

Title VI & LEP Plan

Syracuse Metropolitan
Planning Area

Final Report
February 2015



Syracuse Metropolitan Transportation Council
126 N. Salina St., 100 Clinton Square, Suite 100,
Syracuse, NY 13202

TITLE VI & LEP PLAN

Syracuse Metropolitan Transportation Council

*Final Report
February 2015*

Adopted February 17, 2015 by the Policy Committee of the Syracuse Metropolitan Transportation Council

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For further information contact:

*Kevin Kosakowski, Transportation Planner
Syracuse Metropolitan Transportation Council
126 N. Salina St., 100 Clinton Square, Suite 100
Syracuse, NY 13202
kkosakowski@smtcmpo.org
PHONE: (315) 422-5716 FAX: (315) 422-7753
www.smtcmpo.org*

EXECUTIVE SUMMARY

As part of the 2014-2015 Unified Planning Work Program, the Syracuse Metropolitan Transportation Council (SMTC) decided to complete this joint Title VI/LEP plan. The purpose of this plan is to describe how the SMTC complies with Title VI of the Civil Rights Act of 1964 and to also describe how the SMTC addresses the Limited English Proficiency (LEP) requirements enacted in August of 2000, by President Clinton's Executive Order 13166. In short, the underrepresented minority and Limited English Proficient populations in the Metropolitan Planning Area (MPA), of which Title VI looks to protect, are to be accommodated and/or accounted for when the SMTC partakes in transportation planning activities that affect these populations. Analysis from this document has provided the agency with the information and the tools to help make the inclusion of these populations possible.

The resulting document has helped to show overall that 3.5% of the MPA's population is LEP. Spanish, Chinese and Other Slavic Languages are the most common non-English languages. It has been found that most LEP individuals reside in the City of Syracuse. While analyzing the minority population, even though 80% of the MPA population is white, only 53% of the City of Syracuse's population is white, showing clearly that much of the MPA's underrepresented populations, lie in its largest entity, the City of Syracuse.

This document, coupled with the Environmental Justice Analysis report, shows that the SMTC does not discriminate on the basis of race, color or national origin and no disparate expenditures of federal funds are made and overall, all population groups have the same opportunities afforded to them as the other.

The SMTC realizes the importance of the inclusion of the minority and LEP population in the transportation planning process, and it will continue to be cognizant of any future training offered on both Title VI and LEP, attending where and when appropriate.

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INTRODUCTION/PURPOSE

As part of the 2014-2015 Unified Planning Work Program, the Syracuse Metropolitan Transportation Council (SMTC) decided to complete this joint Title VI/LEP plan. The purpose of this plan is to describe how the SMTC complies with Title VI of the Civil Rights Act of 1964 and to also describe how the SMTC addresses the Limited English Proficiency (LEP) requirements enacted in August of 2000, by President Clinton's Executive Order 13166.

As a subrecipient of federal funds, the SMTC is required to comply with Title VI, as well as show how it addresses the LEP Executive Order. A subrecipient according to the federal government is an entity that receives funds from another Federal Transit Administration (FTA) recipient. In the SMTC's case, planning funds have been "passed through" to the SMTC from the New York State Department of Transportation (NYSDOT), which receives funds from both the Federal Highway Administration (FHWA) and the FTA.

Per FTA federal guidance, since States "pass through" planning funds to the MPO, MPOs are subrecipients of the State and must submit Title VI compliance reports for planning activities to the State in order to assist the State in demonstrating compliance with Title VI. The State is thus responsible for monitoring the Title VI compliance of the MPO.

The overall purpose of this plan is to show to the extent practical that the metropolitan transportation planning process is inclusive of public participation by traditionally underserved/underrepresented populations within the Metropolitan Planning Area (MPA), as defined in Title VI, and that the activities carried out by the agency are done so in a non-discriminatory fashion.

The Syracuse Metropolitan Transportation Council (SMTC)

In 1966, the Governor of the State of New York established the SMTC to serve as the local Metropolitan Planning Organization (MPO) for the Syracuse MPA. This area consists of all of Onondaga County, the Town of Sullivan in Madison County and the Towns of Hastings, Schroepfel and West Monroe, and a small portion of the Town of Granby in Oswego County. The purpose of the MPO is to carry out the continuous, comprehensive, and cooperative transportation planning process for the MPA.

In addition to maintaining a Long Range Transportation Plan (LRTP), the SMTC conducts a number of specific transportation planning activities as part of its annual Unified Planning Work Program (UPWP). The SMTC is also responsible for the maintenance of the area's Transportation Improvement Program (TIP), a multi-year program that funds capital projects related to transit, local roadways and interstates, bridges, bicycle and pedestrian amenities, and more.

As the Syracuse area's MPO, the SMTC also acts as a forum where long term and immediate transportation planning decisions are made for the region. These decisions are made through committees comprised of officials representing local, State, and Federal governments or agencies who utilize consensus-building models to make transportation planning decisions. Many of

these committees are run by SMTC staff; however, the governing committees are staffed solely by member agency representatives.

What is Title VI?

As defined by the United States Department of Justice, Title VI was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color and national origin in programs and activities receiving federal financial assistance.

The SMTC will reference the Title VI regulations/requirements/guidance put forth by the U.S. Department of Transportation (DOT) due to the fact that SMTC is a subrecipient of both FTA and FHWA planning funds.

DOT's Requirements

The U.S. Department of Transportation publishes a "circular," which is a document that provides all recipients of FTA financial assistance with the guidance and instruction necessary to carry out DOT Title VI regulations.

In this circular, FTA C 4702.1B, Chapter III in particular, the DOT puts forth general requirements and guidelines they expect all FTA recipients to follow, whether an entity be a direct "recipient" (i.e. NYSDOT) or "subrecipient" (i.e. SMTC), in order to ensure that their programs, policies and activities comply with their regulations. There is also Chapter VI, which specifically describes the procedures that MPOs shall follow in order to comply.

This plan will mainly adhere to the guidance described in both these chapters to provide readers of this plan with a thorough description of how the SMTC complies with Title VI. It is the intent that when this plan is completed, it will provide the needed assurance to State, Federal and local stakeholders that the SMTC has carried out, and will carry out, its programming in compliance with DOT's Title VI regulations/requirements.

CHAPTER 1: TITLE VI REQUIREMENTS

General Requirements

Section 1: Notice to Public

Requirement: 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.

Response: The Syracuse Metropolitan Transportation Council will 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 via a notice. This notice includes:

- A statement that the agency operates programs without regard to race, color, and national origin.
- A description of the procedures that members of the public should follow in order to request additional information on SMTC's nondiscrimination policy.
- A description of the procedures that members of the public should follow in order to file a discrimination complaint against the SMTC.
- A Spanish translation of the entire notice due to the Spanish population being the largest non-English speaking population in the SMTC's planning area and therefore the most likely to be affected by SMTC actions.

The notice is posted in the following locations:

- In the entry way to the SMTC office, behind the reception desk.
- In the SMTC's meeting rooms.
- On the SMTC's "Public Involvement" webpage:

http://www.smtcmpo.org/pub_involve.asp

Wording taken from the notice reads: *"The SMTC is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its metropolitan transportation planning process on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964 and related statutes and regulations. If you believe you have been subjected to discrimination under Title VI, using the following form, you may file a complaint to the Syracuse Metropolitan Transportation Council by sending your written complaint to Attention: Director, Syracuse Metropolitan Transportation Council, 126 North Salina Street, Suite 100, Syracuse, New York 13202, or by sending an e-mail to director@smtcmpo.org."*

A copy of the SMTC's Title VI notice can be found on the following page.

TITLE VI NOTICE

The Syracuse Metropolitan Transportation Council (SMTC) is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its metropolitan transportation planning process on the basis of race, color, national origin, gender, age, disability or economic status as provide by Title VI of the Civil Rights Act of 1964 and related statutes. If you believe you have been subjected to discrimination under Title VI, you may file a complaint with the SMTC by sending your written complaint to Attention: Director, Syracuse Metropolitan Transportation Council, 126 North Salina Street, Suite 100, Syracuse, NY 13202, or by sending an e-mail to director@smtcmpo.org.

Complaints may also be filed directly with the Federal Highway Administration, at FHWA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact 315-422-5716.

El Consejo de transporte metropolitano de Siracusa (SMTC) se compromete a garantizar que ninguna persona está excluida de la participación en, o negada los beneficios de, su transporte metropolitano planificación proceso sobre la base de raza, color, origen nacional, género, edad, discapacidad o condición económica como proporcionar al título VI de la ley de derechos civiles de 1964 y estatutos relacionados. Si usted cree que ha sido sometidos a discriminación bajo el Título VI, usted puede presentar una queja con el SMTC enviando su queja por escrito a la atención: Director, Consejo Metropolitano de transporte de Siracusa, 126 North Salina Street, Suite 100, Syracuse, NY 13202, o enviando un correo electrónico a director@smtcmpo.org. Las quejas pueden ser presentadas también directamente con la Administración Federal de carreteras, en FHWA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Section 2: How to File a Complaint

Requirement: 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.

Response: Included in the attachments on the following pages are both the complaint procedures and the complaint form used by the SMTC.

These references provide people who believe that they have been discriminated against direction on how to report any incidences of discrimination and describes the specific procedure taken when a complaint is received by the SMTC.

It should also be noted that the SMTC web site, as noted in Section 1, includes a Title VI statement to make the public aware that there is a procedure for filing a complaint.

Title VI Complaint Procedure

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the SMTC may file a Title VI complaint by completing and submitting the agency's Title VI Discrimination Complaint Form. Please submit this form in person at the address below, or mail to:

Director
Syracuse Metropolitan Transportation Council
126 North Salina Street, Suite 100
Syracuse, NY 13202

The SMTC investigates complaints received no more than 90 days after the alleged incident. SMTC will process complaints that are complete. A copy of the complaint form is available on the SMTC website (http://www.smtcmpo.org/pub_involve.asp) or by mail by calling the SMTC office.

Once the complaint is received, SMTC will review it to determine if our office has jurisdiction and if the complaint falls under the scope of Title VI. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The SMTC has 30 calendar days to investigate the complaint. If more information is needed to resolve the case, the SMTC may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the SMTC official investigating the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the SMTC can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Highway Administration, at FHWA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

Complaints must be signed and include contact information.

No one may intimidate, threaten, coerce, or engage in other discriminatory conduct against anyone because he or she has either filed a complaint to secure rights protected by the nondiscrimination statutes SMTC enforces. Any individual alleging such harassment or intimidation may file a complaint with SMTC and/or the US Department of Transportation and an investigation will be conducted.

Syracuse Metropolitan Transportation Council

Discrimination Complaint Form

Section 1

Name: _____
Last *First*

Address: _____
Street Address *Apartment/Unit #*

City *State* *ZIP Code*

Home Phone: _____ E-mail address: _____

Section 2

Are you filing this complaint on your own behalf?

Yes No

If you answered "Yes" to this question, go to Section 3.

Name of person discriminated against
(if other than complainant) _____

Address: _____
Street Address *Apartment/Unit #*

City *State* *ZIP Code*

Home Phone: _____

Section 3

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Describe how you were discriminated against. What happened, and who was responsible? If additional space is required, please use the back of this form or attach extra sheets to form.

Are there any witnesses to the discrimination? If so, please provide their contact information:

Section 4

Did you file this complaint with another federal, state, or local agency; or with a federal or state court?

Yes No

If you answered "Yes," check each agency complaint was filed with:

Federal Agency Federal Court State Agency
 State Court Local Agency Other

Please provide contact information for the agencies you also filed the complaint with:

Name: _____

Title: _____

Agency: _____

Address: _____

Date Filed: _____

Sign and date the complaint form in the space below. Attach any documents you believe support your complaint.

Signature

Date

Please submit this form in person at the address below, or mail to:

Director
Syracuse Metropolitan Transportation Council
100 Clinton Square
126 North Salina Street, Suite 100
Syracuse, NY 13202

Additionally, this form may be submitted via electronic mail to director@smtcmptc.org

Section 3: Investigations, Complaints and Lawsuits

Requirement: A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission. This list should include only those investigations, complaints or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the recipient, submitting the report, not necessarily the larger agency or department of which the recipient is a part.

Response: The SMTC has no active Title VI investigations, complaints or lawsuits alleging discrimination on the basis of race, color or national origin as of December 2014. If in the future there are any investigations, complaints or lawsuits filed, the SMTC is prepared to document these items, by utilizing the table below.

Table 1: List of Investigations, Lawsuits and Complaints

	Date (Month/Day/Year)	Summary (Include basis of complaint, race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
3.				
4.				
5.				
Lawsuits				
1.				
2.				
3.				
4.				
5.				
Complaints				
1.				
2.				
3.				
4.				
5.				

Section 4: Public Participation Plan and Outreach Plan

Requirement: A public participation plan that includes an outreach plan to engage minority and Limited English Proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

Response: Over the years, the SMTC has strengthened the public involvement process used at the agency. In addition to holding public meetings, the SMTC also holds workshops, open houses, charrettes and informational sessions as necessary to allow the greatest opportunity for attendance by the general public and interested groups. Meetings are conducted in locations that are Americans with Disabilities Act (ADA) accessible and convenient to alternate modes of transportation. Underrepresented audiences such as the minority population are often considered when selecting a meeting location, and services for the hearing impaired are provided if requested prior to a public meeting. The SMTC thoroughly continues to reach out to a wide variety of individuals and organizations.

Public meetings often are advertised via direct mailings to residents in a study area. Additional outreach efforts are supplemented by local community and civic organization assistance. Press releases are sent to the local media. Public comment cards are distributed at all SMTC public meetings, while web site surveys are available for some SMTC projects. The collected contact information is maintained in a database and the comments are included in a project's final report.

Following a poorly attended public meeting, staff reviews steps to make the next meeting more successfully attended. The SMTC will look to contact municipal representatives as well as community organizers to seek input on getting better participation. Via these additional outreach efforts subsequent meetings have often been better attended.

The SMTC's current Public Participation Plan can be found on the agency's web site at http://www.smtcmpo.org/pub_involve.asp Staff is in the process of updating the agency's public participation plan. At minimum, a link in the participation plan to this Title VI plan will be available for reference.

It should be noted that beyond the overarching agency's Public Participation Plan, project managers also create individual public involvement plans (PIPs) for projects. In these PIPs, project managers have the opportunity to speak in more detail about how to get their target audiences potentially involved in the project.

In the recent past, definitive outreach efforts to underserved, underrepresented groups were a part of two projects: the Seymour-Shonnard Corridor Study and The I-81 Challenge. Outreach efforts associated with those two projects follow.

Seymour-Shonnard Corridor Study

In the spring and summer of 2008, the SMTC completed a feasibility study for a one-way to two-way street conversion in an area of Syracuse with a high concentration of Spanish speakers. This was the agency's first experience working directly in a neighborhood with LEP concerns. The SMTC did not conduct a demographic analysis at the time, since the need for interpretation and translation services in the focus area was fairly clear. The actions taken were: notices of meetings were translated into Spanish and distributed at the local grocery store and through the bilingual school in the area, oral interpreters were present for all meetings, meeting materials were translated, and final documents were translated as well. Very few residents came to meetings and there have been no requests for the translated final documents, although they are available on the SMTC's web site.

The I-81 Challenge

The SMTC, during The I-81 Challenge worked to ensure the inclusion of minority and Limited English Proficient (LEP) populations throughout the entire planning process. Consistent with guidance from the FHWA, the SMTC prepared an LEP Plan, which identified LEP populations in the study area and outlined a strategy for overcoming any language barriers.

Following protocols developed by the City of Syracuse, the flyers and newsletter advertising public meetings included information in English, Spanish and Vietnamese, letting people know about the availability of translation services and providing a phone number to call to request further assistance.

During the actual public meetings/open houses, it was important to ensure both that LEP attendees knew about the availability of language assistance services and that the project team knew how to help LEP attendees use these services. A language assistance station with translators present, as well as over the phone interpretation (OPI) accommodations were put in place for making sure that any LEP attendees knew that they were welcomed and that their input was valuable.

Section 5: Language Assistance Measures

Requirement: A copy of the recipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.

Response: Included with the development of this agency's Title VI Plan, the SMTC also developed a LEP Plan. The LEP Plan is found in Chapter 2.

Section 6: Committee Membership

Requirement: 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.

Response: The SMTC acts as a forum where long term and immediate transportation planning decisions are made for the region. These decisions are made through committees comprised of officials representing Local, State, and Federal governments or agencies who utilize consensus building models to make transportation planning decisions. The following page shows the members of the three governing committees (i.e, Policy, Planning, and Executive).

With regard to the membership's race and gender, as well as efforts made to encourage the participation of minorities on such committees or councils, the SMTC does not track and/or relay that information as our members are designated by their appropriate agency or through their elected office and not by the SMTC staff.



SMTC COMMITTEE MEMBERSHIP



SMTC POLICY COMMITTEE

Agency

CenterState Corporation for Economic Opportunity
CNY Regional Planning & Development Board
CNY Regional Transportation Authority
City of Syracuse - Office of the Mayor
City of Syracuse Common Council President
City of Syracuse Planning Commission
Empire State Development Corporation
NYS Department of Environmental Conservation
NYS Department of Transportation
NYS Thruway Authority
Onondaga County - Office of the County Executive
Onondaga County Legislature – Chair
Onondaga County Planning Board

Non-Voting / Advisory Agencies

Federal Aviation Administration
Federal Highway Administration
Federal Transit Administration
Madison County Board of Supervisors - Chair
Onondaga Nation
Oswego County Legislature - Chair

SMTC PLANNING COMMITTEE

Agency

CenterState Corporation for Economic Opportunity
CNY Regional Planning & Development Board
CNY Regional Transportation Authority
City of Syracuse Administration
City of Syracuse Division of City Planning
City of Syracuse Department of Public Works & Engineering
Empire State Development Corporation
NYS Department of Environmental Conservation
NYS Department of Transportation
NYS Thruway Authority
Onondaga County Department of Transportation
Onondaga County Legislature
Syracuse-Onondaga County Planning Agency

Non-Voting / Advisory Agencies

Madison County Planning Department
Onondaga Nation
Oswego County Planning Department

SMTC EXECUTIVE COMMITTEE

Agency

CNY Regional Planning & Development Board
CNY Regional Transportation Authority
City of Syracuse
NYS Department of Transportation
Onondaga County

Advisory Agency

Syracuse-Onondaga County Planning Agency

Section 7: Subrecipient Compliance

Requirement: Primary recipients shall include a narrative or 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.

Response: The SMTC is considered a subrecipient of federal funds. NYSDOT, as the primary recipient, asks the SMTC to submit responses to a number of questions relating to Title VI to help ensure that the agency is complying with Title VI requirements. The latest submission given to NYSDOT has been included in the Appendix for reference purposes. NYSDOT has had no issue with any of the responses given to any Title VI program assessment questions to date. It should be noted that some responses to these past program assessment questions may be dated, and if so, are superseded with information found in this document.

Section 8: Construction of Facility

Requirement: 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 during the planning stage with regard to the location of the facility.

Response: This requirement does not apply, as the SMTC is a planning agency and does not partake in the construction of facilities.

Section 9: Reference to MPO Requirements

Requirement: Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a fixed route transit provider, a State, or an MPO.

Response: The SMTC is an MPO and therefore follows the additional requirements specified in Chapter VI of the FTA Circular. The following sections of this report describe how the SMTC is meeting those requirements.

MPO Requirements

Section 10: Reference to General Requirements

Requirement: All general requirements set out in section 4 of Chapter III of this Circular

Response: How the SMTC addresses the general requirements set forth in Chapter III of FTA Circular is described in the previous sections of this report. The following pages lay out the requirements specifically for MPOs and how SMTC is fulfilling those requirements.

Section 11: Demographic Profile

Requirement: A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate,

Response: According to 2010 Census data, the total population for the MPA is 504,672, while the minority population is 98,126. This results in a minority concentration of 19% for the entire MPA. The 19% is being used as the threshold value in the following map to show minority concentration levels. While viewing the map, one will note that the areas of minority concentration occupy a significant portion of area in the City of Syracuse. The area of highest minority concentration spreads across the central portions of the city, as well as significant sections of the southern, western, and northern portions of the city. Minority populations are concentrated in some non-central city areas and suburban areas as well.

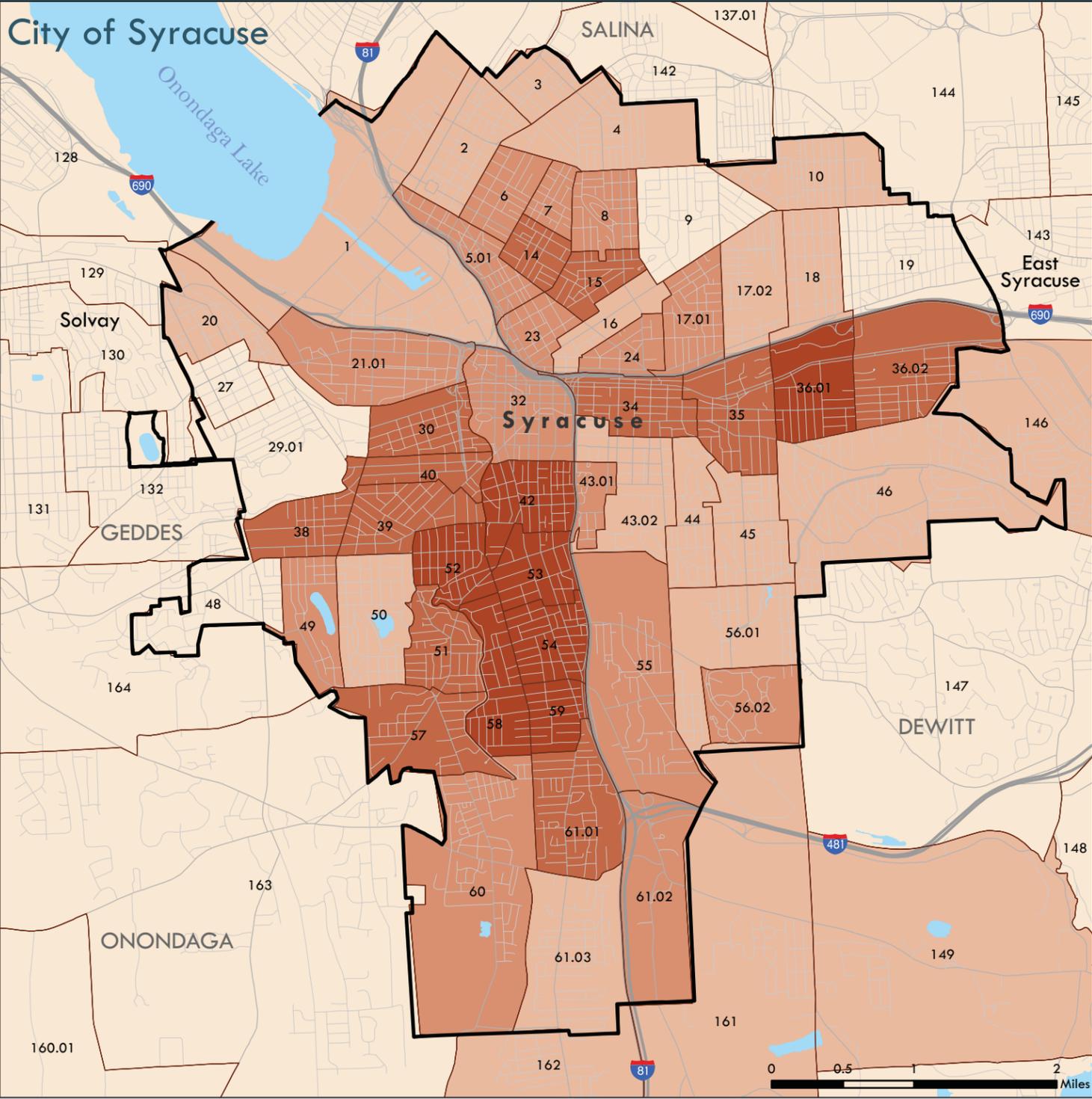
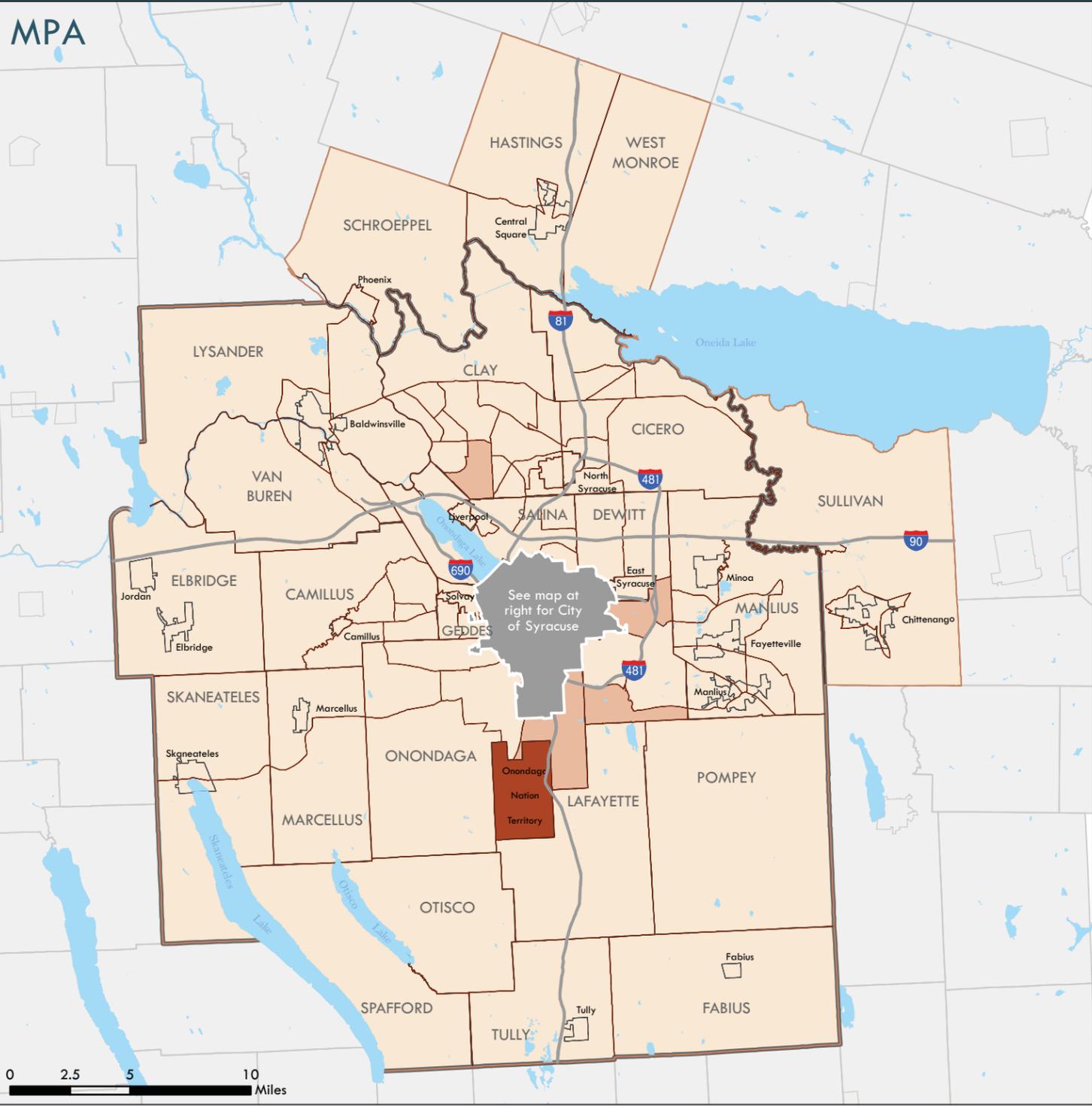
The groups considered in this analysis as minority populations are:

- Black
- Hispanic
- Asian American
- American Indian and Alaskan Native
- Native Hawaiian/ Other Pacific Islander

It should be noted that the Syracuse Metropolitan Area is unique compared to most other urbanized areas because it includes a Native American Nation. The Onondaga Nation Territory is included as one of the suburban areas that have a high concentration of minorities. Although it is a priority of the SMTC to include the Onondaga Nation in their planning activities, the nation has often declined to participate in the SMTC's activities as an affirmation of their sovereignty. Please note that the data provided by the Census Bureau regarding the Onondaga Nation may include several inaccuracies. However, these data were determined to be the most reliable source of demographic information pertaining to the Nation that was available to the SMTC.

Above and beyond identification of the minority concentration, pages in this report immediately following the minority concentration map are taken from the SMTC's soon to be published "Transportation Atlas". The "demographic profile" section includes an examination of the following variables: population density, population change, households, change in number of households, age of population, poverty, race, household income and employment. Each demographic variable breaks off the MPA's largest entity, the City of Syracuse, and compares it to the remainder of the MPA. A combination of 2010 Census information and American Community Survey (ACS) data was used to develop this demographic profile.

Minority Areas of Concentration



SMTC
 100 Clinton Square
 126 North Salina St, Suite 100
 Syracuse, NY 13202
 (315) 422-5716
 Fax: (315) 422-7753
 www.smtcmpo.org



Data Sources: SMTC, NYSDOT,
 2010 US Census
 Prepared by SMTC, 11/2014

Note: The total minority percentage for the MPA, according to 2010 Census data, is 19%.

