Rochester	203,060	37,882	18.7%
Ontario		108,839	14,306	13.1%
Orleans		37,972	6,079	16.0%
Seneca		31,560	5,227	16.6%
Wayne		89,334	13,546	15.2%
Wyoming		37,690	4,959	13.2%
Yates		24,661	2,780	11.3%
<b>Region</b>		<b>1,183,698</b>	<b>166,091</b>	<b>14.0%</b>

Source: 2016-2020 American Community Survey, Table B18101

The demographic data from the 2021 Coordinated Plan showing low income and disability data, divides the larger region into three sub-regions to improve legibility of demographic spatial analysis. Monroe County comprises one sub-region. The Eastern Sub-Region contains Wayne, Ontario, Yates, and Seneca counties while the Western Sub-Region covers Orleans, Genesee, Wyoming and Livingston counties. The color breaks of demographic maps are consistent between sub-regions within each category of disadvantaged populations.

**Monroe County Sub-Region**

Like the rising number of older adults, the number of persons with disabilities aged 20 to 64 increased substantially compared to levels described in the 2011 Coordinated Plan. The 2019 estimate of 53,106 disabled non-senior adults is an increase of over 6,000 from the 2012 estimate and raises the percentage from 10.7 to 12.3. The highest densities of non-seniors with disabilities are far more concentrated than the density of seniors, almost exclusively within the City of Rochester.

