

## Title VI Program Update

September 2024



Developed in Accordance with FTA Circular 4702.1B, October 1, 2012 401 B Street, Suite 800 | San Diego, CA 92101 | 619.699.1900

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The 18 cities and county government are SANDAG serving as the forum for regional decision-making. SANDAG builds consensus; plans, engineers, and builds public transit; makes strategic plans; obtains and allocates resources; and provides information on a broad range of topics pertinent to the region's quality of life.

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## Approving the SANDAG 2024 Title VI Program Update and Authorizing Submittal to the Federal Transit Administration

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000 et seq (Act) and Title 49 CFR Part 21, the United States Department of Transportation, Federal Highway Administration, and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color, or national origin; and

WHEREAS, as a recipient of federal funds, SANDAG is required to comply with the requirements of the Act and applicable implementing regulations; and

WHEREAS, pursuant to FTA Circular 4702.1B, SANDAG is required to submit its Title VI Program Update to its governing body for approval; and

WHEREAS, the SANDAG Board of Directors has considered and determined to approve its 2024 Title VI Program and policies, including but not limited to, disparate impact and disproportionate burden policies, and the Language Assistance Plan, all of which are set forth in the SANDAG 2024 Title VI Program Update;

NOW THEREFORE BE IT RESOLVED, that the SANDAG Board of Directors does hereby approve the SANDAG 2024 Title VI Program Update; and

BE IT FURTHER RESOLVED, that the SANDAG Board of Directors authorizes the Chief Executive Officer or his designee to submit the SANDAG 2024 Title VI Program Update to FTA and take any other steps necessary to give effect to this Resolution, including resolving any follow-up requests from the FTA.

PASSED AND ADOPTED this 13th of September 2024.

c~ \_

Chair

Attest:

Secretary

**Member Agencies**: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach, Vista, and County of San Diego.

**Advisory Members**: California Department of Transportation, Metropolitan Transit System, North County Transit District, Imperial County, U.S. Department of Defense, Port of San Diego, San Diego County Water Authority, Southern California Tribal Chairmen's Association, and Mexico.

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# Chapter 1: Background

#### 1. Introduction

This report describes the activities, programs, and policies of the San Diego Association of Governments (SANDAG) in compliance with Title VI of the Civil Rights Act of 1964 (Title VI) as a Metropolitan Planning Organization (MPO) and in its roles in developing plans and programs to improve mobility options for San Diego residents, setting transit fares, and constructing transit infrastructure for the region.

Title VI states, "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance" (42 U.S.C. Section 2000d). As a recipient of federal funding, SANDAG is required to demonstrate that it complies with Title VI and associated civil rights and environmental justice laws, executive orders, and regulations. This Program update follows the instructions, guidance, and examples set forth in the Circular published by the Federal Transit Administration (FTA) in 2012 (FTA 4702.1B, October 1, 2012) (the Circular). The last Title VI Program update for SANDAG was submitted in 2021.

SANDAG policies, procedures, and programs are consistent with federal and state laws, executive orders, and regulations, including Title VI and Executive Orders 12898 and 13166, and reflect the principles of social equity and environmental justice.

In February 2021 the SANDAG Board of Directors adopted the following Commitment to Equity statement:

We hold ourselves accountable to the communities we serve. We acknowledge we have much to learn and much to change; and we firmly uphold equity and inclusion for every person in the San Diego region. This includes historically underserved, systemically marginalized groups impacted by actions and inactions at all levels of our government and society.

We have an obligation to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone. The SANDAG equity action plan will inform how we plan, prioritize, fund, and build projects and programs; frame how we work with our communities; define how we recruit and develop our employees; guide our efforts to conduct unbiased research and interpret data; and set expectations for companies and stakeholders that work with us.

We are committed to creating a San Diego region where every person who visits, works, and lives can thrive.

Since the adoption of its commitment to equity, SANDAG has launched the process for the development of an equity action plan, which identifies opportunities and strategies to embed equity into the work conducted by SANDAG's various departments. As part of this process, the agency has developed its own definition of social equity:

#### **Context**

Like many metropolitan areas in the U.S., our region has historically underinvested in low-income, Black, Indigenous, or People of Color (BIPOC), and other underserved communities. Many communities have faced and continue to face historical and structural injustices, including barriers to accessing high quality and reliable transportation, access to employment centers, clean air, green spaces, affordable housing, and more.

Additionally, our organization is a microcosm of a society with a legacy of conscious and unconscious biases against various identities: including but not limited to, race, gender, age, language, disability, national origin, and others.

To strive for social equity, we must rectify these systemic injustices in our work externally and internally.

#### **Proposed Definition**

"Social equity is the fair and just distribution of resources, opportunities, and treatment of all individuals, regardless of their race, zip code, language, or other socioeconomic factors.

- In our work with the public: social equity is a vision of our future where all
  communities in our region are empowered to meaningfully shape our work and
  have access to the resources and opportunities they need to have a good quality of
  life, prioritizing the needs of historically under-resourced and under-represented
  communities.
- 2. Within our organization: it's a vision for our workplace and employment practices where every employee feels valued, respected, supported, and equally deserving of opportunities."

#### **Strategy**

To promote equity in our external initiatives, we must prioritize historically underresourced communities: planning and delivering projects, programs, and policies that bridge gaps in access and advancement potential.

Practicing equity inside our agency entails fostering a culture of inclusion and belonging where all employees feel comfortable bringing their full selves to work, regardless of their diverse identities. Further, we must eliminate biases in hiring, management, promotion, compensation, and all other organizational practices.

The commitment and definition provide a foundation for the actions SANDAG intends to take to incorporate diversity, equity, and inclusion in all programs, projects, and policies. When finalized and adopted, the Equity Action Plan will further detail the tangible actions to be implemented to fully enact this commitment to racial equity, civil rights, and environmental justice. All these efforts inform and guide this Title VI Program update.

A note on terminology: according to federal guidance, populations protected by Title VI regulations on the basis of race, color, or national origin are referred to as "minority" populations; the U.S. Census Bureau follows this convention as well. However, the community served by SANDAG is majority "minority" and so the term is not the most descriptive or useful. In this document, the narrative sometimes refers to these protected populations and communities as "people of color" or "communities of color," terms that are used interchangeably with "minority." Similarly, although the term "Limited English Proficiency (LEP) populations" is used when referring to Executive Order 13166 and its specific requirements, our preference for more inclusive language led us to replace this term by "people with language access needs" in our discussion; however, the term LEP is also used in this Program Update.

#### 2. Required Components of the Program Update

Three chapters of the FTA Circular include instructions for the completion of the Title VI Program as they apply to SANDAG: Chapter III, General Requirements; Chapter VI, MPO requirements, and Chapter IV, Section 7b, Fare Policy. All of these requirements are responded to in this document.

According to the Circular, Title VI programs must be updated every three years. SANDAG's first Title VI Program was submitted to FTA on June 5<sup>th</sup>, 2009, and updated every three years since that initial date. Because this report relies on data gathering and reporting, and because sufficient time must be allowed for review by the Board, this 2024 Title VI Program covers Title VI-related activities, practices, and data through March 31, 2024.

#### 3. Background and Role of SANDAG in the Region

San Diego County is home to about 3.3 million people, and SANDAG serves as the forum for regional decision-making. As SANDAG's Mission Statement says, "We are the regional agency that connects people, places, and innovative ideas by implementing solutions with our unique and diverse communities." SANDAG builds consensus; makes strategic plans; obtains and allocates resources; plans, engineers, and builds public transportation projects; and provides information on a broad range of topics pertinent to the region's quality of life.

The Board of Directors is the governing body responsible for establishing the agency's policies and programs. It is composed of representatives from the 18 incorporated cities in the region and the county government. Directors are elected officials – mayors, city councilmembers, and county supervisors – selected by their peers from the incorporated cities and the county. Voting is based upon membership and the population of each jurisdiction, providing for an accountable and equitable representation of the region's residents. Most matters are decided by a simple tally vote; however, under some circumstances, the Board may take a weighted vote based on percent of the population represented that can supersede the tally vote.

Supporting these voting members are advisory representatives from Imperial County, the U.S. Department of Defense, Caltrans, the Port of San Diego, the Metropolitan Transit System (MTS), the North County Transit District (NCTD), the San Diego County Water Authority, the Southern California Tribal Chairmen's Association, Mexico, and the San Diego County Regional Airport Authority. On December 8, 2023, the SANDAG Board of Directors also approved the addition of an advisory representative from the Association of Planning Groups – San Diego County, providing an additional voice to communities living in unincorporated cities.

SANDAG recognizes the value of working collaboratively with tribal governments and local, state, and federal agency staff to achieve regional goals. Through working agreements with local, state, and tribal governments, as well as federal agencies, SANDAG and its member local governments have the opportunity to ensure the consistency of individual agency plans and programs regionwide.

Designated as the MPO by the governor under federal law, and as the regional transportation planning agency by both state and federal governments, SANDAG serves as a technical and informational resource for the region.

#### Overview of SANDAG's Roles and Responsibilities

#### A. Strategic and long-range planning for the San Diego region

SANDAG has the responsibility to look into the future and propose plans that best satisfy the diverse transportation needs and concerns of the San Diego region. Planning efforts that serve as the foundations for transportation planning and programming include the development of regional plans (RP) and regional transportation improvement programs (RTIP) every four years and two years, respectively. SANDAG's latest RP was adopted in December 2021 and its latest RTIP in September 2023. The Regional Plan is the long-range transportation plan for the region, which includes a Sustainable Communities Strategy (SCS) and the Regional Comprehensive Plan (RCP), the long-term planning framework for the San Diego region. The Regional Plan is intended to integrate local land use and transportation decisions and is developed in accordance with both state and federal laws. The RTIP is the five-year programming of state, federal, and other regionally significant transportation funds. SANDAG also prepares an annual Regional Short-Range Transit Plan (SRTP) and Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan), which guide short-term services changes.

#### B. Transit, planning, implementation, and operations

In San Diego County, two transit agencies, NCTD and MTS, are responsible for transit-related operational decisions regarding routes, rolling stock, and paratransit in the region; they also evaluate major service changes as needed based on the requirements stated in the FTA Circular. Under the San Diego Regional Transportation Consolidation Act, known as California Senate Bill 1703 (Peace, 2002) (SB 1703), some of the functions previously carried out by NCTD and MTS were consolidated under SANDAG. As a result, SANDAG carries out development and construction of major capital projects on behalf of NCTD and MTS. Following SB 1703, SANDAG, MTS, and NCTD also agreed by Memorandum of Understanding (MOU) that SANDAG would be responsible for setting regional transit fares, which resulted in SANDAG's development and implementation of a Comprehensive Regional Fare Ordinance. SANDAG does not, however, operate transit itself. Accordingly, this Title VI Program update includes information about SANDAG's fare setting responsibilities, as well as details about SANDAG's Title VI considerations during site selection for construction of the two transit agencies' projects but does not address Title VI responsibilities that remain within the purview of the transit operators.

MTS and NCTD are direct recipients of FTA funding and therefore have Title VI responsibilities independent of SANDAG. The MOU between SANDAG, MTS, and NCTD provides that SANDAG will assist NCTD and MTS with their triennial Title VI Program updates. Title VI Program updates consistent with the Circular were prepared and adopted by the transit operators separately from this document in May 2024; those Title VI Programs are contained in Appendix A.

#### C. Fund allocation and program administration

A series of bills grant SANDAG the authority to award transportation funding in the region. Under the 2005 transportation authorization bill, entitled Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Section 5310 funds were apportioned to the state, and Caltrans was responsible for administering the program. In 2012, the transportation authorization bill, Moving Ahead for Progress in the 21st Century (MAP-21), replaced SAFETEA-LU, and improved efficiency by consolidating programs, including specialized transportation programs historically administered by SANDAG: FTA Section 5316 JARC and Section 5317 New Freedom. Projects formerly eligible under the Job Access and Reverse Commute Program (JARC) are now eligible under Section 5307 Urbanized Area Formula Grants, and MAP-21 repealed New Freedom and folded it into the Section 5310 program, which is now entitled Enhanced Mobility of Seniors and Individuals with Disabilities. On April 23, 2014, Governor Jerry Brown designated SANDAG as the recipient of Section 5310 funds for the San Diego urbanized area. The Fixing America's Surface Transportation Act (FAST Act) was signed into law in 2015 and continued many of the programs initiated with MAP-21. Under the FAST Act, funds are apportioned to the large, urbanized areas and federal guidance allows for more flexibility in the appointment of a designated recipient.

On November 15, 2021, the Infrastructure Investment and Jobs Act (IIJA) was signed into law, extending surface transportation programs through FFY 2026, including the Section 5310 program. The Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSAA) as well as the American Rescue Plan Act of 2021 (ARPA) allocated additional funding to the Section 5310 program to provide relief for the transit industry during the COVID-19 public health emergency.

SANDAG continues to be the designated recipient of Section 5310 funds under the FAST Act and IIJA. As the designated recipient, SANDAG is responsible not only for developing the Coordinated Plan for San Diego County, but also for administering the Section 5310 program for the census-defined San Diego urbanized area. In this role, SANDAG is required by federal statute to, among other activities:

- Maintain a PMP
- Conduct an area-wide solicitation for applicants for grants if a competitive selection process is used
- Certify the fair and equitable distribution of funds
- Certify that each project selected for funding was derived from a strategy in the Coordinated Plan
- Certify that the Coordinated Plan is developed through a process that includes
  participation by older adults, individuals with disabilities, representatives of public,
  private, and nonprofit transportation and human service providers, as well as
  participation by other members of the public

The SANDAG Specialized Transportation Grant Program (STGP) is currently composed of the FTA Section 5310 and TransNet Senior Mini-Grant programs. As stated previously, MAP-21 authorized a new Section 5310 program: Enhanced Mobility of Seniors and Individuals with Disabilities. The STGP began in 2006 when SANDAG held its first competitive process to distribute Job Access and Reverse Commute (JARC) and New Freedom federal funds. SANDAG has held a total of 11 competitive processes (funding cycles). FTA released guidance for the Section 5310 program on June 6, 2014 (FTA Circular 9070.1G). The goal of the Section 5310 program, as stated in FTA Circular 9070.1G, is to improve mobility for older adults and individuals with disabilities by removing barriers to transportation services and expanding the transportation mobility options available. The Section 5310 program provides grant funding for transportation services planned, designed, and carried out to meet the special transportation needs of people aged 65 and older and individuals with disabilities in all areas—large urbanized, small urbanized, and rural.

The following chapter details how SANDAG fulfills these various responsibilities in observance of Title VI requirements, environmental justice, and its own commitment to social equity.

### Chapter 2: General Reporting Requirements Applicable to SANDAG

#### **General Reporting Requirements for All Applicants**

SANDAG complies with the following requirements as indicated in Chapter III of the Circular to ensure that its programs, policies, and activities meet all applicable Title VI and associated civil rights laws, executive orders, and regulations.

## 1. Requirement to Provide an Annual Title VI Certification and Assurance

The annual Title VI Certification and Assurances are provided to the FTA via an update in the FTA's web-based Transit Award Management System (TrAMS). The most recent certifications and assurances were signed on February 1, 2024, by the designated SANDAG and Caltrans officials and a true and accurate copy of the February 1, 2024 Certifications and Assurances is provided in Appendix B.

## 2. Requirement to Notify Beneficiaries of Protection under Title VI

The requirement to notify beneficiaries of their rights under Title VI includes: A) a statement that the agency operates programs without regard to race, color, and national origin; B) a description of the procedures that members of the public should follow in order to request additional information on the recipient's nondiscrimination obligations including but not limited to Title VI; C) a description of the procedures that members of the public should follow in order to file a discrimination complaint.

As stated in Board Policy No. 009 (Appendix C):

It is SANDAG policy to comply with state and federal laws and regulations including the Americans with Disabilities Act of 1990 (ADA), the Civil Rights Act of 1964 (Title VI and Title VII) and other federal and state discrimination laws. SANDAG prohibits discrimination by its employees, contractors, and consultants and in its programs, activities and facilities. SANDAG does not discriminate on the basis of race, color, sex (including pregnancy, childbirth, breastfeeding or related medical condition), creed, religion, national origin, age, marital status, ancestry, medical condition, disability, veteran status, low-income status, English language proficiency, genetic information, gender identity or expression, sexual orientation or any other category protected by federal, state or local law in conducting government business. Persons who believe they have been subjected to discrimination or have been denied access to services or accommodations as required by law, have the right to use this grievance procedure.

Notice of the policy is publicized on the SANDAG website, Board and committee agendas, and other media. The printed version of the notice is provided in SANDAG's reception area and Board room of the agency's main office building as well as in the reception area of the Tolls Operations Center. It can be downloaded from the SANDAG website in English, Spanish, Tagalog, Vietnamese, Arabic, Chinese, and large print. A Google Translate plugin has also been added to the SANDAG website to allow the translation of its content into other languages as needed. A copy of the English brochure, notifying the public of their rights under Title VI, can be found in Appendix D. The brochures for additional languages can be found and accessed on the SANDAG Title VI & Environmental Justice webpage.

## 3. Requirement to Develop Title VI Complaint Procedures and Complaint Form

Board Policy No. 009 – Discrimination Complaint Procedures, describes SANDAG's procedures for receiving, investigating, and tracking Title VI complaints. Procedures for filing a complaint and the complaint form are available on its webpage at SANDAG - Discrimination Complaint Procedures. The SANDAG complaint procedure, attached in Appendix C, was last amended in 2022. As part of this update and consistent with SANDAG's Language Assistance Plan, the policy was also translated into the agency's tier I and tier 2 languages also accessible at the link above.

## 4. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits

During the program period for the prior three (3) years, there were no Title VI lawsuits nor any Title VI complaint received by SANDAG. One discrimination complaint based on age and disability was submitted to the Director of the Office of Diversity and Equity during this program period. SANDAG staff followed Board Policy No. 009 to investigate the complaint, communicate with the complainant, and address the finding. Table 2.1 shows the current tracking log.

Table 2.1: Title VI Complaint Tracking Log

List of Complaint	Date Complaint Filed with SANDAG	Complaint No	Summary of Allegations	Status of Complaint	Responsive Actions by SANDAG
Complaints					
1.	03/04/2023	001	Age/disability bias preventing an individual to participate in one of SANDAG programs managed by a subrecipient		Email and teleconference communication between SANDAG & complainant; Review of case, upon review, SANDAG identified a corrective action that should be taken to address alleged discrimination; Resolution submitted and accepted by both complainant and subrecipient
2.					·
Investigations					
1.		<u> </u>			
2.					
Lawsuits					
1.					
2.					

#### 5. Promoting Inclusive Public Participation

As a part of its overall agencywide policies, SANDAG seeks out and considers the viewpoints of people of color, low-income, and people with language access needs by conducting inclusive and meaningful public outreach and engagement. The agency's public participation strategy offers early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions through a variety of mechanisms (detailed in Chapter 3 of this report).

SANDAG public outreach efforts are guided by its Public Participation Plan Policy, Board Policy No. 025 (Appendix E), which was last amended in 2018. This policy establishes processes for communicating with and obtaining input from the public concerning agency programs, projects, and program funding. The strategies and tactics outlined in the policy guide the agency's public outreach and involvement efforts for highway projects; transit fare changes and construction; smart growth, environmental, and planning efforts; growth forecasts; the Regional Plan; Regional Transportation Improvement Program; Tribal Consultation; and other initiatives.

The SANDAG Language Assistance Plan (LAP) outlines how SANDAG reaches out to and provides meaningful access to LEP persons and communities. The Language Assistance Plan was last updated in October 2022. More information on the LAP is included in the following section on meaningful access to LEP persons, referred to as "people with language access needs".

SANDAG Public Affairs staff and consultants work with project managers to put together outreach and/or public involvement plans (PIP) that guide a project from inception through completion. These efforts include developing outreach materials, working with community-based organizations (CBOs), and more. Best practices are followed, including holding meetings during convenient times for the community, using locations that are accessible by public transportation and are compliant with the Americans with Disabilities Act of 1990 (ADA), sharing information via social media, newspapers and other media, providing materials in languages other than English, and having bilingual staff or interpreters available when necessary.

With the progressive post-pandemic return to "business as usual," SANDAG has maintained and expanded on the improvements made to public engagement strategies during the COVID-19 pandemic. Public meetings now are often offered in a hybrid format, and technology is leveraged to expand the reach of engagement activities. Translation and interpretation of materials continues to be a key strategy in engaging LAN communities.

## 6. Requirement to Provide Meaningful Access to LEP Persons

Along with the FTA Title VI Circular, SANDAG follows the U.S. Department of Transportation *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient* (LEP) Persons (U.S. DOT LEP Guidance) to provide meaningful assistance to persons who do not speak English very well, also referred to as individuals with language access needs (LAN) in this report. Using that guidance, and considering input from the region's transit operators, MTS and NCTD, SANDAG developed a Language Assistance Plan (LAP) to address the language access needs of populations in San Diego County for all its programs, plans, and projects. The LAP was most recently updated in 2022 (Appendix F), and can be found at SANDAG.org/LAP.

The U.S. DOT LEP Guidance directs recipients to first conduct a "Four Factor Analysis" to identify communities with language assistance needs within the agency's jurisdiction. The following summary presents the findings from our latest LAP Update.