Minority Areas of Concentration by 2010 Census Tract Title VI & LEP Plan for SMTC MPA

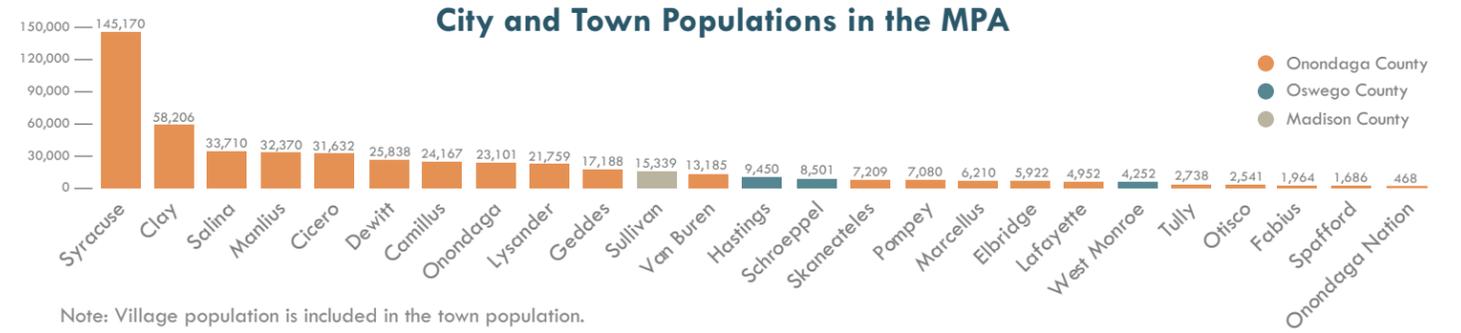
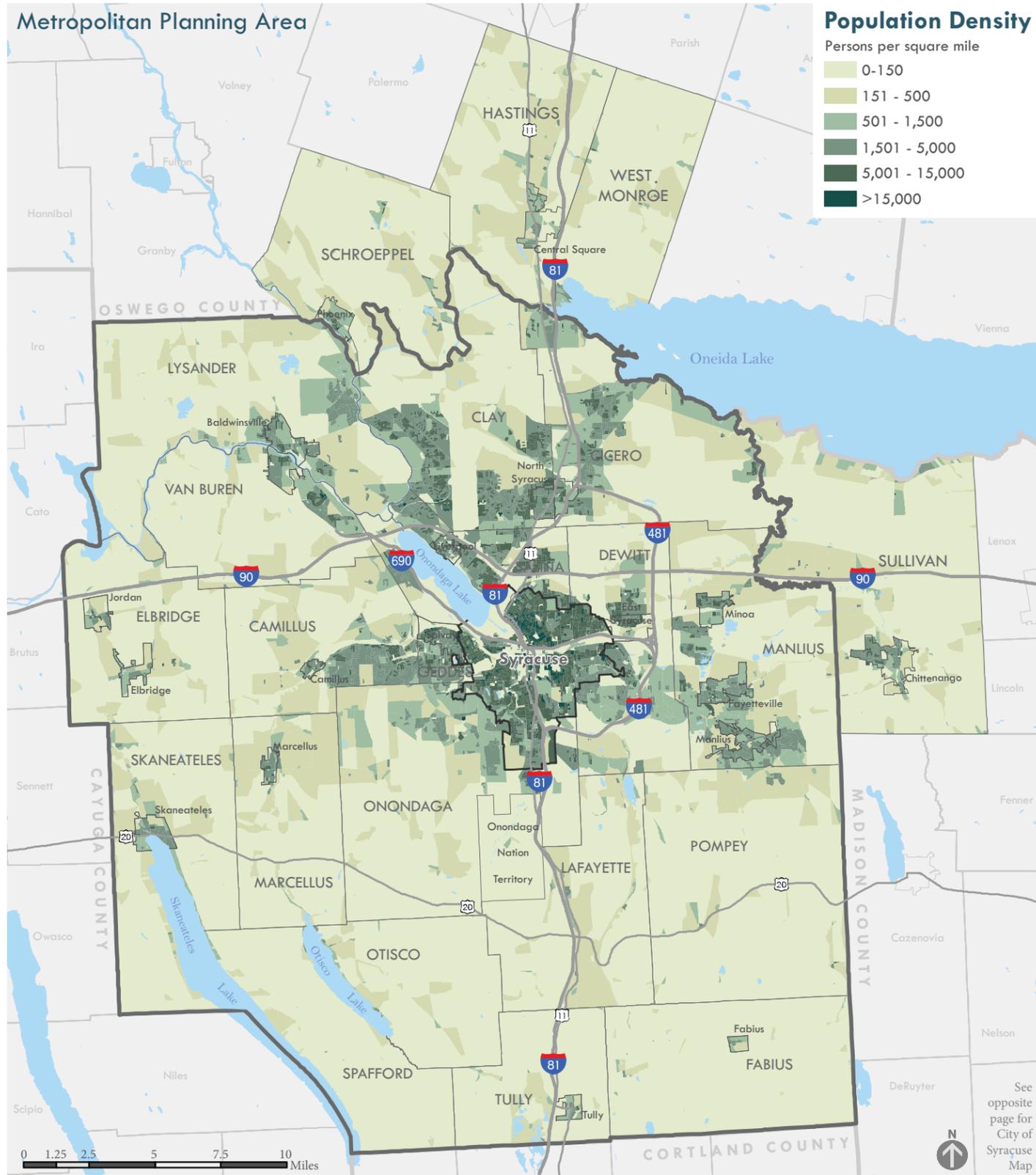
This map is for presentation purposes only.
 The SMTC does not guarantee the accuracy or completeness of this map.

Legend	Percent Minority
— Interstates	0% - 19%
— Major Roads	20% - 40%
— Local Roads	41% - 60%
▭ City of Syracuse	61% - 80%
▭ Municipal Boundaries	81% - 100%

Please note that Census boundaries do not always match those of minor civil divisions.

Population Density

- Population is concentrated within the City of Syracuse and towns immediately adjacent to the City.
- The northern and eastern portions of the region are generally more densely populated than the southern and western portions, with pockets of density in the villages throughout the region.
- The highest population density is found on the northside of the City of Syracuse.

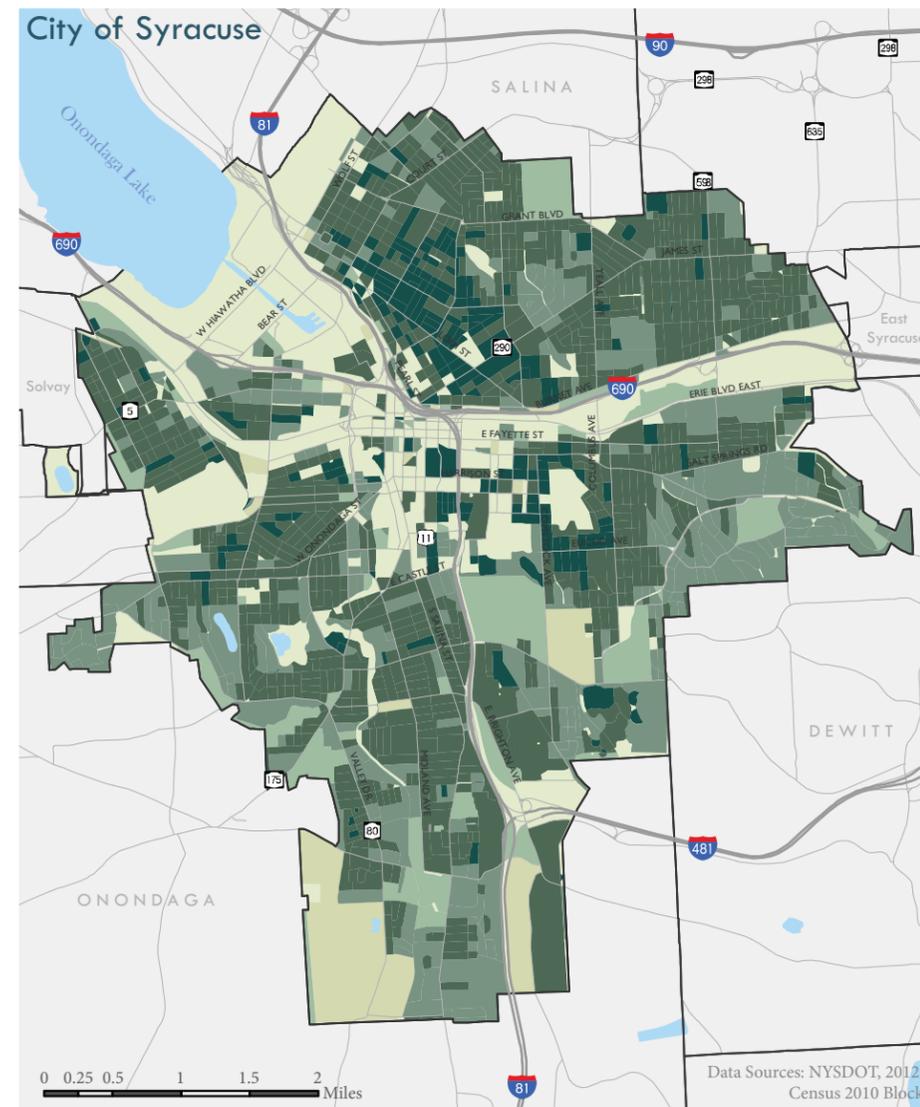


Just over 30 percent of Onondaga County's total population lives in the City of Syracuse according to the 2010 Census, making the City of Syracuse's population greater than any other single town within Onondaga County and the

Metropolitan Planning Area. The second most populous municipality within Onondaga County is the Town of Clay, with 58,206 people or 12.5 percent of the County's total population. Outside of the City, the towns immediately

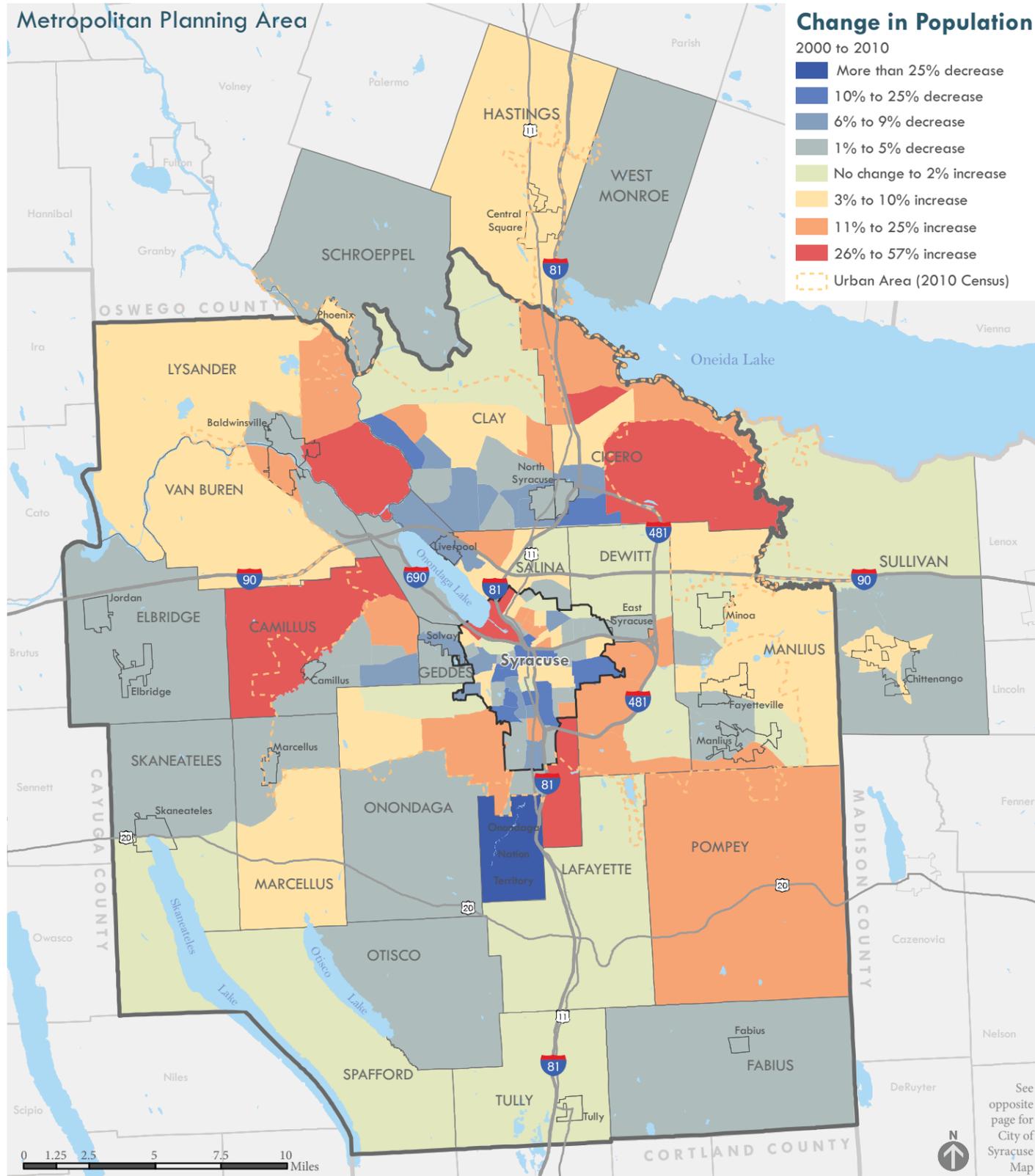
adjacent to the City are generally the most populous with a marked concentration of population to the east and, especially, the north of the city. These towns generally have a suburban character and in some cases, particularly for the towns immediately adjacent to the city, areas with a more urban character. The towns south of the city and to the far west of the city have much lower population density and a much more rural character, although pockets of density can be found in the numerous villages throughout the area.

Within the City of Syracuse, the highest population density is found on the northside. Some areas of the City show very low population density, on par with the most rural areas of the County. The low-density areas of the City are generally occupied by special non-residential land uses, such as large City parks, Destiny USA, the NBT Bank Stadium - Regional Market - Regional Transportation Center complex, and Syracuse University's main campus. Other low-density areas include Erie Boulevard, which is characterized by very suburban-style retail uses, and Downtown Syracuse, which has only recently experienced a renaissance of residential space as evidenced by the very small pockets of high density within downtown.

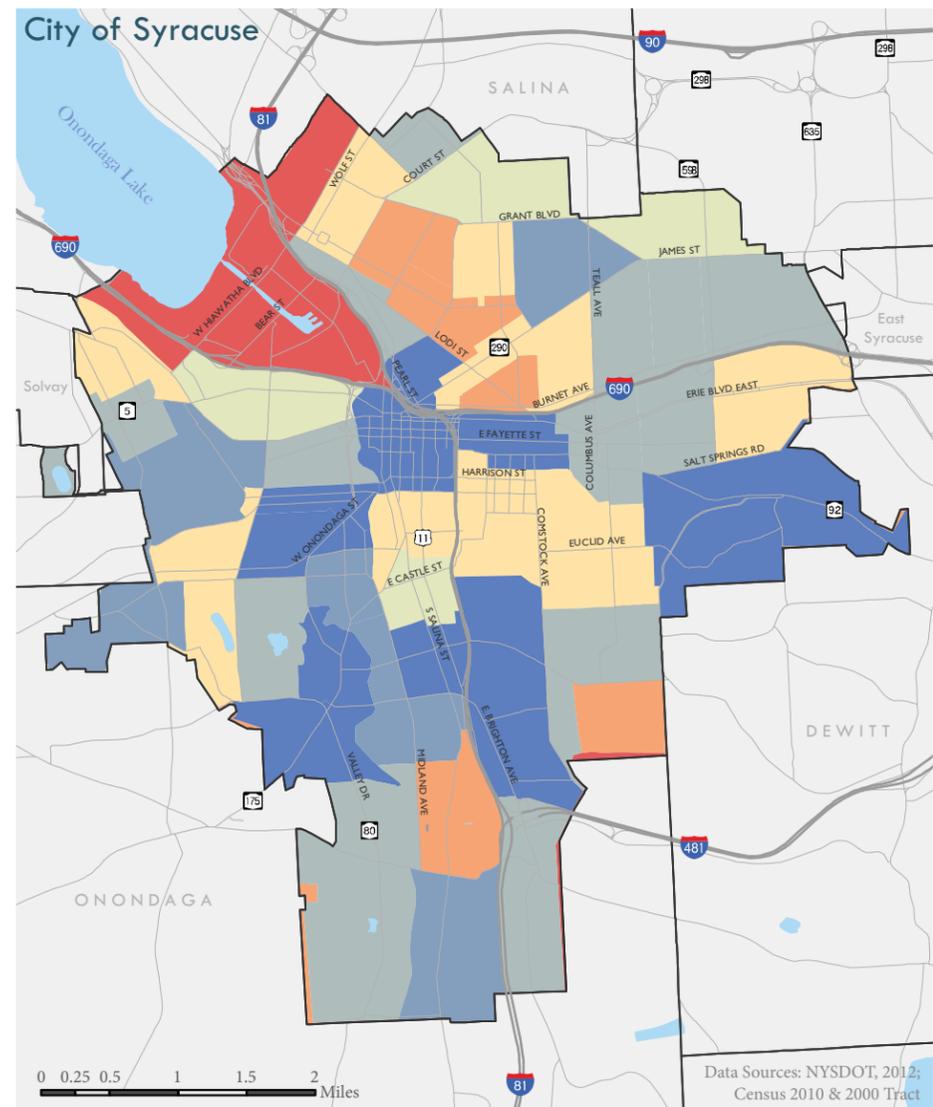
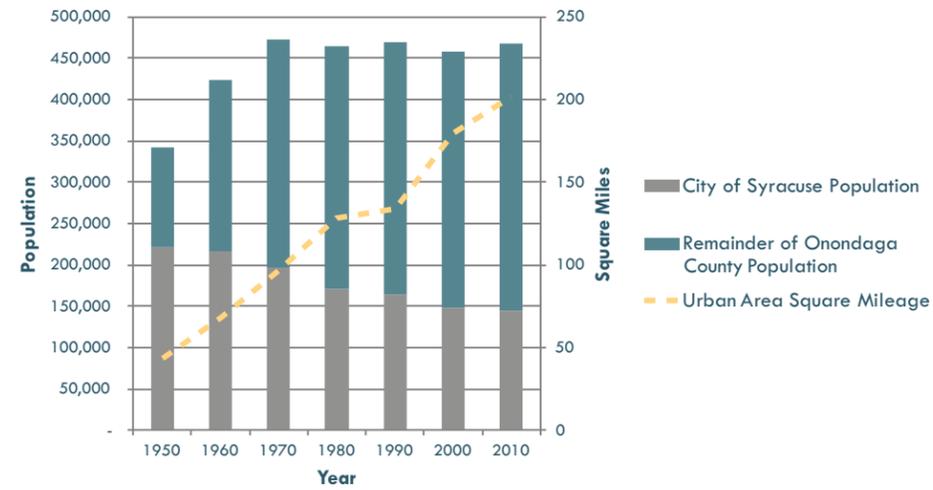


Population Change

- Onondaga County's population peaked in 1970. The total population of the County has remained fairly stable since then, though individual municipalities have experienced more pronounced gains and losses in population.
- The land area considered "urban" has continually increased since 1950.
- The City of Syracuse's total population peaked in 1950 and has continuously declined since then.



Population of City of Syracuse and Onondaga County with Square Mileage of Urban Area, 1950 to 2010

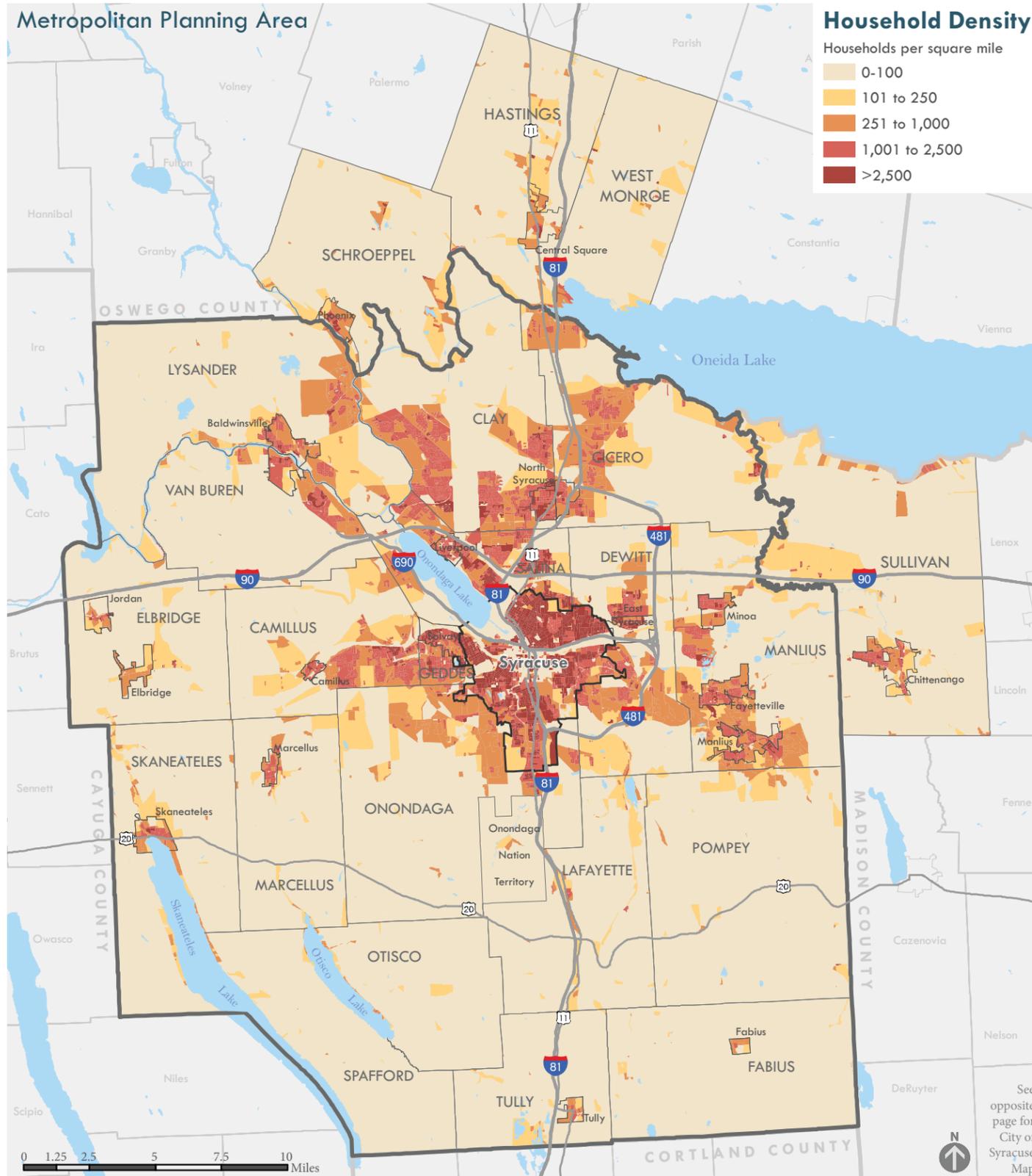


The total population of the MPA (using the 2010 boundary) increased from 495,354 in 2000 to 504,672 in 2010. This is a total increase of 1.9% over the 10-year period. The County's population peaked in 1970 and has remained fairly stable since that time. However, the City of Syracuse saw its population decline from over 220,000 people in 1950 to 145,170 people in 2010. When the County's population peaked in 1970, over 40 percent of the County's total population resided in the City of Syracuse. In 2010, the City's population accounted for just over 30 percent of the County's total population.

The most substantial population loss for the City of Syracuse occurred between 1970 and 1980, when the City population declined by nearly 14 percent. This outflow of population slowed down between 1980 and 1990, but increased again to a loss of over 10 percent from 1990 to 2000. The 2010 Census data show a loss of less than 1 percent of the City's population over the last decade, but only time will tell if this is a first step towards population stabilization within the City of Syracuse. The decline of the City population coupled with a fairly stable County population indicates that the population has decentralized over time, and this trend is also reflected by the expansion of the Urban Area (an official boundary that encompasses the densely-settled portion of our region, containing what most people would characterize as both urban and suburban areas). Towns around the City of Syracuse have experienced some growth even as Onondaga County's population has stayed relatively flat. In the most recent interval from 2000 to 2010, the highest growth generally occurred in towns north and northwest of the City. Towns adjacent to the City saw lower levels of growth, or some decline, likely due to the fact that these "inner ring" suburbs were mostly built-out over the previous decades.

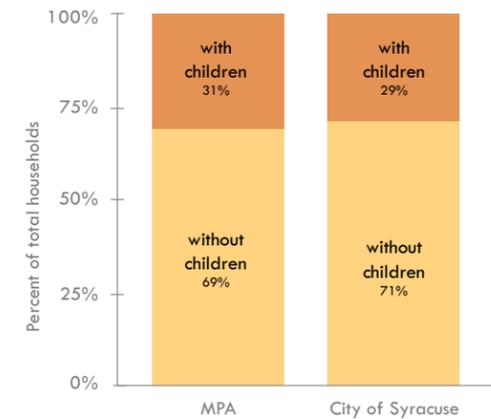
Households

- The geographic pattern of household density is very similar to population density, with the highest density in the city and the adjacent towns.
- Average household size in the MPA is 2.41 people.
- About 30% of all households in the MPA are 1-person households.

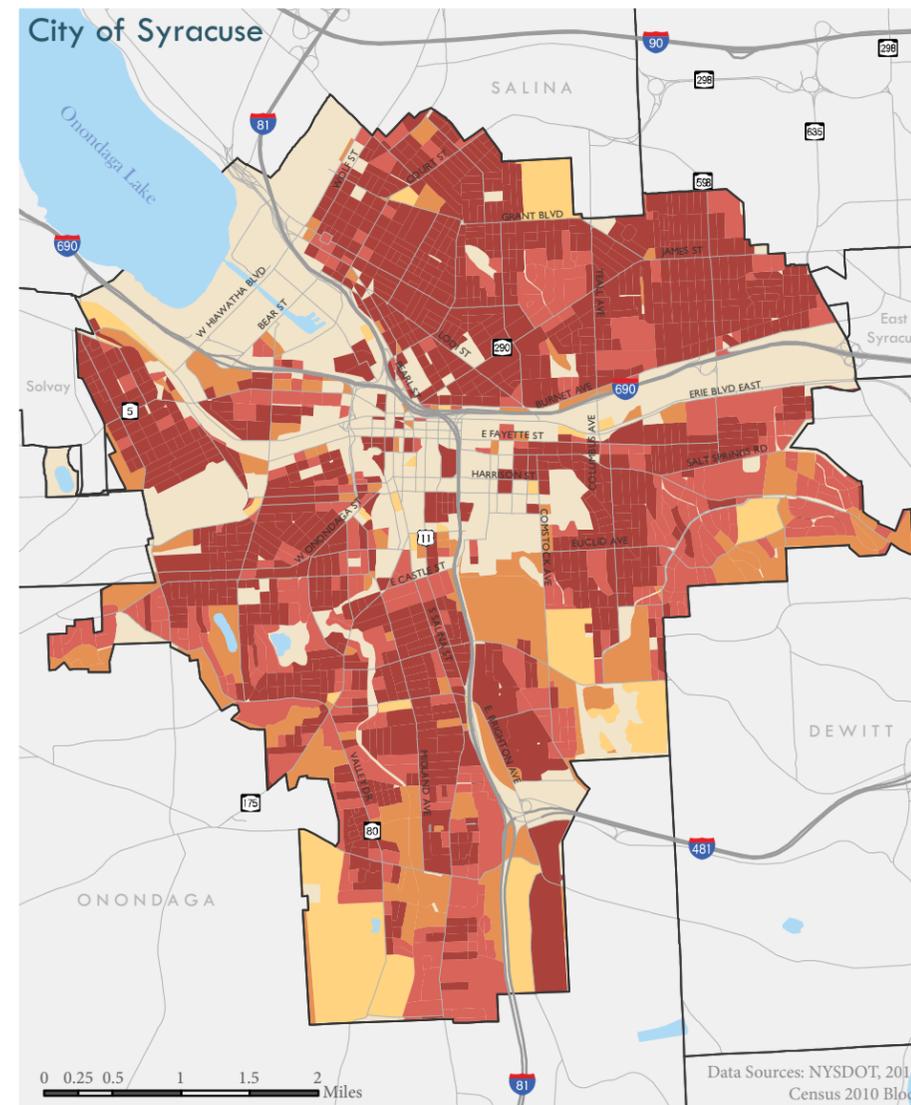
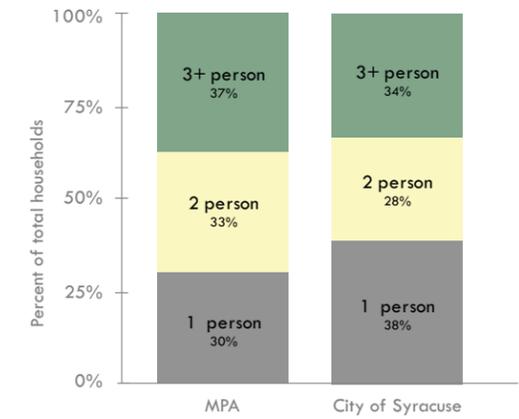