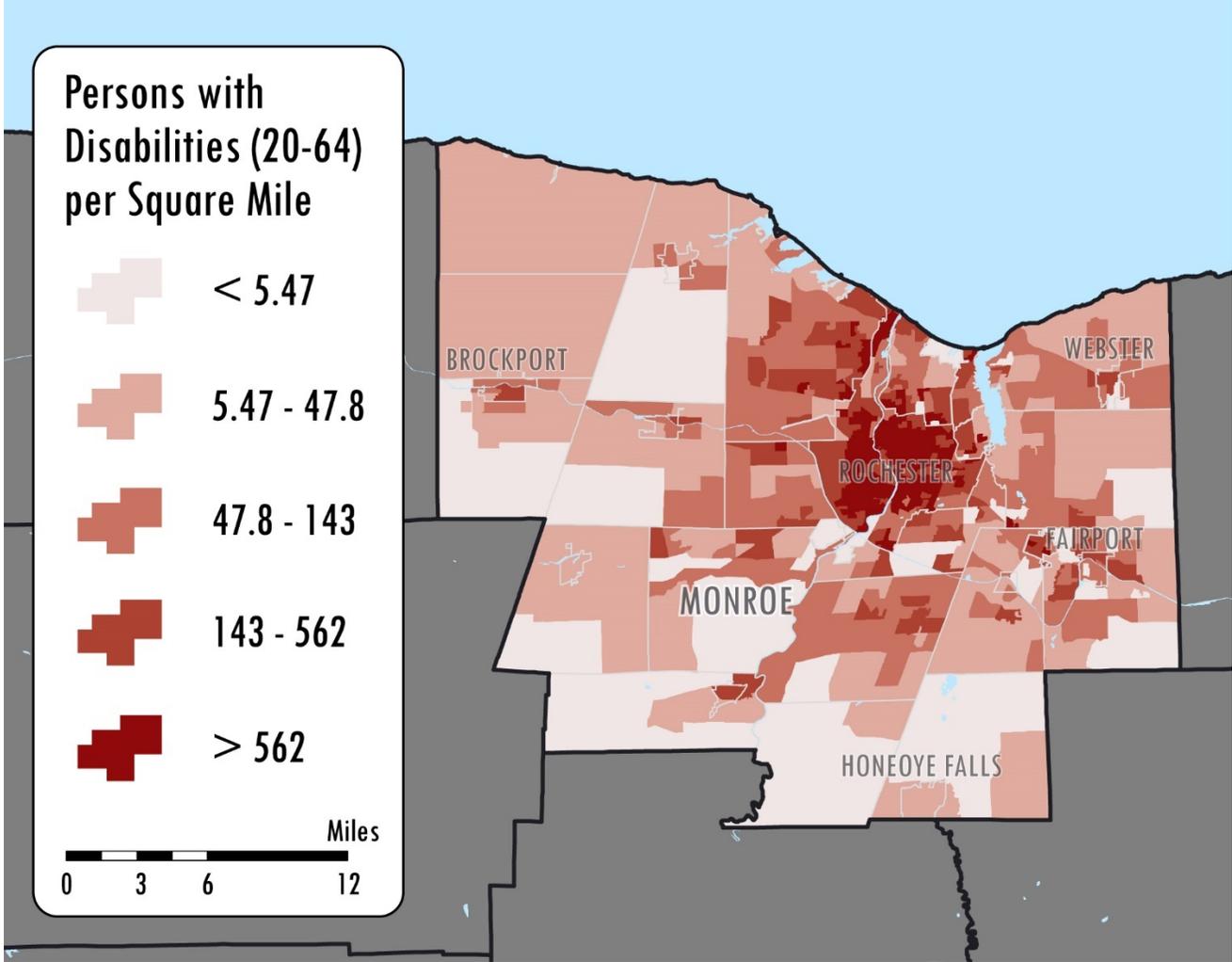


Figure 2 – Density of Persons with Disabilities Aged 20-64 – Monroe County

## Western Sub-Region

Like Monroe County, the number of persons with disabilities aged 20 to 64 in the Western Sub-Region increased substantially since the 2011 Estimate. The 2019 estimate of 13,468 disabled non-senior adults is an increase of almost 1,000 and raises the percentage within that age group from 10.5 to 11.8. The increase is most acutely observed in Livingston, Genesee, and Wyoming Counties while Orleans County conversely experienced a decrease of 315 disabled non-senior adult residents, in line with their overall population decrease. The highest densities of non-seniors with disabilities are again found within the City of Batavia while high densities are observed in Medina, Albion, Oakfield, Warsaw, Perry, Mt. Morris, and Dansville.