#### 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.

SANDAG used multiple sources of information, including from the U.S. Census American Community Survey, California Department of Education English Learner Data, the San Diego Superior Court, County of San Diego Registrar of Voters and San Diego County Department of Behavioral Health Services to determine the number of LEP individuals in San Diego County, characterized as individuals who speak a language other than English at home and who speak English "less than very well." Data was also compared with the result of the Four Factor Analysis conducted by MTS as part of its own Language Assistance Plan. Factor 1 analysis findings indicate that the most prevalent languages spoken by persons with LEP other than English are Spanish, Vietnamese, Tagalog, Chinese simplified, and Arabic.

Using the previous definition, the Factor 1 analysis found that 11 other languages are spoken by more than 1,000 persons with LEP in the County. Finally, in light of the recent conflict in Ukraine and the significant arrival of refugees since the spring of 2022, it was determined that Ukrainian also reached the threshold for "Safe Harbor" languages, bringing the final list to 17 languages for which accommodations must be made. SANDAG is also monitoring additional languages that may need to be added as a result of more recent migrations, including Chaldean and Haitian Creole.

The 17 languages identified in the Factor 1 analysis were divided into three priority groups to account for large variations in group sizes and frequency of interactions with SANDAG.

## Factor 2: The frequency with which LEP individuals come in contact with the program

Based on a survey conducted with SANDAG employees about the frequency of their interaction with LEP individuals as well as focus groups with LEP individuals conducted through current CBO partners, it was determined that LEP individuals regularly come in contact with SANDAG programs and services. Some key activities where LEP interactions were more prevalent included customer service operations at the Toll Operations Center, public engagement activities, and public transportation and micro-transit services. The greatest number of contacts with individuals with LEP are in Spanish, which is consistent with the findings of Factor 1.

Focus group findings with LEP participants indicated some awareness of SANDAG programs and services. The 2022 LAP noted a need to formalize tracking of interactions with LEP across the agencies, and some tracking tools are being developed.

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

The analysis of Factor 3 in the LAP further explores Factor 2 research. Findings suggest that access to SANDAG programs, activities, and services are important for persons with LEP. The focus groups also highlighted an opportunity to further increase communities' awareness of these programs, activities and services, and of the availability of language access services and accommodations. Particularly, emergency support services such as the Motorist Aid Services Program were identified as key services that would benefit from additional promotion in safe harbor languages. Other programs such as the Sustainable Transportation Services program (previously called iCommute) and FasTrak were also included in services that would benefit from additional promotion in other languages.

## Factor 4: The resources available to the recipient and costs associated with that outreach

The Four Factor analysis details language assistance efforts currently in place and the corresponding resources available to provide strategies to reach LEP populations. SANDAG has three standing on-call contracts, two for translation, one for interpretation and one for over-the-phone interpretation services. In addition, the SANDAG Office of Diversity and Equity has a full-time person who coordinates language assistance requests and oversees the implementation and update of the Language Assistance Plan. SANDAG maintains a list of bilingual staff who can support translation reviews and translation of short documents. SANDAG also works closely with its CBO partner network to deepen the agency's relationship with LEP populations. CBOs also have their ear to the ground and have been relied on to confirm or refine our understanding of language access needs within local communities.

Suggestions for additional LEP outreach measures are outlined in the LAP's Factor 4 along with a consideration of the resources available for these efforts. Findings indicate that SANDAG currently has many resources and strategies for reaching LEP populations, and that increased efforts should continue in order to reach and engage larger numbers of LEP persons.

In addition to identification of LEP individuals, the LAP outlines SANDAG's language assistance measures, staff training, how notice is provided to LEP persons, and plan monitoring and updating information.

A list of language assistance measures was compiled by surveying SANDAG staff and reviewing relevant material and through focus groups with LEP individuals conducted by CBO partners. The SANDAG Public Participation Plan and Board Policy No. 025 establish policies to provide services to LEP persons. Current language assistance measures are detailed for Board, Working Group, and Policy Advisory Committee meetings; regional and corridor planning efforts; 511 website, phone system, and mobile app; Freeway Service Patrol and highways; public transit efforts; Sustainable Transportation Services; and general SANDAG activities. The efforts include providing translated materials at public events following a four-factor analysis as well as additional language assistance upon request, streamlining SANDAG's internal process to handle language assistance requests, interpretation services and/or bilingual English/Spanish staff; Google Translate toolbar on website; bilingual English/Spanish interactive voice recognition phone system and Roadside Assistance operators; over-the-phone interpretation services; and more. Staff and community member recommendations for future language assistance measures are also presented.

The report details how staff are trained to understand their responsibilities to provide language assistance, and tools to support that effort. LEP Procedures provide information about providing language assistance in face-to-face, phone, and correspondence contacts, along with how to handle any complaint related to language access. Social Equity training containing detailed information about Title VI, staff responsibilities for providing access and information to LEP persons, and more is implemented for staff throughout the agency. All staff have access via an intranet page to Social Equity training materials. SANDAG also provides recurring in-person or virtual real-time training to staff.

The LAP describes how SANDAG provides notice to persons with LEP about the availability of language assistance. Many of these are referenced in the description of language assistance measures mentioned above. They include translated content, presence of interpreters and/or bilingual staff at community events, distribution of information via ethnic media, web translations, "I Speak" cards for use at the reception desk, providing notice of the availability of translation services in agenda materials, and notice of language services available in multiple languages for project managers to add to materials that are not translated.

Vital Document Guidelines provide employees with direction about what documents require translation. The "vital" nature of a document depends on the importance of the information or service involved, particularly the consequence to the LEP person if the information is neither accurate nor timely. SANDAG Vital Documents have been identified as follows:

- 1. Any document that is critical for obtaining services and benefits,
- 2. Any document that describes legal rights or responsibilities, and/or
- 3. Any document that is required by law to be translated.

Based on the Four Factor Analysis, SANDAG has determined that, with due consideration to resource and time constraints, all vital documents will be translated into Spanish. Notices about the availability of language assistance measures and the Title VI complaint procedures and rights will be translated into Vietnamese, Tagalog, Arabic and Chinese, which are the Priority Group 2 languages identified in the LAP following the Four Factor Analysis detailed earlier. On a case-by-case basis, content may be translated into additional languages when justified by the nature of the document and the document's target audience. SANDAG also has an over-the-phone interpretation service that community members can use to access customer service as needed. Notice of the availability of language assistance is provided on public materials in all safe harbor languages via a standardized "language block" such as the one presented on the cover page of this report.

Finally, the LAP outlines how SANDAG monitors and updates language assistance efforts. The Four Factor Analysis and the LAP are reviewed regularly, typically in conjunction with the Title VI Program update, and changes are incorporated based on the input provided from staff, CBOs, and LEP persons. The next LAP update will take place in 2025.

## 7. Minority Representation on Transit-Related Planning and Advisory Bodies

According to the FTA Title VI Circular, recipients with "transit-related non-elected planning boards, advisory councils, or committees, the membership of which is selected by the subrecipient, 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."

SANDAG values the racial diversity of the public it serves. Accordingly, SANDAG encourages the participation of people of color on its committees when filling a vacancy. It is the goal of SANDAG that these groups represent the racial diversity of the region. Methods that SANDAG uses to promote participation may include, but are not limited to, one or more of the following:

- Notifying partner agencies of the vacancy and underrepresentation
- Making presentations at SANDAG Board of Directors, Policy Advisory Committees, and Working Groups
- Posting the vacancy in eRegion electronic newsletter, the SANDAG website, Twitter, LinkedIn, and other media outlets
- Outreach to civic, cultural, or human service organizations known to serve people of color, persons with disabilities, and other protected populations to inform them of the opportunity

There is a difference between SANDAG selecting the "membership" (identifying which entities or interests should be represented on a working or advisory group) rather than the "members" of a committee (individual persons who sit on a working or advisory group). Typically, SANDAG creates a charter for working and advisory groups in which SANDAG determines the membership, but not the members, and in all of the advisory groups below, agencies and organizations outside of SANDAG chose the individual members. As such, data collected from advisory group members is provided for information only. In addition, the SANDAG Board of Directors and Transportation Committee have transit-related responsibilities; however, the membership of these groups has been defined by the Legislature in statute rather than by SANDAG, and members are not selected by SANDAG. In 2022, the SANDAG Board of Directors updated its Working Group structure, consolidating certain groups to support efficiently and to better align with agency priorities. An overview of SANDAG committees and working groups is presented in Appendix G. Out of 196 valid responses, 109 (56%) working group members self-identified as being white only and 87 (44%) identified as persons of color.

Table 2.2: Minority Representation on Working Groups and Advisory Councils

Committee/ Working Group	Total Members (note 1)	Responde nts (note 2)	White	Latino/a or Hispanic	Black or African American	Asian	American Indian or Alaska Native	Native Hawaiian or Pacific Islander	Other
Social Equity Working Group	24	16	6	8	1	2			
Audit Committee	6	6	2		1	2	1		
Executive Committee	17	7	6	1					
Transportation Committee	26	15	6	4	1	1	2		1
Borders Committee	25	13	6	4	1		1		2
Chiefs'/Sheriff's	33	19	12	6	2		1		
Interagency Technical Task Force on Tribal Transportation Issues	47	1	1						
Mobility Working Group	59	22	16	2	1	1			3
Regional Planning Committee	30	9	5		Ĩ		2		1
Sustainable Communities Working Group	61	30	23	5	1	5	1	1	1
San Diego Regional Military Working Group	26	14	11	2			1		
Public Safety Committee	44	19	10	5	3		1		
Shoreline Preservation Working Group	37	9	9						
Social Services Transportation Advisory Council	32	11	8	2		1			1
TransNet Independent Taxpayer Oversight Committee	7	5	4	1					
Bayshore Bikeway Task Force	9								
San Diego Region Conformity Working Group	6	4	3	2		1			
AB 43 Task Force	5	2	2						
ARJIS Technical Working Group	20	3	2					1	
Regional Habitat Conservation Task Force	32	11	10	1		1	1	1	
Regional Digital Divide Task Force	185	1	1						
Total (note 3)		217	137	43	12	14	11	3	9

Note 1: Because participation in these groups is determined by the organizations or agencies identified in the group charter, the actual member roster is not static.

Note 2: 29 invalid responses were received in addition to 196 valid responses

Note 3: Because respondents were permitted to select more than one answer, the total number of responses is greater than the number of respondents.

#### 8. Providing Assistance to Subrecipients

SANDAG has a number of grant programs it administers pursuant to the TransNet Extension Ordinance, Transportation Development Act, and other sources, however, only one grant program has federally-funded subrecipients – the Section 5310 grant program. Subrecipients under the former Job Access and Reverse Commute and New Freedom programs and the current Section 5310 program, which are components of the Specialized Transportation Grant Program (STGP), are required to develop and submit to SANDAG a Title VI program prior to the execution of a grant agreement with SANDAG. Subrecipients are additionally required to update their Title VI programs every three years based on their resolution date.

SANDAG employs a multi-faceted approach in providing assistance to subrecipients developing their Title VI programs, individualizing the assistance based on the subrecipients' level of need. Title VI requirements are first introduced at the STGP Call for Projects Webinar held during the competitive process to ensure applicants are aware of the requirements before applying. Additionally, potential applicants are provided the grant agreement template with their applications, including the terms and conditions requiring subrecipients to comply with Title VI and Equal Employment Opportunity requirements and pass through these contract provisions to third-party contractors at any tier. The new template can be consulted online at Section 5310 Grant Program.

SANDAG holds a second workshop after the close of competitive processes for those applicants whose projects were approved by the SANDAG Board of Directors to receive federal funds. At the Successful Applicant Webinar, SANDAG staff provides successful applicants with project management and grant implementation training, which includes instruction on complying with federal requirements, including Title VI.

The Program Management Plan (PMP) guides the management of the STGP. The PMP is designed to provide program guidance to potential and successful applicants; provide public information on SANDAG administration of the STGP grant programs; and ensure that all applicable SANDAG policies and federal, state, and local statutes and regulations are fulfilled. The PMP was last updated in 2023 and can be consulted online at Specialized Transportation Program Management Plan.

All subrecipients are provided with a Title VI and ADA Guide, which was updated in 2023 and is available online at SANDAG.org/stgp. The Guide outlines federal requirements and provides step-by-step instructions on how to develop a Title VI Program, including a Language Assistance Plan. The Guide includes templates that grantees may use to develop their own Title VI notice, complaint procedures and complaint forms, relevant data related to grantees' service area as applicable, and other required Title VI documents. SANDAG translated and made these templates available to subrecipients in multiple languages. SANDAG includes step-by-step instructions for obtaining demographic data from the U.S. Census Bureau at data.census.gov. Subrecipients may request additional one-on-one assistance from SANDAG staff. Staff reviews draft Title VI programs, checking them for compliance and offers revisions and additional resources to subrecipients as appropriate.

Finally, Title VI-related issues are addressed routinely through scheduled site visits and/or desk reviews, which generally occur after the initial 6 and 12 months of project implementation and annually thereafter. SANDAG works closely with its subrecipients to ensure Title VI Programs are updated triennially, all Title VI-related issues are resolved, and corrective action is taken in a timely manner, and subrecipients are required to maintain compliance with applicable federal regulations.

Appendix H shows the equity analyses that were conducted as part of the STGP program.

#### 9. Monitoring Subrecipients

Subrecipients are required to submit the following documents to SANDAG at least 30 days prior to execution of a grant agreement.

- Title VI Program
- Title VI Program Resolution
- Certificate of Civil Rights Assurances
- Equal Employment Opportunity Certificate

SANDAG uses the 30-day period between Title VI document submission and grant agreement execution to review programs for compliance. Subrecipients are required to update their Title VI programs every three years. Additionally, subrecipients are required to begin collecting client demographic data at grant execution, submitting to SANDAG its client demographic data one year later and annually thereafter. SANDAG has developed a Client Voluntary Demographic Data Reporting Form that subrecipients may use to determine the populations that are served through their project and the frequency with which these populations access project services. The Client Voluntary Demographic Data Reporting Form template is available at SANDAG.org/stgp.

SANDAG staff coordinates with subrecipients to receive all required documents within a timely manner and tracks and stores subrecipient Title VI Programs and other relevant documents electronically. SANDAG staff also stores records that verify that subrecipients' Title VI notice, Complaint Procedures, and Complaint Forms are available on each subrecipient's respective website in English and any other languages identified through the subrecipient's Language Assistance Plan.

Additionally, SANDAG regularly monitors subrecipients' implementation of their Title VI programs and general Title VI compliance through its grant monitoring program. SANDAG staff uses the Monitoring Checklist (available online at **Grant Monitoring Checklist**) at site visits and desk reviews to monitor subrecipient performance, including compliance with Title VI requirements and subrecipient's Title VI Program. For example, at site visits, SANDAG staff verify that the subrecipient's Title VI notice, Complaint Procedures, and Complaint Forms are posted on federally assisted transit vehicles and in common office areas as applicable and are available in English and any other languages identified in the subrecipient's Language Assistance Plan. Site visits and/or desk reviews generally occur after the initial six months and 12 months of project implementation and annually thereafter.

Subrecipients are required to inform SANDAG of any Title VI complaint that has resulted in an investigation or lawsuit against the subrecipient or that relates to their transportation program within 72 hours of receiving the complaint via a reporting form so that SANDAG can determine whether it needs to carry out its own investigation. Subrecipients must establish and implement procedures to ensure timely resolution of complaints, and sufficiently document steps taken to investigate and address complaints. Subrecipients must make these records available to SANDAG for inspection upon request. SANDAG works closely with its subrecipients to resolve all Title VI-related issues and follows up on the implementation of corrective actions.

#### **Other Project Monitoring**

SANDAG also works with other local government agencies to deploy projects and initiatives such as the Flexible Fleet pilot program. This program focuses on the deployment of ondemand shared mobility options in communities across the County over a one to two-year period, to demonstrate and test out micro-transit's ability to address first-last mile needs and spur alternative modes of transportation. Two SANDAG-funded projects to date were deployed in 2023, in the City of Oceanside and in the City of San Diego. Although these projects are pilot projects with a finite timeline, SANDAG has worked with both cities to ensure their compliance with Title VI requirements and address gaps, if any. Additionally, SANDAG serves as an advisory role to local partners piloting Flexible Fleets to ensure operational and equitable best practices are applied.

#### 10. Determination of Site or Location of Facilities

As a result of SB 1703, SANDAG was given responsibility for carrying out the majority of the project development and construction needs for MTS and NCTD, while leaving responsibilities for operations with the transit operators. In essence, other than smaller maintenance projects, all regional-level transportation planning, project development, and construction, especially in the public transit arena, are now the responsibility of SANDAG. SANDAG collaborates on the design elements with the transit operators and other entities if the project is multi-modal in nature. After construction is completed, the facilities and operational responsibilities are transitioned to Caltrans, a municipality, MTS, and/or NCTD.

The FTA Title VI Circular requires that when SANDAG is determining the site or location of facilities, it may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination. Title 49 CFR Part 21, Appendix C, Section (a)(3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as these are amenities, nor does it include transit stations, power substations, or other facilities that are evaluated during the project development and environmental analysis process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

When determining the site or location of applicable facilities, SANDAG completes an environmental justice and Title VI analysis during the planning and environmental stage to ensure the location is selected without regard to race, color, or national origin. SANDAG also engages in outreach to persons potentially impacted by the siting of facilities, before the selection of a preferred site, to ensure that the analysis compares the equity impacts of various alternatives. When evaluating locations of facilities, SANDAG considers cumulative adverse impacts that might result. SANDAG analyses are performed at the census tract, block group, or on even smaller geographic areas where appropriate to ensure that proper perspective is given to localized impacts. SANDAG conducts this type of Title VI analysis with tools such as CalEnviroScreen, the Department of Transport's Equitable Transportation Community Explorer and the Climate and Economic Justice Screening Tool; those tools also support other analyses, such as for transit fare changes and to understand program level funding allocations, using Title VI principles. SANDAG also provides extensive guidance to staff on Title VI, environmental justice, the ADA and social equity through its SharePoint Civil Rights, Language Assistance, and Social Equity pages, which were just updated in 2024 to provide the latest information and best practices in those fields (Appendix I).

As part of the evaluation, SANDAG must determine whether an inequity exists and whether it is significant enough to be considered to have a disparate impact on protected populations. Specifically, it looks at whether minority populations would experience more adverse effects than non-minority populations, and further explores whether the difference on the two populations would surpass the disparate impact threshold set by the Board for finding a discriminatory outcome. Board Policy No. 018, discussed in Chapter 4 of this Program below, lays out the thresholds for finding discriminatory impacts on minority and low-income populations.

If SANDAG were to determine that the location of a project would result in a disparate impact on the basis of race, color, or national origin, it would proceed with that location only if there was a substantial legitimate justification for locating the project there and if there were no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. SANDAG would document how both tests were met and would do so by considering and analyzing alternatives.

SANDAG did not make any new site decisions and did not construct any operations centers or storage facilities during this reporting period.

#### 11. Requirement to Provide Additional Information Upon Request

SANDAG will comply with any requests made by FTA to investigate complaints of discrimination, for additional information, or to resolve concerns about possible noncompliance with Title VI.

# Chapter 3: Program-Specific Requirements for SANDAG as a Metropolitan Planning Organization

Chapter VI of the Circular details the requirements specified under the "program-specific guidance" for MPOs. As the MPO for the region and a recipient of FTA funds, Chapter VI of the Circular applies to SANDAG. The following sections review SANDAG's planning and capital programming efforts completed during the time horizon of this Title VI Program.

Following federal regulations, SANDAG is required to develop a Regional Transportation Plan (RTP) every four years. San Diego Forward: The 2021 Regional Plan is the most recently adopted RTP; it is the primary long-range transportation plan referenced in this document and is used to demonstrate SANDAG's continuous, cooperative, and comprehensive planning practices. The 2025 Regional Plan is in the development stage as of the development of this Title VI Program; the initial stages of the 2021 Regional Plan and 2025 Regional Plan overlapped, and public involvement for these two plans was combined for efficient use of resources and effective public engagement.

MPOs are also required to develop Transportation Improvement Programs (TIP) at least every four years. During this review period SANDAG developed two TIPs, in 2021 and 2023. SANDAG refers to these as Regional Transportation Improvement Programs (RTIPs). I

The 2021 Regional Plan may be viewed in its entirety online at 2021 Regional Plan (SANDAG.org). The most recent (2023) RTIP is provided in its entirety at 2023 Regional Transportation Improvement Plan Final (SANDAG.org).

# 1. Demographic Profile of the San Diego Region that Identifies the Locations of Minority Populations in the Aggregate

Current planning documents, including the 2021 Regional Plan, recognize that the San Diego region is an ethnically and racially diverse region. As of 2010, the Census confirmed that the region has become a "majority minority" county. This means that no single race or ethnic group comprises more than 50 percent of the region's total population. As the region continues to grow, its racial and ethnic composition will continue to change.

Figure 3.1 displays the projected regionwide changes in population from 2016 to 2060 for six racial/ethnic groups: (1) Hispanic; (2) non-Hispanic White; (3) non-Hispanic Black: (4) non-Hispanic Asian; (5) non-Hispanic Two or More Races; and (6) non-Hispanic Other according to SANDAG's Series 14 Regional Growth Forecast.