Household Characteristics

Households by presence of children under 18 years



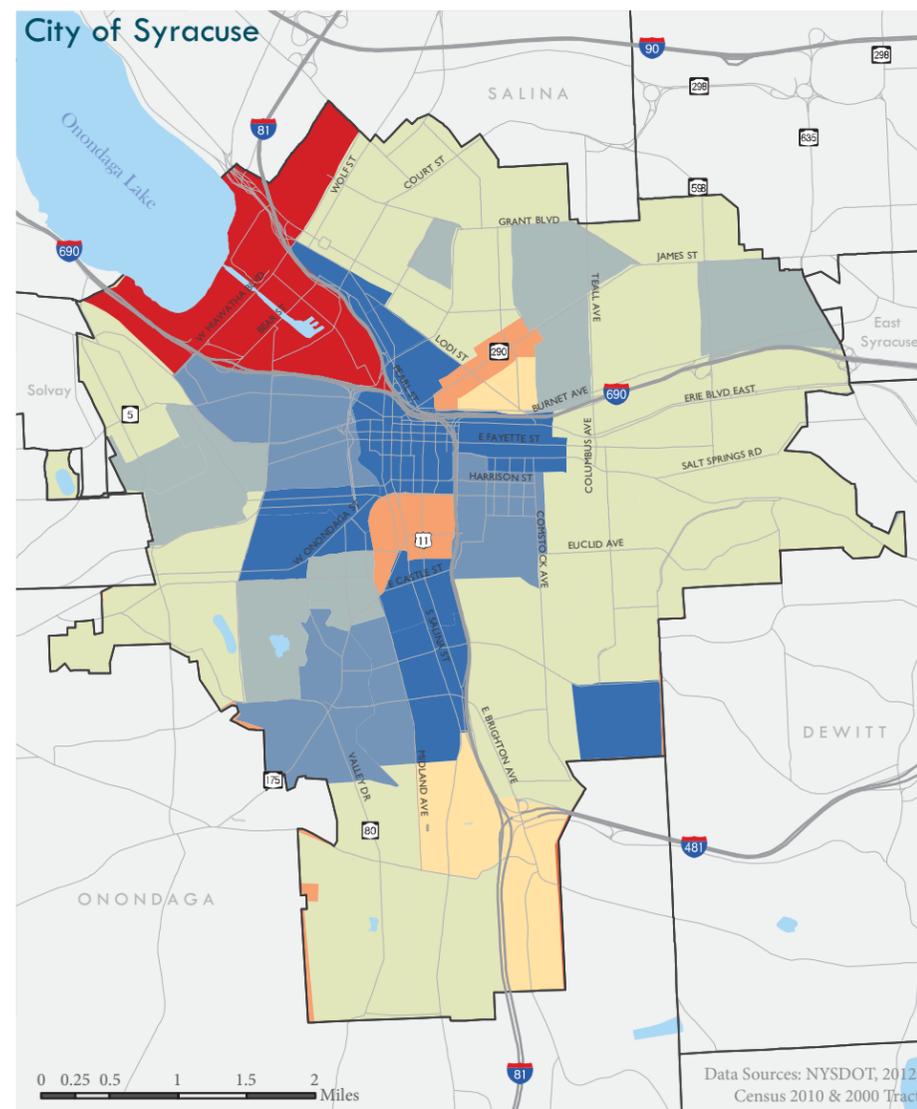
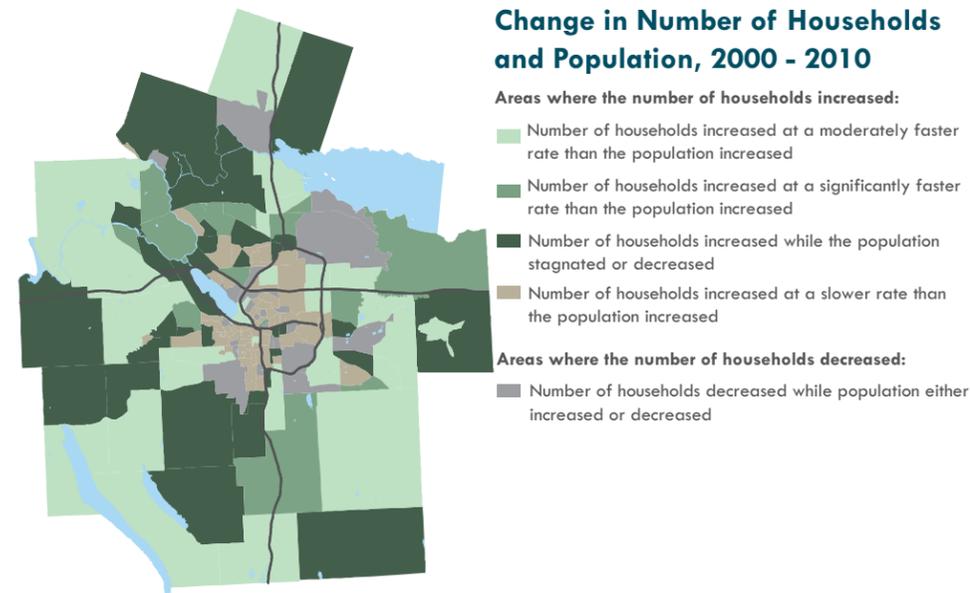
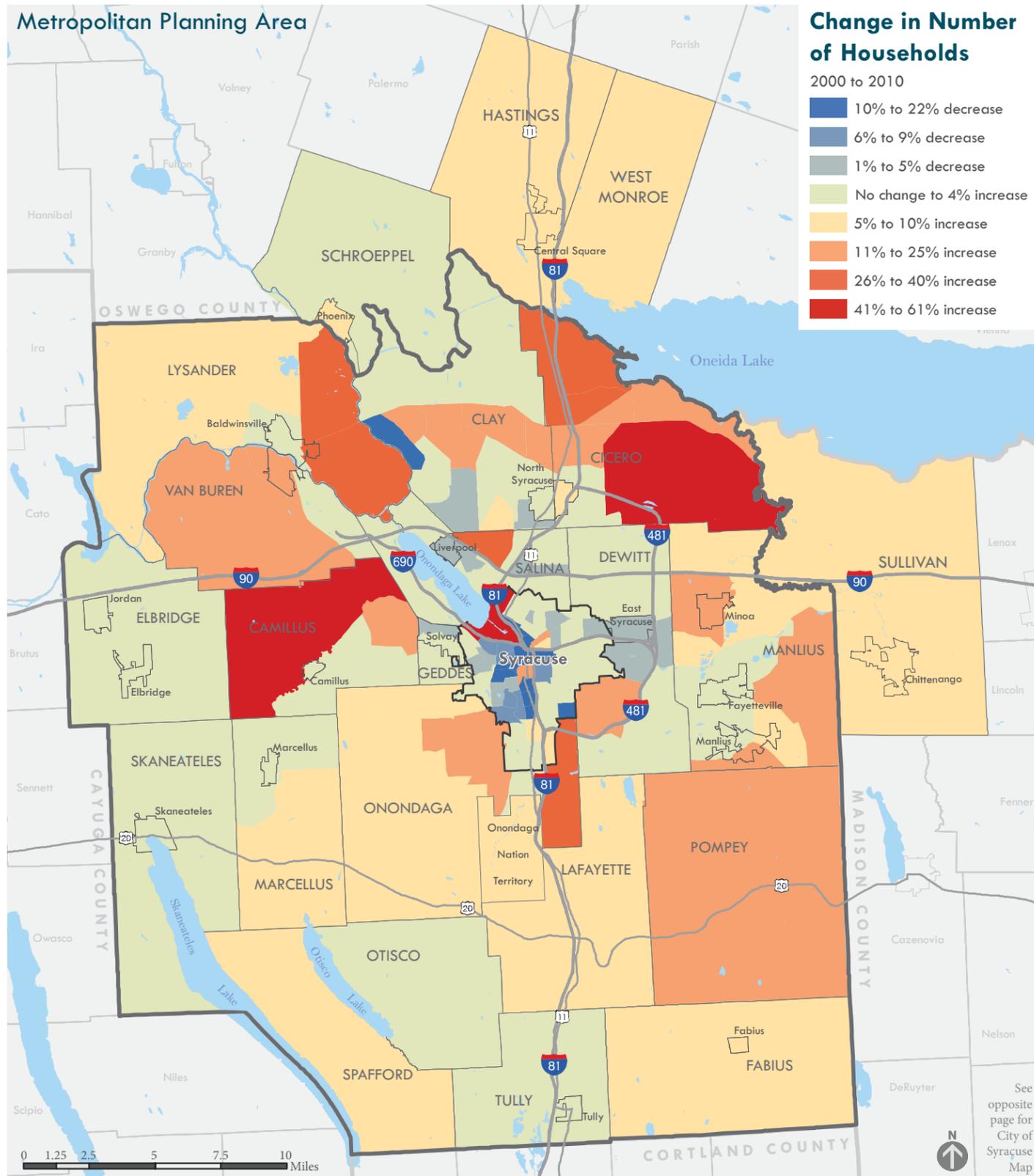
Household size



The density of households throughout the region is very similar to the density of population throughout the region, with the highest density of households located in the City of Syracuse and additional areas of density adjacent to the city and in the villages throughout the region. There were 202,476 total households in the MPA according to the 2010 Census with an average household size of 2.41 people. Average household size is slightly lower in the City of Syracuse – 2.31 people – than in the overall MPA. One-person households make up 30% of the total households in the MPA, another 33% of households consist of two people, and the remaining 37% of households include 3 or more people. Only about 30% of the total households in the MPA have at least one member under the age of 18.

Change in Number of Households

- Between 2000 and 2010, the total number of households in the MPA grew at twice the rate of the population increase.
- Growth in households was concentrated primarily in towns at the edges of the MPA.
- In most of the MPA, the increase in number of households outpaced the increase in population.

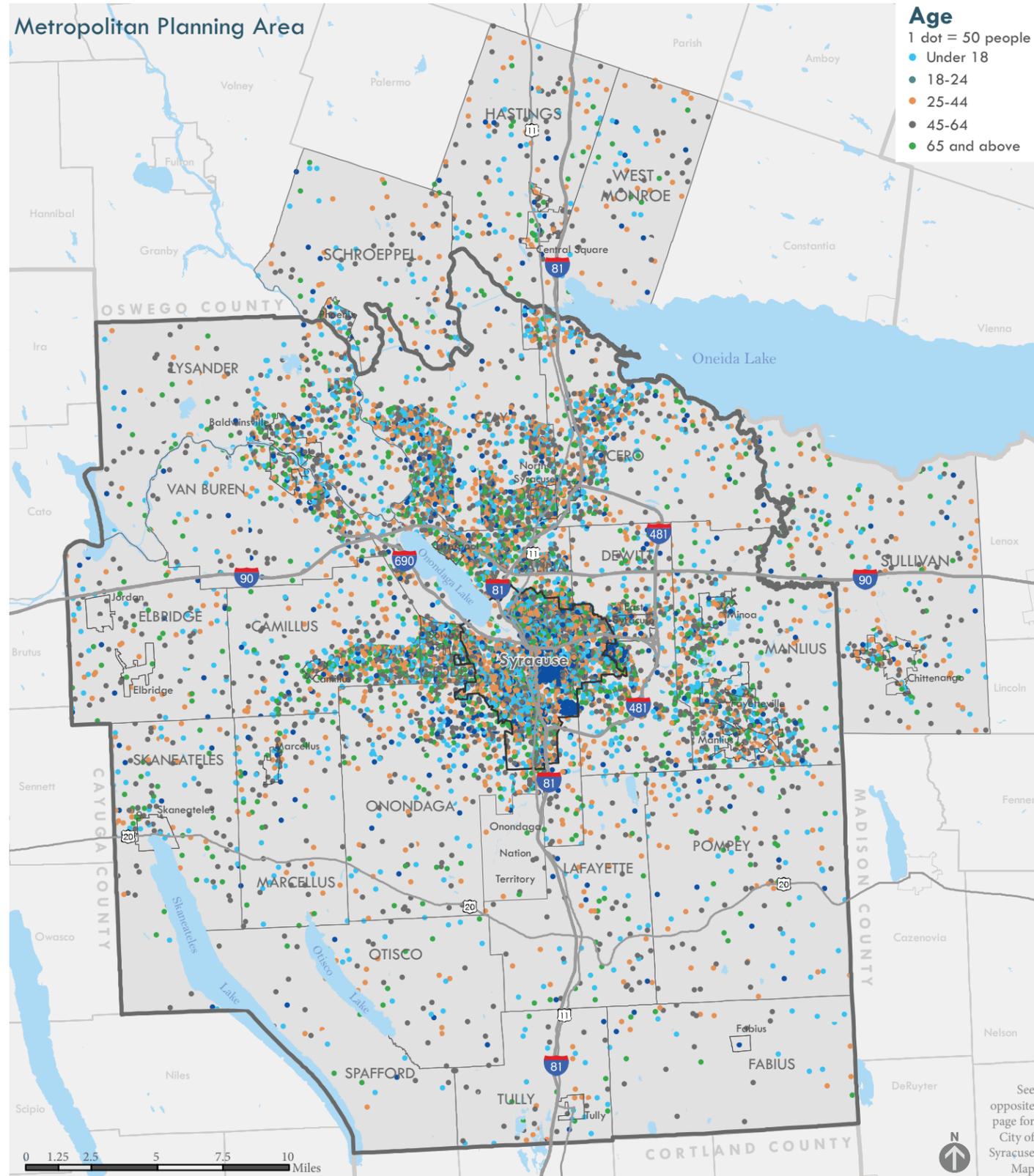


Between 2000 and 2010, the number of households in the MPA increased from 195,045 to 202,476. As shown by the maps at left, this growth in households primarily occurred in the towns at the edges of the MPA, outside of the City of Syracuse. Exceptions include some areas of decreasing households in the towns of Dewitt, Salina, and Clay, as well as a few areas within the City that experienced an increase in the number of households. Large parts of the MPA, including much of the City, saw a relatively constant number of households over this decade (zero to 4% increase).

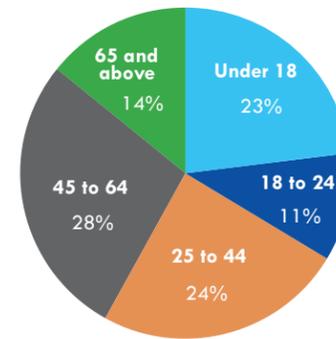
Household change should be considered alongside the change in population. In our region, the increase in households has outpaced the increase in population. The growth in the population of the MPA between 2000 and 2010 was only 1.9%, while the number of households increased 3.9% over the same timeframe. Some areas of the region experienced this disproportionate growth in households more acutely than others. The green areas on the small map at left show the areas of the MPA where the number of households increased faster than the population, with the darkest green denoting areas that experienced an increase in the number of households with either a stagnating or declining population. This situation – household growth outpacing population growth – coincides with the increase in smaller households, including one-person households, and the expansion of our urban area.

Age of the Population

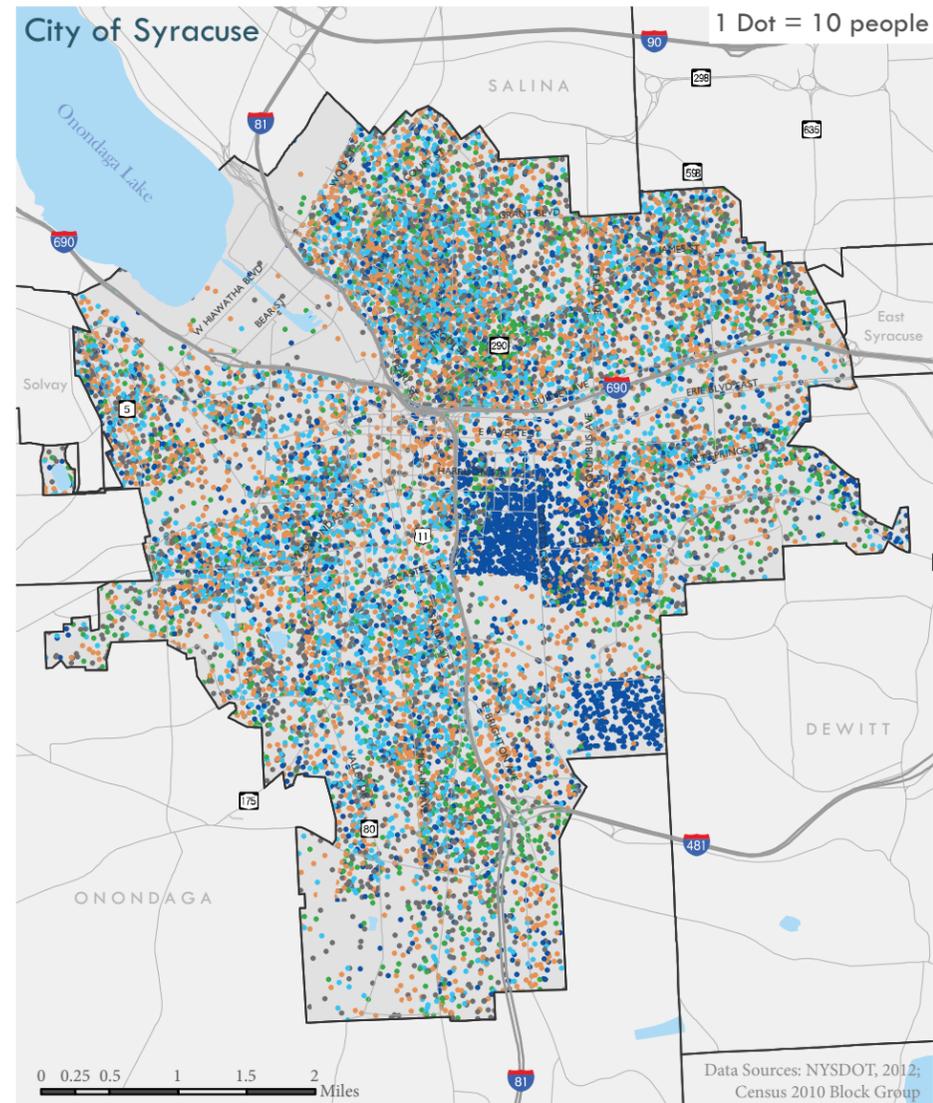
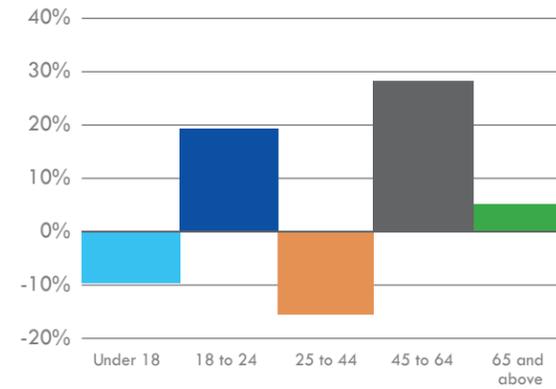
- Over half of the MPA population is between the ages of 25 and 64.
- Median age has increased and recent growth in the 45-64 year age group outpaced growth in any other bracket, reflecting the aging of the “Baby Boom” generation.
- Age groups are generally evenly distributed except for concentrations of young adults around local colleges.



2010 MPA Population by Age Group



Percent Change in Population by Age Group 2000-2010



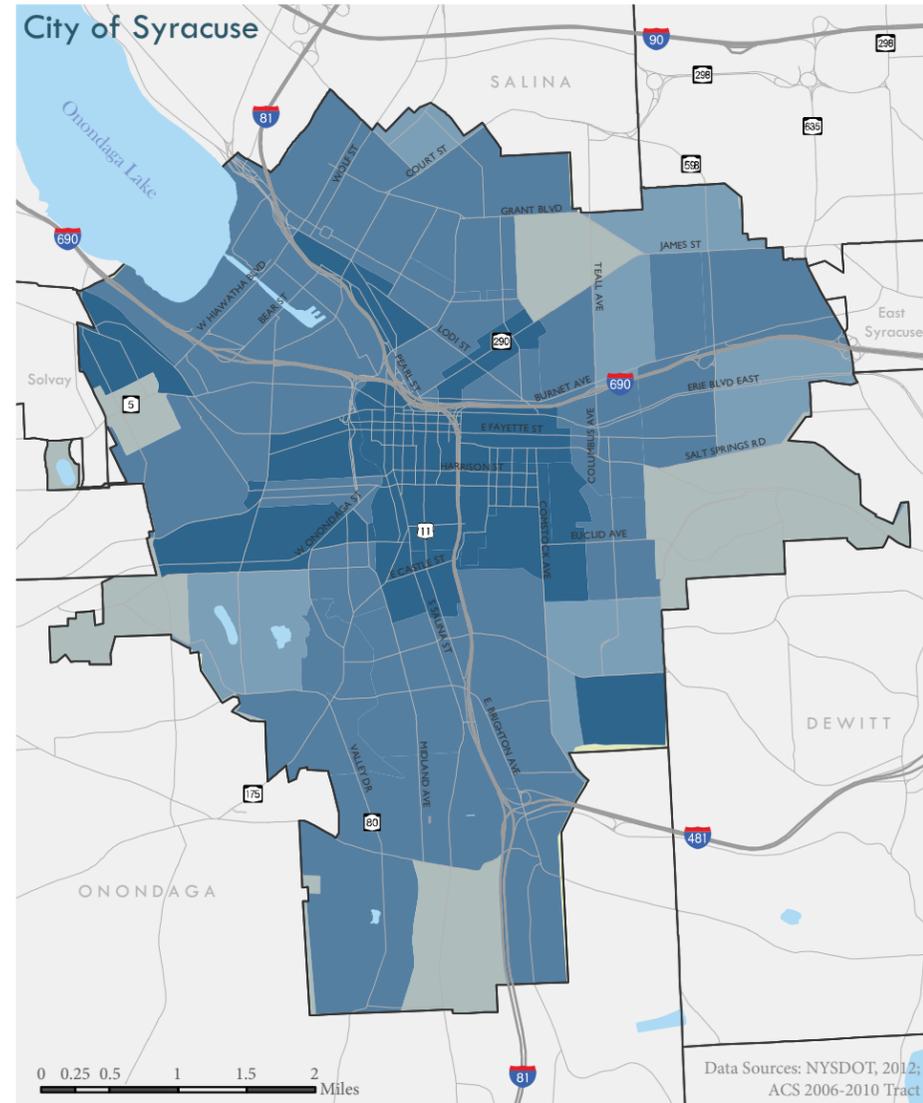
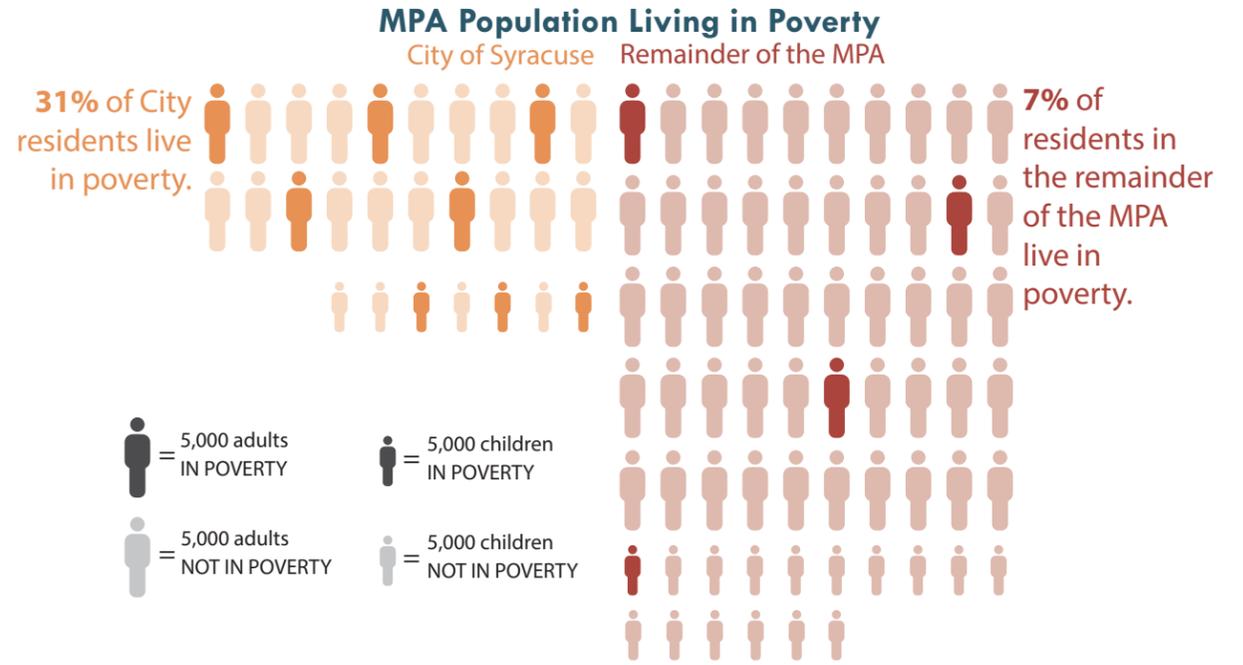
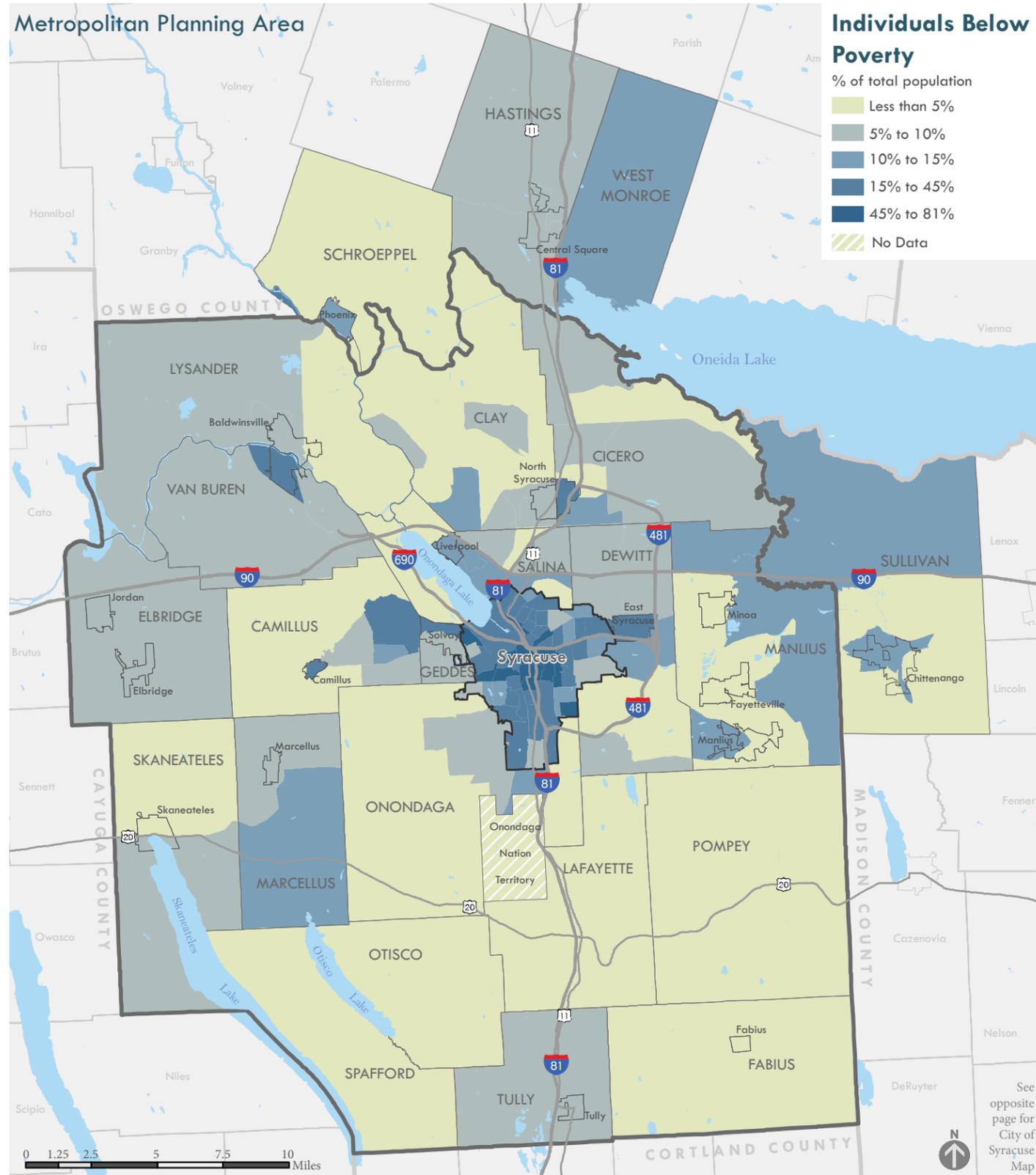
Overall, all age groups seem to be fairly well-distributed throughout the region, with a few exceptions such as the concentrations of young adults (18-24 years) around Syracuse University, Lemoyne College (along the City of Syracuse-Town of DeWitt boundary), and Onondaga Community College (in the Town of Onondaga). Some concentrations of senior citizens are also evident at the southern end of the City of Syracuse and along James Street near downtown Syracuse (due to the presence of senior housing and assisted living facilities).

Age impacts the travel and mobility needs of the population. People under 18 years of age make up 23% of Onondaga County's population. This group is either legally too young to drive or still very likely to be dependent on their parents for transportation. Eleven percent of Onondaga County's population falls into the 18-24 year old category, which likely includes many college students who may not have access to their own vehicle or, if they do have their own vehicle, do not follow typical commuting patterns. Taken together, the 25-44 year old group and the 45-64 year old group constitute the core of the workforce – and thus commuters – and account for over half of Onondaga County's population. Those age 65 or older make up 14% of Onondaga County's population. Many of these people are likely retired. This group may also have physical mobility limitations.

Although over 85 percent of the MPA population was under the age of 65 in 2010, trends suggest that the region has an aging population. Median age in Onondaga County has climbed from 29.7 years in 1980 to 38.6 years in 2010. Between 2000 and 2010, the number of MPA residents aged 45-64 years grew by nearly 30%, outpacing growth in any other age bracket. This age group represents the large “Baby Boom” generation – those born between approximately 1946 and 1966. The first of the Baby Boomers are just beginning to reach retirement age.

Poverty

- Poverty in our MPA is concentrated within the City of Syracuse.
- Poverty rates are higher for children under 18 than for the general population.