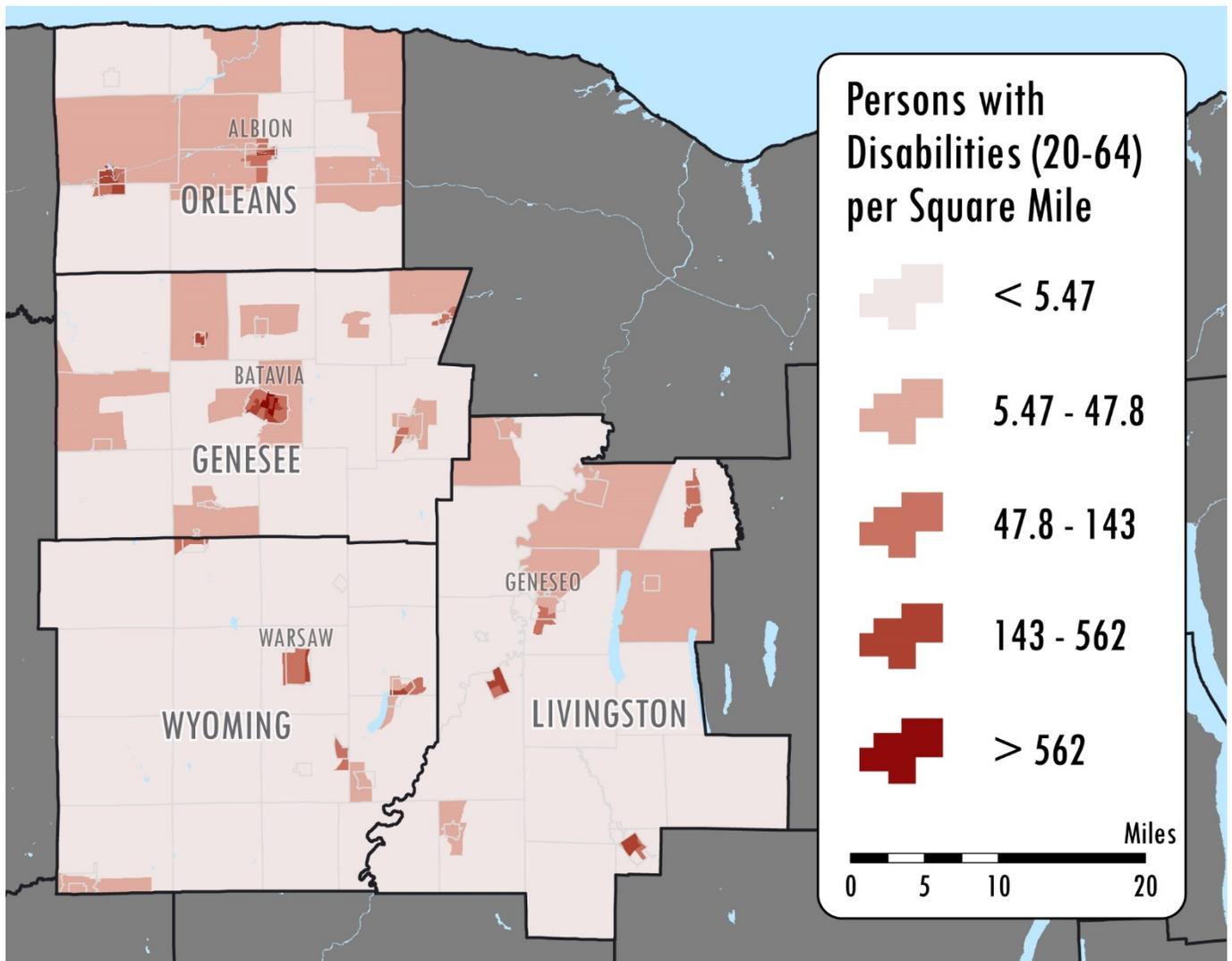


Figure 7 – Density of Persons with Disabilities Aged 20-64 – Western Sub-Region

## Eastern Sub-Region

Like the previously examined sub-regions, the number and percentage of persons with disabilities aged 20 to 64 in the Eastern Sub-Region increased since the 2011 Estimate. The 2019 estimate of 16,989 disabled non-senior adults is an increase of more than 650 and raises the percentage within that age group from 10.9 to 11.7. The increase is most acutely observed in Wayne and Seneca Counties while Yates County conversely experienced a decrease of 295 disabled non-senior adult residents. The highest densities of non-seniors with disabilities are found within small areas of the Cities of Canandaigua and Geneva as well as the former Village of Seneca Falls. High densities are also observed in Sodus, Palmyra, Newark, Waterloo, Penn Yan, and Dundee.