By 2050, the Hispanic population is expected to increase by more than 5%, while the non-Hispanic White population is expected to decline by less than 6%.

By 2050, Hispanics are predicted to account for almost 40% of the total population. The percentage of population who is non-Hispanic White is expected to decline from 46% of the total population in 2016 to about 31% in 2050. The non-Hispanic Asian population is expected to increase from about 11% to about 19%. It is estimated that there will be virtually no change between 2016 and 2050 in the percentage of the following non-Hispanic race groups: Black, Hawaiian/Pacific Islander, Other, American Indian, and Two or More Races.

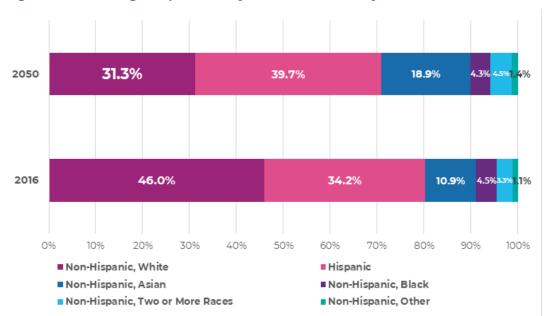


Figure 3.1: San Diego Population by Race and Ethnicity

SANDAG, as the state-designated Regional Census Data Center for the San Diego region, is well positioned to support the mapping, demographic, and data requirements of MTS and NCTD for Title VI-related service quality analysis. SANDAG also has an extensive estimates program that provides updates of the data between censuses. All census and estimate data for the region, including demographic information such as racial and ethnic background and income characteristics, are available through SANDAG and can be displayed on maps or in other formats at the request of the local jurisdictions, transit operators, businesses, community organizations, and other stakeholders. Additionally, as the region's MPO, SANDAG has detailed data about planned and existing transit service and infrastructure. Merging those data sources using Geographic Information Systems (GIS), SANDAG is able to provide detailed accounts of the effects of both proposed service changes and infrastructure changes on communities protected by Title VI regulations.

As an early action of the 2021 Regional Plan, the Social Equity Baseline Report provides a statistical snapshot of the region and examines social equity through the context of race and ethnicity. This report catalogues equity through numerous indicators and thematic topics that will be referenced during the next planning cycle. This report is the first of a series that will be updated as new data and emerging best practices become available. It can be found in Appendix J.

By understanding the region's existing conditions in disadvantaged communities by means of data analysis, such as the Social Equity Baseline Report, and recurring public engagement, SANDAG can benchmark the 2021 Regional Plan's progress towards a truly equitable transportation system throughout its 2050 horizon year.

The process of defining disadvantaged communities (for the purpose of analyzing the impact of the transportation investments) used indicators that were possible to forecast to 2050, but it is also important to understand vulnerable communities in the region in terms of existing conditions. In workshops, to define the disadvantaged communities for the 2021 Regional Plan, participants proposed that some of the indicators of vulnerability that were not used for the purposes of the travel model and performance measures still be documented in order to provide a current snapshot of cumulative socioeconomic and population characteristics that make some communities more vulnerable than others. In the 2021 Regional Plan, disadvantaged communities are defined by three populations: minority, low-income, and seniors. Minorities are defined by the Census criteria above.

About 25% of the population is low income. "Low income" is defined as having an income that is less than 200% of the Federal Poverty Level (FPL). The threshold for "Seniors" selected was 75 and older. This threshold came from a dialogue with social equity stakeholders regarding mobility and age, with the conclusion that at age 75, seniors may become transit dependent, but still mobile.

In public workshops geared towards defining disadvantaged communities for the 2021 Regional Plan, participants proposed that some of the indicators of vulnerability that were not used for the purposes of the travel model and performance measures still be documented to provide a current snapshot of cumulative socioeconomic and population characteristics that make some communities more vulnerable than others.

Maps showing the western two-thirds of the region illustrate the current distribution of each of these populations in the region according to 2016 ACS 5-year estimates.

Figure 3.2: Low-Income Population Density 2016



Figure 3.3: Minority Population Density 2016

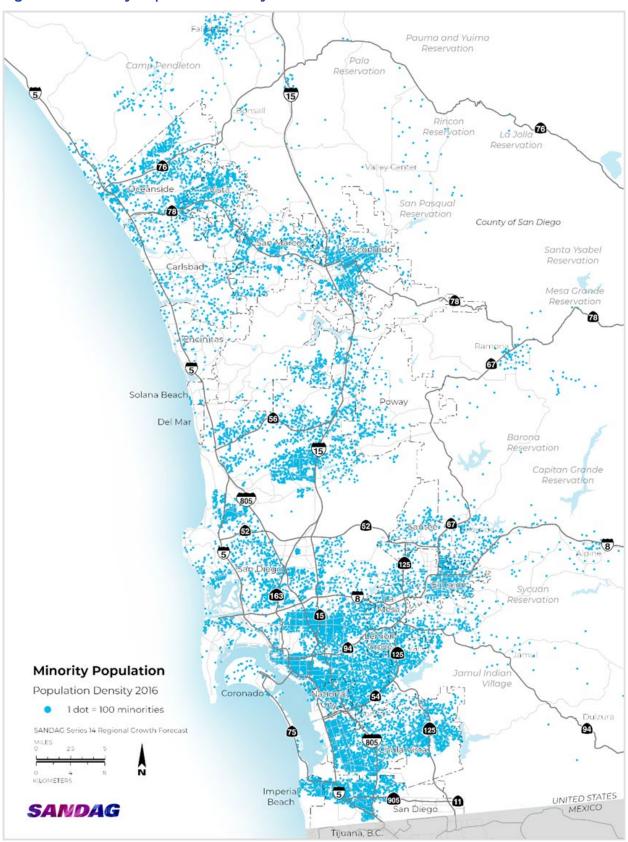


Figure 3.4: Senior Population Density 2016



# 2. How the Mobility Needs of Minority Populations Were Identified and Considered During the Planning Process

#### **Public Participation Policies and Plans**

The SANDAG Program Budget and Overall Work Program (OWP) function together as the annual agency budget and demonstrate the agency's commitments and priorities; these are informed by stakeholder engagement. SANDAG relies on a mix of committees, working groups, public hearings, workshops, surveys, web-based information, social media, and publications to inform, gauge, and respond to public concerns regarding regional issues. Encouraging the direct involvement of community members and organizations representing all segments of the population, including traditionally underrepresented and underserved populations, such as low-income, and minority (i.e., Black, Hispanic, Asian American, American Indian/Alaskan Native, and Pacific Islander) populations, as well as the elderly and disabled, ensures that plans and programs reflect the diverse interests within the region.

SANDAG public outreach efforts (Appendix G: Public Involvement Program - SANDAG.org) are guided by the Public Participation/Involvement Policy, Board Policy No. 025 (Appendix E). This policy establishes a process for obtaining input from and providing information to the public concerning agency programs, projects, and program funding in order to ensure that the public has opportunities to provide SANDAG with input, so plans can reflect the public's feedback. Board Policy No. 025 is reviewed for updates annually.

Board Policy No. 025 addresses public participation policies and public information efforts in the following areas:

- A. Overall Public Participation Plan
- B. Short Range Program Regional Transportation Improvement Program
- C. Development Planning
- D. Design and Construction
- E. Fare Changes
- F. Short Range Transit Planning
- G. Tribal Consultation

The Public Participation Plan policy (PPP) establishes a process for communicating with and obtaining input from the public concerning agency programs, projects, and program funding. The PPP is consistent with the requirements of Public Utility Code Section 132360.1(e) concerning SANDAG development of the Regional Comprehensive Plan under California law. That section reads as follows:

(e) The consolidated agency shall engage in a public collaborative planning process. The recommendations resulting from the public collaborative planning process shall be made available to and considered by the consolidated agency for integration into the draft regional comprehensive plan. The consolidated agency shall adopt a procedure to carry out this process including a method of addressing and responding to recommendations from the public.

The strategies and tactics outlined in the PPP guide the agency's public outreach and involvement efforts for highway projects; transit fare changes and construction; smart growth, environmental review, and planning efforts; growth forecasts; the Regional Plan; RTIP; Tribal Consultation; and other initiatives. The PPP addresses Title VI and related nondiscrimination requirements and reflects the principles of social equity and environmental justice. Included in the PPP are procedures, strategies, and outcomes in federal regulations for MPO's consultation (Title 23 CFR Part 450.316). The PPP also fulfills various state and federal public involvement requirements. It reflects the agency's commitment to public participation and involvement to include all residents and stakeholders in the regional planning process. SANDAG reviews and updates the PPP every three years, and it was last updated February of 2018. The Public Affairs team is currently in the process of reviewing the PPP to detail additional tactics and strategies that will support the agency's efforts to meaningfully engage target communities including but not limited to minorities, LEP populations, and low-income communities. Public Involvement Plans (PIP) are developed for every major project drawing from the guidelines of the PPP.

SANDAG communicates with community members and groups through the news media, social media, agency publications, partnerships with CBOs, and special presentations. Newsletters, report summaries, and news releases are used to present technical and policy issues in plain terms to a broad audience. Staff members regularly make presentations on specific issues to local community, civic, and business groups, and additional information on individual topics and copies of full reports are made available upon request through the agency's Public Information Office or at SANDAG.org.

#### **Organizational Structure**

The Board of Directors is the governing body responsible for establishing all the agency's policies and programs. It is composed of representatives from the region's 18 incorporated cities and the county government. Voting members on the Board are elected officials – mayors, city councilmembers, or county supervisors – selected by their peers from the incorporated cities and the county. Voting is based on membership and, if a weighted vote is called for, the population of each jurisdiction, providing for a more accountable and equitable representation of the region's residents. Most matters are decided by a simple tally vote; however, under some circumstances, the Board may take a weighted vote based on population that can supersede the tally vote.

Supporting these voting members are advisory representatives from Imperial County, the U.S. Department of Defense, Caltrans, the Port of San Diego, MTS, NCTD, the San Diego County Water Authority, the Southern California Tribal Chairmen's Association, Mexico, the Association of Planning Groups, and the San Diego County Regional Airport Authority. SANDAG recognizes the value of working collaboratively with tribal governments and local, state, and federal agency staff to achieve regional goals. Through working agreements with local, state, and tribal governments, as well as federal agencies, SANDAG and its member local governments have the opportunity to ensure the consistency of individual agency plans and programs regionwide.

#### **Committees and Working Groups**

SANDAG is continually evolving its Policy Advisory Committee (PAC) structure and working groups to create more opportunities for public involvement. In response to AB 805, Board Policy No. 039 Audit Policy Advisory Committee and Audit Activities, was adopted by the Board in December 2017, and in 2018 SANDAG added a sixth PAC, the Audit Committee. In general, these PACs make policy recommendations to the full Board. All other participating groups fall into the category of "working groups." Member agency representatives as well as interested individuals and organization representatives on the working groups offer their suggestions, advice, and work products to a particular PAC for the elected officials' review. The PACs then, in turn, may offer policy recommendations to the Board. This process, however, does not preclude a working group representative or individual member from offering public testimony directly to the Board during the monthly meetings.

Between 2021 and 2022, SANDAG conducted a workforce restructuring that addressed issues including outdated charters; declining participation and inability to meet quorum; frequent meeting cancellations due to lack of agenda items; overlapping agenda items and redundancy between groups; and inconsistencies with how working groups function.

Some of the SANDAG committees and working groups that report to the PACs and Board have the word "council" or "task force" in their name because that is how they are known to the public with whom they work and who they serve. However, for purposes of this Title VI Program, all of the groups that provide public input to SANDAG are collectively referenced as "committees and working groups." Information on all SANDAG committees and working groups can be found at SANDAG - Policy Advisory Committees. SANDAG supports more than 20 different committees and working groups that advise the PACs on a variety of projects and issues related to the Overall Work Program (OWP) and the Capital Program. With the exception of the Executive Committee and Audit Committee, each PAC (Transportation, Regional Planning, Borders, and Public Safety) has a number of different committees and working groups that report to it. Appendix G includes the list of committees and working groups and their responsibilities.

These committees provide forums for public involvement and opportunities to incorporate and comply with social equity and environmental justice issues in local planning processes. Efforts to include underrepresented groups in these committees have resulted in expanded community involvement. In addition, the agency's computerized mailing list now contains approximately 90,000 individuals and organizations.

All meetings subject to the California open meeting laws known as the Brown Act are open to the public. Agendas are posted and noticed in advance of meetings, denoting meeting times, and locations to help encourage public attendance. All meeting agendas offer translation for LEP populations and are posted to **SANDAG.org**. Following every meeting, meeting minutes and, when available, an audio or video recording, are posted to the website.

### Local, State, Tribal, and Federal Agency Participation

SANDAG recognizes the value of direct participation and collaboration on various programs by local, state, and federal agency staff. This direct involvement means better coordination and assurance of the best local technical expertise available. It also results in plans that more accurately reflect local needs and foster support when completed. Many of the work elements outlined in the SANDAG OWP rely on input from working groups and task forces composed of residents, special interest groups, and community organizations with federal, state, and local staff participation. SANDAG regularly collaborates and coordinates with the 19 local jurisdictions that serve on the Board and with non-voting advisory members.

SANDAG's government-to-government framework with Tribal Nations in the region is based on consultation, cooperation, and collaboration. At a policy level, the Southern California Tribal Chairmen's Association has an advisory seat not only on the Board but also on policy advisory committees. At a technical level, all Tribes in the San Diego region can participate in the Interagency Technical Taskforce on Tribal Transportation Issues, an official forum for Tribal Nations in the San Diego region to participate in the regional planning process. Also, at a technical level SANDAG partners with other intertribal associations on specific planning projects and programs where appropriate, to conduct public participation and involvement activities to coordinate transportation and land use planning with Tribal Nations in San Diego County. Working collaboratively with tribes, SANDAG developed the Intraregional Tribal Transportation Strategy (ITTS) to identify priority transportation projects. First developed in 2018 and updated in 2021, the ITTS has been used to integrate regional tribal transportation projects into the Regional Plan, as well as other planning efforts.

## 3. A Summary of Regional Planning Efforts and Outreach for Specific Projects and Programs Conducted During the Reporting Period

### **Community Mobility Needs Assessment**

SANDAG collaborated with CBOs to conduct a thorough community-based mobility needs assessment aimed at evaluating requirements, priorities, and opportunities for projects outlined in the 2021 Regional Plan, particularly in historically underserved communities. This assessment sought to provide a comprehensive evaluation of existing transportation services while identifying opportunities for new solutions tailored to the unique needs and diverse backgrounds of communities within the region. Employing both quantitative and qualitative analyses, the assessment delved into community demographics and existing transportation infrastructure and services with a survey developed jointly with SANDAG's community partners to solicit feedback on transportation experiences. This survey, distributed via CBO outreach efforts and available in multiple languages, enabled a deeper understanding of existing transportation options, identification of access barriers, and evaluation of COVID-19 impacts on transportation usage and preferences. Although the survey was not statistically representative of the entire San Diego region, it provided valuable insights into community needs, with the majority of responses collected between November and December 2020.

The survey conducted as part of SANDAG's community-based mobility needs assessment garnered over 2,900 responses. Notably, a majority of respondents identified as female (73%) and as belonging to BIPOC groups (69%). Significant socioeconomic diversity was revealed by the survey, with approximately 87% of respondents reporting annual household incomes below the regional median of \$82,000. Employment status varied among respondents, with more than 45% being full- or part-time employed, 5% being students, and 40% being either unemployed, retired, or not in the workforce. This socioeconomic disparity underscored the critical role of accessible and affordable transportation options in addressing equity gaps and facilitating socio-economic mobility for underserved communities. Key themes identified through the survey responses revolved around accessibility, affordability, and reliability of transportation services. Many respondents highlighted challenges related to accessing essential services, such as healthcare facilities, educational institutions, and employment opportunities, underscoring the need for improved connectivity and last-mile transportation solutions. Figure 3.5 illustrates the demographic breakdown of survey respondents. The regional planning efforts described in the following section show our efforts to address the needs and priorities uncovered in the assessment.

Figure 3.5: Community Mobility Needs Assessment – Demographics of Survey Respondents

Demographics of Survey Respondents				
	Number of Respondents	Percentage of Respondents		
Gender				
Male	488	23.80%		
Female	1,512	73.80%		
Non-binary	4	0.20%		
Prefer not to answer	41	2.00%		
Other	4	0.20%		
Ethnicity				
American Indian or Alaska Native	45	2.10%		
Asian	127	5.80%		
Black or African American	143	6.60%		
White	643	29.50%		
Latinx/Latino/Latina/Hispanic	1,044	47.90%		
Middle Eastern	35	1.60%		
Native Hawaiian or other Pacific Islander	19	0.90%		
South Asian	13	0.60%		
Other	109	5.00%		
Income				
Less than \$24,999	952	50.10%		
\$25,000-\$34,999	313	16.50%		
\$35,000-\$49,999	172	9.00%		
\$50,000-\$64,999	131	6.90%		
\$65,000-\$79,999	96	5.00%		
\$80,000 or more	237	12.50%		
Employment				
Full-time employed	687	30.80%		
Part-time employed	353	15.80%		
Full-time student	78	3.50%		
Part-time student	50	2.20%		
Unemployed and not seeking employment	93	4.20%		
Unemployed and seeking employment	258	11.60%		
Retired	163	7.30%		
Not working	372	16.70%		
Other	175	7.90%		

Several major planning initiatives took place during the reporting period. These included the 2021 Regional Plan, the 2023 RTIPs, and other planning efforts. This section describes these efforts with a summary of public outreach and involvement activities as well as steps taken to ensure that people of color and low-income people had meaningful access to the decision-making process.

In addition to the project specific activities, during the reporting period, Board members and staff made numerous presentations to various leadership, civic, and community groups about population growth management, transportation, environmental projects, public safety programs, and other regional topics. Board members and staff proactively provided information to the general public, interested organizations, public officials and agencies, and news media; edited technical reports for readability; and prepared non-technical summaries of key issues. Public notices in general circulation and minority/community newspapers, newsletters, report synopses, and news releases were used to notify and present technical and policy issues in easy-to-understand language to various selected audiences. Special workshops and other forums were offered as needed to focus attention on individual projects and encourage the public's involvement.

Whenever possible, community participation activities and development of public information collateral materials were coordinated with federal, state, and local agencies to enhance public consideration of issues, plans, and programs, and make them more efficient and cost-effective. Major products included newsletters, monthly digests of Board actions, news releases, workshop materials, informational brochures, and website updates. Significant events included public hearings, press conferences, public workshops, briefing sessions, and public presentations to groups and organizations throughout the region.

Consistent with U.S. Department of Transportation guidance, SANDAG uses its LAP to ensure meaningful input opportunities for persons with limited English proficiency. The LAP calls for SANDAG to translate certain vital documents, such as public notices, into Spanish. The regional planning efforts and outreach for specific projects outlined below demonstrate SANDAG's implementation of the LAP.

### San Diego Forward: The 2021 Regional Plan

The Board makes regional transportation policy for all forms of travel encompassing walkable communities, automobiles, transit, bicycles, and intra-city railroads through the adoption of an RTP, which SANDAG refers to as "San Diego Forward: The 2021 Regional Plan." As the designated MPO for the San Diego region, SANDAG is required to develop a RTP every four years; the RTP typically is oriented around a planning horizon of at least 20 to 30 years. During the time period of this Title VI Program, SANDAG completed San Diego Forward: The 2021 Regional Plan. The 2021 Regional Plan provides policymakers and planners with an overall guide for effective coordination and orderly programming of transportation improvements among local, regional, state, and federal agencies. The RTP is the long-range planning document that forms the foundation for service and short-term planning undertaken by the San Diego region's two transit agencies, MTS and NCTD.

The 2021 Regional Plan was adopted on December 10, 2021, with a planning horizon of 2050. The 2021 Regional Plan contains a robust transportation network with a diversity of transportation projects. Building upon its predecessor, the 2021 Regional Plan focuses on transit by calling for improvements to the region's public transit network by improving the existing system and introducing new access to other areas.

### Developing the Public Involvement Program for the 2021 Regional Plan

SANDAG implemented a comprehensive public outreach and involvement program to support the development of San Diego Forward: The 2021 Regional Plan (2021 Regional Plan). To guide this public outreach program, the agency updated its **Public Involvement Program** (PIP) for the 2021 Regional Plan. This updated PIP established a process through which public communication associated with the Regional Plan development process was aligned with Government Code Section 65080(b)(2)(F).

The 2021 Regional Plan combines the agency's most important regional policy documents: the Regional Comprehensive Plan, Regional Transportation Plan, and Sustainable Communities Strategy. While the 2019 Regional Plan was being developed, recommendations were made to create a new data-driven approach to transform the way people and goods move throughout the region. In February 2019, the Board approved an action plan to extend the project timeline to develop this new vision and build on the extensive public input received in early phases of plan development. From there, development of the 2021 Regional Plan began.

The PIP was most recently updated in May 2021 to reflect conditions related to the COVID-19 pandemic. All SANDAG outreach activities occurring March 19, 2020, through fall 2021 were conducted virtually in accordance with Governor Gavin Newsom's State of Emergency declaration regarding the COVID-19 outbreak, Executive Order N-29-20, and the Guidance for Gatherings issued by the California Department of Public Health.