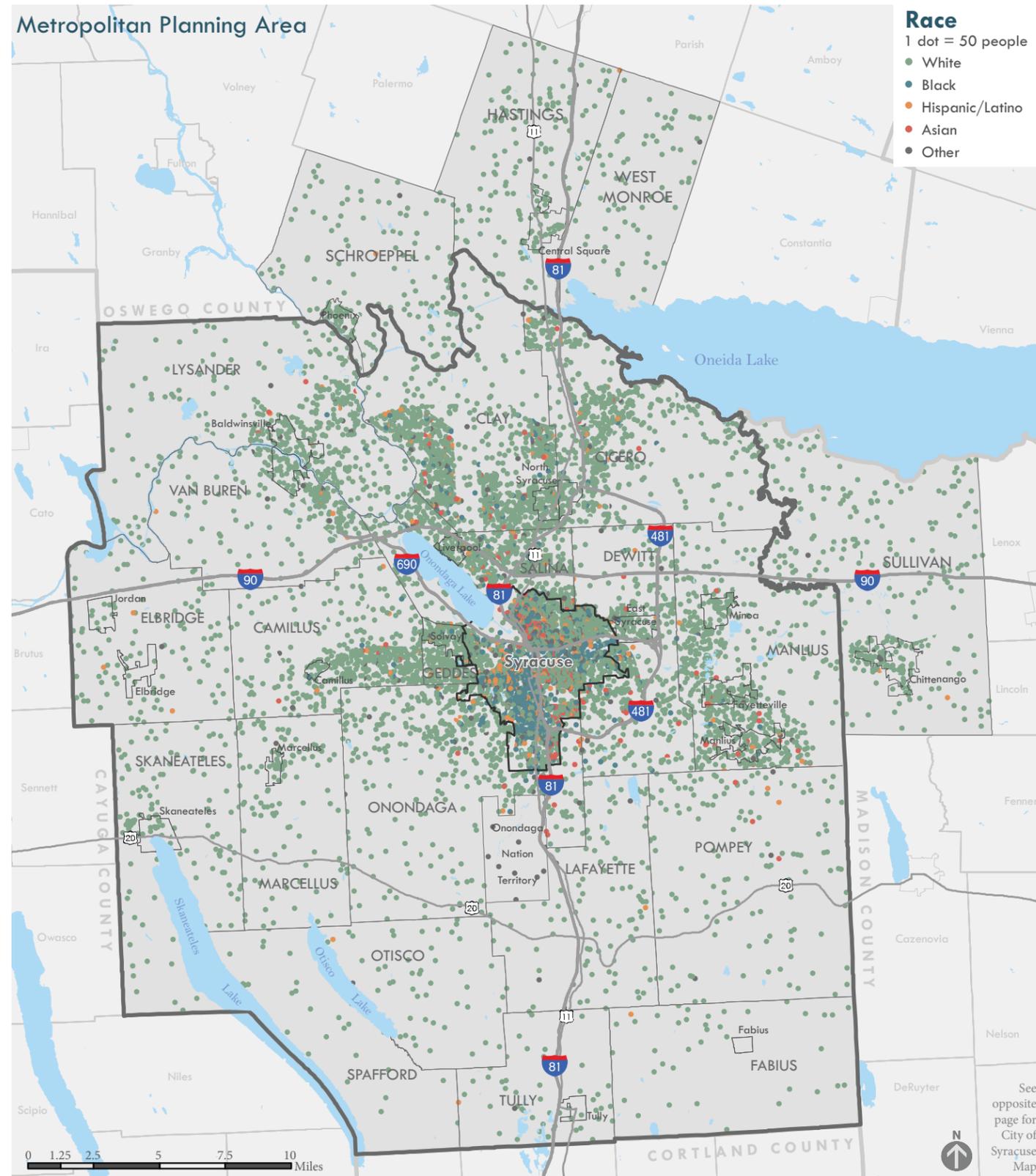


Poverty rates vary significantly across our region. The MPA map at left shows large areas of the MPA with very low poverty (less than 5 percent); however, the areas with the lowest poverty also tend to overlap with the areas of our lowest population density. Within the more populated areas of the MPA outside of the city, poverty rates are mostly in the range of 5 percent to 15 percent. The poverty rate in the MPA overall is 13 percent, while the poverty rate in the City of Syracuse is 31 percent. As the map shows, in some areas of the city the poverty rate exceeds 45 percent. There are over 64,700 individuals that live in poverty in our MPA, and over 41,400 of these people reside in the City of Syracuse. The poverty rate is higher for children than for the general population in both the MPA and the city, with 19 percent of children in the MPA living in poverty and 44 percent of children in the City of Syracuse living in poverty.

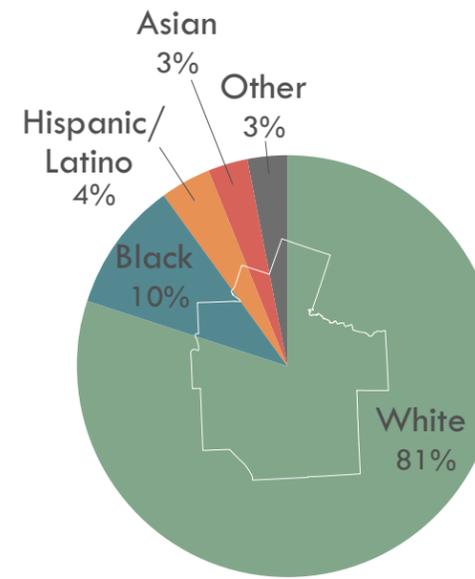
(Note: These statistics rely on the 2006-2010 American Community Survey Data for poverty status in the last 12 months, with percentages [rates] based on the Census-defined "population for whom poverty status is determined," which does not include people living in college dormitories and institutional group quarters. The ACS uses set dollar value thresholds that vary by family size and composition and adhere to the standards specified by the Office of Management and Budget Statistical Policy Directive 14.)

Race

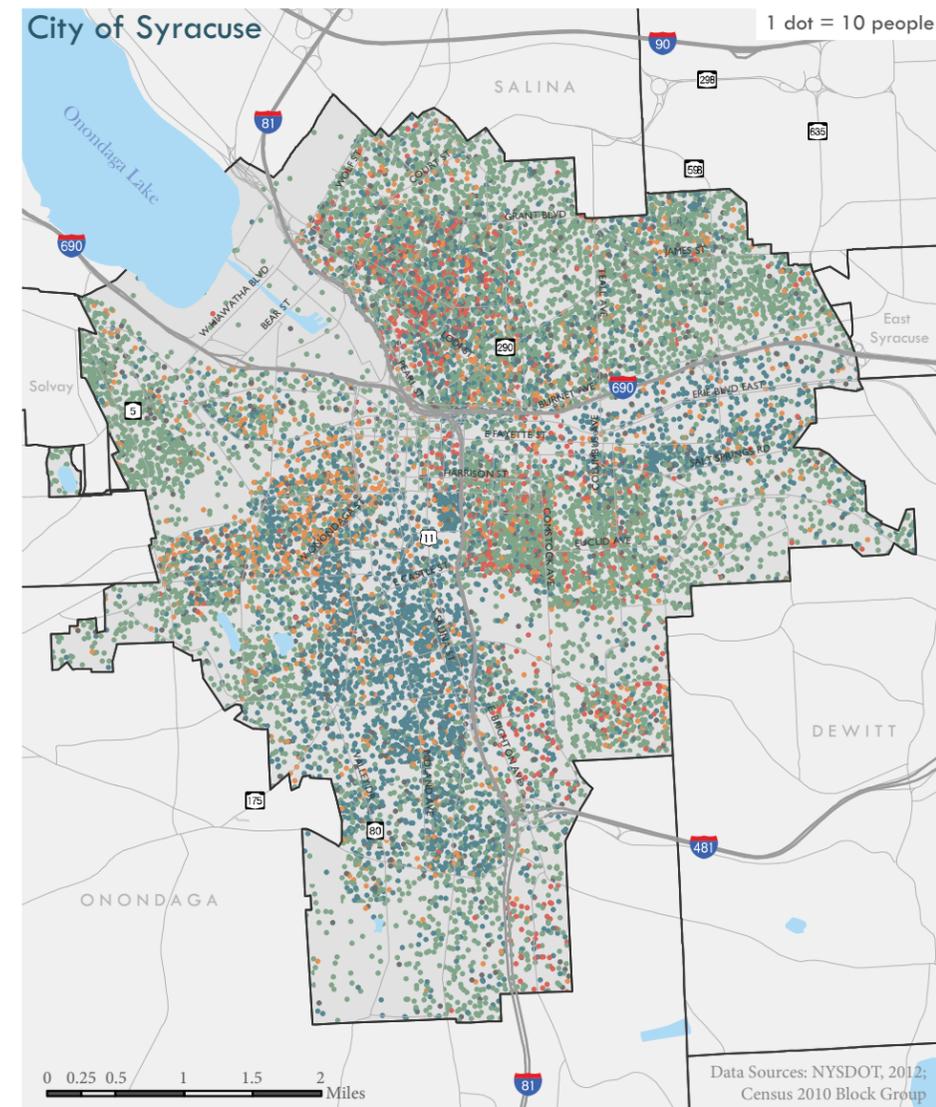
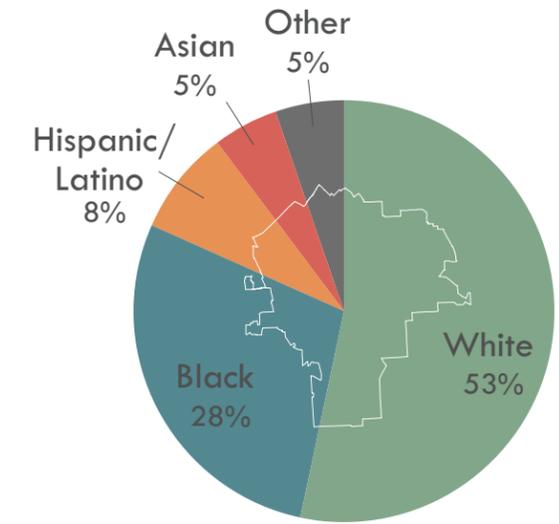
- Over 80% of the total MPA population is white, while only 53% of the City of Syracuse population is white.
- Non-white residents are primarily clustered in the neighborhoods just outside of downtown Syracuse.



Race in the MPA



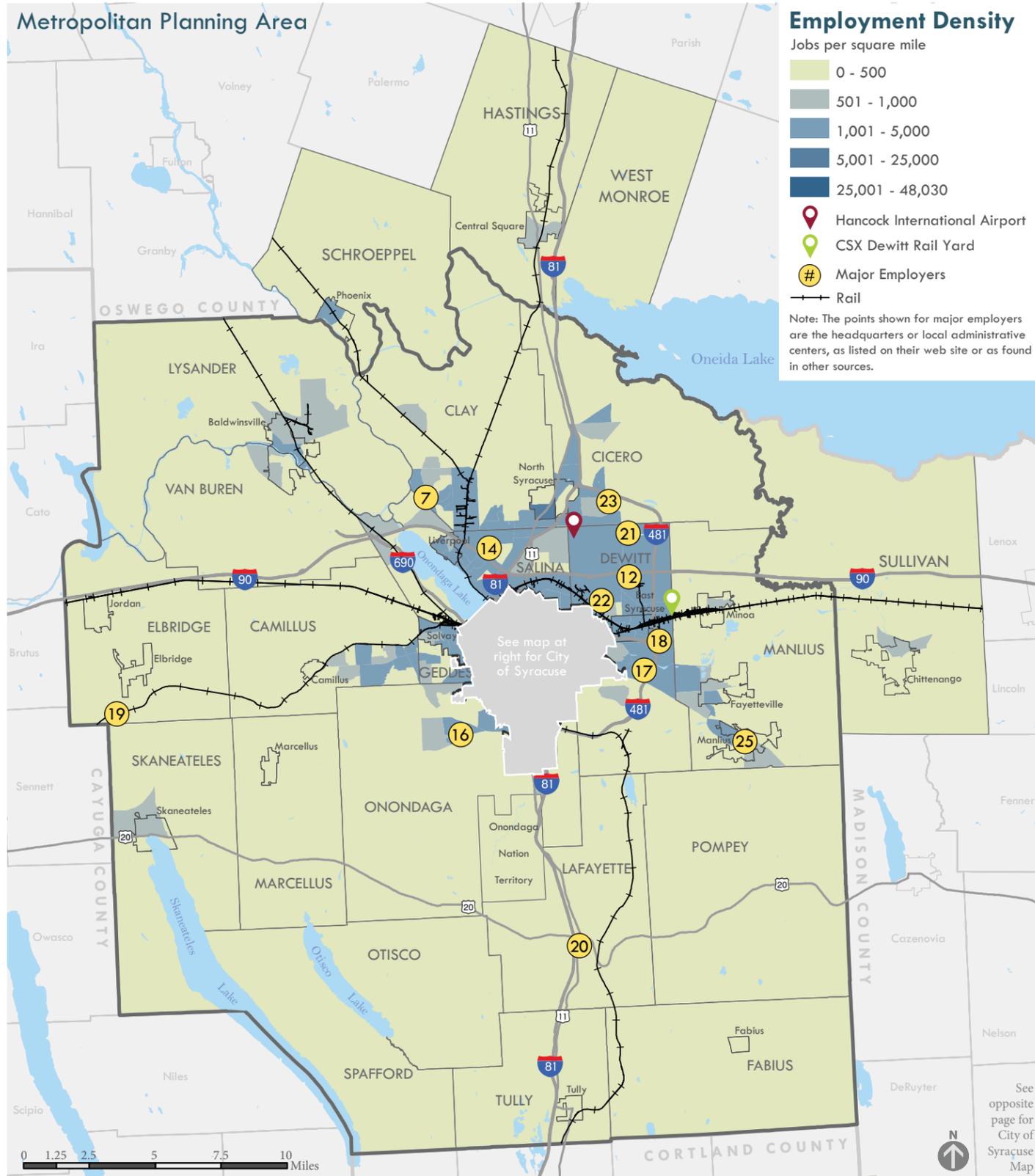
Race in the City of Syracuse



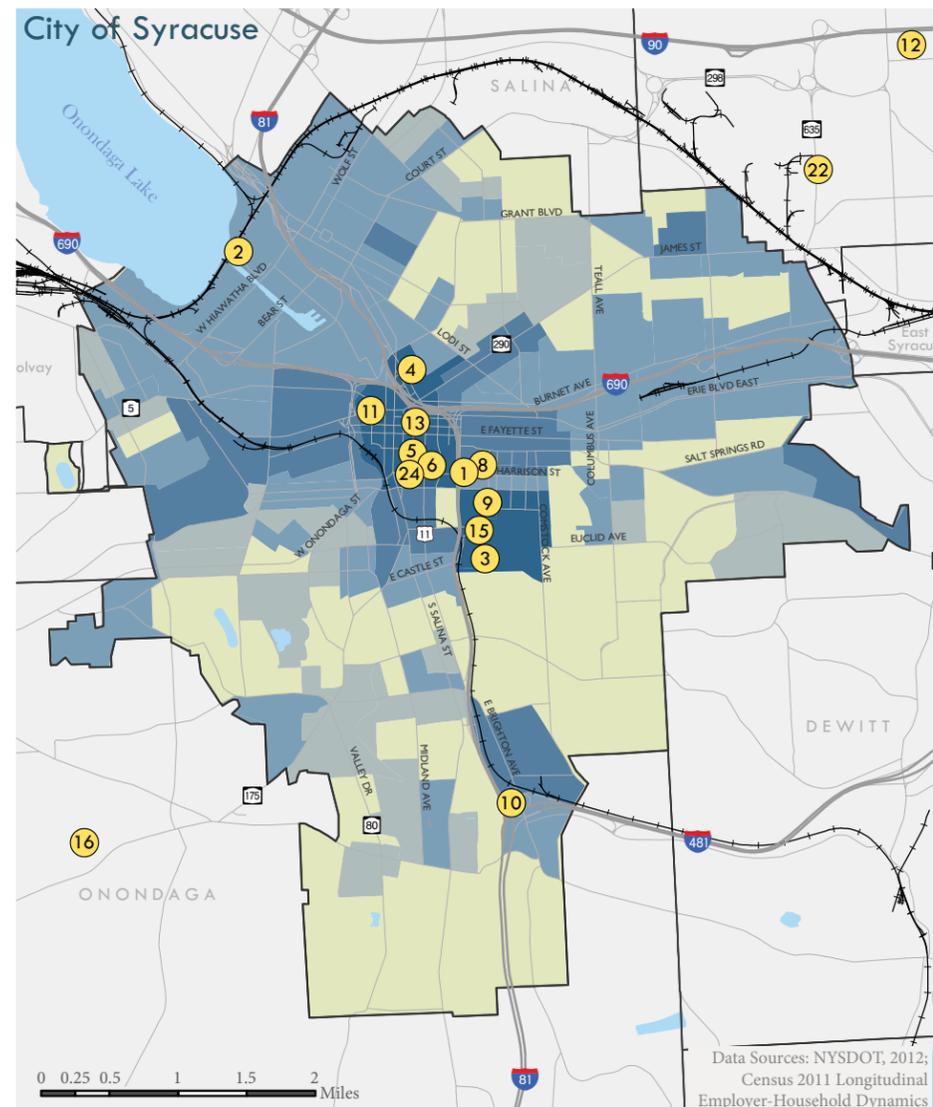
As shown by the maps and charts at left, there are notable differences between the racial makeup of the MPA population as a whole and the City of Syracuse population. While over 80 percent of the MPA population is white, only 53 percent of the City of Syracuse population is white. Seventy percent of the MPA's non-white population resides in the City of Syracuse. City neighborhoods generally show more racial diversity than the towns outside of the City; however, even within the city, racial groups are not evenly distributed across neighborhoods. The City of Syracuse map at left shows black residents clustered primarily in neighborhoods south of downtown and west of I-81, Hispanic/Latino residents clustered in neighborhoods west of downtown, and Asian residents primarily clustered in northside neighborhoods.

Employment

- Total regional employment is approximately 246,400, with 82 percent of that total located in the City of Syracuse and the five largest towns (DeWitt, Clay, Salina, Cicero and Manlius).
- Four of the region's ten largest employers are located on University Hill. However, most (57 percent) of the jobs in the City of Syracuse are located outside of Downtown or University Hill at smaller employers.



Major Employers



The employment density maps illustrate the importance of Downtown Syracuse, University Hill, and the inner-ring suburbs to the regional economy. Four of the region's ten largest employers are located on University Hill, and a fifth is located just north of Downtown. The northern portion of the Town of DeWitt, which benefits from access to Hancock International Airport, I-90, I-481 and a major railroad hub, is also home to major employers.

The City of Syracuse is the region's economic core, with over 90,000 jobs (37 percent of the region's total) located in the city. Approximately 20,000 of these are located in Downtown Syracuse and another 18,000 are located on University Hill. Put another way, 15 percent of the region's total employment is packed into a pair of districts totaling just over one square mile. While several of the region's largest employers are located in these two parts of the city, it is worth noting that the bulk of the jobs in Syracuse (52,700 jobs, or 57 percent of the city's total) are at smaller employers distributed throughout the city, such as in the Erie Boulevard corridor or the Lakefront area.

The municipality with the greatest number of jobs, after the City of Syracuse, is the Town of DeWitt with 43,220 total jobs. Taken together, the Towns of DeWitt, Clay, Salina and Cicero are home to nearly as many jobs as the City of Syracuse, with employment density (number of jobs per square mile) greatest near the city. Employment centers radiate out from the city to the west, north and east along rail lines and major roadway corridors.

The region's villages and hamlets, many of which are located at the junction of major roads, also play an important role economically. Suburban centers, like Skaneateles, Baldwinsville and Fayetteville, are focal points for shopping and small businesses, as well as for manufacturing.

Section 12: Mobility Needs

Requirement: A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process.

Response: The following are the procedures taken by the SMTC to ensure that the mobility needs of the minority population are not only identified but considered within the planning process.

In general, the SMTC makes sure that meetings are conducted in locations that are not only ADA accessible but also convenient to alternative modes of transportation. Underrepresented audiences are often considered when selecting a meeting location and services for the hearing impaired are provided if requested prior to the public meeting. The SMTC will also make every effort to respond to those who need a sign language interpreter, assistive learning system, or any other accommodations to facilitate the public's participation in the transportation planning process.

In addition to the outreach efforts of the SMTC, the Central New York Regional Transportation Authority (Centro), the area's public transit provider and an SMTC member agency, provides travel training. This training is advertised via the flyer on the following page. The SMTC, a recipient of a handful of these flyers, can look to make them available when and if needed at appropriate meetings and to further assist the mobility needs of the minority populations.

The map that follows the flyer shows the Centro bus routes in the SMTC planning area. Most of the routes, when overlaying it onto a minority concentration map go through many areas. This is further supported by an analysis that was done for Centro's own Title VI report completed in 2013, in which a large percentage of the minority population was found to exist within a half-mile buffer of Centro's bus routes. The table below shows the results of the buffer analysis completed in Centro's report.

Table 2: Centro's Buffer Analysis

Buffer Analysis				
County	Cayuga	Oneida	Onondaga	Oswego
Population	80,026	234,878	467,026	122,109
Population in Centro Service Area	41,077 (51%)	123,886 (53%)	339,230 (73%)	48,546 (40%)
Households	31,455	93,028	187,686	46,400
Households in Centro Service Area	16,652 (53%)	51,238 (55%)	138,784 (74%)	18,271 (39%)
Number of Low Income Households in Centro Service Area	8,317 (65%)	26,519 (69%)	62,564 (87%)	10,853 (56%)
Minority Population	6,928	35,624	96,986	6,018
Minority Population in Centro Service Area	5,467 (79%)	28,193 (79%)	88,883 (92%)	3,541 (59%)

*Note Cayuga & Oneida Counties, & a large portion of Oswego County are not part of the SMTC MPA.

The SMTC having analyzed the Centro routes in comparison to the Minority Census Tracts is fully aware of the demographic make-up of its MPA and makes sure as noted above, that any of its project meetings affecting a minority neighborhood, are held at locations that are convenient to alternate modes of transportation, thereby making any public meetings held in those areas accessible by public transit.

Travel Training

Centro's Travel Training program provides outreach services to citizens, community based organizations, and agencies that depend on Centro's public transit system. By providing face-to-face contact within the community and assisting individuals with a desire to learn more about Centro's services, the Travel Trainer is able to customize instruction on how to ride the bus. This approach allows riders to feel more comfortable and confident with using Centro's service while gaining an understanding of how the service is provided.



How Does it Work?

Travel Training offers personalized, one-on-one or group travel training instruction. Taking each trainee's unique needs and abilities into account, the Travel Trainer will teach participants how to safely and independently use the Centro system.

The Travel Trainer will travel with trainees to their desired destinations at times of their choice. Destinations may include work, school, medical offices, and recreation sites.

Who is Eligible for Travel Training?

Travel Training is available to anyone interested in learning how to use the Centro transit system. There are no restrictions – all are welcome!

Participating Organizations

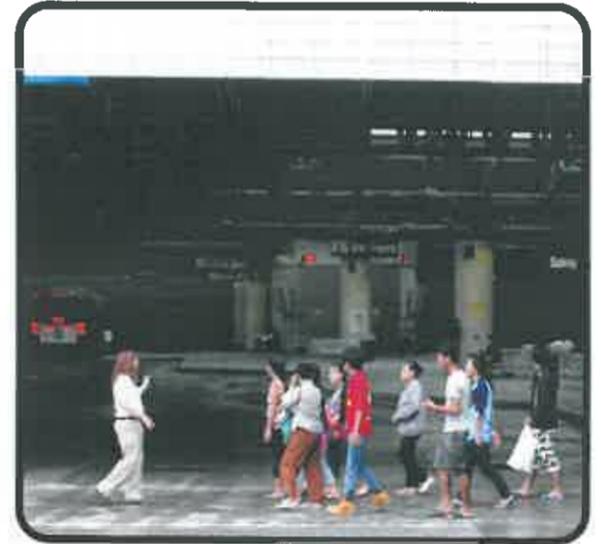
Community organizations that have participated in Centro's Travel Training program include:

- Refugee Assistance Program
- Catholic Charities
- Center for New Americans
- Early Head Start Refugee Program
- The Salvation Army
- AIDS Community Resources
- Providence House Apartments
- Food Pantry Volunteers
- Arc of Onondaga
- AURORA of Central New York



Centro Service Area

Travel Training is available in all areas that Centro provides transit services to including: Syracuse, Utica, Oswego, Auburn, Fulton, Rome, and Mexico.



Training Benefits

How Will Travel Training Help Me?

Participants in Centro's Travel Training program will gain the following:

- Freedom, mobility, and independence
- Access to safe, low-cost transportation
- Travel skills and self-confidence
- The ability to be active in the community

What Will I Learn?

The Travel Training program will teach you how to:

- Plan your trip
- Get to and from a bus stop
- Purchase Centro Ride Passes
- Ride a specific route
- Identify bus numbers and stops
- Board with a mobility device
- Use the farebox
- Use a transfer
- Read and understand bus schedules



Let us show you how to use the Centro public transit system.

To learn more about Centro's Travel Training program, or to schedule an appointment with a Travel Trainer, contact us today at:

Travel Training Program

vsonne@centro.org
(315) 410-7116



Easy to use, hard to beat.



Central New York
Regional Transportation Authority
200 Cortland Avenue
P.O. Box 820
Syracuse, NY 13205-0820

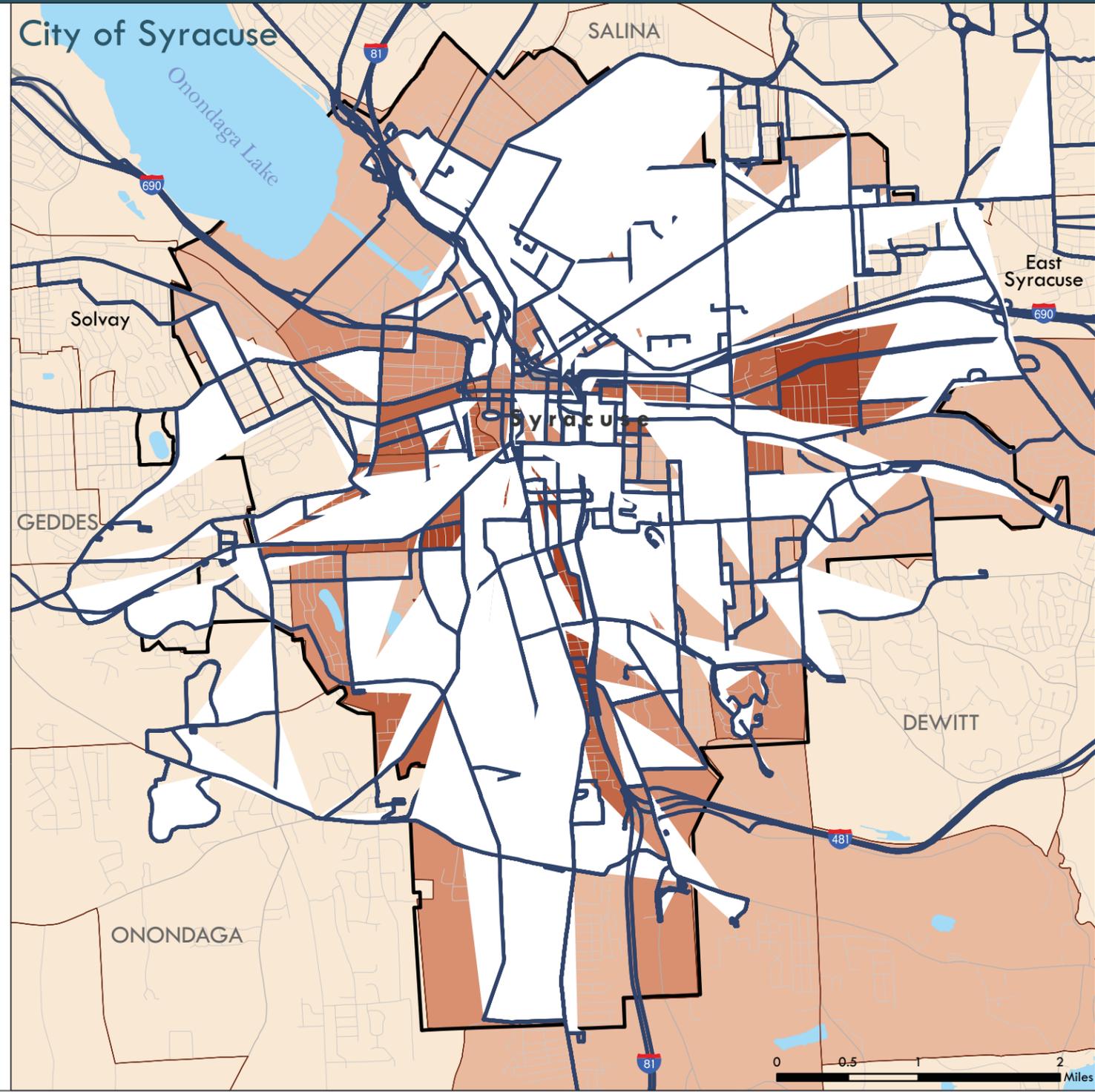
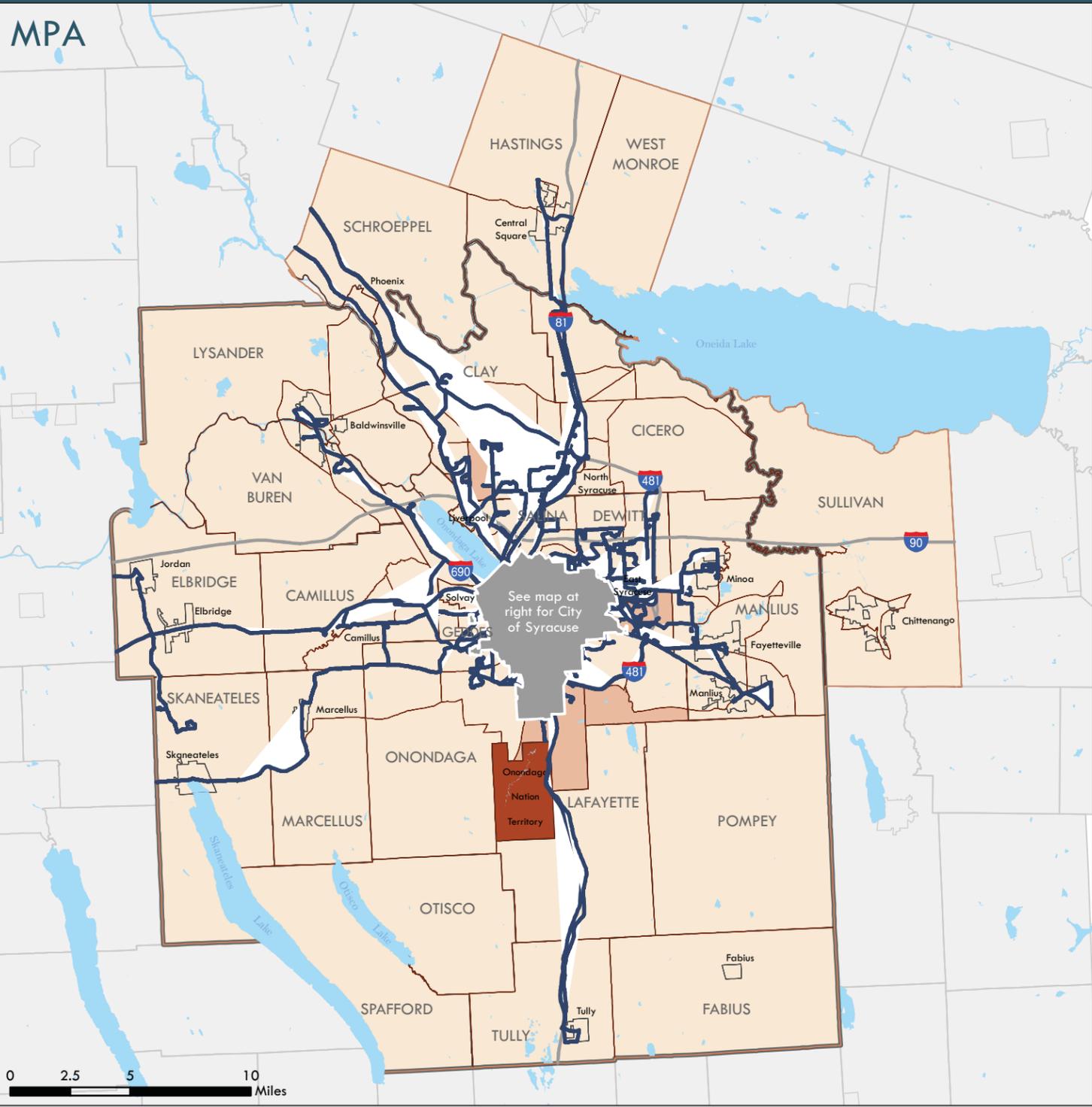
www.centro.org • (315) 442-3400

Centro Travel Training



Easy to use, hard to beat.