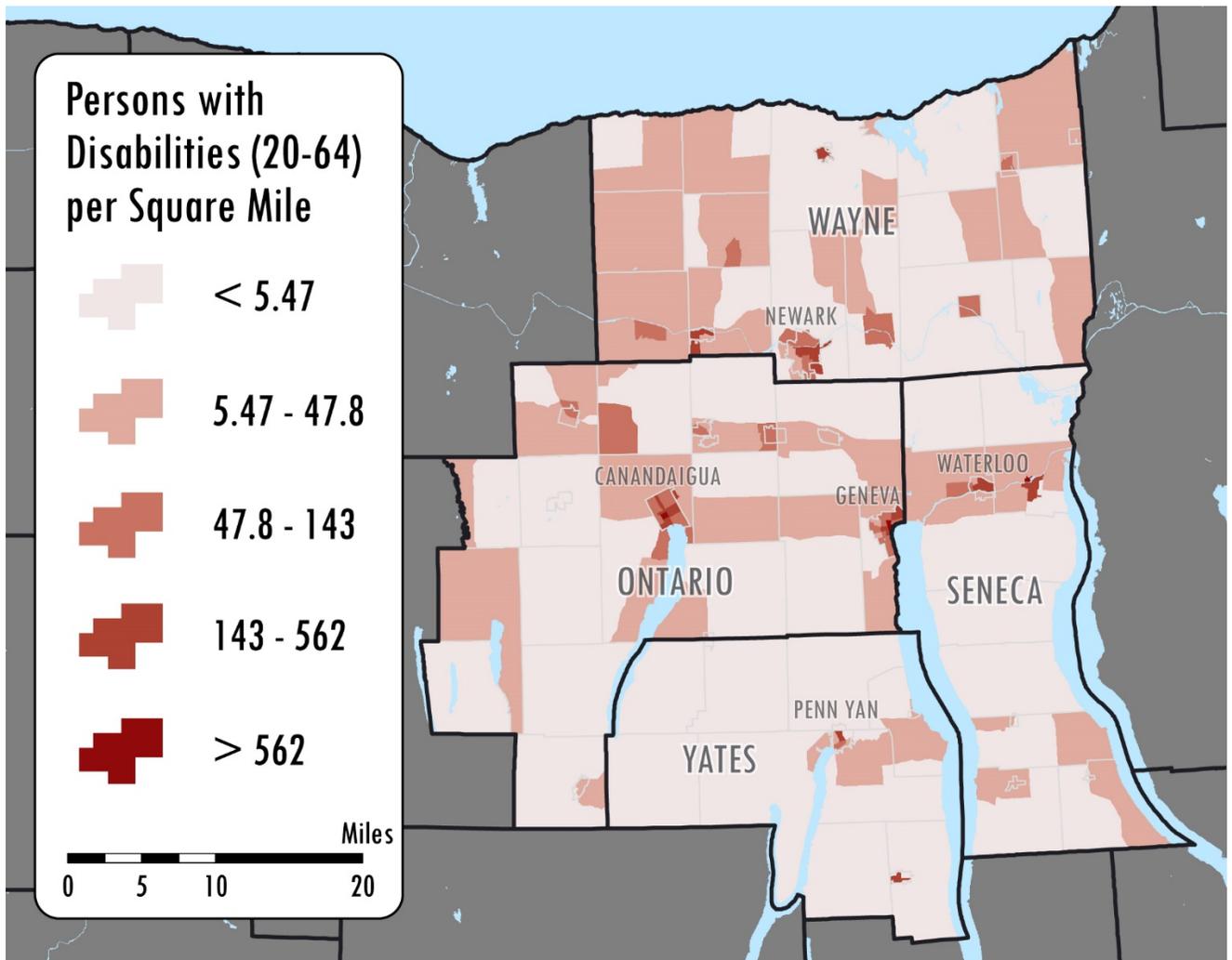


Figure 12 – Density of Persons with Disabilities Aged 20-64 – Eastern Sub-Region

## Limited English Proficiency

A person with Limited English Proficiency is defined as somebody who has a limited ability to speak, read, write, or understand the English language.

According to the 2020 American Community Survey, 10.83% of the total population in the Genesee-Finger Lakes region speaks a language other than English as their primary language and 4.07% of the population speaks English less than very well. This information is important to consider when formulating and implementing community engagement plans across the region.

See more language analysis in the Limited English Proficiency Plan in the Appendix H.

### Persons with Limited English Proficiency (by County)

County	Genesee	Livingston	Monroe		Ontario	Orleans	Seneca	Wayne	Wyoming	Yates	Region
			(All)	City							
Total Pop. 5 Years and Over	54,550	60,532	702,253	192,918	104,365	38,733	32,481	85,196	38,112	23,437	1,139,659
Speaks only English	52,587	56,222	605,208	151,401	98,235	36,373	29,918	80,720	36,777	20,227	1,016,267
%	96.4%	92.9%	86.2%	78.5%	94.1%	93.9%	92.1%	94.7%	96.5%	86.3%	89.2%
Language other than English	1,963	4,310	97,045	41,517	6,130	2,360	2,563	4,476	1,335	3,210	123,392
%	3.6%	7.1%	13.8%	21.5%	5.9%	6.1%	7.9%	5.3%	3.5%	13.7%	10.8%
Spanish	1,222	1,599	42,688	27,934	2,711	1,330	906	2,106	831	324	53,717
Other Indo-European languages	560	1,158	31,005	6,466	2,468	768	1,424	1,929	316	2,795	42,423
Asian and Pacific Island languages	161	357	14,685	3,573	543	150	196	403	127	91	16,713
Other languages	20	1,196	8,667	3,544	408	112	37	38	61	0	10,539

Source: 2016-2020 American Community Survey, Table 16007



Appendix A - Genesee Transportation Council Title VI Assurances

Appendix B - Title VI Complaint Form

Appendix C - Genesee Transportation Council 2021 Title VI Annual Report

Appendix D - Notice to the Public

Appendix E - FTA Log of Investigations, Complaints, and Lawsuits

Appendix F - Public Engagement Plan

Appendix G - Summary of Public Outreach Activities

Appendix H - Limited English Proficiency Plan

Appendix I - Disadvantaged Business Enterprise Plan

Appendix J - Equal Employment Opportunity Plan

Appendix K - Board Resolution approving Title VI Program