While the overall Public Participation Plan policy for SANDAG provided guidelines for drafting the PIP, creation of this PIP was based on expertise obtained through development of prior Regional Plan efforts, feedback from the Board, Policy Advisory Committees, working groups, tribal governments, surveys, a wide variety of communications experts, and regional stakeholders and partners, including a network of CBOs.

### Goals and objectives

The PIP provides a menu of options for SANDAG to involve the public and gather meaningful input on the various anticipated components of the 2021 Regional Plan. The primary goal of the PIP for the 2021 Regional Plan is to engage a broad and diverse cross-section of the San Diego region in the development of the plan. Community input is critical to creating a plan that represents the varied values, needs, and interests of the San Diego region's residents and businesses.

- Raise awareness of the 2021 Regional Plan as the region's updated blueprint that will guide the way as our region grows to 2050 and beyond.
- Gain meaningful input from a broad range of individuals, organizations, agencies, and local governments throughout the 2021 Regional Plan development and decision-making process.
- Make proactive efforts to involve communities and members of the public that have traditionally been underserved or not participated in public planning efforts.
- Meet or exceed local, state, and federal guidelines and requirements for public involvement in the development of the 2021 Regional Plan.
- Deploy an inclusive process that leads to broad support for policies, projects, and programs outlined in the 2021 Regional Plan.

### Implementation techniques and activities

Public outreach and consultation for the 2021 Regional Plan used key sections from the PIP, which encompasses both federal and state elements (23 Code of Federal Regulations 450.316, California Government Code Section 65080[b][2][F]).

- Public Information (Section 2.4.2): project fact sheet, public notices, frequently asked questions, and dedicated 2019 Federal RTP phone line and email address.
- Face-to-Face Interactions (Section 2.4.3): presentations to the Board, policy advisory committees, and working groups; public workshops/open houses; discussions with mayors, supervisors, and councilmembers; and outreach to partner agencies.
- CBO Network (Section 2.4.4): CBOs and collaboratives provide culturally relevant structures for community discussions and input. CBOs are provided with resources to engage their communities in the planning process and are tasked with implementing outreach programs appropriate to their community context. CBOs provide a social equity perspective on planning efforts and support the Title VI and social equity analyses for the 2021 Regional Plan.
- Web-Based Interactive Communications (Section 2.4.5): 2021 Regional Plan webpage, email updates, social media, and visualizations.
- Media (Section 2.4.6): Media kit, outreach via trade publications, and stakeholder email updates.

### **Public information**

A crucial tactic was to create and distribute clear, concise, and engaging information to support public involvement efforts and to provide materials with a consistent look and feel, reflecting the branding developed for the 2021 Regional Plan. The range of resources included written materials, public notices, a website, e-newsletters, and a dedicated phone number and email address for engaging with the public.

### **Face-to-face interactions**

The PIP recognized that face-to-face interaction was important and emphasized the need to create opportunities for SANDAG to interact directly with stakeholders in a variety of formats. These included presentations to the Board, PACs, and Working Groups; public workshops/open houses; interviews and briefings with key stakeholders; and outreach to partner agencies. In accordance with COVID-19 public health orders, these interactions were conducted virtually as well as through print distribution to reach community members with limited internet access.

### **Community-based organizations**

The PIP recognized that due to its convening capacities, community collaboratives and CBOs would be critical to the ability of SANDAG to reach out to underrepresented and low-income populations and communities of color who might not otherwise become involved in the planning process. CBOs provided a culturally relevant structure for developing local protocols, crossing language barriers, and structuring meetings. To help ensure diverse and direct input into the 2021 Regional Plan, the PIP included a strategy for SANDAG to broaden its community-based partnership network with 13 CBOs through competitive contracts awarded by SANDAG. The primary goal was to engage and encourage diverse, inclusive, and active public participation from stakeholders in specific communities who traditionally may not have been involved in regional planning processes (e.g., people with low incomes, seniors, communities of color, persons with disabilities, and other identified populations). The Social Equity Working Group comprises representatives from CBOs serving underserved and historically marginalized communities. The Social Equity Working Group is a collaborative public forum for the CBO network and SANDAG, and it reports to the SANDAG Regional Planning Committee, which in turn reports to the Board.

### Partnering with collaboratives and CBOs in disadvantaged communities

To help ensure that all communities were meaningfully involved in the development of the 2021 Regional Plan, SANDAG developed an innovative partnership program in its PIP with community collaboratives and CBOs in vulnerable areas around the region, drawing on its leadership and knowledge of the communities and providing resources to them to support their collaboration.

Collaboratives are made up of a variety of social institutions, including social service providers, ethnic associations, schools, churches, chambers of commerce, and other CBOs within an underserved and systemically marginalized identified community, including low-income communities and communities of color.

CBOs are often non-profit service providers who work with the target populations in their community and are part of the community fabric, advocating for their needs. Often, their staff reflects the demographics of the communities they serve.

These groups, acting as forums for local institutions of all kinds, provide a culturally relevant structure for developing local protocols, crossing language barriers, and structuring meetings according to the needs of their communities. If their stakeholders make connections between their local concerns and regional planning efforts, they can begin to understand regional planning in a way that is relevant and meaningful to their communities.

SANDAG believes that trust-building is a crucial component of meaningful public involvement that can only be established when stakeholders have been engaged early and consistently in the process. The CBO Partners already have established this leverage with their constituents, and therefore can be highly instrumental in bridging the gap between SANDAG decision makers and historically underserved and systemically marginalized, underrepresented communities.

- Alliance for Regional Solutions
- National Latino Research Center
- Bayside Community Center
- Nile Sisters Development Initiative
- Barrio Logan College Institute

- Olivewood Gardens & Learning Center
- Casa Familiar
- Operation Samahan
- City Heights Community Development Corporation

- Urban Collaborative Project
- Chula Vista Community Collaborative
- Vista Community Clinic
- El Cajon Collaborative

### Dedicated website with interactive elements

SANDAG launched a dedicated website for the 2021 Regional Plan on the SANDAG regional planning website, SDForward.com (Figure 3.6). The website served as the information portal for project updates, the calendar of events, and reports related to the plan. It also included various interactive elements, including a videos page, online comment form, interactive maps and data viewers, and the virtual Vision Lab, which served as a one-stop resource for community members to engage in the plan-development process.

Figure 3.6: Dedicated 2021 Regional Plan Website



Apply the 5 Big Moves
The grouped data helped Identity opportunity areas to apply Complete Corridors, Transit Leap services, Mobility Hubs, and Flexible Fleets.

Figure 3.7: Dedicated 2021 Regional Plan Website Map of Transformative Transportation Vision

### Media

The PIP identified the opportunity for SANDAG to use print, broadcast, or online media to communicate information to a broad audience and promote opportunities for the public to get involved. For the 2021 Regional Plan, these opportunities included earned media, media partnerships, paid media, and outreach via trade publications and stakeholder newsletters.

### Summary of results of 2021 Regional Plan outreach

- Advertisements for public comment were communicated through the SANDAG and San Diego Forward websites, social media channels, via email to 2021 Regional Plan stakeholder email lists, and in regional newspapers: Union Tribune (English language), Daily Transcript (English language), and El Latino (Spanish language).
- The SANDAG CBO network shared information about the 2021 Regional Plan with their respective communities and conducted events to facilitate dialogue and comments leading up to and throughout the comment period.
- Five subregional open houses were cohosted by CBOs. The open houses included an interactive tour in both English and Spanish of components considered in the transportation network scenario development process.
- A bilingual survey was posted on the project website, SDForward.com, and print copies were available through CBOs.
- A Working Group forum with multiple SANDAG working groups and members of the public solicited input on the draft 2021 Regional Plan.
- Regular working group meeting presentations on the proposed draft network and draft plan were given, including to the Social Equity Working Group.

- Presentations were given to the Southern California Tribal Chairmen's Association, the Interagency Technical Working Group on Tribal Transportation Issues, and the TransNet Independent Taxpayer Oversight Committee.
- Presentations were given to the policy advisory committees, including the Audit Committee, and to the Board of Directors.
- Presentations were given to community groups.
- Draft documents were made available online.
- The project established a presence on social media, including SANDAG's Facebook, Twitter, and YouTube pages.
- Members of the public were provided with opportunities for interaction via social media, including Facebook and Twitter.
- Members of the public were given opportunities to subscribe to E-newsletters.
- A dedicated project website, SDForward.com, was created.

All of the public comments on the proposed draft transportation network and draft plan received during the comment periods are included in the PIP.

### **Regional Transportation Improvement Program**

The Regional/Federal Transportation Improvement Program (RTIP) is a multi-billion-dollar, five-year program of major transportation projects funded by federal, state, and local revenues, as well as other local and private funding. The RTIP is a prioritized program designed to implement the region's overall strategy for providing mobility and improving efficiency and safety of the transportation system, while also reducing transportation-related air pollution in support of efforts to attain federal and state air quality standards for the region. Each RTIP also incrementally implements the region's adopted Regional Transportation Plan. The RTIP, which includes an analysis of the air quality emissions for all regionally significant projects, requires approval by the Federal Highway Administration (FHWA) and the FTA. During this reporting period, SANDAG prepared and adopted the 2023 RTIP, which includes programming for FYs 2021-2025. The 2023 RTIP implements policies and projects from the 2021 Regional Plan and the 2021 RTIP, which includes programming for FYs 2023-2027, and follows the policies and projects from the 2015 Regional Plan. The following section reviews the public participation process followed for the most recent 2023 RTIP.

Furthermore, SANDAG conducted its first iteration of a social equity analysis of project dollars of its RTIP, found in Appendix G of the 2023 RTIP. The analysis sought to identify which projects in both the 2021 and 2023 RTIPs proportionately allocate investments towards social equity focus/vulnerable communities. Staff examined the comparative investment made in disadvantaged communities in addition to the comparative investment between 2021 and 2023

Figure 3.8 shows mapped projects in the 2023 RTIP found in the top 50% and above of CalEnviroScreen 4.0 scores.

Pauma and Yuima Reservation Reservation Camp Pendletor Rincon Reservation La Jollo Reservation Oceanside San Pasqual Reservation County of San Diego San Marcos Santa Ysabei Reservation Carlsbad Overall CalEnviroScreen Mesa Grande Reservation 4.0 Scores 1 Encinitas in a 0.5 mile buffer zone of proposed 1 capital improvement projects for Top 50th Solana Beach percentile Poway of CES 4.0 Scores Del Mar Barona > 90 -100 Reservation 15 > 80 - 90 Capitan Grande Reservation > 70 - 80 > 60 - 70 Santee 🗗 > 50 - 60 3 2023 Proposed Capital San Diego Improvement Sycuan Projects Reservation Top 50th percentile of CES 4.0 Scores Note: There are multiple projects within the City of Jamul Indiai Coronado and National City. Village Coronado Source: CalEnviroScreen 4.0, OEHHA August 2022 3 Chula Vista 0 4 KILOMETERS Imperial UNITED STATES San Diego Beach MEXICO SANDAG

Figure 3.8: Overall CalEnviroScreen 4.0 Scores & 2023 RTIP Projects

### **Public participation**

It is the SANDAG policy to encourage public participation in the transportation planning and programming processes. The public involvement program for the RTIP consisted of: (1) public participation at various SANDAG working groups; (2) opportunities to comment at SANDAG Board meetings and public hearings; and (3) through the SANDAG public communications program.

The public was provided opportunities to participate at SANDAG Board and committee meetings. For all meetings, SANDAG posted public notices of document availability and public hearings. Presentations were provided to the CBOs requesting comments. Additional details are described below. The projects in the 2021 RTIP build upon the public outreach efforts from the 2019 Federal RTP.

Pursuant to 23 U.S.C. 134(i), the SANDAG Board approved the release of the draft 2023 RTIP for public review and comment at its meeting on July 22, 2022, ending September 5, 2022, and held a public hearing on September 9, 2022. The public hearing also satisfied the public participation process requirement pertaining to the development of the Program of Projects for the FTA Section 5307 and 5339 programs including time for public notice and time established for public review and comment.

Examples of public outreach efforts and ongoing participation efforts included the following:

### **Independent Taxpayer Oversight Committee**

In conformance with the regional transportation sales tax TransNet Ordinance, a citizen advisory committee, the Independent Taxpayer Oversight Committee (ITOC), was established. It oversees projects funded through the TransNet program. As the document through which SANDAG identifies TransNet-funded projects, the RTIP is reviewed by the ITOC, and the ITOC's comments on the TransNet Program of Projects are conveyed to the SANDAG Transportation Committee, and ultimately to the Board of Directors.

### **Social equity**

For the development of the 2023 RTIP, SANDAG utilized the social equity analyses from the development of the 2021 Regional Plan. For these processes SANDAG used performance measures to aid in making decisions intended to ensure compliance with Title VI requirements and environmental justice principles. For the 2023 RTIP, SANDAG conducted additional outreach to low-income and minority areas and Tribal Nations to solicit their input. The social equity analysis conducted can be found in Appendix G of the 2023 RTIP and Appendix H of the 2021 Regional Plan. Staff presented the 2023 RTIP social equity analysis to the Social Equity Working Group on June 23, 2022.

### Public workshops/outreach

SANDAG provided information about the 2023 RTIP and solicited feedback on the projects included in the draft 2023 RTIP to CBOs through the Social Equity Working Group. In addition, as part of the development of the 2021 Regional Plan, multiple public workshops were provided in which SANDAG provided information regarding the RTIP. A series of subregional open houses and workshops, community-based outreach events, and an online comment tool provided a foundation to start developing the plan.

In addition, each city and the County of San Diego are responsible for providing adequate notice and holding public meetings and/or public hearings as part of their process to develop and submit transportation projects for inclusion in the 2023 RTIP. Pursuant to federal law, the requirements to hold public hearings/notices for federally funded transit projects for MTS and NCTD are herein incorporated as part of the public hearing process for the 2023 RTIP. The public meetings/hearings held by each member agency provide further opportunities for public involvement and participation on specific projects and programs.

### **Other Planning Efforts**

Since the last reporting period, SANDAG has undertaken planning and construction for several transportation projects. For each major project a PIP was developed to ensure critical community concerns and technical issues are identified and potential options to address those concerns were provided. SANDAG values the input of our community members and takes efforts to involve the public in the planning process. SANDAG's Social Equity Working Group was engaged on each of the listed projects to provide planning feedback and contribute to the development of each project's outreach plan. SANDAG continues to work directly with local CBOs to gather valuable community input and ensure that the needs and desires of historically disadvantaged communities are considered in our planning process. Below is a sampling of a few of these projects with a summary of engagement and outreach efforts. Materials and information for these projects were made available on SANDAG's website. Additionally, as part of the development of the agency's Equity Action Plan, SANDAG's staff created an equity inventory in 2022 to compile and document all equity-related initiatives led by the agency's various departments. The inventory can be found in Appendix K.

### **Digital equity**

Since the COVID-19 pandemic began, access to the internet has proven increasingly vital for essential daily tasks and services, and opportunities. In December 2021, SANDAG established its **Regional Digital Equity Strategy and Action Plan** to help close the growing gap between people who do and do not have access to high-speed, high-quality, and affordable internet service, as well as a suitable device for connecting to the internet, known as the digital divide.

### Vision Zero action plan

In July of 2022, the SANDAG Board of Directors adopted a Regional Vision Zero Resolution towards eliminating all traffic fatalities and severe injuries while increasing safe, healthy, and equitable mobility options for all. As a result, SANDAG is developing a regional Vision Zero Action Plan which will incorporate national and international best practices and define a 'Safety Focus Network' for the region to capture where the highest proportion of fatalities and serious injuries occur. As a result, the plan will recommend proven roadway safety strategies to address this complex issue.

### Next generation rapid conceptual planning

In October 2023, SANDAG finalized a conceptual planning document for three new bus rapid transit routes identified in the 2021 Regional Plan. Rapid routes 41, 471, and 625 were selected because of their geographic spread, connections to major institutions and disadvantaged communities, and potential for near-term implementation. This plan includes existing conditions analyses, identification of potential alternatives and transit priority treatments, potential funding sources, cost estimates, and conceptual design drawings. SANDAG will continue working to implement fast, frequent transit throughout San Diego County.

### **Airport transit connection**

SANDAG is currently planning a rapid transit connection to the San Diego International Airport. Despite its convenient location less than three miles from downtown San Diego, the airport has never had a high-frequency fixed connection to the region's public transit network. San Diego is one of the few large metropolitan areas in North America without a rail connection to its major airport. SANDAG has developed a concept study evaluating alternatives including enhanced bus service, an extension of the existing light rail Trolley system, and a new automated people mover connection to transit centers and destinations in downtown San Diego and Old Town. SANDAG will continue this planning work with the intention of advancing the project to environmental clearance and construction in the coming years.

### **Comprehensive Multimodal Corridor Plan program**

In 2019, the SANDAG Board of Directors allocated funding to develop Comprehensive Multimodal Corridor Plans (CMCPs) in partnership with Caltrans. CMCPs are data-driven plans to reduce vehicle miles traveled and greenhouse gas emissions, identify mobility solutions, and preserve community character while creating opportunities for neighborhood enhancement projects. After a comprehensive review of existing and future conditions and implementation of a robust outreach strategy, CMCPs propose solutions and recommend projects that prioritize equity by integrating diverse modes of transportation and mobility options while ensuring that all communities, especially marginalized communities, are engaged. Equity is embedded in all CMCPs at every phase of a project, from project definition to engagement strategies and the development of recommendations that prioritize the needs of our equity-focus communities.

### Flexible Fleet Pilot program

In 2022, SANDAG completed the Flexible Fleets Implementation Strategic Plan (FFISP) that developed a strategy for the successful deployment of "Flexible Fleets" throughout the region. Flexible Fleets consist of a variety of on-demand, shared, mobility services that are oftentimes requested or reserved and paid for through a smartphone app. Through a comprehensive process of outreach to CBOs and an evaluation framework that considers several socioeconomic and travel demand factors, and stakeholder feedback through a "regional scan" analysis of the County. This scan identifies communities best "fit" for Flexible Fleet services. Through this analysis, 10 locations were selected as Tier 1 priority locations and eight locations were selected as Tier 2 priority locations. In 2023, SANDAG partnered with the Cities of San Diego and Oceanside to launch Neighborhood Electric Vehicle Shuttle Pilots "Beach Bug" in Pacific Beach and "gO'side" in Downtown Oceanside, respectively. SANDAG has laid the groundwork for an equity-minded pilot program by improving accessibility to the shuttle service and ensuring that the pilots are compliant with Title VI of the Civil Rights Act. Prior to launch and throughout the operational refinement period, SANDAG took several steps to apply equitable measures to the Beach Bug and gO'side Pilot Programs:

- Conducted community outreach prior to launch to ensure service was meeting the needs of each unique community. Feedback was applied to the service and operations plan.
- 2. Completed a Social Equity Analysis report for each Pilot. This report considers data on senior, low-income, and minority populations. Findings were considered in operations planning.

- 3. Added a Wheelchair Accessible Vehicle (WAV) to each fleet. Riders requesting an ADA trip are provided service with a WAV.
- 4. Added option to request a ride through a phone call via a regional Call Center. This ensures that riders without access to a smart phone or broadband can book a ride.
- 5. Added option to hail a ride. This ensures that riders who do not have access to a telephone, smartphone, or a credit/debit card are able to ride the service.
- 6. Added option for unbanked riders to hail a ride or pay with a Visa gift card via the smartphone application.
- 7. Provided option for Language Assistance Translation services for non-English speaking riders through SANDAG's LAP I-Speak Program.
- 8. Targeted outreach to social equity communities. In Pacific Beach, outreach was targeted to the Senior population and in Oceanside, outreach was targeted to an under resourced community East Capistrano.
- 9. Extended service area considerations for under-resourced communities based on the findings of the Social Equity Analyses for each pilot.
- 10. Ensured that a complaint process is in place for each Pilot.
- 11. Metric monitoring for social equity considerations including: riders above 65, riders' ethnicity, riders' reported number of household vehicles, ride zip code, quantity of rides requested and completed via the call center.
- 12. Provided free trips to and from the transit station in the Pacific Beach location, which encourages overall transit network connectivity and ensures that riders are not paying two fares when transferring to a bus or the Trolley.

Figure 3.9: Flexible Fleet Vehicle



Figure 3.10: Flexible Fleet Vehicle with Ramp Deployed



### **Construction and Engineering Projects**

### Bicycle infrastructure program

Many of the SANDAG TransNet-funded Bicycle, Pedestrian, and Neighborhood Safety Capital Projects improve the public right-of-way to prioritize travel of vulnerable roadway users in Disadvantaged Communities. Maximizing the funding and impact of this program, efforts have been made to identify communities of need in historically underfunded areas where segments of the Regional Bike Network can be implemented. These projects have been prioritized and grant funding is routinely sought using local funds to match and act as leverage for quicker, high quality infrastructure investments in these communities.