Centro Routes and Percent Minority



SMTC
 100 Clinton Square
 126 North Salina St, Suite 100
 Syracuse, NY 13202
 (315) 422-5716
 Fax: (315) 422-7753
 www.smtcmpo.org



Data Sources: SMTC, NYSDOT,
 2010 US Census, CNYRTA
 Prepared by SMTC, 11/2014

Note: The total minority percentage for the MPA,
 according to 2010 Census data, is 19%.

Centro Routes and Percent Minority by 2010 Census Tract Title VI & LEP Plan for SMTC MPA

This map is for presentation purposes only.
 The SMTC does not guarantee the accuracy or completeness of this map.

Legend		Percent Minority	
— Interstates	— Centro Routes	0% - 19%	61% - 80%
— Major Roads	▭ City of Syracuse	20% - 40%	81% - 100%
— Local Roads	▭ Municipal Boundaries	41% - 60%	

Please note that Census boundaries do not always match those of minor civil divisions.

Section 13: Distribution of State and Federal Funds

Requirement: 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.

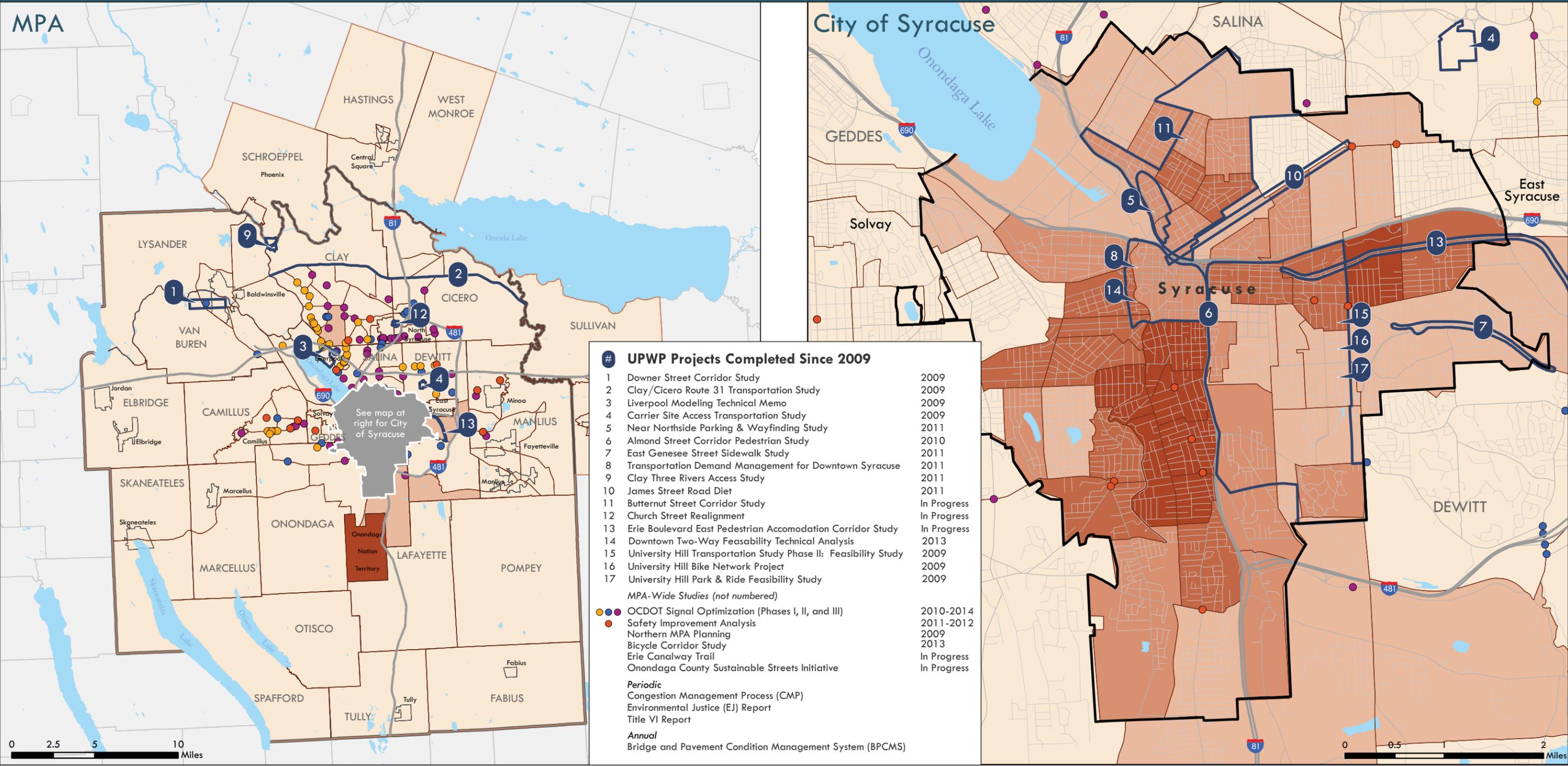
Response: The SMTC develops a yearly UPWP and also maintains the TIP. Millions of dollars of federal funds are utilized for both of these programs, and the SMTC understands it has a responsibility to periodically analyze expenditures of these funds to avoid any disproportional spending.

In 2012, the SMTC completed a stand-alone Environmental Justice Analysis report, which can be found on the SMTC web site (http://www.smtcmmpo.org/docs/reports/2012-07_EJ_Report.pdf). This report analyzed the distribution of TIP and UPWP projects at that time, amongst a concentrated population consisting of a combination of minority, low-income and senior populations. The report showed there was no disproportional expenditure of federal funds by the SMTC.

This section provides an updated look at the projects that exist on both the current and most recent past UPWPs, as well as the current 2014-2018 TIP to show where funds are being spent in relation to the location of the minority population per the requirement above.

As one can conclude from the maps and documentation on the following pages, the SMTC continues to not disproportionately spend federal funds amongst these various population groups.

Location of UPWP Projects and Percent Minority



#	UPWP Projects Completed Since 2009	Year
1	Downer Street Corridor Study	2009
2	Clay/Cicero Route 31 Transportation Study	2009
3	Liverpool Modeling Technical Memo	2009
4	Carrier Site Access Transportation Study	2009
5	Near Northside Parking & Wayfinding Study	2011
6	Almond Street Corridor Pedestrian Study	2010
7	East Genesee Street Sidewalk Study	2011
8	Transportation Demand Management for Downtown Syracuse	2011
9	Clay Three Rivers Access Study	2011
10	James Street Road Diet	2011
11	Butternut Street Corridor Study	In Progress
12	Church Street Realignment	In Progress
13	Erie Boulevard East Pedestrian Accommodation Corridor Study	In Progress
14	Downtown Two-Way Feasibility Technical Analysis	2013
15	University Hill Transportation Study Phase II: Feasibility Study	2009
16	University Hill Bike Network Project	2009
17	University Hill Park & Ride Feasibility Study	2009
<i>MPA-Wide Studies (not numbered)</i>		
●	ODOT Signal Optimization (Phases I, II, and III)	2010-2014
●	Safety Improvement Analysis	2011-2012
●	Northern MPA Planning	2009
●	Bicycle Corridor Study	2013
●	Erie Canalway Trail	In Progress
●	Onondaga County Sustainable Streets Initiative	In Progress
<i>Periodic</i>		
●	Congestion Management Process (CMP)	
●	Environmental Justice (EJ) Report	
●	Title VI Report	
<i>Annual</i>		
●	Bridge and Pavement Condition Management System (BPCMS)	

SMTC
 100 Clinton Square
 126 North Salina St, Suite 100
 Syracuse, NY 13202
 (315) 422-5716
 Fax: (315) 422-7753
 www.smtcmpo.org

Data Sources: SMTC, NYSDOT,
 2010 US Census
 Prepared by SMTC, 11/2014

Note: The total minority percentage for the MPA,
 according to 2010 Census data, is 19%.

Location of UPWP Projects and Percent Minority by 2010 Census Tract

Title VI & LEP Plan for SMTC MPA

This map is for presentation purposes only.
 The SMTC does not guarantee the accuracy or completeness of this map.

Legend

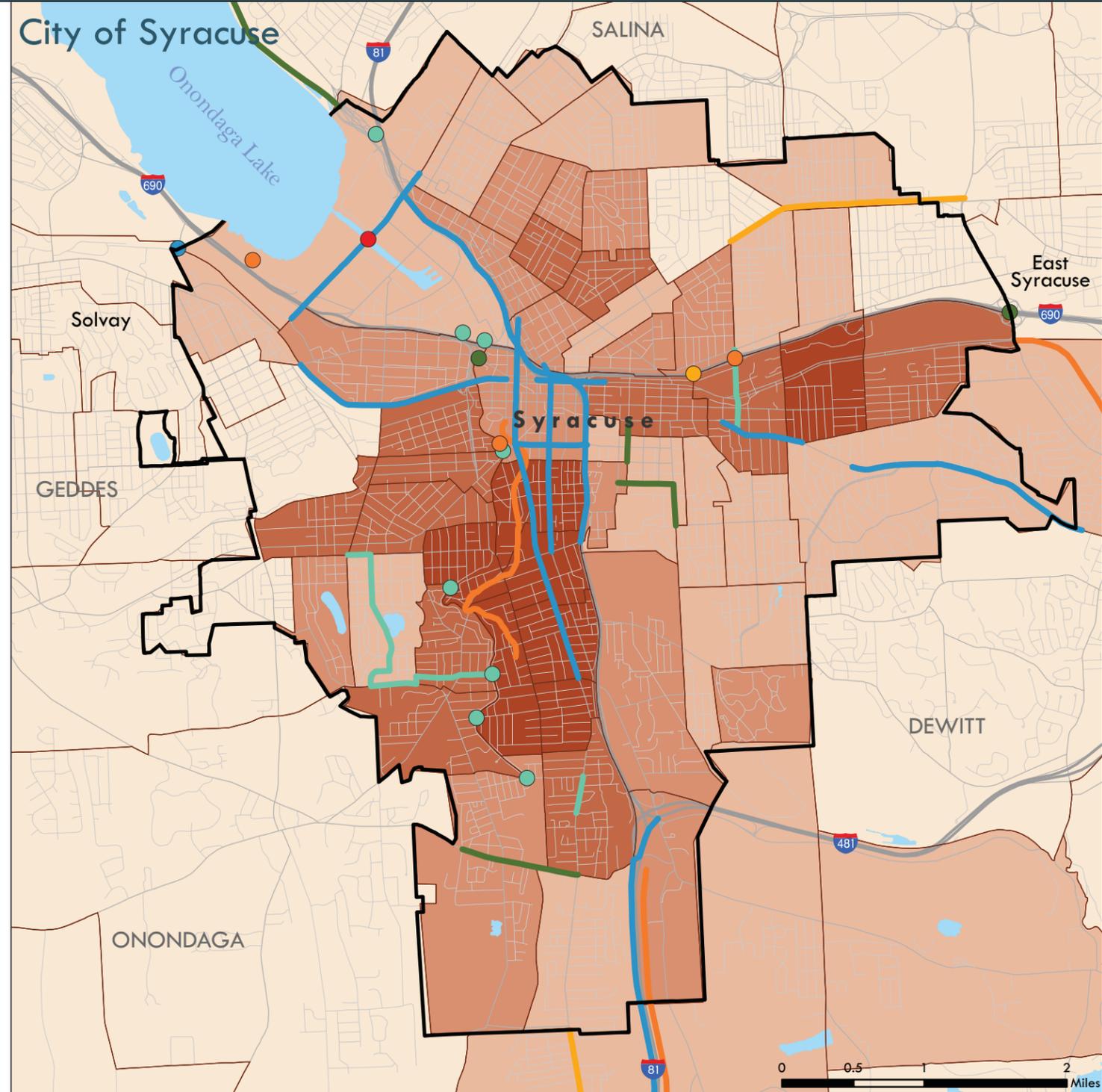
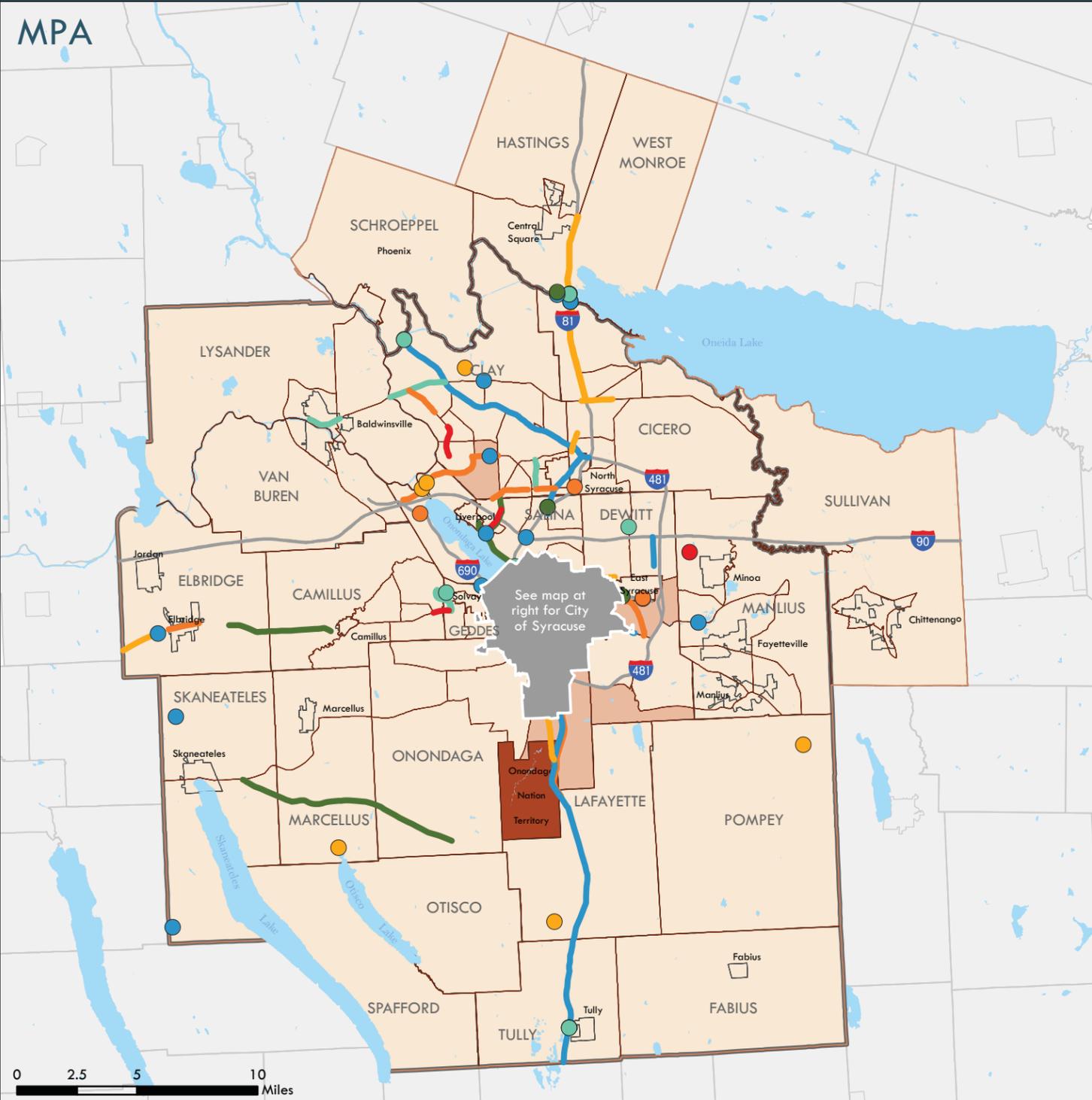
- # UPWP Project
- Safety Improvement Analysis
- ODOT Signal Optimization
 - Phase I
 - Phase II
 - Phase III
- Interstates
- Major Roads
- Local Roads
- ▭ City of Syracuse
- ▭ Municipal Boundaries

Percent Minority

- 0% - 19%
- 20% - 40%
- 41% - 60%
- 61% - 80%
- 81% - 100%

Please note that Census boundaries do not always match those of minor civil divisions.

Location of TIP Projects and Percent Minority



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 100 Clinton Square
 126 North Salina St, Suite 100
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Data Sources: SMTC, NYSDOT,
 2010 US Census
 Prepared by SMTC, 11/2014

Note: The total minority percentage for the MPA,
 according to 2010 Census data, is 19%.

**Location of TIP Projects and Percent Minority
 by 2010 Census Tract**
 Title VI & LEP Plan for SMTC MPA

This map is for presentation purposes only.
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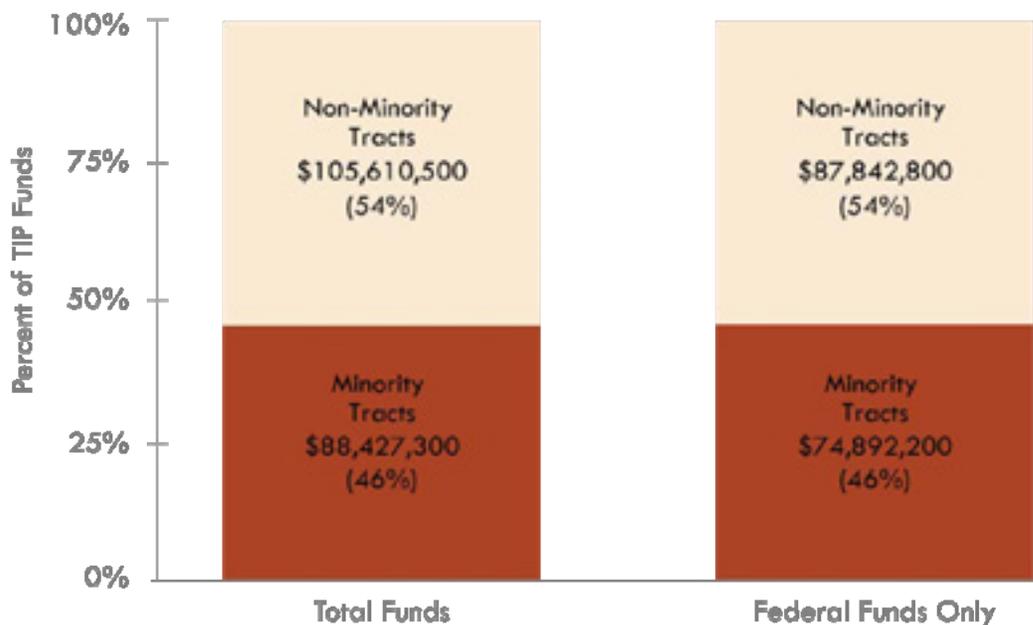
Construction Year ● 2013-2014 ● 2014-2015 ● 2015-2016 ● 2016-2017 ● 2017-2018 ● Post 2018	Legend — Interstates — Major Roads — Local Roads □ City of Syracuse □ Municipal Boundaries	Percent Minority 0% - 19% 20% - 40% 41% - 60% 61% - 80% 81% - 100%
		Please note that Census boundaries do not always match those of minor civil divisions.

Section 14: Analysis of Impacts

Requirement: An analysis of impacts identified in the previous section, 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.

Response: No disparate impacts on the basis of race, color, or national origin were found upon analysis. Below is a chart showing the percentage of FHWA TIP funds programmed within the minority Census Tracts and the amount programmed in the non-minority Census Tracts.

Figure 1: Percentage of TIP funds programmed in Minority and Non-Minority Census Tracts



The figure above pertains to FHWA funds that were programmed for projects that had a specific study boundary and were able to be mapped and therefore analyzed. Those projects that had MPA-wide implication and hence no specific study boundary, such as bridge clean and wash, were not included in the analysis. The generalization was made that expenditures on those projects serve both the minority and non-minority populations equally. Additionally, only FHWA funds were analyzed overall in this report due to the fact that FTA funds in the TIP are utilized by the regional transit authority, Centro. As previously noted, Centro, who has already produced its own Title VI report, found that a majority of their riders within the SMTC MPA are minorities. (See Centro's buffer analysis in Section 12)

Therefore, although the mapping and table analysis conclude that slightly more FHWA-funded projects fall in non-minority areas (54%) of the MPA vs. minority areas (46%), when combined with the percentage of FTA funds that Centro utilizes to service mostly the minority population, and if MPA-wide projects were also included into the mix, TIP funded projects are found to be equitably dispersed.

LEP PLAN

CHAPTER 2: LEP PLAN

Syracuse Metropolitan Transportation Council

*Final Report
February 2015*

This document was in part prepared with financial assistance from the Federal Highway Administration and the Federal Transit Administration of the U.S. Department of Transportation through the New York State Department of Transportation. The Syracuse Metropolitan Transportation Council is solely responsible for its contents.

For further information contact:

*Kevin Kosakowski, Transportation Planner
Syracuse Metropolitan Transportation Council
126 N. Salina St., 100 Clinton Square, Suite 100
Syracuse, NY 13202
kkosakowski@smtcmpto.org
PHONE: (315) 422-5716 FAX: (315) 422-7753
www.smtcmpto.org*

Introduction

Under Chapter III of the FTA Circular 4702.1B, one of the items every Title VI program shall include, as stated in Section 4a (5), is “*a copy of the recipient’s plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP guidance.*”

This plan will undergo a four factor analysis as required by the federal government and will use the results of the analysis to determine which language assistance services are appropriate.

Purpose

With the current development of the Title VI report, it was necessary that a plan be undertaken that would analyze the Metropolitan Planning Area (MPA) for populations with Limited English Proficiency (LEP). The SMTC’s goal is to be inclusive of all populations in its planning activities.

2008-2012 American Community Survey information from the Census Bureau, amongst other sources, was looked at to show where concentrations of the LEP populations lie within the MPA. This LEP analysis provides readers with an analysis of a traditionally underserved population group that should be considered by the SMTC and its member agencies when completing planning projects and other federally funded transportation activities.

Who Is a Limited English Proficient Individual?

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient, or “LEP,” and, therefore, are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter.

**Source: [Federal Register Volume 70, Number 239 (Wednesday, December 14, 2005)]*

The Four Factor Analysis

Federal guidance on LEP policy decisions states, “*recipients [of federal funding] are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.*” In terms of identifying the extent of such access, FHWA advises agencies to begin with the following four factor analysis established by the US Department of Justice (US DOJ):

FACTOR 1: *The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;*

FACTOR 2: *The frequency with which LEP individuals come in contact with the program;*

FACTOR 3: *The nature and importance of the program, activity, or service provided by the recipient to people's lives; and*

FACTOR 4: *The resources available to the recipient and costs.*

FHWA guidance states, “The intent of this policy guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small businesses, small local governments, or small nonprofit organizations.”¹ (FHWA, 4-14)

“Meaningful Access”: The Four Factor Analysis

The US DOJ LEP Guidance sets out four factors for consideration in deciding what reasonable steps should be taken to ensure meaningful access to LEP persons. When the Four Factor Analysis is completed, the determination of the reasonable steps to ensure that LEP populations have the access to language assistance services, both oral and written, can be made. Meaningful access does not just pertain to vital documents. It involves other types of language assistance services and activities, such as providing interpreters, as well as encouraging public involvement.

The “steps” in italics that are highlighted throughout this LEP plan, are methodology suggestions from the NYSDOT’s Office of Civil Rights Draft LEP Toolkit (based on the FTA’s guidance).

¹ Source: [FHWA, Limited English Proficiency Program and the Federal Aid Highway Program: Desk Reference]

FACTOR 1: *Identifying the number or proportion of LEP persons eligible to be served or likely to be encountered by SMTC programs.*

NYSDOT’s LEP Toolkit essentially sets a population threshold for the provision of LEP services by stating that, “generally, if an activity will have an impact where an eligible LEP language group constitutes 5% or 1,000 people, whichever is less, reasonable efforts should be put forth to provide meaningful access, or what is considered a ‘safe harbor.’² (NYSDOT, 14)

Safe Harbor

A safe harbor means that if a recipient provides written translations under these circumstances below, such action will be considered strong evidence of compliance with the recipient’s written–translation obligations under Title VI.

Many recipients would like to ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. The DOT recipient provides written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.

Translation of other documents, if needed can be provided orally: or if there are fewer than 50 persons in a language group that reaches the 5% as above, the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials free of cost.

² Source: [NYSDOT, *Limited English Proficiency Toolkit*]

Step 1:

Examine prior experiences with LEP individuals: review relative benefits, services, and information provided by agency and determine the extent to which LEP persons have come into contact with these functions and if they are appropriate for the populations of the service area.

As the region's MPO, the SMTC provides transportation planning services for all of Onondaga County and portions of Madison and Oswego Counties. The SMTC currently, in English, offers special accommodations upon request on all flyers for public meetings or workshops that are hosted by the agency.

In the spring and summer of 2008, the SMTC completed a feasibility study for a one-way to two-way street conversion in an area of Syracuse with a high concentration of Spanish speakers. This was the agency's first experience working directly in a neighborhood with LEP concerns. The SMTC did not conduct a demographic analysis at the time, since the need for interpretation and translation services in the focus area was fairly clear. The actions taken were: notices of meetings were translated into Spanish (see following page) and distributed at the local grocery store and through the bilingual school in the area, oral interpreters were present for all meetings, meeting materials were translated, and final documents were translated as well. Very few residents came to meetings and there have been no requests for the translated final documents, although they are available on the SMTC's web site,

<http://www.smtcmpo.org/Docs/EstudioDelCorredorSeymourShonnard2008.pdf>.

From 2009 to 2013, a larger regional project was worked on by the SMTC (The I-81 Challenge). It was the agency's first experience with the development of a LEP plan. The SMTC conducted the demographic analysis to help determine at that time what languages were predominant and where those individuals speaking those languages lived, in relationship to the study area. The plan/analysis completed served in part as a template/guidance for this LEP plan. The actions taken at the time as a result of the analysis included, but were not limited to, the translation of public meeting flyers (see page after next) and newsletters into Spanish, as well as, letting people know about the availability of translation services (Spanish and Vietnamese) and the phone number to call to request further assistance. Few if any LEP residents came to meetings and/or took advantage of the translation accommodations provided.

There are no other recent experiences with LEP individuals to examine other than these two instances. The LEP population has generally tended not to participate in many of the SMTC's activities and rarely have they taken advantage of the benefits, services and information provided in the past by the SMTC. The functions the SMTC provides, staff feels, has been appropriate for the populations of the service area and for the size of the agency. With that said though the agency will continue to strive to look at other ways to involve this population in its activities when warranted.

Calle Seymour, Calle Shonnard, Calle Gifford: ¿Tráfico en un sentido o doble sentido?



El propósito del **Estudio del Corredor Seymour-Shonnard** es evaluar la viabilidad de convertir la Calle Seymour, la Calle Shonnard, y una porción de la Calle Gifford en una vía con flujo de tráfico de un sentido a doble sentido. El área de dicho estudio se ilustra en el mapa al pie de esta página. El Consejo de Transporte Metropolitano de Syracuse (Syracuse Metropolitan Transportation Council o SMTC) está llevando a cabo este estudio a petición de la Ciudad de Syracuse.

El SMTC ha completado un análisis de las operaciones de tráfico en el área de estudio. Otros factores, incluyendo la velocidad de vehículos, seguridad de peatones y bicicletas, aparcamiento, y el carácter del barrio, también han sido considerados.

El SMTC está buscando aportación de la opinión pública, tanto respecto al cambio propuesto para el flujo de tráfico, como para analizar los resultados antes de finalizar las recomendaciones de dicho estudio.



¡Necesitamos su aportación!
Por favor asista a la reunión pública sobre el Estudio del Corredor Seymour-Shonnard el **miércoles, 13 de febrero de 2008** a las **6:30 p.m.**
En la Escuela Primaria Seymour
(Seymour Elementary School)
108 Shonnard Street

En esta reunión, el personal del SMTC discutirá los resultados del análisis y pedirá la opinión del público. Habrá servicio de intérprete disponible en la reunión.



Para mayor información, o para hacer arreglos para personas con necesidades especiales, por favor póngase en contacto con el SMTC:
Teléfono (315) 422-5716
Correo electrónico: mvitale@smtcmpo.org
Correo Postal: 126 N. Salina St, Suite 100, Syracuse, NY 13202



Stay involved in *The I-81 Challenge*!

Join us for the second public meeting for *The I-81 Challenge*

Drop in any time that is convenient for you:

Wednesday, May 9th
from 2 pm - 8 pm

Location: Oncenter Ballroom (lower level)
800 South State Street
Syracuse, NY

The Syracuse Metropolitan Transportation Council and the New York State Department of Transportation need your help in planning the future of I-81 through Syracuse. Be part of the process for determining what options for the highway are best for our region.