### **Otay Mesa East Social Equity White Paper**

Otay Mesa East (OME) will be a new port of entry built east of the current Otay Mesa border crossing. The project aims to alleviate long wait times, congestion and greenhouse gas emissions resulting from acute demand at the other land crossings in the region. It includes the development of a new tolled facility and an integrated information system that will allow people crossing the border to get real-time information about wait times at the different border crossings and plan their trip accordingly. As part of this critical capital project for the region, SANDAG has initiated the development of a *White Paper on Social Equity and the OME*. The White Paper will look at historical planning, design, and operations strategies to look at how social equity was considered, as well as identify opportunities to further equitable outcomes from the project.

# 4. Analysis of Regional Transportation System Investments that Identifies Disparate Impacts, Including Maps Showing Impacts of Distribution of Transportation Funding

The FTA requires that MPOs develop analytical processes to identify the benefits and burdens of metropolitan transportation system investments for minorities and different socioeconomic groups, identifying imbalances, and responding to the analyses' findings. This section responds to the requirement to provide demographic maps that analyze minority and non-minority populations, and charts that analyze the impacts of distribution of state and federal funds for public transportation purposes, including federal funds managed by SANDAG as a designated recipient. This analysis was conducted as part of the 2021 Regional Plan and demonstrated there were no disparate impacts on the basis of race, color, or national origin.

The 2021 Regional Plan continued the robust regionwide social equity analysis carried out for the preceding regional plan. For that effort SANDAG engaged affected communities in the planning process through an innovative collaborative effort with CBOs and collaboratives from around the region. SANDAG incorporated their issues and concerns into the design and decision-making process, the definition of disadvantaged communities, and the development of social equity project evaluation criteria and performance measures. The goal of these efforts is for minority and low-income communities to share equitably in the benefits of the transportation investments without bearing disparate impacts or disproportionate burdens.

### **Identifying the San Diego Region's Disadvantaged Populations**

The first step in the SANDAG social equity analysis was to identify the population groups who are vulnerable or disadvantaged. Pursuant to Title VI, Executive Order 12898 and the 1999 Department of Transportation Memorandum "Implementing Title VI Requirements in Metropolitan and State Planning," SANDAG must provide information on the effects of the 2021 Regional Plan on low-income and minority populations. SANDAG uses CalEnviroScreen, which is an index of environmental and social vulnerability, to identify disadvantaged communities and include transportation strategies that reduce pollution exposure in these communities. SANDAG is using both population-based methods and geographic areas for different aspects of the analysis.

Similar to the 2019 Federal RTP, for the 2021 Regional Plan SANDAG utilized its Activity-Based Model (ABM), which analyzes traveler behavior at the household level instead of by generalizing travel at the Transportation Analysis Zone (TAZ) level like Travel Demand Models used in earlier RTP cycles. With the ABM model, traveler characteristics (such as age, ethnicity, and income) are modeled at the household level so the information is more detailed and allows for the identification and consideration of minority and low-income households located throughout the region.

In public workshops geared towards defining disadvantaged communities for the 2021 Regional Plan, participants proposed that some of the indicators of vulnerability that were not used for the purposes of the travel model and performance measures still be documented to provide a current snapshot of cumulative socioeconomic and population characteristics that make some communities more vulnerable than others.

## The San Diego Forward: 2021 Regional Plan Social Equity Analysis

In developing the 2021 Regional Plan, SANDAG used performance measures and other evidence to make decisions intended to ensure compliance with Title VI requirements and environmental justice principles. As pointed out by the National Cooperative Highway Research Program (NCHRP), however, "the fact that federal policy mandates consideration of environmental justice should not be the only driving force behind considering it; a more compelling argument is that it makes for good transportation planning." (See NCHRP, Effective Methods for Environmental Justice Assessment. Report 532. Washington, D.C.: Transportation Research Board. 2004.)

### Framework

The 2021 Regional Plan envisions a transportation system that is faster, fairer, and cleaner for every person in the region. In practice, this means creating a system where people have a variety of transportation options to choose from to get where they want to go. The transportation network presents a future where riding a bus or train is just as fast and convenient as driving a car and where walking, biking, and using mobility devices are safe and comfortable ways to get around. Technology connects and enhances the transportation system, giving people access to and information about their trips to make travel seamless.

To evaluate the performance of the 2021 Regional Plan, a series of performance measures were used, which are listed in Appendix T: Network Development and Performance. Through the process of developing the performance measures, a subset of measures was identified as a framework for the social equity analysis in which data would be produced comparing three vulnerable populations against their respective counterpart populations (minority versus non-minority,17F18 low income versus non-low income, and senior versus non-senior). These measures include:

- Fast focuses on the transportation system by evaluating the transportation system for how accessible and safe it is for every person, no matter which mode of transportation they choose to use.
- **Fair** focuses on the "fairer" component of the transportation system by evaluating the level of access the system provides to each person in the region, connecting people to jobs, education, and activities.
- **Clean** focuses on the transportation system by considering the environmental and health impacts of the network and reducing greenhouse gas emissions.

SANDAG has developed this framework to ensure that it does not engage in practices that have the effect of discriminating on the basis of race, color, national origin or other categories listed in the legislation. In some analysis work, statistics are used as a way to screen for unintentionally caused discriminatory impacts. The threshold percentage often used to screen for disparate impact or disproportionate effect is 20% due to the so-called "four-fifths" or "80%" rule, because it is only presumed that a case for disparate impact or disproportionate effect is created when there is a substantially different rate of impact for a particular group. A rate that is different by more than 20 percentage points is regarded as substantial because it is statistically unlikely to occur on a random basis. Although this relatively stringent standard is only required when checking for disparities for minorities under Title VI, SANDAG also analyzed low-income and senior groups using this screening process.

The modeled results were presented for four years: 2016, 2025, 2035, and 2050. The 2016 year serves as the existing transportation network, and the performance outcomes reflect the function of the region's transportation system in a given year. Years 2025, 2035, and 2050 are significant phases in the 2021 Regional Plan when strategies are planned to be implemented. These phase years are included twice for each performance measure. These outcomes are considered results of implementation of 2021 Regional Plan strategies, also known as the Build Scenario. The No-Build Scenario includes projects that would be built in the region in absence of the 2021 Regional Plan because they are in progress or recently completed. Throughout the Plan, each performance measure compares outcomes from both the Build and No-Build Scenarios.

During the process of evaluating the 2021 Regional Plan network for each disadvantaged population and its respective non-disadvantaged population, the percent difference was calculated between the No-Build projections and the 2021 Regional Plan for each phase (2025, 2035, and 2050) to determine how each group fared. As part of the analysis, the percentages of each disadvantaged population group were compared to its comparable non-disadvantaged population group to determine whether the percentage point difference between the groups is substantial enough to potentially qualify for further evaluation as a disparate impact or disproportionate effect. Anything above a 20-percentage-point difference would result in further analysis. The results in this report compare the No-Build to the 2021 Regional Plan network. Additional methodological information is provided in the section below titled "Results for Social Equity Performance Measures."

Table 3.1: Summary Results for Social Equity Performance Measures Social Equity Calculations on All Metrics

Metrics	Low Income	Minority	Seniors
Fast: People within 0.5 miles of transit (by transit tier)	٧	٧	٧
Fair: Access to opportunities via transit:20F <sup>21</sup>			
Employment centers	V	٧	N/A
Higher education	V	٧	N/A
Benefit-cost ratio	V	٧	٧
Transportation system use costs	٧	٧	٧
Clean: Access to basic needs:			
Medical/healthcare	٧	٧	٧
Active parks	٧	٧	٧
Retail	٧	٧	٧
Average PM <sub>2.5</sub>	٧	٧	٧
People within 0.25 miles of bicycle facilities	٧	٧	٧

√ No disparate impact/disproportionate adverse effect.

The modeling results for the social equity performance indicators referenced above show that the 2021 Regional Plan improves conditions for disadvantaged populations significantly compared with the 2050 No-Build alternative. SANDAG conducted analyses of low-income, minority, and senior populations and modeled the impacts on these populations separately.

For each performance measure, the social equity calculation was conducted as follows:

- Step 1: Percentage differences between the 2021 Regional Plan (Build) and the No-Build Scenario were calculated for each horizon year (2025, 2035, and 2050), respective disadvantaged and non-disadvantaged population, and measure.
- Step 2: Figures for the disadvantaged populations were compared to the respective non-disadvantaged populations to determine the percentage point difference between the groups. When the social equity calculation returns a positive number, such as 1.0, it indicates that the disadvantaged population is projected to receive a larger benefit relative to the non-disadvantaged population over the phase years of the 2021 Regional Plan, with the exception of the change in percentage of income spent on out-of-pocket transportation costs and exposure to PM2.5. Since these are burden measures, increase in value is an increased burden. For the rest, when the social equity calculation is a negative number, it indicates that the disadvantaged population is projected to receive less of a benefit than the non-disadvantaged population over the phase years of the 2021 Regional Plan. A social equity calculation of 0.0 would be parity; in other words, it would indicate that conditions for the two populations were improving at the same rate.
- Step 3: Percentage differences of more than 20 points in the Step 2 social equity calculation would be considered a potential disparate impact or disproportionate effect. If a potential disparate impact or disproportionate effect had been found, SANDAG would have considered alternatives and mitigation that would reduce the impact/effect.

Table 3.2 illustrates an example social equity calculation based on this process.

Table 3.2: Example Social Equity Calculation - Percentage of Population within 15 Minutes of Access to Parks by Walk

Demographics	2050 No-Build (NB)	2050 Regional Plan (RP), Build
Minority	54.7%	55.1%
Non-Minority	49.3%	50.0%

Step 1: Percentage Difference

Minority = 2050RP-2050NB = 55.1%-54.7% = 0.4%

Non-Minority = 2050RP-2050NB = 50.0%-49.3% = 0.7%

Step 2: Percentage Point Difference between Pop/Non-Pop

(Minority Percentage Difference-Non-Minority Percentage Difference) × 100

 $(0.4\%-0.7\%) \times 100 = -0.3$ 

### **Activity-based modeling**

SANDAG utilizes an Activity-Based Model (ABM), which analyzes traveler behavior at the household level. With the ABM, traveler sociodemographic characteristics (such as age, race, ethnicity, and income) are modeled at the household level so that the information and planning efforts are more detailed. For more information on the ABM, see Appendix S: Travel Demand Modeling Tools.

After examining mapped data using both the previous indicators and various populations proposed for a social equity analysis, and with input from the social equity stakeholders, SANDAG selected three population groups that represent the disadvantaged populations that are analyzed in the transportation model: (1) minorities; (2) low-income populations; and (3) seniors. These are the same populations identified in the 2015 Regional Plan, and the team determined this approach would maintain consistency and allow for comparison between the 2015 and 2021 Regional Plans. Since the ABM simulates each individual traveler's travel choice (instead of groups of travelers), there is no need to have a threshold percentage for determining if a certain geographic area should be counted as "minority." It was, however, still necessary to select demographic thresholds for low-income and senior populations that were appropriate for the San Diego region. The threshold for seniors selected was 75 and older. This threshold came from a dialogue with social equity stakeholders regarding mobility and age, with the conclusion that at age 75, seniors may become transit dependent, but still mobile. For low-income populations, the threshold selected was populations with household income of less than 200% of the 2016 federal poverty level (FPL). The rationale to use less than 200% of the FPL was twofold. First, below 200% of the FPL reflects the higher cost of living in the San Diego region as compared to other areas of the state and nation that might choose 100% of FPL. Second, this indicator can be forecasted.

### Access to rail and rapid transit

Access to high-quality transit (commuter rail, light rail, or Next Gen Rapid) improves significantly for all disadvantaged populations in the 2021 Regional Plan (Build Scenario). For low-income populations, access to any transportation tier improves from 11.8% in the 2016 base year to 41.1% by 2050. For comparison, the projection for 2050 is 17.8% in the No-Build Scenario. For all social equity populations, access to high quality transit doubled from 2025 to 2050 (Table 3.3). Low-income populations' benefit is greater than that of non-low-income populations, with a percentage point difference of 0.24 in 2025 and 3.88 in 2050. For minority populations, there is also a significant improvement in access to high-quality transit. In the base year of 2016, minority populations' access to high quality transit is 10.4%, which increases to 18.9% by 2025 and 36.1% in the horizon year of 2050. For comparison, projected access is only 15.5% in the No-Build Scenario by 2050. Compared to non-minority populations, minority populations show a difference of -0.32 percentage points in 2025 and 0.61 percentage points in 2050. This indicates that minority populations will benefit more relative to the nonminority population in the Build Scenario (see the map in Figure H.14 for details). For seniors, access to high-quality transit also improves significantly, going from 8.0% in the base year to 34.7% by the 2050 horizon year. For comparison, projected access in 2050 is 14.1% in the No-Build Scenario. There are slight differences between seniors and non-seniors over the life of the 2021 Regional Plan. Initially, the relative benefit for non-seniors is -0.22, but by 2050, the percentage point difference favors seniors (0.23).

Table 3.3: Social Equity Calculation: Regionwide Access to Commuter Rail, Light Rail, and Next Gen Rapid Transit: Percentage Point Difference: Build vs. No-Build

Demographics	2025	2035	2050
Access to Any Tier (1–3)			
Low Income vs. Non-Low Income	0.24	3.67	3.88
Minorities vs. Non-Minorities	-0.32	0.38	0.61
Senior vs. Non-Senior	-0.22	-0.35	0.23
Commuter Rail (Tier 1)			
Low Income vs. Non-Low Income	-0.02	0.67	2.37
Minorities vs. Non-Minorities	-0.12	0.04	0.26
Senior vs. Non-Senior	0.05	-0.12	-0.01
Light Rail (Tier 2)			
Low Income vs. Non-Low Income	0	0.27	-0.21
Minorities vs. Non-Minorities	-0.15	-0.59	-1.73
Senior vs. Non-Senior	-0.09	0.06	0.62
Next Gen <i>Rapid</i> (Tier 3)			
Low Income vs. Non-Low Income	0.85	5.2	5.24
Minorities vs. Non-Minorities	-0.24	0.93	0.95
Senior vs. Non-Senior	-0.17	-0.66	0.14

#### Benefit analysis

Vulnerable populations will have increased mobility and better accessibility to transportation alternatives with the investments proposed in the 2021 Regional Plan network. A benefit–cost analysis tool developed for economic analysis uses the outputs from the SANDAG activity-based travel model to assess and monetize the benefits of the 2050 Plan versus a No-Build Scenario. However, the horizon year for the benefit–cost analysis tool is 2070, which allows the projects completed in 2050 to accrue benefits over the typical 20-year lifespan. This tool can also estimate benefits for subpopulations—such as minorities, low-income residents, and seniors—to gauge the relative effects of the 2021 Regional Plan on these disadvantaged populations.

The results of this analysis are presented in Table 1.4. Over the time period analyzed (2016–2070), low-income (those earning less than 200% of the FPL) residents receive 34.7% of the benefits but are only 32% of the population in 2016. That is, low-income San Diegans receive an almost equal amount of the benefits from the proposed 2050 Plan Network investment. In contrast, minority populations made up 53.6% of the county population in 2016 and receive 68.6% of the benefits of the 2021 Regional Plan by 2070. For seniors (75 and over), they receive proportionally more of a benefit—seniors made up 5.8% of the population in 2016 and receive 7.5% of the benefits by 2070. For all disadvantaged populations, the share of the population is 68.1% and they receive 80.9% of the benefits of the 2021 Regional Plan. The benefit—cost analysis tool does account for forecasted changes in these populations over time.

**Table 3.4: Benefits to Disadvantaged Populations** 

Population	Benefits to Disadvantaged Population	Benefits to Non- Disadvantaged Population	Total Benefits	Benefits to Disadvantaged as Percentage of Total (2070)	Disadvantaged as Share of Total Population (2016)
Low Income	\$26,212	\$49,362	\$75,575	34.7%	32.0%
Minority	\$51,829	\$23,745	\$75,575	68.6%	53.6%
Seniors	\$5,706	\$69,869	\$75,575	7.5%	5.8%
Total	\$61,148	\$14,427	\$75,575	80.9%	68.1%

<sup>\*</sup> Not all benefit categories calculated by the benefit-cost analysis tool can be apportioned to specific sub-populations. Time-Savings for commercial vehicles, emissions benefits, safety benefits, reliability benefits, and operating benefits cannot be calculated by sub-populations and are excluded from this analysis. With those categories, total benefits are \$75.1 billion.

As mentioned, input from affected communities was incorporated into the performance measures that were ultimately utilized. Performance measures were used for evaluating the comparative impact of the 2021 Regional Plan on social equity focus populations (low-income/minorities/seniors) to its No-Build outcomes. Each performance measure was calculated separately for each set of disadvantaged population in relation to non-population. A full comprehensive list of the 2021 Regional Plan's social equity performance measures can be found in **Appendix H** of the 2021 Regional Plan.

## 2023 Regional Transportation Improvement Program Social Equity Analysis

As described in section 3 of this chapter, SANDAG staff conducted a social equity analysis of the 2023 Regional Transportation Improvement Program (RTIP) to identify projects that proportionately allocate funding dollars towards social equity focus/vulnerable communities and the overall proportion of total project funding dedicated to these communities. The analysis compared investments in both the 2021 and 2023 RTIPs and their respective proportionate allocations towards social equity focus/vulnerable communities. The results were examined to create a starting point for future iterations of RTIP social equity analyses.

<sup>\*\*</sup>All values are in millions of \$2020. Benefits calculated to 2070 horizon.

## 5. Description of Procedures Used by SANDAG to Ensure Non-Discriminatory Pass Through of FTA Financial Assistance

As outlined in SANDAG Board Policy No. 009, SANDAG does not discriminate on the basis of race, color, or national origin in conducting government business, including the distribution of federal grant funds to subrecipients. Also, the contract templates SANDAG uses to pass through federal funding require subrecipients to comply with, and assure the compliance of any third-party contractors at any tier of the project, with all of the requirements under Title VI, including the provision that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. In addition, SANDAG places non-discrimination clauses in its grant agreements for subrecipients of federal funding and monitors compliance with those requirements as described in Sections 8 and 9 of Chapter 2 in this document.

SANDAG uses the Regional Plan and RTIP processes described above, as well as the Coordinated Plan process and a process for distribution of Section 5310 funding to ensure it distributes funding in a non-discriminatory manner. The processes not already discussed above in this Program document are described in this section.

### **Coordinated Plan**

The Coordinated Plan provides a five-year blueprint for the implementation of public transit and social service transportation concepts described in the Regional Plan. The Coordinated Plan is unique in that it combines the regional requirement for a Short-Range Transit Plan with the federal requirement for a Coordinated Plan into one concise planning document. Additionally, the combination of transit and social service transportation provides an opportunity to evaluate all available transportation services in the region. Along with the evaluation of transportation services, the Coordinated Plan establishes a unified regional strategy to provide transportation to the most sensitive population groups in the county, including seniors, individuals with disabilities, and persons with limited means, among other recognized transportation-disadvantaged population groups. While there is currently a range of transportation services available to these population groups, gaps in service remain due to geography, limitations in transit service, funding constraints, eligibility, knowledge, and training. The availability of funding programs specifically tied to the Coordinated Plan, however, enables SANDAG to help put strategies into action to help meet the identified unmet transportation needs of these population groups.

A prominent theme of the current Coordinated Plan is to further define the administration and implementation of the Fixing America's Surface Transportation (FAST) Act in regard to specialized transportation grant programs, such as Section 5310, Enhanced Mobility for Seniors, and Individuals with Disabilities. While past plans have focused on a passenger-first perspective toward planning, this plan addresses a more holistic view of what services will meet the population's needs over the five-year planning period.

For each process, all meeting locations were accessible by public transit and meeting times were scheduled to maximize accessibility by low-income and minority populations. Meeting locations which were ideally positioned to be readily accessible to low-income and minority populations via both MTS and NCTD services were utilized. Additionally, SANDAG (in compliance with the Americans with Disabilities Act) accommodates individuals who require assistance to participate in SANDAG sponsored meetings. Public outreach materials were provided in both English and Spanish via newspaper announcements. Additionally, press releases were sent and public meeting notices were posted.

The SANDAG team is currently working on the preparation of the 2025 Coordinated Plan. The 2020 Coordinated Plan, which was discussed in the 2021 Title VI Program Update submitted to FTA, can be viewed and downloaded at the SANDAG Coordinated Plan webpage.

## 6. Description of Financial/Technical Assistance Provided to Federal Subrecipients

The Governor of the State of California appointed SANDAG as the designated recipient for JARC and New Freedom funds under the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), and Section 5310 funds under Moving Ahead for Progress in the 21st Century (MAP-21) for the urbanized portion of San Diego County in letters dated August 21, 2006, and April 23, 2014, respectively.

SANDAG, as the designated recipient, assumes the responsibility for the administration of the former JARC and New Freedom programs and the current Section 5310 program for the census-defined San Diego urbanized area (Figure 3.11) including the preparation of the Program Management Plan (PMP). The specific tasks required by the FTA for this designation are:

- Conducting an area-wide selection process.
- Certifying fair and equitable distribution of funds.
- Certifying that each project selected for funding was derived from the Coordinated Plan.
- Certifying that the Coordinated Plan was developed through a process that included representatives of public, private, and nonprofit transportation and human service providers, as well as participation by the public.

Pauma and Yuima Reservation Pala Reservation Camp Pendleton 15 Rincon Reservation La Jolla Reservation Oceanside Vista San Pasqual 0 0 Reservation County of San Diego San Marcos Escondido Santa Ysabe Reservation Carlsbad Mesa Grand Reservation Encinitas Solana Beach Poway Del Mari Reservation Capitan Grand Reservation Santee San Diego Sycuan El Cajon Reservation 163 Mesa 2020 Census Lemon **Urban Areas** @ Grove San Diego Urban Jamul Indiai Area Village National Coronado City 1 Čhula Vista Imperial UNITED STATES Beach San Diego SANDAG MEXICO

Figure 3.11: Urbanized Area of San Diego County as of the 2020 Census

To ensure an open and transparent program process, SANDAG involves stakeholder input and public involvement through all phases of program implementation. Eligibility and evaluation criteria for the federal grant programs are developed with input from members of the public, Social Services Transportation Advisory Council (SSTAC), and other stakeholders.

All materials for the call for projects undergo a legal review by the SANDAG Office of General Counsel, and the eligibility and evaluation criteria are reviewed by SSTAC and the SANDAG Transportation Committee before final approval by the Board.

To ensure equitable distribution of grant funding, social equity criteria are incorporated within the eligibility and evaluation criteria used to score and rank applicant projects. To be eligible for funding, an applicant must include in its civil rights assurances adequate methods for ensuring that the benefits of the project are distributed equitably among protected and non-protected population groups in its service area. Additionally, applicants' projects are evaluated on the following:

- Will the project serve a low-income or minority area?
- Does the applicant describe how it will communicate with individuals with limited proficiency in English?
- Does the applicant have an approved Title VI program?
- How comprehensive are the applicant's proposed strategies for marketing the project and promoting public awareness (specifically including outreach to low-income and minority areas as well as populations with limited proficiency in English)?
- Are there provisions within the project proposal that ensure the equitable distribution of project services?

An evaluation committee – composed of staff from non-applicant agencies or organizations such as state agencies, municipalities, and social services agencies – reviews, scores, and ranks project proposals using the approved eligibility and evaluation criteria. All evaluation materials undergo an independent review to ensure accuracy of reporting. A social equity analysis is conducted to determine whether the projects recommended for funding would result in disproportionate burdens for low-income populations or disparate impacts for minority populations. If disparate impacts are identified, project rankings are adjusted to ensure project funding recommendations would not result in disparate impacts. The project rankings and funding recommendations are then brought to the Transportation Committee for review and the Board of Directors for final approval.

## Tracking funding requests from private non-profit organizations, state or local governmental authorities, and Indian tribes

Per FTA Circular 4702.1B, SANDAG also must prepare and maintain "a record of funding requests received from private non-profit organizations, State or local governmental authorities, and Indian tribes. The record shall identify those applicants that would use grant program funds to provide assistance to predominantly minority populations. The record shall also indicate which applications were rejected and accepted for funding." During the areawide selection process, SANDAG requires applicants to indicate if the requested Section 5310 funds would be used to provide assistance to predominantly minority populations. SANDAG also requires applicants to cite demographic data to substantiate their response. Once the SANDAG Board of Directors approves funding awards through the area-wide selection process, SANDAG updates its record of which applications were rejected and accepted. Appendix L displays this record, which is from the STGP Cycle 12 Call for Projects, SANDAG's most recent area-wide selection process.

# 7. Description of Procedures SANDAG Uses to Provide Assistance to Potential Subrecipients Applying for Funding, Including Efforts to Assist Applicants that Would Serve Predominantly Minority Populations

After the solicitations for grant applicants are released for 5310, SANDAG staff holds a Call for Projects Webinar to review the call for projects materials and provide potential applicants with assistance in completing and submitting a competitive project proposal. This webinar provides instruction to ensure that all potential applicants, including those that would serve predominantly minority populations, have the guidance to complete a successful application.

Approximately six weeks prior to the final grant application submittal deadline, applicants are required to submit draft applications. Staff reviews draft applications to ensure project proposals meet minimum program requirements; address all application questions; and include all required materials, such as a scope of work, budget, and performance indicator worksheet (as applicable). This step was implemented in response to a number of applicants being disqualified during the first competitive process because their application had incomplete information, or their budget was filled out incorrectly.

More information regarding SANDAG efforts to provide assistance to grant applicants and recipients is provided in Sections 8 and 9 of Chapter 2 of this document.

### Chapter 4: Circular Chapter IV Requirements Applicable to SANDAG

### 1. Requirement to Evaluate Fare Changes

As described in Chapter 2 of this Program, SANDAG has agreed to carry out the responsibility to maintain the Regional Comprehensive Fare Ordinance under the Memorandum of Understanding with MTS and NCTD. The Comprehensive Fare Ordinance outlines a regional fare system that is uniform and fair for users of both transit systems.

SANDAG has three board policies that guide activities when any changes to the fare ordinance are proposed to ensure that such changes are equitable, and that there is an opportunity for meaningful public participation before implementation of fare changes. SANDAG uniformly applies these policies to all major service changes regardless of mode.

## Board Policy No. 018 – Regional Transit Service Planning and Implementation

SANDAG Board Policy No. 018 – Regional Transit Service Planning and Implementation (see Appendix M), outlines SANDAG responsibilities to the FTA regarding fare changes. Section 1.2 contains the SANDAG disparate impact policy concerning impacts of fare changes on minority populations:

SANDAG will determine the existence of disparate impacts to minority populations for all Fare Ordinance changes. Pursuant to Title VI of the Civil Rights Act, disparate impacts are found when there is a difference in adverse effects between minority and non-minority areas of ten percent (10%) or more. Minority populations will be deemed adversely affected when the proportion of minority persons adversely affected by the change exceeds the average proportion of minority persons in the analysis service area.

Section 1.2 of Board Policy No. 018 also contains the disproportionate burden policy regarding impacts of fare changes on low-income populations:

SANDAG will determine the existence of disproportionate burdens on low-income populations for all Fare Ordinance changes. Pursuant to Executive Order 12898 (Clinton 1994), disproportionate burdens are found when there is a difference in adverse effects between low-income and non-low-income populations of ten percent (10%) or more. Low-income populations will be deemed adversely affected when the proportion of low-income persons (using a threshold of at or below 150 percent of the U.S. Department of Health and Human Services poverty guidelines) adversely affected exceeds the average proportion of low-income persons in the analysis service area.

### **Board Policy No. 025 – Public Participation Plan Policy**

SANDAG Board Policy No. 025 – Public Participation Plan Policy (Appendix E) establishes processes for providing information to and obtaining input from public transit riders, stakeholders, and the general public concerning agency programs, projects, and program funding to ensure the public has meaningful opportunities to share their opinions and concerns about plans.

Section E describes the procedures used to identify Title VI-protected communities about fare changes following federal requirements:

3.1. Residential, employment, and transportation patterns of low-income, limited English speaking, and minority populations shall be identified so that their needs can be identified and addressed, and the benefits and burdens of transportation investments can be fairly distributed. SANDAG shall endeavor to involve the affected communities in evaluating the benefits and burdens of transportation investments.

3.2. SANDAG shall evaluate and - where necessary - improve the public involvement processes to eliminate participation barriers and engage minority and low-income populations in transportation decision making.

## **Board Policy No. 029 – Regional Fare Policy and Comprehensive Fare Ordinance**

Finally, SANDAG Board Policy No. 029 Regional Fare Policy and Comprehensive Fare Ordinance (see Appendix N), provides the regional structure for transit fares and consolidates fare levels for MTS and NCTD into a single SANDAG ordinance.

Section 2.3 of SANDAG Policy No. 029 addresses the impacts that fare changes could potentially have on people of color and low-income communities:

SANDAG shall consider the financial and Title VI impacts of a fare change upon ridership, service provision, and operating budgets.

Section 5.5 addresses public participation in the decision-making process:

Public notice of fare changes shall be provided as legally required, including written notice on all public transit vehicles, and legal notices to newspapers. The public will be provided with an opportunity(ies) to comment on proposed fare changes in accordance with SANDAG Policy No .025, Public Participation/Involvement Policy.

### **Title VI Analysis for Fare Changes**

### 2021 fare changes

In September 2021, SANDAG, MTS, and NCTD implemented fare changes, approving the new PRONTO fare system with new "best fare" fare capping features, ensuring that riders never pay more than the cost of a day pass in a day or more than the cost of a monthly pass in a month. The Title VI Fare Equity Analysis for this change was completed in March 2021 and included in the previous program update.

### 2022 fare changes

In 2022, SANDAG, MTS, and NCTD implemented two fare changes. The first was the reintroduction of the SPRINTER/BREEZE monthly pass for NCTD riders. This pass provides unlimited monthly access to NCTD's SPRINTER hybrid rail and BREEZE bus services without including access to MTS's bus and rail system. The second fare change was the introduction of the Youth Opportunity Pass pilot program. This program provides free transit fares to all youth 18 and under in San Diego County through the PRONTO fare system and constitutes a change to the Youth fare via PRONTO.

SANDAG completed the Title VI Fare Equity Analysis for these fare changes in 2022, and it was approved by the SANDAG Board of Directors at its March 25, 2022, meeting. The analysis found that neither fare change presented a disparate impact or disproportionate burden. As both fare changes were decreases in fare, there were no populations that were adversely affected by the change. The fare equity analysis for these service changes is included in Appendix O.

### 2023 fare changes

In 2023, SANDAG and NCTD implemented one fare change. This fare change introduced a new fare type for COASTER commuter rail passengers, allowing the purchase of 5-packs or 10-packs of COASTER day passes at a discounted rate. This change was made to attract ridership back to the COASTER in a world with more remote work and flexible schedules for office workers who comprise the majority of COASTER weekday ridership.

SANDAG completed the Title VI Fare Equity Analysis for this fare change in 2023, and it was approved by the SANDAG Transportation Committee at its October 20, 2023, meeting. The Transportation Committee has the authority to approve matters related to transit fares per SANDAG Board Policy 001. The analysis found that the fare change did not present a disparate impact or disproportionate burden. As the fare change was a discounted fare (with no increases in fare), there were no populations that were adversely affected by the change. The fare equity analysis for this service change is included in Appendix O.

### Conclusion

This report includes all items required by the FTA Title VI Circular. As demonstrated in developing the 2019 Regional Plan and other planning efforts, SANDAG proactively reaches out across all segments of the community to encourage public participation in the planning process. Further, through the allocation of dedicated resources in its current program budgets and beyond, SANDAG demonstrates its commitment to full compliance with Title VI, Executive Order 12898 on environmental justice, and Executive Order 13166 on limited English proficiency. SANDAG is working diligently to address the needs of people of color and low-income communities, tribal governments, persons with disabilities, and other persons and groups traditionally underserved by existing transportation systems, and to provide meaningful opportunities for public involvement in all decision-making related to transportation. SANDAG will continue to analyze the impact of proposed investments on low-income and minority populations.

## **Appendices**

### Appendix A: Transit Agency Title VI Programs

To access the MTS Title VI Program Plan follow this link:

https://www.sdmts.com/sites/default/files/2024-05-16-board-agendamaterialsrevised\_1.pdf

To access the NCTD Title VI Program Plan follow this link:

https://d4lp5oxce4dvw.cloudfront.net/wp-content/uploads/NCTD-Title-VI-Program-2024.pdf

# SAN DIEGO METROPOLITAN TRANSIT SYSTEM

## Resolution No. 24-05

# Resolution Approving the San Diego Metropolitan Transit System's Triennial Title VI Program and its Submittal to the Federal Transit Administration

WHEREAS, Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal funding; and

WHEREAS, the Federal Transit Administration (FTA) provided guidance to and set requirements for transit agencies' Title VI compliance by issuing FTA Circular 4702.1B on October 1, 2012; and

WHEREAS, FTA Circular 4702.1B details the elements required in San Diego Metropolitan Transit System (MTS') Title VI Program, required to be submitted to the FTA every three years; and

WHEREAS, FTA Circular 4702.1B requires that the Title VI Program be approved by the MTS Board of Directors; and

WHEREAS, MTS' current Title VI Program expires July 31, 2024; and

WHEREAS, FTA Circular 4702.1B requires that the Title VI Program contain certain elements, including <u>but not limited to</u> the following MTS documents:

- 1. Title VI notice to the public
- 2. Title VI complaint procedures
- 3. Title VI complaint form
- 4. List of transit-related Title VI complaints, investigations, and lawsuits
- 5. Public Participation Plan
- 6. Language Assistance Plan
- 7. Table depicting the racial breakdown of MTS' non-elected boards and committees
- 8. Evidence of the Board of Director's review and approval of the Title VI Program
- 9. System wide service standards and policies
- 10. Demographic and service profile maps and charts
- 11. Demographic ridership and travel patterns, collected by surveys
- Description of the public engagement process used for determining the major service change, disparate impact, and disproportionate burden policies
- 13. Results of service equity analyses conducted since the last Title VI Program submission and evidence of the Board of Director's awareness and approval of the equity analysis; and

WHEREAS, MTS Staff, in conjunction with the San Diego Association of Governments (SANDAG) staff, has developed a Title VI Program (provided to the MTS Board of Directors as an attachment to the May 16, 2024 Board agenda item) that contains the above listed elements and shows MTS' compliance with Title VI, for Board consideration and approval.

NOW, THEREFORE, BE IT RESOLVED, that the MTS Board of Directors does hereby adopt the MTS Title VI Program; and

BE IT FURTHER RESOLVED, that the MTS Board of Directors authorizes the Chief Executive Officer, or a designee, to:

- 1. Provide evidence of the Board 's consideration and approval of the final MTS Title VI Program to the FTA;
- 2. Submit the final MTS Title VI Program to the FTA; and
- 3. Take any other steps necessary to give effect to the Resolution, including responding to any follow-up inquiries from the FTA.

PASSED AND ADOPTED, by the Board of Directors this <u>16th</u> day of <u>May</u>, 2024 by the following vote:

AYES: Gronzalez, McCann, Donovan, Goble, Leyba-Gonzalez, Hall Dillard, Gostil, Bush, Frank, Morano, Elo-Rivera, Whitburn,

NAYS:

ABSENT: Montgomeny Stoppe, Giloria

ABSTAINING:

Chairperson

San Diego Metropolitan Transit System

Filed by:

Clerk of the Board

San Diego Metropolitan Transit System

Approved as to form

General Counsel

San Diego Metropolitan Transit System

Resolution 24-05



**Agenda** Item #

# **STAFF REPORT** APPROVE THE CALENDAR YEAR 2024 UPDATE TO THE NORTH COUNTY TRANSIT DISTRICT'S TITLE VI PROGRAM

Time Sensitive: ⊠ Consent: ⊠

# STAFF **RECOMMENDATION:**

Approve the Calendar Year (CY) 2024 update to the North County Transit District's Title VI Program.

# **BACKGROUND INFORMATION:**

As a recipient of federal funds, the North County Transit District (NCTD) conducts assessments of NCTD's activities related to Title VI of the Civil Rights Act of 1964 to ensure nondiscrimination of services and facilities for minority communities. These assessments and other compliance documents constitute the Title VI Program which must be submitted to the Federal Transit Administration (FTA) Regional Civil Rights Officer once every three (3) years. The current Title VI Program is set to expire in June 2024.

With the approval of Senate Bill 1703 in 2002 and the consolidation of planning and programming functions, the San Diego Association of Governments (SANDAG) entered into a Master Agreement with the respective transit operators. San Diego Metropolitan Transit System (MTS) and NCTD, and assumed the responsibility for conducting the triennial Title VI Program Update on behalf and in coordination with the transit agencies. Through this coordination, the respective Boards of NCTD and MTS are required to approve the update of the Title VI Program prior to final approval by SANDAG's Board of Directors and submission to the FTA.

The Title VI Program includes the following:

- Demographic Information (Minority Population) Pursuant to the Program
- Specific Requirements (SANDAG responsibility)
- NCTD's Title VI Complaint Procedures
- Title VI Investigations, Complaints, and Lawsuits, if any
- NCTD's Process to Ensure Meaningful Access to Limited English
- Proficiency (LEP) Populations
- NCTD's Notice to Beneficiaries of Protection Under Title VI
- Provision of Additional Information Upon Request Made by FTA
- NCTD's System-wide Service Standards
- NCTD's System-wide Service Policies

The Title VI Program included six (6) service equity analyses conducted related to COASTER and BREEZE temporary service reductions due to COVID-19. COASTER service restoration and service expansion, BREEZE 347 reroute, and the launch of Sorrento Valley COASTER Connection FLEX routes.

Following a thorough analysis, there were no significant changes from the Title VI Program Plan approved by the Board in 2021.

Based on the foregoing, staff recommends that the NCTD Board of Directors approve the CY2024 update to NCTD's Title VI Program.

Staff Report No.: SR-24-05-006

**ATTACHMENT:** | 6A – NCTD Title VI Program CY2024 Update

**GOAL/STRATEGIC** Grow Ridership and Improve Service Quality

**DIRECTION:** 

FISCAL IMPACT: This staff report has no fiscal impact.

**COMMITTEE REVIEW:** None

**STAFF CONTACT:** Chris Orlando, Chief Planning and Communications Officer

E-mail: corlando@nctd.org Phone: 760-967-2807

Approved and/or authorized
by the Board of Directors of the
North County Transit District

By:

Bate: 5 16 24

Clerk of the Board

70

# Appendix B: Certificates and Assurances

## FY 2023/2024 FHWA and FTA Metropolitan Transportation Planning Process Self-Certification

In accordance with 23 CFR part 450, the California Department of Transportation and the San Diego Association of Government (SANDAG), the designated Metropolitan Planning Organization for the San Diego, California urbanized area(s), hereby certify that the transportation planning process is being carried out in accordance with all applicable requirements including:

- 1) 23 U.S.C. 134, 49 U.S.C 5303, and subpart C of 23 CFR part 450;
- In nonattainment and maintenance areas, sections 174 and 176(c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506(c) and (d)) and 40 CFR part 93;
- 3) Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C 2000d-1) and 49 CFR part 21;
- 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;
- Section 1101(b) of the FAST Act (Pub. L. 114-94) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;
- 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
- 7) The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and 49 CFR parts 27, 37, and 38;
- The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance;
- 9) Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender; and
- 10) Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities.

Dolm	Roy Abboud
MPO Authorizing Signature	Caltrans District Approval Signature Roy Abboud
Chint Executive Officer	Acting Deputy, Planning and Local Assistance
Title	Title
1/25/24	02/01/2024
Date	Date

# Appendix C: Discrimination Complaint Procedures Board Policy No. 009



# BOARD POLICY NO. 009

## **DISCRIMINATION COMPLAINT PROCEDURES**

This policy is intended to establish a procedure under which complaints alleging discrimination in SANDAG's provision of services or SANDAG activities can be made by persons who are not employees of SANDAG.

# **Background**

It is SANDAG policy to comply with state and federal laws and regulations including the Americans with Disabilities Act of 1990 (ADA), the Civil Rights Act of 1964 (Title VI and VII) and other federal and state discrimination laws. SANDAG prohibits discrimination by its employees, contractors, and consultants and in its programs, activities and facilities. SANDAG does not discriminate on the basis of race, color, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), creed, religion, national origin, age, marital status, ancestry, medical condition, disability, military or veteran status, low-income status, English language proficiency, genetic information, gender identity or expression, sexual orientation or any other category protected by federal, state or local law in conducting government business. Persons who believe they have been subjected to discrimination or have been denied access to services or accommodations as required by law, have the right to use this grievance procedure.

The procedures below are the same for complaints of any type of prohibited discrimination.

#### **Procedures**

# 1. Applicability

This complaint procedure is applicable to all persons who are not employees of SANDAG. This includes, but is not limited to, visitors to SANDAG, members of the public, Board, committee, and working group members, vendors, or any other person transacting business with SANDAG or using SANDAG's services who believe that they have been subjected to discrimination by SANDAG employees, contractors, or consultants. In general, it is designed to address disputes, including but not limited to the following:

- 1.1 Disagreements regarding a requested service, accommodation, or modification of a SANDAG practice or requirement;
- 1.2 Inaccessibility of a program, publication, or activity; and
- 1.3 Harassment or discrimination prohibited by California or federal law.

## 2. Identification of Compliance Officer, ADA Coordinator and Title VI Coordinator

The Director of Diversity and Equity is the Compliance Officer and ADA Coordinator for this policy and Title VI Coordinator required by FHWA regulations (collectively referred to throughout as "Compliance Officer") and is responsible for administering this complaint procedure as well as ensuring compliance with applicable laws. The Compliance Officer can be reached at: SANDAG, 401 B Street, Suite 800, San Diego, California 92101; (619) 699-1900.

## 3. Preliminary Review Process

- 3.1 Informal Resolution Prior to initiating the formal complaint procedure set forth below, and as a prerequisite to it, the complaining party shall contact the Compliance Officer for assistance in resolving the matter informally as soon as is reasonably practicable, generally within approximately fifteen (15) calendar days of the time the grievant became aware of the SANDAG act or omission that is the subject of the complaint. If the Compliance Officer is not successful in quickly achieving a satisfactory resolution (that is, generally within approximately thirty [30] calendar days), the Compliance Officer will take the steps described in subparagraph 3.2.
- 3.2 Review Panel The Compliance Officer will convene an ad hoc review panel to review the issue(s) raised. The panel will consist of the following (or their designees): the Compliance Officer, a member of the management staff, a Deputy Chief Executive Officer, and (depending upon the issues) such other personnel as may be appropriate. This panel will review the request, investigate and attempt to resolve the issues within approximately thirty (30) calendar days of the request for or initiation of a second review. No formal report need be issued by the panel, but the panel will document the outcome of its review in a letter to the complaining party. If the complaining party is not satisfied with the panel's disposition of the matter, the complaining party may file a formal complaint in accordance with the procedure described below.