At this meeting, you will be able to:

- Review materials from the May 2011 workshop
- See the feedback received in May 2011 and learn how this feedback was developed into initial strategies for I-81
- Provide feedback on the initial strategies before NYSDOT begins further analysis
- Learn how strategies will be evaluated
- Learn about potential long-term improvements to our transit system and provide your thoughts

Need more information?

Free parking will be provided in the Oncenter garage and parking lot. For directions and additional information, visit www.thei81challenge.org.

Can't make the meeting in person?

Participate online in our virtual meeting at www.thei81challenge.org/virtual starting May 9.

Need special accommodations?

The meeting facility is handicapped accessible. To request special accommodations, please contact the SMTC at 315-422-5716 or contactus@thei81challenge.org.

Need language assistance?

American Sign Language and Spanish interpreters will be available at the meeting. For more information, please contact the SMTC at 315-422-5716 or contactus@thei81challenge.org.

¿Habla usted español?

Usted tendrá intérpretes disponibles en español en la reunión. Para más ayuda por favor llame al 315-944-2014 (debe marcar el código de área).

Quý vị có nói tiếng Việt không?

Thông dịch viên nói tiếng Việt sẽ sẵn sàng theo yêu cầu. Xin vui lòng gọi số (315) 944-2014 (quý vị phải quay số khu vực) và để lại lời nhắn yêu cầu xin thông dịch viên. Xin bao gồm cả tên và số điện thoại quý vị. Các yêu cầu xin thông dịch viên phải được nhận trước ngày 2 Tháng Năm, 2012.



Step 2:

Identify the geographic boundaries of the area that your agency serves. If boundaries correspond to county boundaries, obtain information on the county level.

The Metropolitan Planning Area is the area which the SMTC serves. The recently updated MPA boundary consists of all of Onondaga County and portions of Madison and Oswego Counties. With the majority of the updated MPA boundary following clear municipal boundaries, American Community Survey data can easily be utilized to speak to the LEP make-up of the entire MPA.

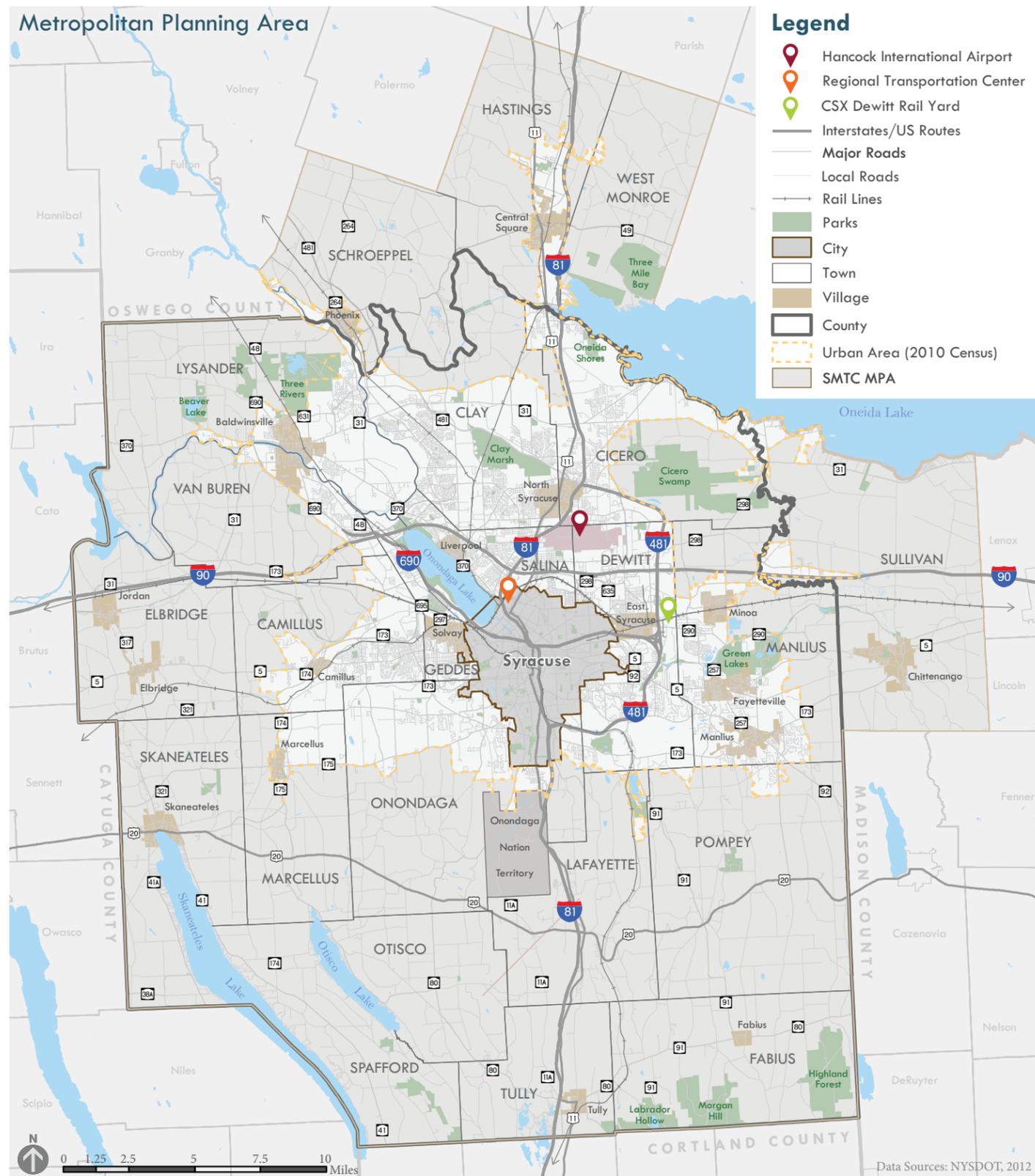
Other LEP information sources referenced later in this document do not utilize the MPA boundary for their LEP analysis, because of its uniqueness. Those sources referenced later in this plan utilize either Onondaga County and/or just the City of Syracuse as their boundary for analysis.

More often than not though, the SMTC provides its planning services to specific areas within the MPA defined at the project level, whether it be a neighborhood, a corridor or an intersection within Onondaga County or in particular the City of Syracuse. In those cases the geographic boundary that the agency serves would be considered the individual Census Tracts within the County and/or City. Therefore, this plan is set up to show the LEP make up of both the MPA as a whole and the individual Census Tracts within the MPA.

Please refer to the following page for a map of the MPA along with a more detailed description.

SMTC Metropolitan Planning Area

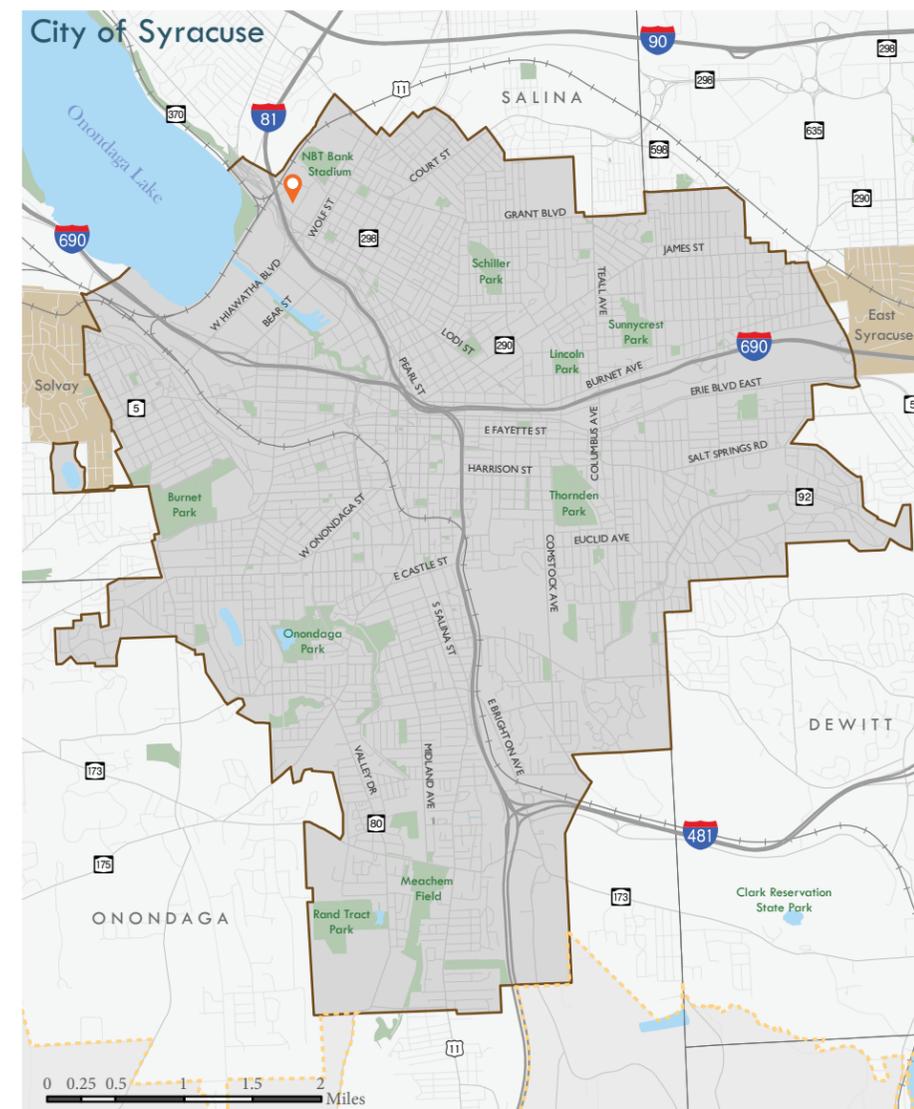
- The SMTC is responsible for transportation planning and the administration of federal transportation capital funds within Onondaga County and portions of Oswego and Madison Counties.
- The SMTC's planning area includes 23 towns, 18 villages, one city (Syracuse), and the Onondaga Nation.



The Syracuse Metropolitan Transportation Council is a state-designated Metropolitan Planning Organization (MPO), responsible for administering comprehensive, continuous, and cooperative transportation planning. The Council's planning jurisdiction, called the Metropolitan Planning Area (MPA), includes Onondaga County and portions of Madison and Oswego counties. As the Metropolitan Planning Organization for the Greater Syracuse Metropolitan Area, the Council, as directed through federal metropolitan transportation planning policy, acts as a clearinghouse where long-term and immediate transportation planning decisions are made for the region.

The MPO defines the geography of the MPA (with approval from the Governor). The MPA must include at least the existing urbanized area (as defined by the U.S. Census Bureau based on population density) and the contiguous area expected to become urbanized over a 20-year planning horizon. The Urban Area Boundary (UAB) is an expansion of the Census-defined urbanized area that includes those areas that are locally considered to have urban characteristics but that do not have the population density necessary to "qualify" for inclusion in the urbanized area (for example, airports, warehousing districts, or parks).

The urbanized area is the densely settled portion of our region, as defined by the U.S. Census Bureau (generally those census tracts with at least 1,000 persons per square mile). The UAB is the official "urban/rural" boundary for functional classification and roadway design standards. The MPO also defines the UAB (with approval of the Federal Highway Administration). The SMTC must reexamine the UAB and the MPA each time new decennial census data are released. Both the MPA and UAB boundaries seen on this map were updated in 2013 to reflect the 2010 Census. The current MPA consists of: all of Onondaga County; the Town of Sullivan in Madison County; and the entire towns of Schroepfel, Hastings, and West Monroe plus the urbanized portion of the Town of Granby in Oswego County. This results in a total of 23 towns (plus the small portion of the Town of Granby), 18 villages, the Onondaga Nation, and one city (Syracuse) that are in the MPA. The decision to include entire towns outside of Onondaga County in the MPA was based on the percentage of a town's total population that commutes into Onondaga County. Federal transportation funds may be spent on capital projects and planning studies in any of the municipalities within the MPA. The SMTC planning process leads to the allocation of millions of dollars in federal transportation funding each year. This funding goes toward road, bridge, safety, transit, and bicycle and pedestrian projects as well as planning studies addressing multimodal issues throughout the MPA. The SMTC cannot implement particular transportation improvements, but serves as a collaborative forum where transportation issues are studied. Implementation of capital projects and other recommendations from SMTC studies is the responsibility of the member agencies and the infrastructure owners.



Step 3:

Collect data related to English proficiency within that geographic area in order to determine the number and proportion of LEP persons in the service area and the languages most frequently spoken by these LEP persons. Identify any concentrations of LEP persons within the service area. The greater the number or proportion of LEP persons, the greater the need to provide meaningful access to services.

Step 4:

Obtain Census Data on the LEP population in the service area. Become familiar with data from the U.S. Census. Also include information from Census Bureau's American Community Survey (ACS) which can provide data on shorter time periods.

Steps 5 and 6:

Analyze the data you have collected and identify areas of concentration within the service area.

The American Community Survey provides a complete language breakdown of the LEP population within the MPA.

According to the 2008-2012 American Community Survey 5-Year Estimates data, the languages whose speakers have the least English proficiency in the MPA (i.e. the most speakers who speak English less than 'very well') are Spanish or Spanish Creole (4,609 speakers), Chinese (1,572 speakers), other Slavic languages (1,011 speakers), Serbo-Croatian (850 speakers), and other Indic languages (850 speakers). Of these populations, the number of Spanish or Spanish Creole, Chinese, and other Slavic languages who speak English less than 'very well' meet the 1,000-person threshold. In all, 3.5% of the MPA's population is LEP.

Table 4: "Top 10" LEP Languages Spoken at Home inside the MPA

Universe: Population 5 years and older

Language	Total Speakers	Speak English less than 'very well'	% of Total Population**
*Spanish or Spanish Creole	12,991	4,609	0.97%
*Chinese	3,359	1,571	0.33%
*Other Slavic Languages	2,449	1,011	0.21%
Serbo-Croatian	1,597	850	0.18%
Other Indic Languages	1,457	850	0.18%
African Languages	2,078	842	0.17%
Italian	3,022	791	0.17%
Vietnamese	1,367	761	0.16%
Other Asian Languages	1,353	725	0.15%
Russian	1,385	721	0.15%

Source: 2008-2012 American Community Survey 5-Year Estimates, Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Older

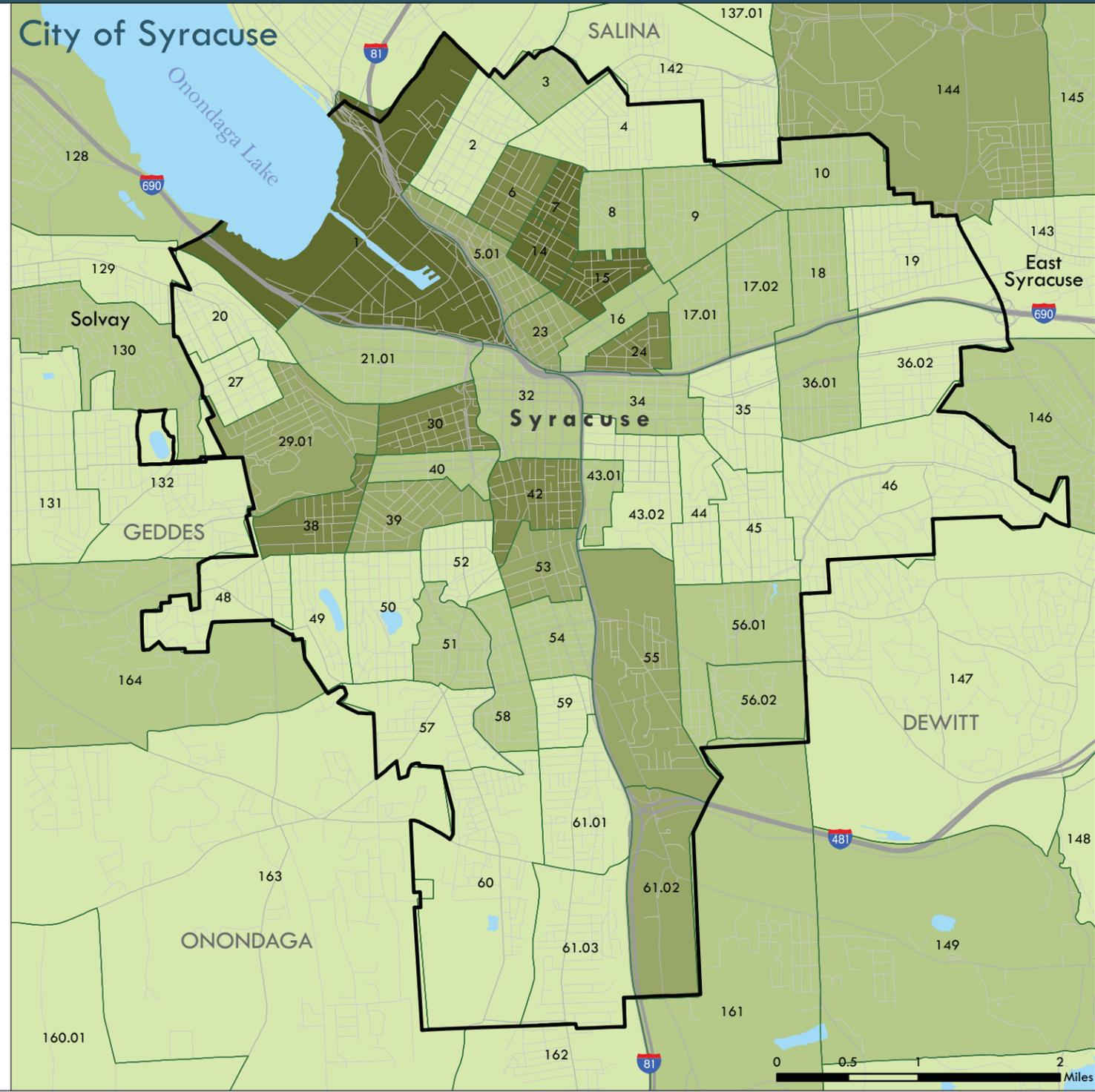
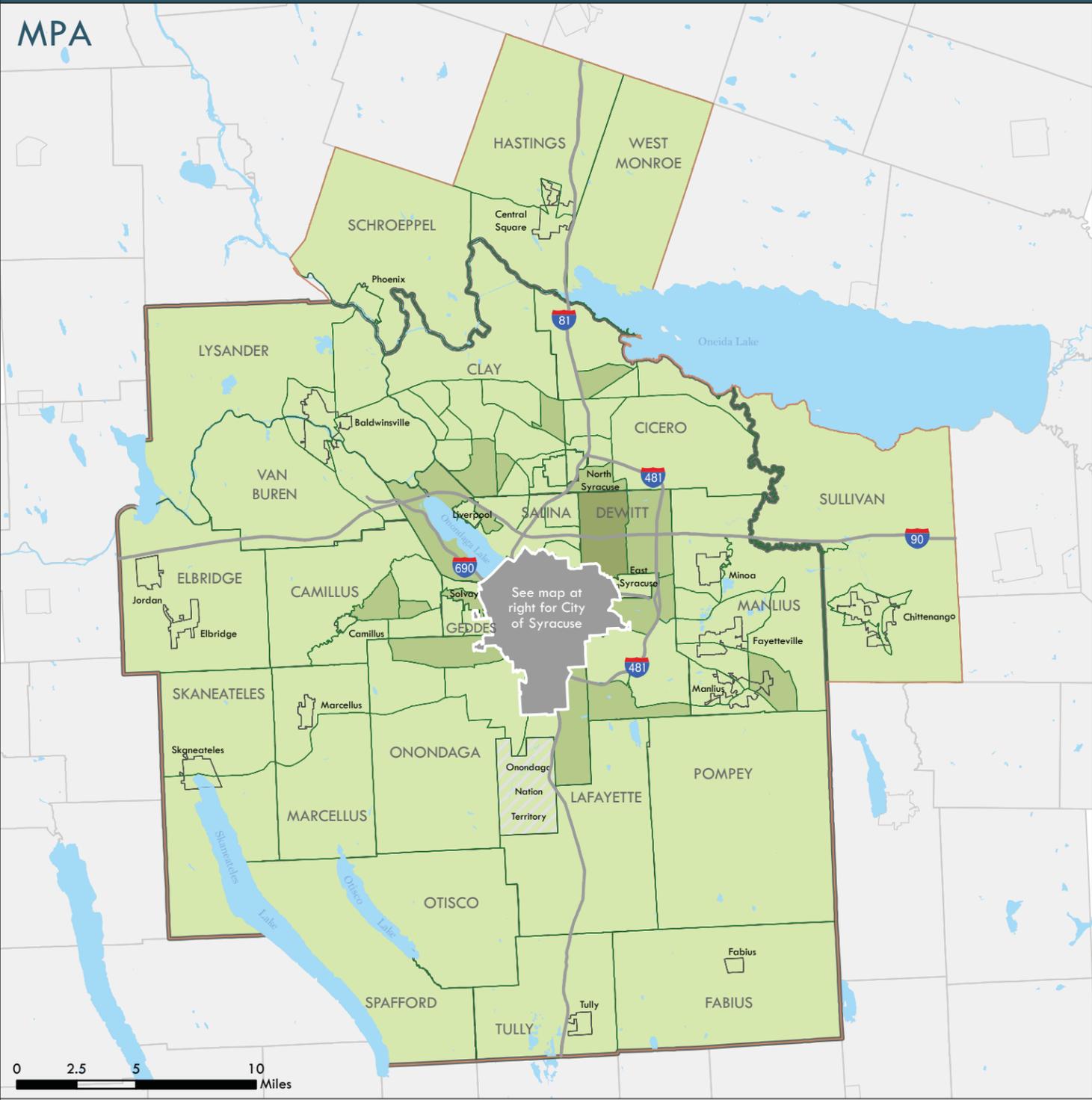
* These populations meet the 1,000-person threshold for persons with limited English proficiency.

** "Total Population" is referring to the MPA's total population which is 504,672

The next few pages display visually the LEP make-up of the MPA.

- The first map entitled “Limited English Proficiency Areas of Concentration” shows the concentration of LEP individuals per Census Tract. The first incremental breakdown on the map signifies LEP concentration levels between 0 and 3.5%. 3.5% was found to be the overall LEP percentage of the entire MPA. This gives readers the ability to “see” concentration levels. When viewing the map, the highest concentration of LEP residents reside mostly in the City of Syracuse, particularly on the north and west sides of the City.
- Table 5, entitled “Languages Spoken at Home by Municipality,” shows those languages spoken at home in the municipalities within the MPA, according to 2008-2012 ACS data.
- Table 6, entitled “Language Identification” identifies just those Census Tracts with LEP concentrations above 3.5% and highlights (in colors that correspond to the following map) the languages in those Census Tracts that make up more than 5% of that Census Tracts total population. 5% is chosen because it is the Safe Harbor threshold identified earlier in this report.
- The second map, entitled “Top Languages Spoken at Home” essentially is a visual representation of the analysis completed in Table 6.

Limited English Proficiency Areas of Concentration



SMTC
 100 Clinton Square
 126 North Salina St, Suite 100
 Syracuse, NY 13202
 (315) 422-5716
 Fax: (315) 422-7753
 www.smtcmpo.org



Data Sources: SMTC, NYSDOT,
 2008-2012 American Community Survey
 Prepared by SMTC, 11/2014

Note: The total LEP percentage for the MPA
 (excluding the Onondaga Nation), according
 to the 2012 American Community Survey, is 3.5%.

Limited English Proficiency Areas of Concentration by 2010 Census Tract

Title VI & LEP Plan for SMTC MPA

This map is for presentation purposes only.
 The SMTC does not guarantee the accuracy or completeness of this map.

Legend		Percent LEP	
— Interstates	▭ City of Syracuse	0% - 3.5%	15.1% - 20%
— Major Roads	▭ Municipal Boundaries	3.6% - 10%	20.1% - 30%
— Local Roads	# 2010 Census Tract	10.1% - 15%	▨ Onondaga Nation (No Data)

Please note that Census boundaries do not always match those of minor civil divisions.

Table 5: Languages Spoken at Home by Municipality						Of those who speak English less than “very well”			
Geography	Population 5 Years and Older	Speak only English	Speak other Languages	Speak English Less than Very Well	Percentage of LEP Speakers	Speak Spanish	Speak Other Indo-European Languages	Speak Asian or Pacific Island Languages	Speak Other Languages
Sullivan	14,453	14,178	275	78	0.54%	54	24	0	0
Camillus	22,652	20,552	2,100	786	3.47%	34	615	52	85
Cicero	29,488	27,978	1,510	590	2.00%	117	384	39	50
Clay	54,820	50,872	3,948	1,213	2.21%	219	468	412	114
De Witt	24,471	21,470	3,001	1,047	4.28%	123	643	241	40
Elbridge	5,647	5,579	68	21	0.37%	3	4	14	0
Fabius	2,051	1,988	63	23	1.12%	10	9	4	0
Geddes	16,190	14,364	1,826	689	4.26%	62	577	50	0
LaFayette	4,565	4,475	90	0	0.00%	0	0	0	0
Lysander	20,849	19,759	1,090	234	1.12%	122	111	1	0
Manlius	30,633	28,479	2,154	685	2.24%	135	293	203	54
Marcellus	5,895	5,798	97	7	0.12%	0	0	7	0
Onondaga	22,089	20,409	1,680	474	2.15%	189	225	41	19
Otisco	2,438	2,399	39	9	0.37%	0	9	0	0
Pompey	6,696	6,386	310	45	0.67%	9	36	0	0
Salina	31,790	29,283	2,507	810	2.55%	137	426	197	50
Skaneateles	6,976	6,794	182	42	0.60%	7	33	0	2
Spafford	1,740	1,690	50	4	0.23%	0	0	4	0
Syracuse	134,596	111,929	22,667	9,455	7.02%	3,202	2,261	2,717	1,275
Tully	2,595	2,521	74	0	0.00%	0	0	0	0
Van Buren	12,612	11,919	693	168	1.33%	20	63	75	10
Hastings	8,899	8,625	274	98	1.10%	56	42	0	0
Schroepfel	8,012	7,771	241	105	1.31%	33	58	14	0
West Monroe	4,025	3,790	235	19	0.47%	0	13	6	0
TOTAL in the MPA	474,340	429,089	45,251	16,679	3.52%	4,609	6,294	4,077	1,699

Source: American Community Survey, 2008-2012 5 Year Estimate

2010 Census Tract Number	Total Population	LEP Total	Spanish	Serbo-Croat	Other Slavic	Other Indic	Other Indo-Euro	Chinese	Vietnamese	Other Asian	African Languages
1	470	126	0	0	0	0	0	0	12	0	0
3	1547	119	42	0	0	0	0	53	0	0	0
5.01	1683	240	0	0	0	0	0	65	13	39	22
6	3473	586	88	0	0	54	0	19	17	233	0
7	1521	335	35	0	0	0	75	0	159	61	0
8	2074	150	47	0	0	0	0	0	9	0	87
9	2960	149	6	0	0	17	11	0	18	0	0
10	3517	233	88	57	2	0	0	0	0	0	0
14	2742	646	93	0	0	169	0	8	69	73	135
15	2607	754	32	0	0	329	0	0	85	75	134
16	2803	104	28	12	0	6	0	15	0	0	0
17.01	2086	188	129	0	0	0	0	31	0	0	0
17.02	2381	104	90	0	0	0	0	0	0	0	0
18	2590	133	0	35	0	0	16	0	0	0	0
21.01	2609	218	103	0	0	0	0	0	0	0	15
23	1692	196	23	0	0	22	0	0	33	19	38
24	1926	310	92	18	0	88	0	5	0	40	61
29.01	2767	314	190	0	15	0	0	109	0	0	0
30	1451	230	193	0	5	0	0	0	11	0	17
32	1906	100	7	0	0	11	0	0	0	0	7
34	1361	87	32	0	0	0	0	26	0	0	0
36.01	2301	124	84	0	0	0	0	40	0	0	0
38	2379	390	340	0	8	0	0	5	0	2	0
39	3250	406	379	0	0	0	0	11	0	0	0
40	1685	151	151	0	0	0	0	0	0	0	0
42	1869	289	167	0	0	0	0	12	0	0	100
43.01	1596	69	13	0	0	0	0	25	0	0	0
51	1990	98	94	0	0	0	0	0	0	0	0
53	1631	179	7	0	0	0	10	14	0	0	145
54	2975	236	159	0	0	0	0	0	0	0	0
55	3720	513	15	147	0	0	0	275	0	15	31
56.01	1392	111	10	8	0	0	16	38	0	0	39
56.02	2803	122	36	0	0	0	0	36	0	0	0
58	2206	111	105	0	0	0	0	0	0	0	0
59	1617	56	37	0	0	0	0	0	0	0	0
61.02	1963	234	0	21	0	0	0	70	0	12	0
103.22	3726	143	0	78	0	36	0	0	0	0	0
106	2029	76	19	0	0	0	0	0	0	0	0
110.12	3689	133	24	0	0	14	0	10	11	0	0
111.02	3504	125	52	0	0	0	0	4	0	7	0
112.42	5585	248	15	0	0	0	15	18	0	25	0
124	4056	181	0	0	112	0	0	0	0	0	0
125	3626	226	8	70	96	0	0	0	0	0	0
128	3129	165	26	0	40	0	0	30	0	0	0
130	3792	286	0	0	211	0	0	0	0	0	0
134	5468	210	21	0	0	0	0	0	0	0	0
136	2868	178	57	0	17	0	0	62	0	0	0
144	2083	270	58	146	30	0	0	16	0	0	0
145	3908	144	23	92	0	0	0	10	0	0	0
146	4654	385	26	11	0	0	10	32	81	11	0
149	2212	83	6	0	0	0	0	34	0	0	0
152.02	4115	188	12	0	0	0	0	42	0	0	0
161	2169	167	70	0	0	17	0	0	0	0	0
164	3641	216	119	27	39	0	0	0	0	0	0

Table 6: Language Identification

This table identifies just those Census Tracts with LEP concentrations above 3.5% and highlights (in colors that correspond to the following map) the languages in those census tracts that make up more than 5% of that Census Tracts total population.