#### 4. Formal Complaint

If the procedure set forth above for preliminary review does not yield a successful resolution, then the complaining party may file a formal complaint in the following manner:

4.1 When To File a Formal Complaint – Formal Complaints must be in writing and must be filed within ten (10) calendar days of the complaining party's receipt of notice of the end of the preliminary review process described above.

- What To File A complaint must be in writing and include the information requested in the attached Discrimination Complaint Forms. Complainant also must attach a copy of the letter from the Review Panel setting forth the outcome of the preliminary review procedure described above.
- 4.2 Where To File Complaint The complaint shall be filed with the Compliance Officer at SANDAG, 401 B Street, Suite 800, San Diego, California 92101; Fax number (619) 699-1995; TTY (619) 699-1904.
  - Notice of Receipt Upon receipt of the complaint, the Compliance Officer will review the complaint for timeliness and appropriateness for this grievance procedure, and will provide the complaining party with written notice acknowledging its receipt.
- 4.3 Investigation The Compliance Officer or his or her designee shall promptly initiate an investigation. In undertaking the investigation, the Compliance Officer may interview, consult with, and/or request a written response to the issues raised in the complaint from any individual the Compliance Officer believes to have relevant information, including staff and members of the public. The Compliance Office also may hold an informal hearing at their discretion.
- 4.4 Representation The complaining party and any party against whom the grievance is directed shall have the right to have a representative. The party shall indicate whether they are to be assisted by a representative and, if so, the name of that representative. For purposes of this procedure, the representative may be an attorney so long as the Office of General Counsel is present during proceedings.
- 4.5 Findings And Notification Upon completion of the investigation, the Compliance Officer will prepare and transmit to the complaining party, and to any party against whom the complaint is directed, a final report containing a summary of the investigation, written findings and a proposed disposition. This transmission will be expected within forty-five (45) calendar days of the filing of the formal complaint. The deadline may be extended by the SANDAG Chief Executive Officer for good cause. The final report shall also be provided, where appropriate, to any person whose authority will be needed to carry out the proposed disposition or to determine whether any personnel action is appropriate.
- 4.6 Final Disposition The disposition proposed by the Compliance Officer shall be put into effect promptly. The complaining party or any party against whom the complaint or the proposed disposition is directed may appeal. The appeal to the Chief Executive Officer (as set forth below) will not suspend the implementation of the disposition proposed by the Compliance Officer, except in those circumstances where the Chief Executive Officer decides that good cause exists making the suspension of implementation appropriate.

# 5. Urgent Matters

Whenever the application of any of the time deadlines or procedures set forth in this complaint procedure creates a problem due to the nature of the complaint, the urgency of the matter, or the proximity of the upcoming event, the Compliance Officer will, at the request of the complaining party, determine whether an appropriate expedited procedure can be fashioned.

### 6. Remedies

Possible remedies under this complaint procedure include corrective steps, actions to reverse the effects of discrimination or to end harassment, and measures to provide a reasonable accommodation or proper ongoing treatment. As stated above, a copy of the Compliance Officer's report may, where appropriate, be sent to appropriate persons to determine whether any personnel action should be pursued.

### <u>Appeal</u>

- 6.1 Within ten (10) calendar days of the issuance of the final report, the complaining party or any party against whom the complaint is directed may appeal to the Chief Executive Officer the Compliance Officer's determination.
- 6.2 An appeal is taken by filing a written request for review with the SANDAG Chief Executive Officer, 401 B Street, Suite 800, San Diego, California 92101; Fax number (619) 699-1995; TTY (619) 699-1904.
- 6.3 The written request for review must specify the particular substantive and or procedural basis for the appeal, and must be made on grounds other than general dissatisfaction with the proposed disposition. Furthermore, the appeal must be directed only to issues raised in the formal complaint as filed or to procedural errors in the conduct of the complaint procedure itself, and not to new issues.
- 6.4 The review by the Chief Executive Officer or their designee normally shall be limited to the following considerations: Were the proper facts and criteria brought to bear on the decision? Were improper or extraneous facts or criteria brought to bear on the decision that substantially affected the decision to the detriment of the complaining party? Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the complaining party? Given proper facts, criteria, and procedure, was the decision one that a person in the position of the decision-maker might reasonably have made?
- 6.5 A copy of the Chief Executive Officer or their designee's written decision will be expected within thirty (30) calendar days of the filing of the appeal and shall be sent to the parties, the Compliance Officer, and, if appropriate, to persons whose authority will be needed to carry out the disposition. The deadline may be extended by the Chief Executive Officer for good cause. The decision of the Chief Executive Officer or their designee on the appeal is final.

## 7. Title VI Complaints

SANDAG operates programs without regard to race, color, and national origin in compliance with Title VI of the Civil Rights Act. In order to comply with 49 CFR Section 21.9(b), recipients and subrecipients of Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) funding such as SANDAG are required to develop procedures for investigating and tracking Title VI complaints and to make the procedures for filing a complaint available to members of the public upon request. This policy contains the procedures that members of the public should follow in order to request additional information regarding SANDAG's nondiscrimination obligations or file a discrimination complaint against SANDAG. Any person who believes himself or herself or any specific class of persons to be subjected to discrimination prohibited by Title VI also may file a written complaint with the FTA or FHWA. A complaint should be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by FTA or FHWA. Title VI complaints regarding federally funded programs at SANDAG can be sent to the applicable funding agency below:

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

Federal Highway Administration Attention: Office of Civil Rights 1200 New Jersey Avenue, SE 8th Floor E81-105 Washington, DC 20590

#### 8. Confidentiality

SANDAG will take reasonable measures to protect the privacy of the complaining party and those individuals who may be the subject of a complaint. SANDAG cannot guaranty privacy, however, particularly if disclosure is necessary for a complete investigation or is required by law.

Adopted June 2003
Amended November 2004
Amended January 2010
Amended February 2012
Amended October 2013
Amended January 2017
Amended November 2022

# **Discrimination Complaint Form**

Instructions: If you believe SANDAG has engaged in discrimination against one or more persons, please fill out this form completely in black ink or type. Sign and return to the address on page 2. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

Complainant:					
Address:					
City:		State:	ZIP Code:		
Telephone:	Home:	e: Business:			
complainant)		(if other than the			
Address:					
City:		State:	ZIP Code:		
Telephone:	Home:		Business:		
When did the discrimination occur?  Date:  Describe the alleged acts of discrimination providing the name(s) where possible of the responsible individuals (use space on page 3 if necessary). Include the category upon which you believe the discrimination was based (race, color, disability, medical condition, etc.):					

Has a complaint been filed with another bureau of the Department of Justice or any other Federal, State, or local civil rights agency or court?				
Yes:No	):			
If Yes:				
Agency or Court	:			
	::			
	::			
City:	State:	ZIP Code:		
Telephone	±			
	l:			
Additional space for	answers:			
Signature:				

Return to:
Compliance Officer – Office of Diversity and Equity
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Phone: (619) 699-1900; Fax: (619) 699-1995 TTY: (619) 699-1904

OfficeofDiversityandEquity@sandag.org

Free Language Assistance | Ayuda gratuita con el idioma | Libreng Tulong sa Wika Hỗ trợ ngôn ngữ miễn phí | 免费语言协助 | 免費語言協助 | 如果 | 무료 언어 지원 | 中료 언어 지원 | 無料の言語支援 | Бесплатная языковая помощь | Assistência linguística gratuita मुफ्त भाषा सहायता | Assistance linguistique gratuite | ជំនួយភាសាឥគគិតថ្លៃ | ఉచిత భాషా సహాయం ການຊ່ວຍເຫຼືອດ້ານພາສາຟຣີ | Kaalmada Luqadda ee Bilaashka ah | Безкоштовна мовна допомога SANDAG.org/LanguageAssistance | 619.699.1900

SANDAG Notice of Non-Discrimination | Aviso de no discriminación de SANDAG Abiso sa Hindi Pandidiskrimina ng SANDAG | Thông cáo Không phân biệt đối xử của SANDAG | SANDAG 非歧视通知 | SANDAG: إشعار عدم التمييز

# Appendix D: Title VI Know Your Rights Brochure



# YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

# What is Title VI of the Civil Rights Act?

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals and groups from discrimination on the basis of their race, color, and national origin in programs and activities that receive federal financial assistance. This also includes other civil rights provisions of federal statutes and related authorities to the extent that they prohibit discrimination in programs and activities receiving federal financial aid.

Pursuant to Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and other non-discrimination authorities, it is the policy of the San Diego Association of Governments (SANDAG) that discrimination on the grounds of race, color, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), creed, religion, national origin, age, marital status, ancestry, medical condition, disability, military or veteran status, low-income status, English language proficiency, genetic information, gender identity or expression, sexual orientation, or any other category protected by federal, state or local law in conducting government business shall not occur in connection with programs or activities receiving federal financial assistance.

In operating federally-assisted programs, Title VI prohibits SANDAG from discriminating either directly or through contractual or other means by:

- Denying programs, services, financial aids, or other benefits.
- Providing different programs, services, financial aids, or other benefits, or providing them in a manner different from that provided to others.
- Segregating or separately treating individuals or groups in any matter related to the receipt of any program, service, financial aids, or benefit.
- Denying person(s) the opportunity to participate as a member of a planning, advisory, or similar body on a discriminatory basis.
- Denying person(s) the opportunity to participate in the program through the provision of services or affording the opportunity to do so differently from those afforded others.

## **Environmental Justice**

In 1994, President Clinton signed Executive Order 12898: Federal Action to Address Environmental Justice in Minority Populations and Low-income Populations, which focused attention on Title VI by providing that, "each agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations."

# **Title VI and Limited English Proficiency**

The federal government, and those receiving assistance from the federal government, must take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access to the programs, services, and activities of those entities. This means that SANDAG will create solutions to address the needs of this population of individuals for whom English is not their primary language.

## Who is a person with LEP?

Persons who do not speak English as their primary language and have a limited ability to read, speak, write, or understand English may be considered Limited English Proficient (LEP). These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. More information can be found on the SANDAG website at <a href="mailto:sandag.org/languageassistance">sandag.org/languageassistance</a>. Anyone requiring assistance may contact SANDAG at languageassistance@sandag.org.

# What discrimination is prohibited by Title VI?

Discrimination is an act (action or inaction), whether intentional or unintentional, through which a person or group, solely because of a protected characteristic, has been subjected to unequal treatment or impact, under any program or activity receiving federal financial assistance.

# Who may file a complaint?

A complaint may be filed by any individual or group who believes they have been subjected to discrimination or retaliation based on the categories previously listed. The complaint may be filed by the affected party or representative and must be received in writing.

# How to file a complaint

You may submit a complaint in accordance with the procedures in SANDAG Board Policy No. 009, which can be found at www.sandag.org/nondiscrimination, or obtained from SANDAG using the contact information in this notice.

# What if SANDAG retaliates against me for asserting my rights or filing a complaint?

SANDAG is prohibited from retaliating against any person because they reported an unlawful policy or practice, or made charges, testified, or participated in any complaint action.

# **CONTACT INFORMATION**

Any Title VI and/or Environmental Justice-related questions, concerns, or complaints regarding SANDAG programs, services, and/or activities may be submitted to:

The SANDAG Office of Equity and Diversity 401 B Street, Suite 800, San Diego, CA 92101 Voice phone 619.699.1900 TTY 619.699.1904 OfficeOfDiversityAndEquity@sandag.org





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# TÍTULO VI

# SUS DERECHOS EN VIRTUD DEL TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964

# ¿Qué es el Título VI de la Ley de Derechos Civiles?

El Título VI de la Ley de Derechos Civiles de 1964 es la ley federal que protege a las personas y grupos de la discriminación sobre la base de raza, color y nacionalidad en programas y actividades que reciben asistencia financiera federal. Esto también incluye otras disposiciones de derechos civiles de estatutos federales y autoridades relacionadas en la medida en que prohíben la discriminación en programas y actividades que reciben ayuda financiera federal.

En virtud del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, así como otras autoridades de no discriminación, es política de la Asociación de Gobiernos de San Diego (SANDAG, por sus siglas en inglés) no incurrir en actos de discriminación sobre la base de raza, color, sexo (incluidas condiciones de embarazo, parto, lactancia u otras condiciones médicas asociadas), credo, religión, nacionalidad, edad, estado civil, ascendencia, condición médica, discapacidad, condición de militar o veterano, condición de bajos ingresos, dominio del idioma inglés, información genética, identidad o expresión de género, orientación sexual, así como cualquier otra categoría protegida por la ley federal, estatal o local, en la realización de asuntos gubernamentales en conexión con programas o actividades que reciban asistencia financiera federal.

Al operar programas con asistencia federal, el Título VI prohíbe a SANDAG la discriminación, ya sea directamente o a través de medios contractuales, u otros, al:

- Denegar programas, servicios, ayuda financiera u otros beneficios.
- Ofrecer distintos programas, servicios, ayuda financiera u otros beneficios, o brindarlos de una manera distinta que la provista a otras personas.
- Tratar a personas o grupos en forma segregada o por separado, en cualquier asunto relacionado con la recepción de algún programa, servicio, ayuda financiera o beneficio.
- Denegar a la(s) persona(s) la oportunidad de participar como miembro de un organismo de planeación, asesoría u otro similar, sobre una base discriminatoria. SANDAG 2024 Title VI Program Update

 Denegar a la(s) persona(s) la oportunidad de participar en el programa mediante la provisión de servicios o permitir la oportunidad de hacerlo de manera distinta que la utilizada con otros..

## Justicia ambiental

En 1994, el Presidente Clinton firmó la Orden Ejecutiva 12898: Acción Federal para abordar la justicia ambiental en poblaciones minoritarias y de bajos ingresos, la cual enfocaba su atención en el Título VI al estipular que, "cada agencia debe hacer que el logro de la justicia ambiental sea parte de su misión al identificar y abordar, según corresponda, efectos ambientales o sobre la salud humana desproporcionadamente altos y adversos sobre poblaciones minoritarias y de bajos ingresos a causa de sus programas, políticas y actividades".

# Título VI y dominio limitado de inglés

El gobierno federal y aquellos que reciben asistencia del gobierno federal, deben tomar medidas razonables para garantizar que las personas con dominio limitado del inglés (LEP, por sus siglas en inglés) tengan acceso significativo a los programas, servicios y actividades de esas entidades. Esto significa que SANDAG creará soluciones para abordar las necesidades de esta población para quienes el inglés no sea su idioma primario.

# ¿Quién es una persona con LEP?

A las personas que no hablan inglés como idioma primario y tienen una habilidad limitada para leer, hablar, escribir o comprender el inglés se les puede considerar personas con dominio limitado del inglés (LEP, por sus siglas en inglés). Estas personas pueden tener derecho de recibir asistencia con el idioma con respecto a un tipo de servicio, beneficio o encuentro en particular. Puede encontrar más información en la página web de SANDAG en sandag.org/languageassistance. Cualquier persona que requiera asistencia puede comunicarse con SANDAG en languageassistance@sandag.org.

# ¿Qué discriminación prohíbe el Título VI?

La discriminación es un acto (acción o inacción), ya sea intencional o no intencional, a través del cual una persona o grupo ha estado sujeto a un trato o impacto desigual, bajo cualquier programa o actividad que reciba asistencia financiera federal, únicamente debido a una característica protegida.

# ¿Quién puede presentar una queja?

Cualquier persona o grupo que considere haber estado sujeto a discriminación o represalias en base a las categorías antes indicadas puede presentar una queja. La queja puede presentarla la parte afectada o su representante, y debe recibirse por escrito.

# ¿Cómo presentar una queja?

Usted puede presentar una queja de acuerdo con los procedimientos señalados en la Política N.º 009 de la Junta de SANDAG, la cual puede encontrar en <a href="https://www.sandag.org/nondiscrimination">www.sandag.org/nondiscrimination</a>, u obtenerla de SANDAG utilizando la información de contacto indicada en este aviso.

# ¿Qué ocurre si SANDAG toma represalias en mi contra por reafirmar mis derechos o presentar una queja?

SANDAG tiene prohibido tomar represalias en contra de cualquier persona por haber reportado una política o práctica ilegal, o por haber presentado cargos, atestiguado o participado en una acción de queja.

## INFORMACIÓN DE CONTACTO

Cualquier pregunta, inquietud o queja relacionada con el Título VI y/o la justicia ambiental, con respecto a programas, servicios y/o actividades de SANDAG puede presentarse en:

The SANDAG Office of Equity and Diversity 401 B Street, Suite 800, San Diego, CA 92101 Teléfono de voz 619.699.1900 TDD 619.699.1904 OfficeOfDiversityAndEquity@sandag.org





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# QUYỀN CỦA QUÝ VỊ THEO MỤC VI CỦA ĐẠO LUẬT QUYỀN CÔNG DÂN NĂM 1964

# Mục VI của Đạo luật Quyền Công dân là gì?

Mục VI của Đạo luật Quyền Công dân năm 1964 là luật liên bang dùng để bảo vệ các cá nhân và các nhóm khỏi bị phân biệt đối xử dựa trên chủng tộc, màu da và nguồn gốc quốc gia trong các chương trình và hoạt động được liên bang tài trợ. Mục VI này cũng chỉ ra các điều khoản khác về quyền công dân theo đạo luật liên bang và các cơ quan có thẩm quyền liên quan, qua đó nghiêm cấm mọi hành vi phân biệt đối xử trong các chương trình và hoạt động được liên bang tài trợ.

Căn cứ vào Mục VI của Đạo luật Quyền Công dân năm 1964, Đạo luật Khôi phục Quyền Công dân năm 1987 và các cơ quan có thẩm quyền khác về việc không phân biêt đối xử, chính sách của San Diego Association of Governments (SANDAG) nghiêm cấm mọi hành vi phân biệt đối xử trong các chương trình và hoạt động được liên bang tài trợ: phân biệt đối xử dựa trên chủng tộc, màu da, giới tính (bao gồm tình trạng mang thai, sinh con, cho con bú hoặc các tình trạng y tế liên quan), tín ngưỡng, tôn giáo, nguồn gốc quốc gia, tuổi tác, tình trạng hôn nhân, tổ tiên, tình trạng sức khỏe, tình trạng khuyết tât, tình trang quân nhân hoặc cưu chiến binh, tình trạng thu nhập thấp, trình độ tiếng Anh, thông tin di truyền, bản dạng giới hoặc thể hiện giới, khuynh hướng tính duc hoặc bất kỳ danh mục nào được luật pháp liên bang, tiểu bang hoặc địa phương bảo vê trong lúc tiến hành công việc của chính phủ.

Trong thời gian thực hiện các chương trình được liên bang tài trợ, Mục VI cấm SANDAG phân biệt đối xử trực tiếp hoặc thông qua hợp đồng hoặc bằng các hình thức khác như:

- Từ chối chương trình, dịch vụ, trợ giúp tài chính hoặc các phúc lợi khác.
- Cung cấp các chương trình, dịch vụ, hỗ trợ tài chính hoặc các phúc lợi khác, hoặc cung cấp chúng theo cách khác biệt so với những người khác.
- Cô lập hoặc đối xử riêng biệt đối với các cá nhân hoặc các nhóm trong bất kỳ vấn đề nào liên quan đến việc nhận chương trình, dịch vụ, hỗ trợ giúp tài chính hoặc phúc lợi.
- Không tạo điều kiện cho các cá nhân tham gia với tư cách thành viên của ban kế hoạch, ban cố vấn hoặc đoàn thể tương tự do phân biệt đối xử.

 Không tạo điều kiện cho các cá nhân tham gia chương trình theo điều khoản dịch vụ hoặc tạo điều kiện tham gia theo cách khác biệt so với những người khác.

# Công bằng Môi trường

Năm 1994, Tổng thống Clinton đã ký Sắc lệnh 12898: Hành động của liên bang để giải quyết vấn đề Công bằng Môi trường cho Nhóm người dân tộc thiểu số và Nhóm người thu nhập thấp, và hành động này chủ yếu tập trung vào Mục VI, "mỗi cơ quan phải hoàn thành nhiệm vụ thực thi công bằng môi trường bằng cách xác định và giải quyết các tác động cao bất đối xứng và gây hại cho sức khỏe con người hoặc môi trường của các chương trình, chính sách và hoạt động lên nhóm người dân tộc thiểu số và nhóm người thu nhập thấp."

# Mục VI và Trình độ tiếng Anh hạn chế

Chính phủ liên bang và các tổ chức có nhận hỗ trợ của chính phủ liên bang phải có hành động thích hợp để đảm bảo rằng những người có Trình độ tiếng Anh hạn chế (LEP) vẫn có thể tham gia các chương trình, hoạt động và sử dụng dịch vụ của những tổ chức đó. Điều này có nghĩa là SANDAG sẽ đưa ra các giải pháp để giải quyết nhu cầu cho các cá nhân thuộc nhóm người không sử dụng tiếng Anh làm ngôn ngữ chính này.