**Please note the individual languages included in this table will not add up to the value in the "LEP Total" column. The "LEP Total" simply provides the reader the capability of determining the percentage that the highlighted language makes up of the total LEP population living in its census tract.*

Below is a further explanation of the language groups identified in this table:

Serbo-Croat: Serbocroatian, Croatian, Serbian

Other Slavic: Belarusian, Ukrainian, Czech, Slovak, Bulgarian, Macedonian, Slovene

Other Indic: Bengali, Panjabi, Marathi, Oriya, Assamese, Kashmiri, Nepali, Sindhi, Sinhalese, Romany

Other Indo-European: Jamaican Creole, Krio, Pidgin, Gullah, Catalanian, Romanian, Rhaeto-romanic, Welsh, Irish Gaelic, Scottish Gaelic, Albanian, Lithuanian, Lettish, Pashto, Kurdish

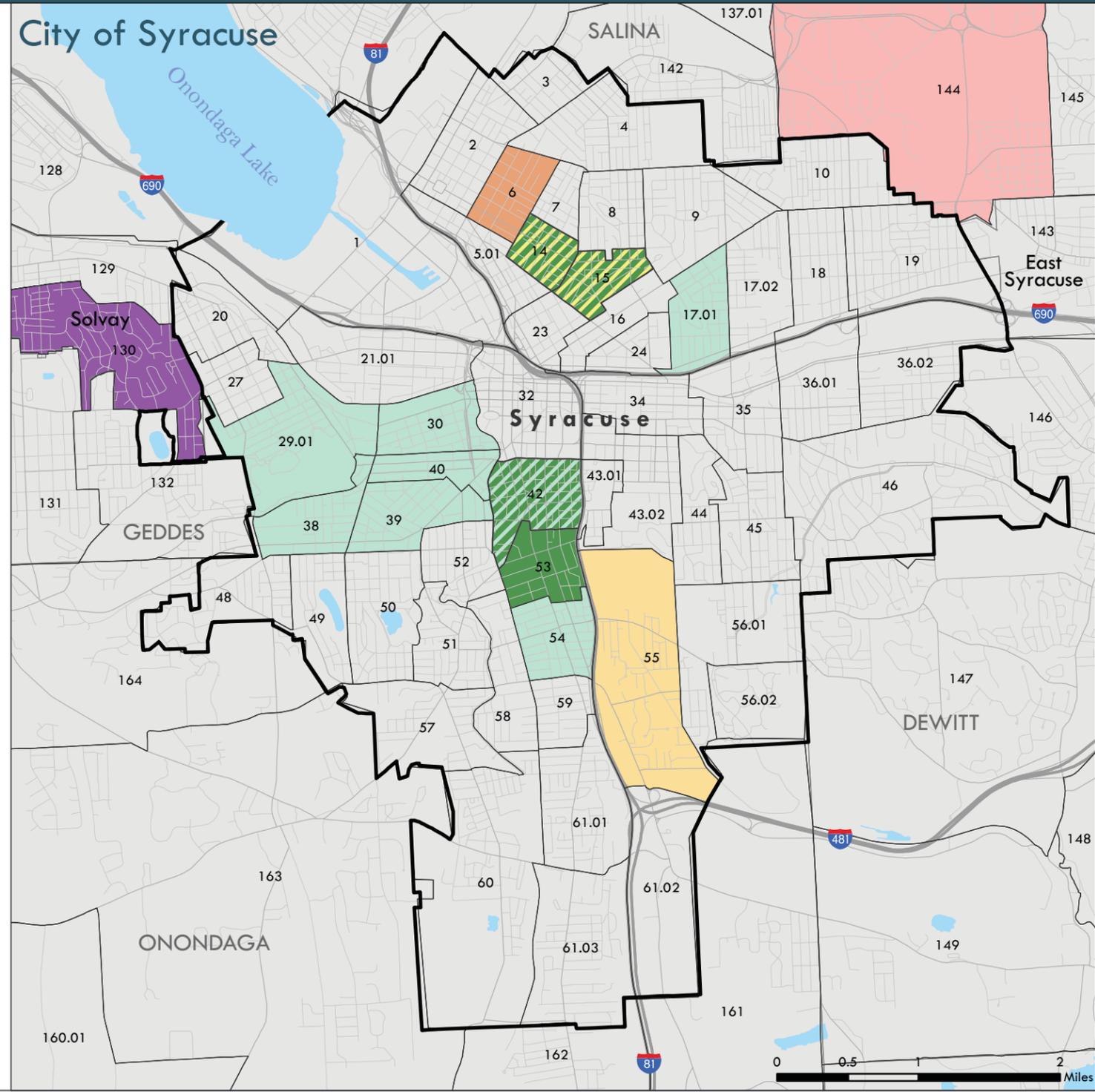
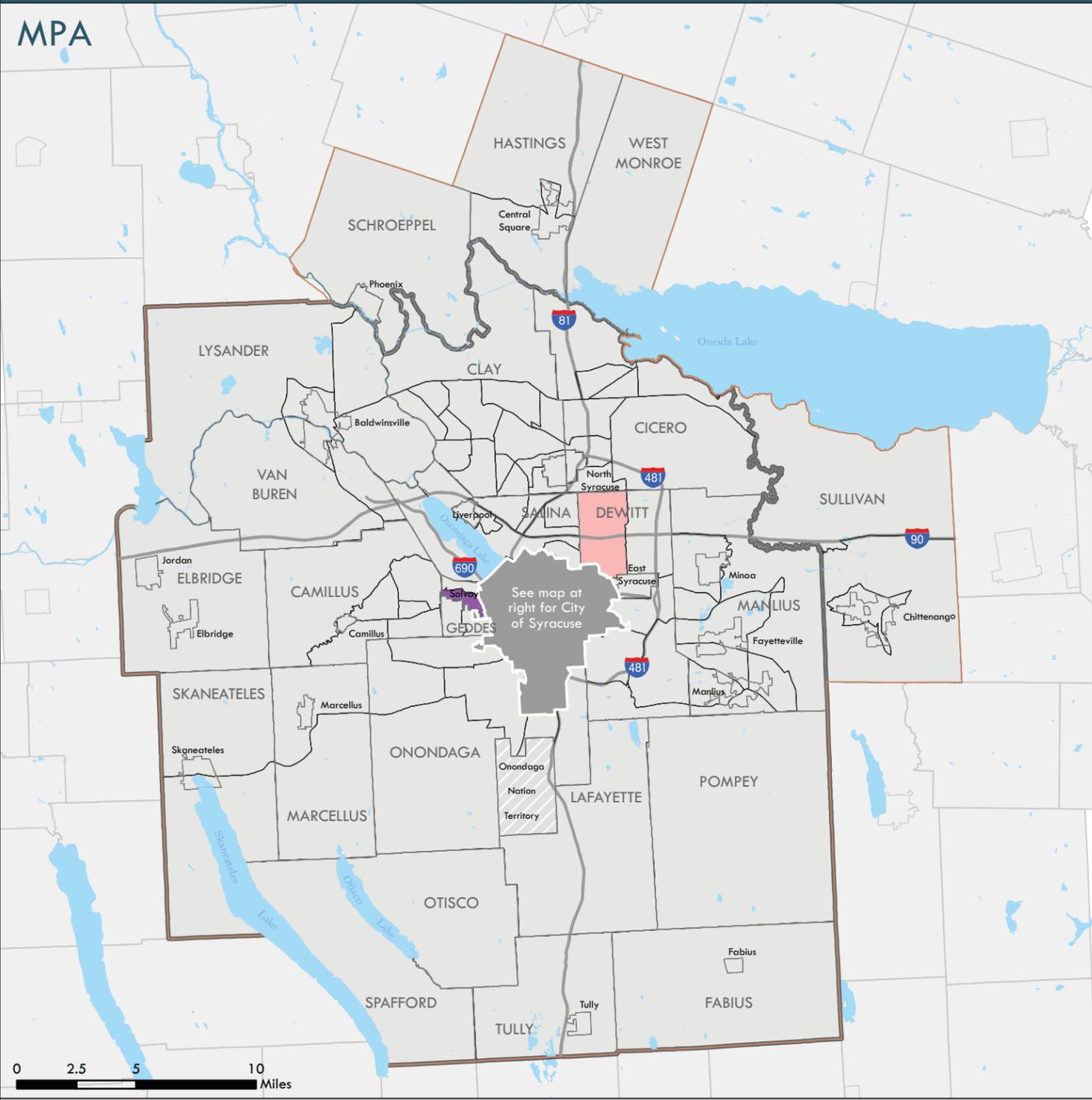
Chinese: Chinese, Hakka, Cantonese, Mandarin, Fuchow, Formosan, Wu

Other Asian: Kazakh, Karachay, Uighur, Azerbaijani, Turkish, Turkmen, Mongolian, Tungus, Dravidian, Telugu, Kannada, Malayalam, Tamil, Munda, Tibetan, Burmese, Karen, Kachin, Miao-yao, Mien

African Languages: Amharic, Berber, Chadic, Cushite, Sudanic, Nilotic, Swahili, Bantu, Mande, Fulani, Gur, Kru, Ibo, Yoruba, Efik

Sources:
American Community Survey 5-Year Data, 2008-2012. Table B16001.
<https://www.census.gov/prod/2013pubs/acs-22.pdf>

Top Languages Spoken at Home



SMTC
 100 Clinton Square
 126 North Salina St, Suite 100
 Syracuse, NY 13202
 (315) 422-5716
 Fax: (315) 422-7753
 www.smtcmpo.org



Data Sources: SMTC, NYSDOT,
 2008-2012 American Community Survey
 Prepared by SMTC, 11/2014

Census Tracts with an LEP population of at least 3.5% were considered "concentrated." This map shows only the tracts where LEP speakers of a language constitute at least 5% of the total tract population. For more information, see Table 6.

Top Languages Spoken at Home in 2010 Census Tracts with Concentrated LEP Population

Title VI & LEP Plan for SMTC MPA

This map is for presentation purposes only.
 The SMTC does not guarantee the accuracy or completeness of this map.

Legend		Language	
— Interstates	▭ City of Syracuse	■ African Languages	■ Other Indo-Euro
— Major Roads	▭ Municipal Boundaries	■ Chinese	■ Other Slavic
— Local Roads	# 2010 Census Tract	■ Other Asian	■ Serbo-Croat
▭ Onondaga Nation (No Data)		■ Other Indic	■ Spanish
			■ Vietnamese

Please note that Census boundaries do not always match those of minor civil divisions.

Step 7:

Consult other (including state and local) sources of data.

Step 8:

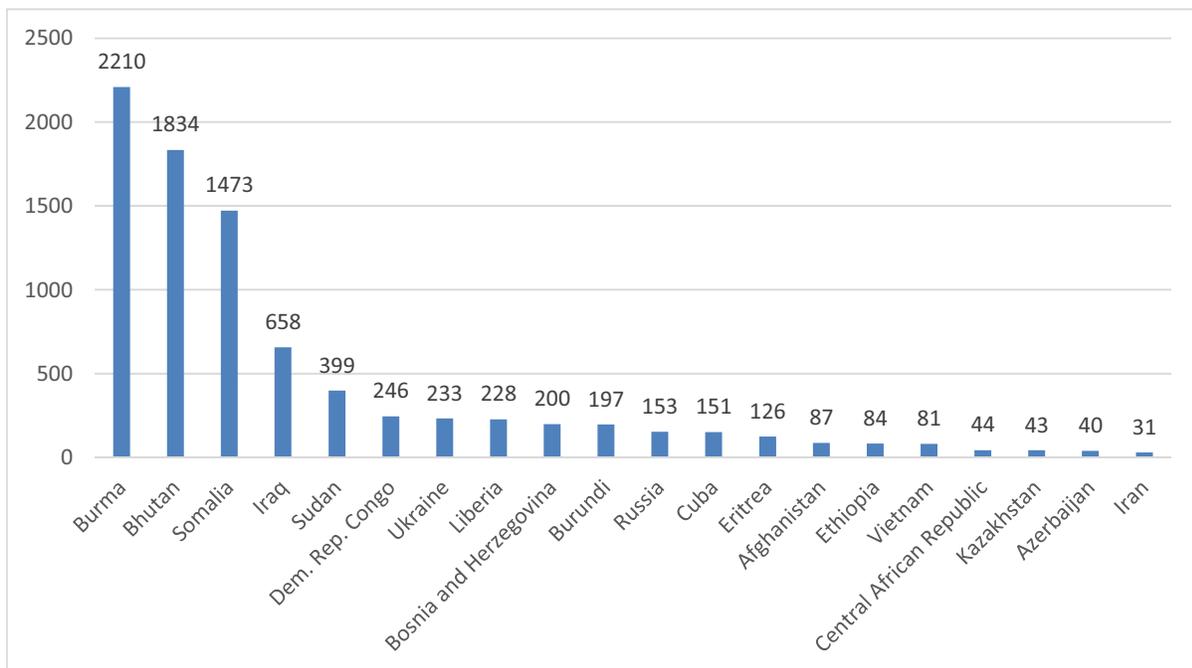
Identify, reach out to, and obtain information from community organizations that serve LEP persons.

STATE SOURCES:

NYS Office of Temporary and Disability Assistance

The refugee data for Onondaga County, available through the NYS Office of Temporary and Disability Assistance (NYSOTDA), tells the following story (see following figure). According to the data, the most common country of origin for refugees in Onondaga County since 2002 is Burma, with 2,210 refugees. Following Burma is Bhutan (1,834 refugees), Somalia (1,473 refugees), Iraq (658 refugees), and Sudan (399 refugees).

Figure 2: Country of Origin of Refugees in Onondaga County (FFY 2002-FFY 2014)



Source: NYS Office of Temporary and Disability Assistance

*See “Local Sources” portion of this section to reference what the OCL study identified as the languages spoken by these refugee populations.

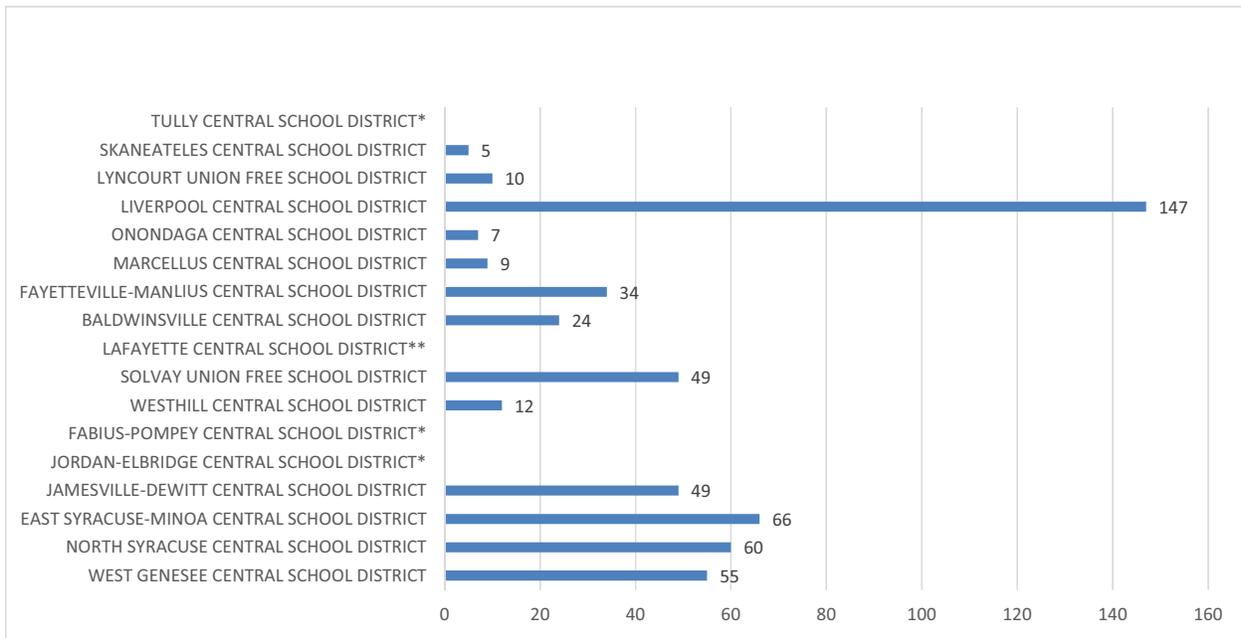
** The level of English Proficiency for these refugee populations has not been identified. The assumption has been made that their ability to speak English is limited, and therefore, at minimum, this qualifies them as populations of which the MPO may need to be cognizant of when undertaking any planning activities where they reside.

*** The breakdown by age was not provided.

NYS Education Department

According to 2013-2014 school year data from the NYS Education Department (NYSED), the area school district with the largest number of LEP students was the Syracuse City School District, with 3,394 LEP students. The figure below shows the distribution of LEP students by Onondaga County school district minus the Syracuse City School District. There are far more LEP students in the Syracuse City School District than all the other Onondaga County districts combined.

Figure 3: Number of LEP Students in Onondaga County School Districts



Source: NYS Department of Education (2013-2014 School Year)

*According to NYSED, counts less than 5 needed to be suppressed. In addition, counts greater than 5 may have needed to be suppressed so that the total suppressed is at least 5.

**Data was not available.

***Entire 2013-2014 school year was reviewed.

****Syracuse City School District not included.

The following page maps the distribution of the LEP students in the Onondaga County School Districts during the 2013-2014 school year.

Number of LEP Students



100 Clinton Square
126 North Salina St, Suite 100
Syracuse, NY 13202
(315) 422-5716
Fax: (315) 422-7753
www.smtcmpo.org



Data Sources: SMTC, NYSDOT,
NYS Department of Education 2013-14
Prepared by SMTC, 11/2014

Number of LEP Students

by School District

Title VI & LEP Plan for SMTC MPA

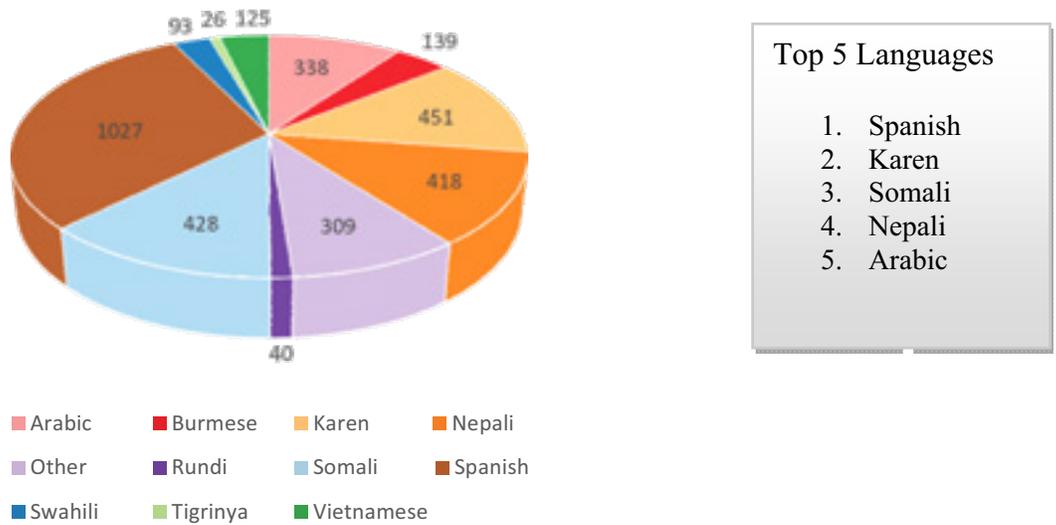
This map is for presentation purposes only.
The SMTC does not guarantee the accuracy or completeness of this map.

Legend

- Interstates
- SMTC MPA
- Number of LEP Students
- 0 - 5
- 6 - 10
- 11 - 50
- 51 - 200
- 201 - 3394
- No Data

Below shows the top languages among the LEP students in the Syracuse City School District from this past school year, 2013-2014.

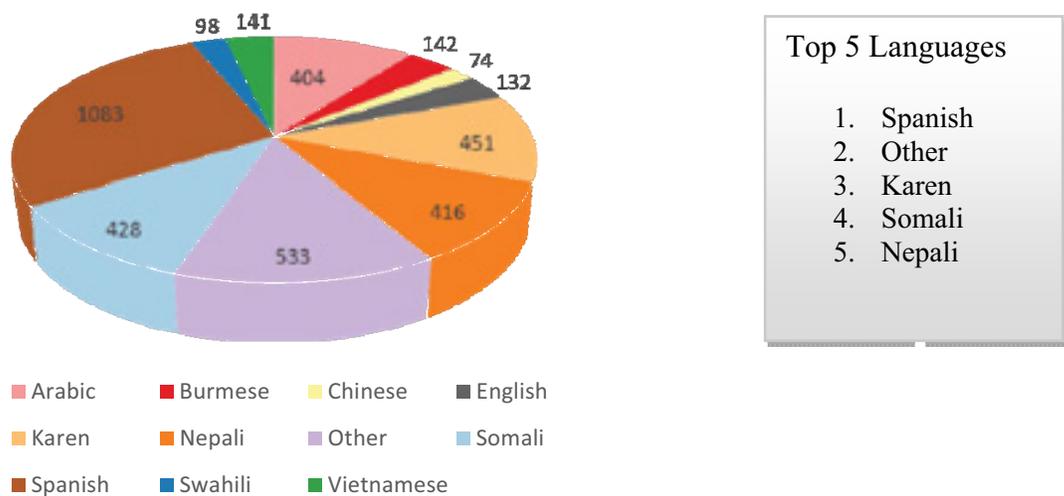
Figure 4: Top Languages among LEP Students in Syracuse City School District



Source: NYS Department of Education (2013-2014 school year)

As for all the school districts in Onondaga County, including the Syracuse City School District, the top languages among the LEP students during the 2013-014 school year, are shown in the figure below.

Figure 5: Top Languages among LEP Students in All School Districts in Onondaga County



Source: NYS Department of Education (2013-2014 school year)

*Non-public and charter school data were not included in any NYSED data.

**According to NYSED staff, student counts are taken at various times throughout the year. Data given to SMTC staff was using the entire year. The counts may vary depending upon when enrollment is counted.

CITY SOURCES:

City of Syracuse Department of Neighborhood and Business Development

The City of Syracuse Department of Neighborhood and Business Development uses the services, on an ad hoc basis, of two City employees fluent in Spanish and Vietnamese to assist with various translation projects. This would lead SMTC to believe based on this and past reports (i.e. 2009 I-81 LEP plan) that they translate their materials when needed into just these two languages.

Syracuse City School District's Refugee Assistance Program (RAP)

The Syracuse City School District Refugee Assistance Office suggested Spanish, Vietnamese, Burmese, and Nepalese.*

COMMUNITY BASED ORGANIZATION (CBO) SOURCES:

Catholic Charities

Catholic Charities, another local refugee assistance program, suggested Burmese, Bhutanese, and Arabic as critical language groups.*

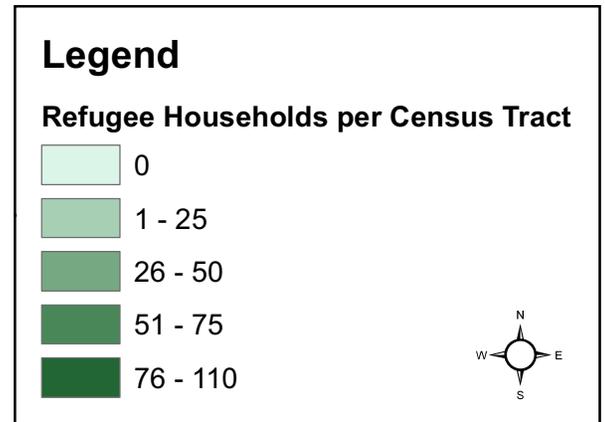
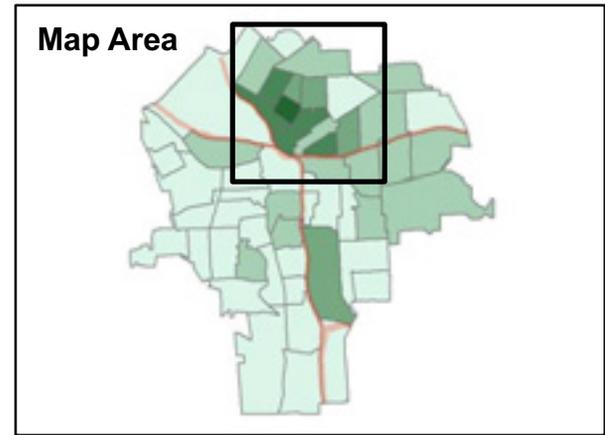
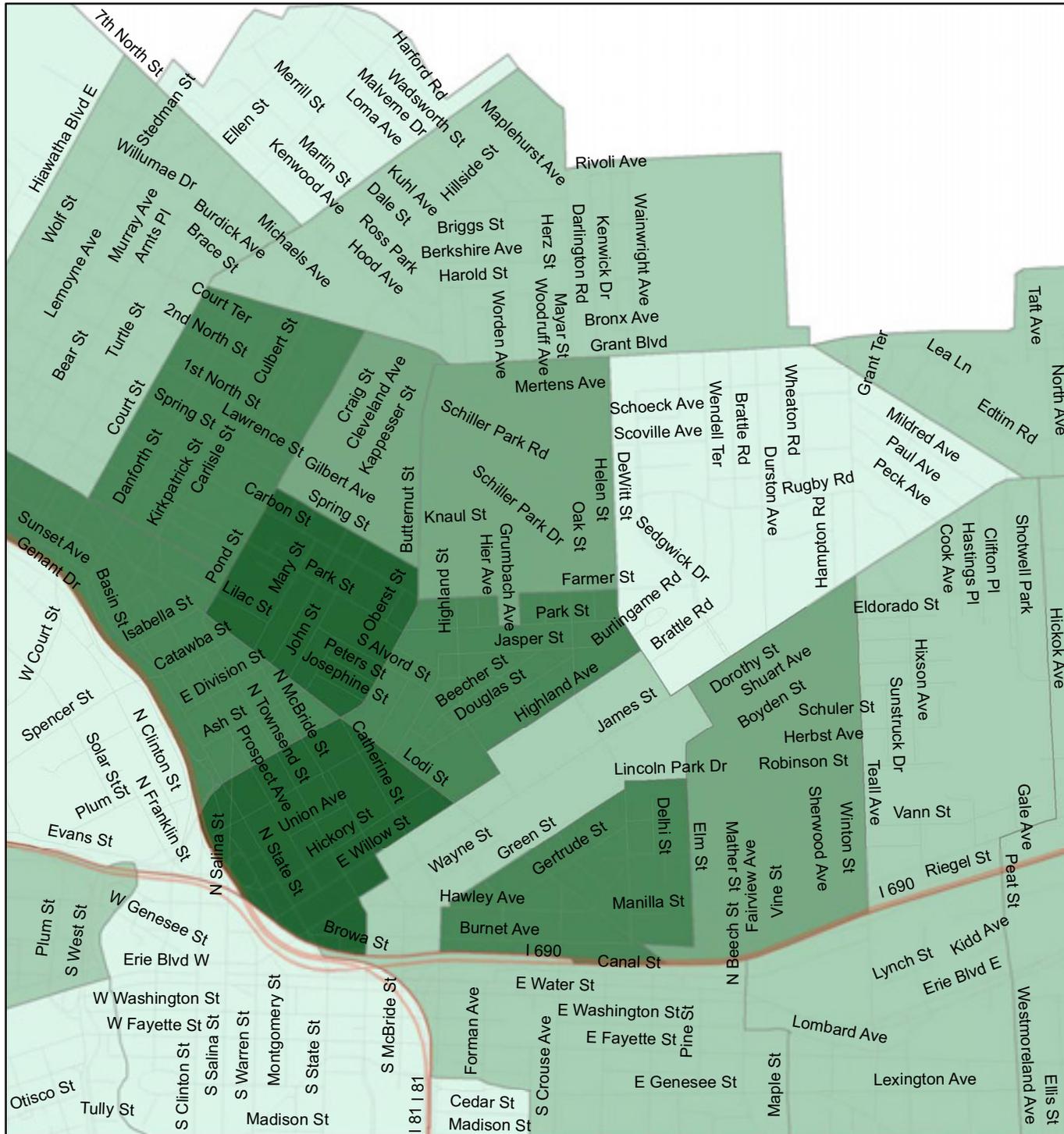
Interfaith Works

Interfaith Works/The Center for New Americans (CNA), a local refugee assistance program, suggested that Vietnamese, Burmese, Nepalese/Bhutanese, Somali, and Arabic are the most prominent language groups in the region with populations of limited English proficiency.*

The Syracuse Community Geography organization based at Syracuse University that “*works in partnership with community-based organizations and university affiliates to map and spatially analyze topics of concern to Central New York communities*” received information more recently from CNA and created the map on the following page to help show refugee information.

*Source: 2009 I-81 LEP plan, via contact with agency/program staff

Refugee Resettlement by the Center for New Americans by Census Tract (2003-2011)



668 households were mapped. A household may include more than one resident and varies depending on family size. The map includes the first residence established for new refugees by Center for New Americans and does not indicate secondary migration (where refugees may move after their initial resettlement).

OTHER LOCAL SOURCES:

SUNY Upstate Hospital

Per communication with the Director of Patient Education and Interpreter Services at SUNY-Upstate Hospital, their most common requests for interpretation are for Spanish, Nepali, Somali, Karen, Arabic, Bosnian and Vietnamese in that order. They receive 25,000 interactions a year; 500 a month are done in person. Also, while there is an increasing amount done on video remote interpreting in the Emergency Department, more is done with phone interpreters than in person or by video overall.

Onondaga Citizens League

In 2012, the Onondaga Citizens League (OCL) produced a study entitled, “The World at our Doorstep.” The primary purpose of the study, in short, was to “*develop a clearer picture and understanding of the refugee dynamic in Onondaga County.*”

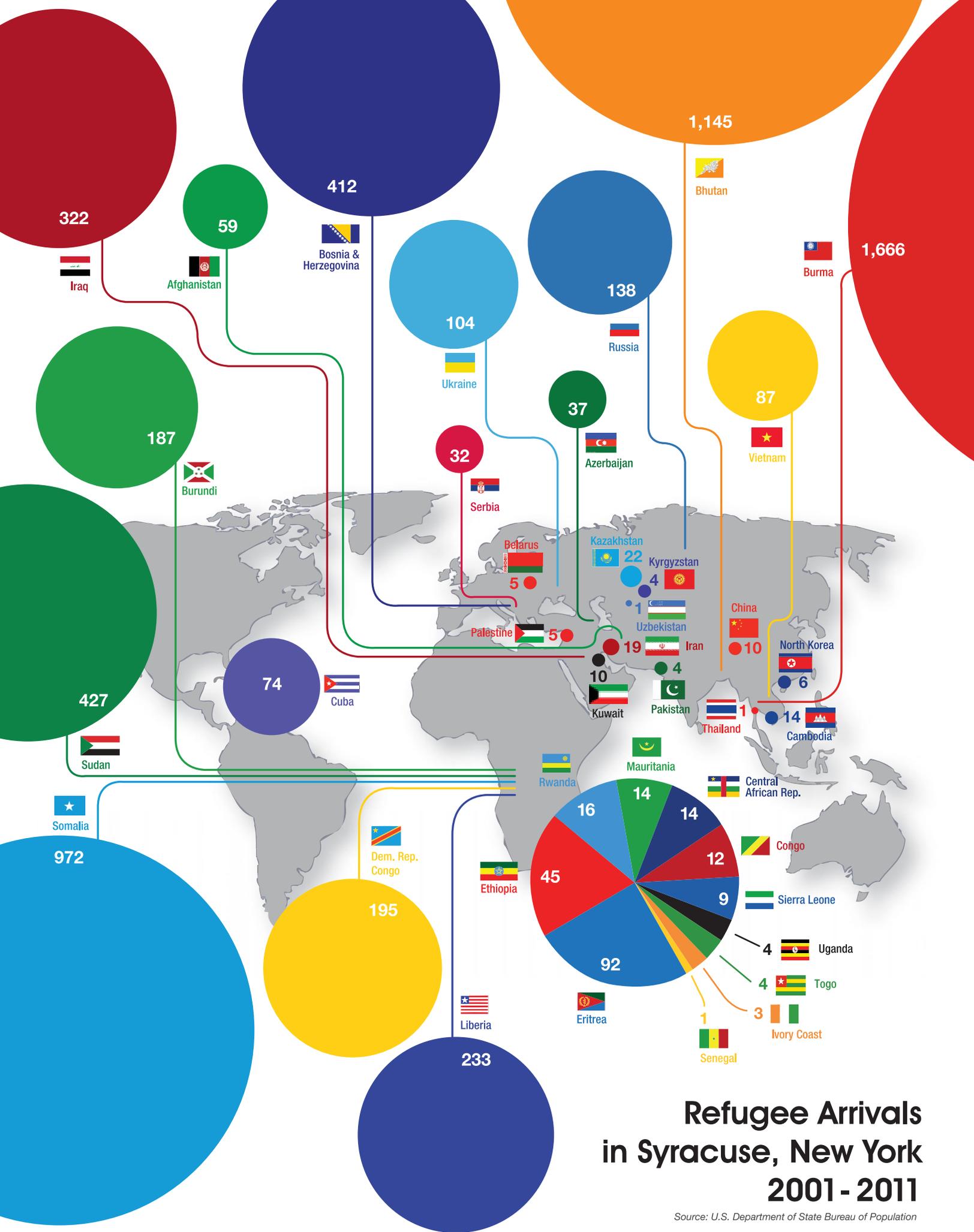
The OCL study provided the following general information on refugee resettlement in Syracuse:

- From 2001 through 2012, 7,210 refugees were resettled in Syracuse, according to the U.S. Department of State.
- There has been a recent boost in refugee arrivals with the average number of new refugees increasing from 450 individuals to more than 800 individuals annually in the last several years.
- Approximately 12,000 refugees and former refugees currently reside in Syracuse.

The OCL study provided the following specific information on refugee resettlement in Syracuse between 2001 and 2012, from the following Countries:

- Burma/Myanmar
 - 1,857 Burmese
 - Tribes in Syracuse: Karen, Kachin, Burmese, Chin, Mon and Karenni (Kayah)
 - The official language of Burma: Burmese (Myanmar)
- Bhutan
 - 1,427 Bhutanese
 - Major Languages: Nepali (Tamang, Mongor, Rai, Limbu)
- Somalia
 - 1,098 Somalis
 - Major Languages: Kizigua, Somali, Swahili and Arabic
- South Sudan
 - 450 Sudanese
 - Major Languages: Dinka, Arabic, and English
- Iraq
 - 397 Iraqis
 - Major Languages: Arabic and Kurdish

A visual of the influx of refugee arrivals in Syracuse was provided in the OCL report via the Info Graphic on the following page, which was fed by information from the U.S. Department of State, Bureau of Population, Refugees and Migration.



Source: U.S. Department of State Bureau of Population

Below is a table showing a synopsis of the languages identified when reviewing these different sources of information.

Table 7: Languages Identified by Data Sources (Both Quantitative and Qualitative)

	Quantitative Data Sources			Qualitative Data Sources					
	ACS	NYS OTDA **	NYS DOE **	City of Syracuse	RAP	Catholic Charities	Interfaith	SUNY Upstate	OCL
Burmese/Karen		X	X		X	X	X	X	X
Bhutanese/Nepalese		X	X		X	X	X	X	X
Somali		X	X				X	X	X
Arabic		X	X			X	X	X	X
Spanish or Spanish Creole	X*		X	X	X			X	
Chinese	X*								
Other Slavic Languages	X*								
Vietnamese				X	X		X	X	
Bosnian								X	

*LEP population meets 1,000 person threshold

** 1,000-person threshold not applicable, as these datasets contain only portions of the total population, in the case of the DOE data, or do not contain data on language proficiency, in the case of the NYS Office of Temporary and Disability Assistance data.

The quantitative data sources above show that the most common language groups with Limited English Proficiency in Onondaga County are Spanish, followed by Chinese and other Slavic Languages. They officially meet the 1,000 person threshold (See definition of Safe Harbor under Factor 1). Yet, previous discussions with other local resources, the NYS DOE data and the recently completed OCL study provide strong indication that a large number of refugees, settling originally and primarily on the North side of the City of Syracuse are most likely still living there and may very well still speak their native language of either Somali, Bhutanese/Nepalese, Burmese, Arabic, or Vietnamese.

Whether a majority speak English “less than very well” is to be determined by referencing the “Language Identification” table produced earlier in this plan, showing the LEP languages spoken in the individual Census Tracts, coupled with making connections with CBOs in the area. This will help SMTC staff identify those speaking English “less than very well,” and in turn help develop a better understanding of the level of services that may be needed in order to offer the opportunity for these individuals to get involved in future SMTC activities. Because of the large number of refugees and their concentration on the North side of the City, certain languages easily make up 5% of a Census Tract population. Therefore, if a Census Tract is considered to be the “service area,” it may warrant some level of language accommodations when SMTC activities take place in that Census Tract.

FACTOR 2: *Identifying the frequency with which LEP persons come into contact with SMTC services.*

**NOTE: Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed.*

Step 1:

Refer to relevant programs, activities, and services you provide: Agencies conducting review of prior experience with LEP persons will have listed programs, activities, and services with which LEP persons most frequently come in contact.

The SMTC does not provide direct services to individuals, in that we do not operate buses or coordinate carpools. The agency also does not own or maintain infrastructure. As previously noted, the SMTC serves as the region's MPO, and in this capacity, provides transportation planning services, including regional long-range transportation planning, for all of Onondaga County and portions of Madison and Oswego Counties. In addition, the SMTC administers federal transportation funding for the same geographic area. These activities impact all citizens in the MPA. However, in the past, LEP populations have not frequently participated in the SMTC's public process. The SMTC will continue to work to make its activities accessible to all members of the community, including investigating ways to more effectively reach LEP populations.

Step 2:

Review information obtained from community based organizations.

Step 3:

Consult directly with LEP persons: Hold face-to-face meetings with LEP persons. Advertise event and hold meetings during the day at locations convenient and accessible to LEP persons. Ask LEP persons if they are aware of the types of language assistance agency provides and what additional language assistance measures would be helpful.

Past contact with CBOs during the I-81 LEP planning process suggested that direct outreach to LEP populations is likely to be most effective in encouraging participation in SMTC projects. When asked whether LEP populations are likely to participate in large public meetings if these meetings are located in accessible places, held at convenient times, and language services are publicized, the CBOs suggested that this was improbable. The abstract nature of the planning process, which often focuses on long-term possibilities and potential impacts (i.e. very little tangible or immediate) was noted by several CBO staff members as a possible deterrent to participation. Instead, CBOs suggested that the SMTC do direct outreach, coming to local centers where LEP populations congregate, in order to engage them in projects. When asked about translating documents CBOs suggested that this was unnecessary, as literacy can sometimes be an issue in the native language of some of these groups, and that direct face-to-face communication is likely to be more effective. Representatives of CBOs also suggested that access to the Internet tends to be inconsistent for these groups.

FACTOR 3: *Defining the nature and importance of the programs, activities, or services provided by the SMTC to LEP persons.*

**NOTE: The more important a particular service or activity, the greater is the need to provide meaningful access to the LEP customer by providing language services and assistance. Recipient and/or SMTC needs to assess the services provided by each program area to determine which are most critical and examine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual. Examples include identifying and translating vital documents.*

Step 1:

Identify agency's most critical services: Agency should identify what programs or activities would have serious consequences to individuals if language barriers prevent a person from benefiting from the activity.

The SMTC conducts a number of specific transportation planning activities, some of which include traffic corridor studies, transportation data collection, congestion management, and multi-modal transportation planning (including bicycle and pedestrian planning). The SMTC is also responsible for the maintenance of the area's Transportation Improvement Program, a multi-year program that funds capital projects related to transit, local roadways and interstates, bicycle and pedestrian amenities and more. It is important to note, however, that the SMTC is not an agency that implements particular transportation improvements. Rather, it is a collaborative forum where transportation issues are studied, and recommendations are made. Denial, therefore, of access to any opportunities and information provided by the SMTC would have the same consequences for LEP populations as it would for any other population. Any programs or projects worked on by the SMTC can have economic, environmental, social and transportation ramifications for LEP populations, as well as for the population at large.

Step 2:

Review input from community organizations and LEP persons: Agency's contact with community organizations that serve LEP persons, as well as contact with LEP persons themselves, should provide information on the importance of the modes or types of services provided to LEP persons.

As previously noted, the SMTC has had contact with CBOs in the past when undergoing projects that could affect LEP populations.

In preparation for the Seymour-Shonnard Study, the SMTC worked closely with the Spanish Action League, a non-profit organization in the area, which provides services to the neighborhood's Spanish speaking population.

Most recently during the undertaking of The I-81 Challenge, CBOs that were contacted suggested that direct outreach to LEP populations is likely to be most effective in encouraging participation in SMTC projects in general. CBOs suggested that the SMTC do direct outreach, coming to local centers where LEP populations congregate, in order to engage them in projects.

In short, it was recommended to outreach to LEP persons through face-to-face contact and to limit the translation of documents unless they are specifically requested.

The SMTC feels it is not only important but beneficial for the agency and transportation planning in general, that when the agency undertakes projects in an LEP area to reach out to the local CBO for assistance in getting people involved. It serves to strengthen not only the particular study/plan being worked on, but the overall transportation planning process.

FACTOR 4: *Defining the resources available and the costs*

**NOTE: Costs and resource expenditures must be balanced in a reasonable manner with the need to provide meaningful services. Language services need to be prioritized to target those individuals most in need because of the nature and importance of the activity involved.*

Step 1:

Inventory language assistance measures currently being provided, along with associated cost. Agency's marketing, customer relations, and community outreach offices may be able to determine the costs associated with translating documents, contracting with language interpreters, producing pictographs, installing multilingual technology and other language assistance measures.

As noted previously, the SMTC currently offers accommodations (in English) on flyers for all public meetings or workshops hosted by the SMTC. These accommodations are generally not requested, but LEP services have been provided in the past for certain projects when the need transpired.

For example, the SMTC utilized during The I-81 Challenge mentioned earlier in this plan, a translation service whose overall cost for services was costly considering no participants to the public meetings utilized those provided services. On the smaller scale project, the one-way to two-way street conversion project also mentioned earlier in this plan, accommodations were provided but not utilized at the public meetings.

Step 2:

Determine what, if any, additional services are needed to provide meaningful access. Determine what information may need to be translated into additional languages and what additional oral or written languages services should be provided or what existing language assistance services need to be made available on a more widespread basis.

In general, more translation and interpretation into Spanish at the very least may be necessary, considering the Spanish language is the language spoken most by those LEP individuals in the SMTC MPA. At the same time, it may be necessary, depending upon what section of the MPA is being studied, for some interpretation into other languages at face-to-face meetings.

Given the different scales of projects worked on by the SMTC, each project will need to be evaluated individually to determine the level of services needed. At minimum, the SMTC will make sure public meetings are language accessible by noting on meeting flyers that interpretation is available upon request (as is done currently).

The agency has also considered looking into having a translation service of some kind, available at all times in case an LEP individual were to approach administrative staff in the office and need interpretation. Whether the costs imposed of having this interpretation service "on call" will substantially exceed the benefit for these services will need be evaluated.

There is also the option of looking into sharing the initial cost of retaining in general a translation service with other MPOs in the state. Once initial costs of retaining this “on call” service are paid, individual MPOs would be responsible for the cost incurred when actually utilizing these services.

Step 3:

Analyze budget: Consider what percentage of the agency’s capital and/or operation budget could be devoted to additional language assistance expenses and whether the Agency’s budget for these expenses will remain stable over time or whether it may be subject to reduction.

The SMTC has no bilingual staff at the present time. Staff will continue to explore special language assistance resources, which may assist. In many instances there are non-profit organizations located in areas of LEP populations that provide needed services to the population. Whether a fee would be charged to the SMTC would need to be determined on a case-by-case basis.

Overall, there are many different levels of translation/interpretation services that could be provided, and the SMTC will look to provide needed services where appropriate, making sure that costs do not exceed benefit. The SMTC is a fairly small agency with a limited budget and therefore needs to be reasonable with its expenditures, and will evaluate the expense if services are determined to be needed.

If the SMTC continues to do what it has done in the past for future projects, which may need translation/interpretation services, it is estimated that the cost for those services could most likely be accommodated. Though, due to the limited amount of projects that have taken place in an LEP area, budgets are subject to change according to specific project needs.

Step 4:

Consider cost effective practices for providing language services: Agency may have access to language assistance products that have been developed and paid for by local, regional, or state government agencies and may also have bilingual staff that could provide language assistance on an ad hoc or regular basis. These resources should be inventoried and taken into consideration as part of assessment of total resources available.

The SMTC has no bilingual staff at the present time. In many instances there are not-for-profit organizations located in areas of LEP populations that provide needed services to the population. As mentioned earlier, whether a fee would be charged to the SMTC would need to be determined on a case-by-case basis.

To what level the agency will utilize language assistance measures in the future will need to be determined on a project-by-project basis.

On the following pages is the SMTC Language Assistance Plan (LAP), a synopsis on what measures the agency plans to take based on what it has learned as a result of the Four Factor Analysis.

Language Assistance Plan (LAP)

The quantitative and qualitative data clearly shows that there are many people in the MPA speaking languages other than English. It is also clear that there is a growing refugee population living within the MPA that the SMTC should be cognizant of when undertaking planning activities particularly in the North side of the City. The SMTC will strive to make projects accessible to all people, including LEP populations and those with language assistance needs outside those identified in the approach herein.

However, there are financial and practical limitations to consider. Past contact with the City of Syracuse and local community-based organizations suggested that the SMTC should be judicious in the use of resources for translation and interpretation services. For example, they recommended that, at least initially, translating executive summaries of documents into numerous languages is not a wise use of limited funds, as translated project materials may not be widely read. Likewise, the SMTC was advised to focus on direct face-to-face contact with LEP populations, rather than contracting with many interpreters for many large workshops.

Given the above advice, the SMTC proposes to proceed with the following approach: a general approach and a project specific approach. These approaches will be evaluated periodically, especially on contact with LEP populations, to ensure their effectiveness. The following is an exhaustive list of the types of steps that could be taken under both approaches.

General Approach

When undergoing any project that has MPA wide implications, the SMTC will look at the following generic options to help encourage the participation of the LEP populations in its planning activities and to proactively assist this population group to get involved.

- ✓ The use of Google Translate on the SMTC's web site, so that anyone visiting the site could review text in any other language.
- ✓ Translate one of the agency's quarterly newsletters into Spanish, the language that is one of the highest LEP populations in the MPA, as a test case. Distribute this newsletter via CBOs in areas of the community with high densities of Spanish speakers. Review internally (and with CBOs) post-publication to determine if the translated newsletter reached the intended audience, whether it spurred interest in the process, and whether it precipitated additional participation.
- ✓ Include a phrase on all public meeting invites for MPA-wide projects (i.e. LRTP) that notes, "To request special accommodations, please contact the SMTC at 315-422-5716." This phrase will be in languages identified in this plan that meets the Safe Harbor threshold and/or is considered to be a population that will be encountered by SMTC actions.
- ✓ Have ready access to an on-call translation organization, to assist in the translation of public meeting materials and to provide translation by phone or at public meetings if necessary.

- ✓ Utilize language identification methods such as “I Speak” cards at all public meetings and also have them available at the front desk of the office if an LEP individual were to visit the office.
- ✓ Have administrative staff, and staff in general, versed in what course of action is to be taken if they encounter an individual with Limited English Proficiency.

Project Specific Approach

Currently, beyond the over-arching agency’s public participation plan, project managers are asked to create an individual Public Involvement Plan (PIP) for most projects. In those plans, project managers will have the opportunity to describe in more detail about how they intend to get their target audiences involved in the project. Project Managers for non-MPA-wide projects will describe in individual PIPs what actions might be used to ensure the project is inclusive of the LEP populations.

Each project manager going forward will be asked to analyze a specific project study area to determine, by referencing the SMTC’s Title VI/LEP plan (this plan), the extent to which a project study area falls in an LEP populated area.

A section of the PIP will be set aside that speaks to what, if any, accommodations may be needed for the LEP population affected by their study. The project managers in this section will be asked to explain the rationale behind their decision and their anticipated course of action.

The course of action may include a range of options depending upon the location of the LEP population in and around a study area, which can be determined by reviewing the numerous maps in this Title VI/LEP plan.

Note this list is not meant to be a “checklist of must do’s” for every project, but more a list that project managers should review and choose those items they feel may best help reach the LEP population in a study area.

- ✓ Make all project public meetings language accessible by noting on meeting flyers/notices that interpretation is available upon request. Need for interpretation services will be determined based on review of demographic information within a study area.
- ✓ Translate notices into the languages that meet the Safe Harbor provision if it is anticipated they will be affected by SMTC actions.
- ✓ Make contact with neighborhood community based organizations (CBO) in a study area to:
 - Distribute meeting notices to contacts at CBOs.

- Utilize their resources and connections in getting translation assistance and/or assistance in getting the word out. (i.e. newspapers and radio programs whose audience is of a language different from English)
 - Hold small group meetings on location with CBOs. Taking interpreters in key languages, to be determined with CBO staff. Timing of these small group meetings to be determined with CBO staff.
 - Review internally (and with CBOs) post-distribution to determine if the translated material reached the intended audience, whether it spurred interest in the process, and whether it precipitated additional participation.
- ✓ Make contact with school ESL (English as a Second Language) staff, in a study area, to better understand which languages are spoken in the specific study area and then see if they would be able to provide any assistance in translation and/or recruitment.

It should be noted that the SMTC regardless of whether a study is in a LEP-populated area or not will continue to put on all of its meeting notifications that special assistance, i.e. sign language or other interpretation services, are available upon request.

For MPA-wide meetings, this “special assistance notification” line will be translated in Spanish, Chinese, and other Slavic languages. For smaller scale study areas within the MPA, it will be up to the project manager to assess the situation, but this “special assistance notification” line could be translated in the language that meets the Safe Harbor definition for the particular Census Tract the study is being completed in.

Lastly, it should be noted that SMTC staff members have attended Title VI, Environmental Justice, Limited English Proficiency, and Americans with Disabilities Act training sessions, and plan to do so in the future when offered, to learn more of what is required of the agency and what suggestions and/or examples to obtain LEP involvement can be replicated.

CONCLUSION

The SMTC will look to continue to be inclusive of both the minority and LEP populations in its planning activities as it has done in the past. The results of this plan have reinforced the fact that the SMTC MPA is made up of a number of minority and LEP populations particularly within the City of Syracuse's borders. The SMTC shall continue to be cognizant when undergoing planning activities, specifically on the north side of the City, that there is a refugee population concentration with a number of different languages present. Though small in number in comparison to the entire MPA, they make up a fairly large number within specific Census Tracts. This plan has also reinforced that projects completed by the SMTC have not discriminated against the minority or LEP populations when it comes to the expenditures of federal funds in the MPA.

In all, SMTC project managers can benefit from the contents of this plan on a regular basis. It can be used as guidance to assist them in developing their individual public involvement plans. As staff utilizes this plan, it will assist the agency in evaluating what works and what doesn't, particularly with regard to the language assistance measures outlined within the plan. This, coupled with the Title VI compliance report submitted to NYSDOT, will help identify the need for any small updates to be made periodically to this plan while leaving the larger update of the entire plan for when there is a significant change in source data (i.e. 5 year ACS and/or decennial Census).

The SMTC realizes the importance of the inclusion of the minority and LEP population in the transportation planning process, and it will continue to be cognizant of any future training offered on both Title VI and LEP, attending where and when appropriate.

*Appendix: NYSDOT Triennial Report for MPO Subrecipients
SFY 2009-2012*

New York State Department of Transportation Triennial Report for MPO Subrecipients SFY 2009-2012

Name of Organization: **Syracuse Metropolitan Transportation Council (SMTC)**

Date Submitted: **September 5, 2012**

Name/Title of Person Completing Triennial Report: **James D'Agostino, Director**

Name of Host Agency: **Onondaga County c/o Central New York Regional Planning & Development Board**

The following questions are to be completed by the MPO Central Staff. The purpose of the Triennial Report is to provide an update of MPO Title VI activities and processes during this reporting period. The completed Report will be submitted to the Federal Highway Administration for their review as required under the Code of Federal Regulation 200.9 (b)(7).

1. Public Involvement

a. Has the MPO updated its Public Participation Plan during the last three years? Describe how your public involvement process provides information to the public, timely public notice and full public access to key planning decisions.

The SMTC last updated its Public Participation Plan (PPP) in April 2009 and it is still valid to date. A copy of the PPP has been included.

The SMTC provides advance notice of all public meetings. Meetings are announced through fliers, press releases and other media announcements, through established organizations/groups, and on the SMTC web site.

b. Does the MPO periodically review its Public Involvement Plan to determine its effectiveness for assuring the process provided open and continuous access to stakeholders?

Yes, the SMTC periodically reviews its PPP. The PPP will be updated based on the requirements of the new federal legislation, Moving Ahead for Progress in the 21st Century (MAP-21). Additionally, the SMTC establishes a Public Involvement Plan (PIP) for individual Unified Planning Work Program (UPWP) projects.

c. How are community based organizations representing minorities/disadvantaged individuals made aware of your planning process and offered the opportunity to provide input? What strategies, if any, have been implemented to reduce participation barriers for such populations?

As stated above, each individual study has its own PIP. The SMTC reviews the demographics of the study area at the start of the project and works with the project sponsor to develop

said PIP. The SMTC has established relationships with community based organizations representing minorities/disadvantaged individuals. Through these relationships minorities/disadvantaged individuals have representation on Study Advisory Committees (SAC) or Working Groups. Some SMTC meetings have been held in community rooms within the study area to further resident participation.

For the I-81 Public Participation Project the SMTC created a Community Liaison Committee (CLC) consisting of established organizations, some of which represent minority and disadvantaged populations. Due to said partnership, the Syracuse Housing Authority, a CLC member, provided transportation for its residents to *The I-81 Challenge* meetings in order to encourage their participation. Also, for the May 2012 public meeting, the SMTC, partnering with the Central New York Regional Transportation Authority, provided complimentary round trip bus passes to those who wished to travel to the meeting by bus.

d. Describe outreach efforts to LEP populations. For example, are public meeting announcements made available in languages other than English?

The SMTC has conducted outreach efforts to LEP populations through several methods. For the Seymour-Shonnard Street Corridor Study the SMTC contracted for services to translate all documents (notices, fliers, project documents) into Spanish. Additionally, Spanish Language Interpreters were provided at all public meetings.

For *The I-81 Challenge*, the SMTC publishes public meeting/workshop information in English, Spanish and Vietnamese. Documents have been created in Spanish.

Copies are included.

e. How do you ensure an accessible location and appropriate translation services are provided during public meetings?

As required under the Americans with Disabilities Act, the SMTC holds all public meetings at accessible venues such as school buildings, fire houses, and hotels/motels.

As stated in 2d, language interpreters were provided at all public meetings for the Seymour-Shonnard Street Corridor Study. For *The I-81 Challenge*, Spanish and American Sign Language (ASL) interpreters were on-site to provide services. Additionally, on-call interpreters for other languages were available through a provided phone line. Vietnamese translators were available with an advance request.

f. Does your public outreach effort use traditional media (such as print, television, radio, etc.) and social media (Facebook, Twitter, etc.)?

Yes. The SMTC contacts local traditional media through press releases. The SMTC also contacts area media to include our upcoming meetings/workshops on their "Community Calendars". In addition, the SMTC uses social media, i.e. Facebook.

g. Was a draft Transportation Improvement Program (TIP) released for public comment during the reporting period? What efforts were made to notify the public of the draft TIP? Explain how public comments are solicited on the draft TIP (written comments, public meetings, etc.)?

Yes, the SMTC released a draft TIP for a 30-day public comment period in 2010. Public meetings were held. Notices were placed on the SMTC web site and a legal notice was published in the local daily newspaper, *The Post-Standard*. Public comments were solicited in either written or verbal format to the project manager.

h. Does the MPO include Title VI related material in its public brochures or newsletters? Please attach samples.

The SMTC includes information relative to Title VI in project specific meeting/workshop fliers. The SMTC newsletter, *Directions*, includes articles on Environmental Justice and *The I-81 Challenge*, in addition to other studies. A copy of a newsletter is included.

i. How does the MPO involve Indian tribal governments in the transportation decision making process?

Indian tribal governments are invited to participate in all SMTC studies either as Study Advisory Committee (SAC) members or as stakeholders. The Onondaga Nation leaders are included in all SMTC committee mailings through the United States Postal Service. The Onondaga Nation leaders are non-voting members of the SMTC Executive, Planning and Policy Committees.

2. Planning Process

a. Does the MPO have an Environmental Justice (EJ) Plan? When was the EJ Plan last updated?

The SMTC completes an Environmental Justice (EJ) Analysis. The most recent version was acknowledged as complete at the SMTC's July 23, 2012 Policy Committee meeting.

b. Does the EJ Plan include a demographic profile of the metropolitan planning area that includes identification of the locations of socio-economic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI provisions?

Yes.

c. Does the MPO use the demographic information to examine the distribution of the benefits and burdens of the transportation investments included in the Plan and TIP? Does the MPO take corrective actions to address an imbalance of benefits/burdens to EJ populations? Explain.

Based on past analyses, no known imbalances were identified.

d. Were any studies conducted during the reporting period that provided data relative to minority persons, neighborhoods, income levels, physical environments and/or travel habits? If yes, were Title VI considerations addressed in the study?

All SMTC studies are comprehensive in nature and address the above concerns.

e. Please list the major transportation projects planned during the last two years in which social, environmental, economic, or demographic adverse impacts were identified. Were any mitigation measures made to address the adverse impacts?

I-81 Public Participation

I-81 Travel Demand Modeling

James Street Road Diet

E. Genesee Street Sidewalk Study

Almond Street Accommodation Evaluation

Environmental Justice

Onondaga County Department of Transportation Signal Optimization

Syracuse/Onondaga County Planning Agency Development Guide Update Assistance

Clay Three Rivers Access Study

Near Northside Parking & Transportation Study

NYSDOT Bicycle Corridor Study

Onondaga County Sustainable Streets Initiative, Phase 1

Erie Canalway Trail, Syracuse Connector Route

Downtown Syracuse Two-Way Feasibility Study

City of Syracuse Wayfinding Study

Bicycling and Pedestrian Planning

There were no known impacts requiring mitigation at this time.

3. Title VI Training

a. Did your MPO receive any Title VI training information from NYSDOT/FHWA/ during the reporting period? If applicable, how many participants attended training? What was the subject of the training?

Yes, staff attended the following Title VI trainings during the reporting period:

March 25, 2010 - Building Bridges for Traffic Safety Symposium. Speakers included representatives from the National Highway Traffic Safety Administration (NHTSA), the New York State Department of Health, and NYSDMV Governor's Traffic Safety Committee (GTSC) and Onondaga County officials. Training focused on traffic safety concerns and prevention strategies involving diverse communities. Staff attending included:

Mario Colone, (then) Principal Transportation Planner

Patricia Wortley, Administrative/Communications Assistant.

June 16, 2010 - A NYSMPO training session - Civil Rights/ADA/Title VI Training. The training was conducted by the FHWA. The training provided a general overview of Title VI, ADA and Civil Rights elements. Current staff in attendance were:

**Kevin Kosakowski, Junior Transportation Planner
Patricia Wortley, Administrative/Communications Assistant.**

March 21-22, 2012 - Building Bridges for Multicultural Traffic Safety – New York Native Nations Transportation Safety Summit event. Presentations were done by FHWA, NYSDOT Main Office and the GTSC in conjunction with New York State Native Nations. The training focused on the cooperative work that has been done and that could be done between tribal governments and the state, MPOs, and other transportation and traffic safety partners. Staff in attendance were:

**Mike Alexander, Transportation Planner
Patricia Wortley, Administrative/Communications Assistant.**

4. Upcoming Year

a. Describe plans regarding Title VI, EJ, LEP and ADA for the upcoming year. Include any significant problem areas to focus on and plans for approaching them.

The SMTC completed the latest Environmental Justice report in July 2012. Title VI and ADA requirements will be adhered to. The SMTC will address LEP elements on an as needed basis in the coming year.