# Ai được xem là người có Trình độ tiếng Anh hạn chế (LEP)?

Những người có Trình độ tiếng Anh hạn chế là những người không sử dụng tiếng Anh làm ngôn ngữ chính và có khả năng đọc, nói, viết hoặc hiểu tiếng Anh hạn chế. Những người này có thể yêu cầu các loại dịch vụ, phúc lợi hoặc cuộc gặp gỡ để sắp xếp việc hỗ trợ ngôn ngữ. Tìm hiểu thêm thông tin trên trang web của SANDAG sandag.org/languageassistance. Bất kỳ ai cần trợ giúp cũng có thể liên hệ SANDAG tại languageassistance@sandag.org.

# Mục VI cấm những hình thức phân biệt đối xử nào?

Phân biệt đối xử là một hành vi (thể hiện qua hành động hoặc không), bất kể cố ý hay vô ý, lên một cá nhân hoặc nhóm nào đó, chỉ vì một đặc điểm được bảo vệ, được xem là gây tác động hoặc đối xử không công bằng trong bất kỳ chương trình hoặc hoạt động nào được liên bang tài trợ.

# Ai có thể nộp đơn khiếu nai?

Bất kỳ cá nhân hoặc nhóm nào tin rằng bản thân đã bị phân biệt đối xử hoặc trả thù dựa trên các danh mục được liệt kê trước đó đều có thể nộp đơn khiếu nại. Bên hoặc đại diện chịu ảnh hưởng có thể nộp đơn khiếu nại, và đơn khiếu nai phải được soạn thành văn bản.

# Hướng dẫn nộp đơn khiếu nại

Quý vị có thể nộp đơn khiếu nại theo thủ tục được đề cập trong Chính sách của Hội đồng quản trị số 009 của SANDAG. Quý vị có thể xem chính sách này tại <a href="https://www.sandag.org/nondiscrimination">www.sandag.org/nondiscrimination</a>, hoặc liên hệ SANDAG theo thông tin liên lạc trong thông báo này để chúng tôi gửi cho quý vị.

# Tôi cần làm gì nếu SANDAG trả thù tôi vì đã đòi quyền lợi của mình hoặc nộp đơn khiếu nai?

SANDAG không được phép trả thù những người đã báo cáo chính sách hay việc làm trái pháp luật, hoặc những người đã tố cáo, làm chứng, hay tham gia vào bất kỳ khiếu nại nào.

# THÔNG TIN LIÊN LAC

Nếu quý vị có bất kỳ câu hỏi, mối lo ngại hoặc khiếu nại nào liên quan đến Mục VI và/hoặc vấn đề Công bằng Môi trường trong các chương trình, dịch vụ và/hoặc hoạt động của SANDAG, quý vị có thể gửi đến:

The SANDAG Office of Equity and Diversity 401 B Street, Suite 800, San Diego, CA 92101 Voice phone 619.699.1900 TTY 619.699.1904 OfficeOfDiversityAndEquity@sandag.org





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# SANDAG

# سداسلا بابلا

# نوناق نم سداسل ا بابل ا بجومب كقوقح 1964 ماعل قيندمل قوق حل

# ؟ةيندملا قوقحلا نوناق نم سداسلا بابلا وه ام

نوناقلا وه 1964 ماعل قيندملا قوق حل انوناق نم سداسلا بالبلا المهورع ساساً على ويندملا ولا يكارديفلا ممقرع ساساً على وييمتلا انم تاعوم جملاو دارفالا يمحي يذلا يكارديفلا مدعاسم يولت يولت يولي ودعاسم يولت يولت يولل المولي والمولو مطفناله نم يرخاله قيندملا قوق حل المكح أضياً لمشي اذه قيلارديف قيلام زي عمتلا مبعن عن مي يذلا دحلل قين عمل الطلسلاو ويلارديفلا قيساسالها . قيلارديفلا قيلام يف

نوناقو ،1964 ما على غيندما اقوق حلى انوناق نم سداس لها بابلا بجومب مدعب غين عمل عرخال حالص المدعب غين عمل عرخال حالص المدعب غين عمل عرخال حالص المدعب غين عمل عرخال عرخال الطلسل الو ،1987 ما على غين دما اقوق حل احالص المشتف ، زي يهمت لا في المحل الخلذي عن المبرب) سن جل او أنول لما و أقور على ساساً على عزي يهمت لا المنتب عاد و أن المحل الما و أنهي عيب طل المحال المحال الما و أنه المبرب الما و أنهي على المال المنال المال المنال المنال المنال المنال المنال المنال المنال المال المنال ا

ةيمارديفىلاا قدعالسملل قيقالت لها جمار بىل اقرادا ءانثأ سداس لا بالبال عنمي لى اسو وأ دق اعتلا ربع وأ قرش البم ءاوس زي يمتل ان م SANDAG قطب ار : يماي لم لى الخ نم عرخ أ

> ، ه چه املا تان و عمل و أ ، تامدخل او أ ، جمار بال م يدقت نع عانت مال ا . عرر خال ا اي از مل او أ

عررخاً ايبازم وا ،ةيميالم تــانـوعم وا ،تــامدخ وا ،جمارب ميدقت ـ .نـيرخالــل امميدقت ققــيرطــنع فـــلــتخت ققـيرطب امميدقت وا ،ةفـــلــتخم

يأ يف قلصفن مقلماعم مهتلماعم وأ تاعوم جمل وأ دارف أل الزع - . مَرْيِم وأ ، فيلام تان وعم وأ ، مَهدخ وأ ، جمان رب يأ يقلت مطبترم قلأسم

قكر اشملل (صاخشاً) صخشل قصرف قحاتاً نع عانتمال السلام الله وضعك ساساً على عنه وضعك وضعك وضعك الله ويهمتال الله ويهمتال الله والله و

يف قلكر السملل (صراخشاً) صخشل قصرف قحات إنع عانتمالها -لكلذ لعفل قصرفله قفلكت مليمحت وأ تنامدخل ميدقت لىالخ نم جمان ربلها ن يرخ آلها نع امتفلكت لمحتمل صرفل انع فلتخي امب

## ةيئيبكا قلادعلا

32893 مقر عنيفنتا رمأل 1994 ماع عن نوتنعلك سيعنرا اعقو المناكسل المنادع المناكول المناك

# ةيزيلجنالا ةغلل دودحملا ناقتالاو سداسلا بابلا

قموك حل ان مقدع السمل اليق لتمو ، قيل ارديف الاقموك حل الحل عبجي القصال الموقع من الوطخ ذاختا ، قيل الديف الناق القصال القصال الموصول الموضل الموطخ ذاخت المقيل الموصول على الموصول الكلت جمار بالموطول الموصول على الموطول المولح الموطول المولى المولى

# ؟ة يزيل جن إلا قغلل دود حمل ناقت إلى اوذ صخش ل اوه نم

مويدلو ةيساسال المستخلك قيزيلجن الما قطّل الوشدحت الى الى النوندا صاخشال المستخسال الله المستخسسات وأ ،اهب شدحت الوأ ، وغيزيل جن الما قطل المنتسات وأ ،اهب شدحت الوأ ، وغيزيل جن الله قطل الله وقد من القسار يوفد مهر البست الله المه وف قدي دق . (LEP) في خون ولا قطل دودحم القسار يوفد مه المناهد خل الله ولا يوفد من عون و قل عنه المولى الميف في و غل قد عاسم يول الما وأما وأ ، الي الما وألما وأ ما يا المراد الله والما وأ ، الي المال الله SANDAG قطب الله والما وألما والما والما وألما و

جاتحي صخش يا عيطتسي sandag.org/languageassistance. جاتحي صخش يا عيطتسي SANDAG تطبار عم لصاوتالا تدعاسمالا علل Ianguageassistance@sandag.org.

## ؟سداسل بابل هرظحي زي عمت يأ

ريغ و أ ادم عتم ناك ءاوس ، (هن ع س عاقتال و أ ملم عب) فرصت و ه زي يهمتال المسحف قيم حم تي من على المعتبى ، دم عتم الله عنه عيم حم تي الله عنه عيم عنه الله عنها عمل الله عنها الله عنها الله عنها الله عنها عمل الله عنها الله عنها عمل الله عنها الله عنها الله عنها عنها عمل الله عنها ا

### ؟ىوكش مىدقت ەنكمى نم

# ىوڭش مىدقت ةىفىك

SANDAG قطبار قرادا سلجم قسايس عم قفاوتي امب يوكش لااسرا كنكمي طبارل ربع اميلع روشعل ناكمي يتلاو ،009 مقر قطبارل ربع اميلع لوصحلا وأ ،www.sandag.org/nondiscrimination قطبار نم اميلع لوصحلا وأ ،SANDAG

# وأ يقوقح علع يديكأتل ينم SANDAC قطبار تمقتنا ول اذام وأيوكشل عمىدقت

واً مسايس نع مغالبال صخش يأ نم ماقتنالا SANDAG قطبار علع رظحي يأ يف متكراشم وا متداهشب مئالدا وا ممنت مئاقل وا متينوناق ريغ مسرامم يو عد

# لاصتالا تامولعم

سداسل بابلاب قلعت عواكش وأ ، فواخم وأ ، قلى سأ يأ وأ ،SANDAG قطبار جمارب نأشب قيئ يبل قلاعل وألو على الماسر إنكمي المتطشن وألو ، المتالمدخ

> The SANDAG Office of Equity and Diversity 401 B Street, Suite 800, San Diego, CA 92101 619.699.1900 يتوصلا فتاملا

OfficeOfDiversityAndEquity@sandag.org





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# 第六章

# 根据 1964 年《民权法案》 第六章您享有的权利

### 什么是《民权法案》第六章?

1964年《民权法案》第六章是保护个人和群体不会在接受联邦财政援助相关计划和活动中因其种族、肤色和民族血统而受到歧视的联邦法律。该法律还纳入了联邦法规包含的和相关当局发布的禁止在接受联邦财政援助相关计划和活动中产生歧视的其他民权条款。

根据 1964 年《民权法案》第六章、1987 年《民权复原法案》和其他非歧视当局的规定,圣地亚哥政府协会 (SANDAG) 的政策要求,在接受联邦财政援助相关计划或活动中,不得因种族、肤色、性别(包括怀孕、分娩、哺乳或相关医疗状况)、信仰、宗教、民族出身、年龄、婚姻状况、血统、医疗状况、残疾、军人或退伍军人身份、低收入身份、英语水平、遗传信息、性别认同或表达、性取向或在处理政务时受联邦、州或地方法律保护的任何其他类别而受到歧视。

开展联邦援助计划时,第六章禁止 SANDAG 采用以下方式直接 或通过合同或其他方式实施歧视:

- 拒绝提供计划、服务、财政援助或其他福利。
- 提供不同的计划、服务、财政援助或其他福利,或者以异于 他人的方式提供此类福利。
- 在与接受任何计划、服务、财政援助或福利相关的任何事项上,对个人或团体区分处理或单独对待。
- 因歧视而剥夺个人作为规划、咨询或类似机构成员参与活动的机会。
- 通过提供服务剥夺人员参与计划的机会,或者以异于他人的方式提供机会。

## 环境正义

1994年,克林顿总统签署了第12898号行政令:《确保少数民族和低收入群体享受环境正义的联邦政府行动令》做出如下规定以强调第六章:"各机构应将实现环境正义纳入其工作使命,酌情查明并解决其计划、政策和活动对少数民族和低收入群体造成的过度严重和不利的人类健康或环境影响问题。"

### 第六章和英语水平有限

联邦政府和接受联邦政府援助的人员必须采取合理措施,以确保英语水平有限 (LEP) 的人员能够有意义地参与这些实体的计划、服务和活动。这意味着 SANDAG 将推出解决方案,以满足英语并非其主要语言的群体的需求。

### LEP 人员是指哪些人?

并非以英语为主要语言且读、说、写或理解英语的能力有限的人员可被视为英语水平有限 (LEP) 的人员。这些人员可能有权就特定类型的服务、福利或体验获得语言援助。如需获取更多信息,请访问 SANDAG 网: <u>sandag.org/languageassistance</u>. 任何需要援助的人员均可通过 languageassistance@sandag.org. 联系 SANDAG.

#### 第六章禁止实施哪些歧视行为?

歧视是指在接受联邦财政援助的任何计划或活动中,个人或群体 仅因某些特征(受法规保护)而受到不公平待遇或影响的有意或 无意行为(作为或不作为)。

## 谁可以发起投诉?

认为自己因上述各类特征而受到歧视或报复的任何个人或群体均可发起投诉。受影响方或其代表均可发起投诉,但必须以书面形式进行提交。

## 如何发起投诉

您可根据 SANDAG 董事会第 009 号政策中的程序提交投诉,有 关政策的具体内容,可在

www.sandag.org/nondiscrimination, 上查看, 也可使用本公告所示联系信息从 SANDAG 处获取。

## 如果 SANDAG 因我维护自身权利或发起投诉而报复我,

**我该怎么办?**SANDAG 严禁因任何人举报非法政策或做法,或者进行指控、作证或参与任何投诉活动而对其进行报复。

# 联系信息

与 SANDAG 计划、服务和/或活动有关的任何第六章和/或环境司法相关问题、疑问或投诉均可提交至:

SANDAG 公平与多样性办公室

加利福尼亚州圣地亚哥 B 街 401 号 800 室,邮编:92101

语音电话: 619.699.1900 电传: 619.699.1904 OfficeOfDiversityAndEquity@sandag.org





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# **PAMAGAT IKA-VI**

# ANG IYONG MGA KARAPATAN SA ILALIM NG PAMAGAT IKA-VI NG BATAS NG KARAPATANG SIBIL 1964

# Ano ang Batas ng Karapatang Sibil ng Pamagat VI?

Ang Batas ng Karapatang Sibil ng Pamagat VI taong 1964 ay ang pederal na batas na nagpoprotekta sa mga indibidwal at grupo mula sa diskriminasyon batay sa kanilang lahi, kulay, at bansang pinagmulan sa mga programa at aktibidad na tumatanggap ng pederal na tulong pinansyal. Kasama rin dito ang iba pang mga probisyon sa karapatang sibil ng mga pederal na batas at mga kaugnay na awtoridad hanggang sa lawak na ipinagbabawal nila ang diskriminasyon sa mga programa at aktibidad na tumatanggap ng pederal na tulong pinansyal.

Alinsunod sa Batas ng Karapatang Sibil ng Pamagat VI taong 1964, Pagpapanumbalik ng Batas sa Karapatang Sibil taong 1987, at iba pang awtoridad na walang diskriminasyon, patakaran ng San Asosasyon ng Gobyerno ng San Diego (SANDAG) na ang diskriminasyon sa mga batayan ng lahi, kulay, kasarian (kabilang ang pagbubuntis, panganganak, pagpapasuso o mga kaugnay na kondisyong medikal), paniniwala, relihiyon, bansang pinagmulan, edad, marital status, ninuno, kondisyong medikal, kapansanan, katayuang militar o beterano, katayuang mababa ang kita, kasanayan sa wikang Ingles, genetic na impormasyon, pagkakakilanlan ng kasarian o pagpapahayag, oryentasyong sekswal, o anumang iba pang kategoryang protektado ng pederal, estado o lokal na batas sa pagsasagawa ng negosyo ng pamahalaan ay hindi dapat mangyari kaugnay ng mga programa o aktibidad na tumatanggap ng pederal na tulong pinansyal.

Sa pagpapatakbo ng mga pederal na programang pantulong, ang Pamagat VI ay nagbabawal sa SANDAG na magdiskrimina nang direkta o sa pamamagitan ng kontraktwal o iba pang paraan sa pamamagitan ng:

- Pagtanggi sa mga programa, serbisyo, tulong pinansyal, o iba pang benepisyo.
- Pagbibigay ng iba't ibang mga programa, serbisyo, tulong pinansyal, o iba pang benepisyo, o pagbibigay ng mga ito sa paraang naiiba sa ibinigay sa iba.
- Paghihiwalay o hiwalay na pagtrato sa mga indibidwal o grupo sa anumang bagay na nauugnay sa pagtanggap ng anumang programa, serbisyo, tulong pinansyal, o benepisyo.
   SANDAG 2024 Title VI Program Update

- Ang pagtanggi sa (mga) tao ng pagkakataong lumahok bilang isang miyembro ng pagpaplano, pagpapayo, o katulad sa isang diskriminasyong may batayan.
- Ang pagtanggi sa (mga) tao ng pagkakataong lumahok sa programa sa pamamagitan ng pagbibigay ng mga serbisyo o pagbibigay ng pagkakataong gawin ito nang iba sa mga napagkalooban ng iba.

# Kapaligiran ng Hustisya

Noong 1994, nilagdaan ni Pangulong Clinton ang Ehekutibong Kautusan 12898: Pederal na Aksyon upang Tugunan ang Katarungang Pangkapaligiran sa Mga Populasyon ng Minorya at Populasyon na Mababa ang Kita, na nakatuon ang pansin sa Pamagat VI sa pamamagitan ng pagbibigay ng, "ang bawat ahensya ay gagawing bahagi ng misyong ito ang pagkamit ng katarungang pangkapaligiran sa pamamagitan ng pagtukoy at pagtugon, kung naaangkop, di-proporsyonal na mataas at masamang tao. epekto sa kalusugan o kapaligiran ng mga programa, patakaran, at aktibidad nito sa minorya at populasyon mababang kita."

# Pamagat VI at Limitadong Kahusayan sa Ingles

Ang pederal na pamahalaan, at ang mga tumatanggap ng tulong mula sa pederal na pamahalaan ay dapat gumawa ng mga makatwirang hakbang upang matiyak na ang mga taong may Limitadong Kahusayan sa Ingles (LEP) ay may makabuluhang access sa mga programa, serbisyo, at mga aktibidad. Nangangahulugan dito na ang SANDAG ay gagawa ng mga solusyon upang matugunan ang mga pangangailangan ng populasyon na ito ng mga indibidwal na hindi Ingles ang kanilang pangunahing wika.

# Sino ang taong may LEP?

Ang mga taong hindi nagsasalita ng Ingles bilang kanilang pangunahing wika at may limitadong kakayahang magbasa, magsalita, magsulat, o umunawa ng Ingles ay maaaring ituring na may Limitadong Kahusayan sa Ingles(LEP). Ang mga indibidwal na ito ay maaaring may karapatan sa tulong sa wika na may kinalaman sa isang partikular na uri ng serbisyo, benepisyo, o pakikipagtagpo. Higit pang impormasyon ang makikita sa website ng SANDAG sa sandag.org/languageassistance. Ang sinumang nangangailangan ng tulong ay maaaring makipagugnayan sa SANDAG sa languageassistance@sandag.org.

# Anong diskriminasyon ang ipinagbabawal ng Pamagat VI?

Ang diskriminasyon ay isang kilos (aksyon o hindi pagkilos), sinadya man o hindi, kung saan ang isang tao o grupo, dahil lamang sa isang protektadong katangian ay nakaranas sa hindi pantay na pagtrato o epekto sa ilalim ng anumang programa o aktibidad na tumatanggap ng pederal na tulong pinansyal.

# Sino ang maaaring magsampa ng reklamo?

Ang isang reklamo ay maaaring ihain ng sinumang indibidwal o grupo na naniniwalang sila ay nakaranas ng diskriminasyon o paghihiganti batay sa mga kategoryang naunang nakalista. Ang reklamo ay maaaring ihain ng apektadong partido o kinatawan at dapat makatanggap ng sulat.

## Paano magsampa ng reklamo

Maaari kang magsumite ng reklamo alinsunod sa mga pamamaraan sa SANDAG Board ng Polisiya No. 009, na makikita sa <a href="www.sandag.org/nondiscrimination">www.sandag.org/nondiscrimination</a>, o nakuha mula sa SANDAG gamit ang impormasyon ng contact sa abiso na ito.

# Paano kung gumanti sa akin ang SANDAG sa paggigiit ng aking mga karapatan o paghahain ng reklamo?

Ang SANDAG ay ipinagbabawal na gumanti laban sa sinumang tao dahil nag-ulat sila ng labag sa batas na patakaran o kasanayan, o nagsampa ng kaso, tumestigo, o lumahok sa anumang pagkilos ng reklamo.

## IMPORMASYON NG CONTACT

Anumang mga katanungan, alalahanin, o reklamo na may kaugnayan sa Pamagat VI at/o Katarungang Pangkapaligiran tungkol sa mga programa, serbisyo, at/o aktibidad ng SANDAG ay maaaring isumite sa:

The SANDAG Office of Equity and Diversity 401 B Street, Suite 800, San Diego, CA 92101 Telepono 619.699.1900 TTY 619.699.1904 OfficeOfDiversityAndEquity@sandag.org





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# Appendix E: Public Participation Plan – Board Policy No. 025

# SANDAG

# BOARD POLICY NO. 025

## **PUBLIC PARTICIPATION PLAN POLICY**

## **Purpose**

This policy establishes a process for obtaining input from and providing information to the public concerning agency programs, projects, and program funding in order to ensure the public is informed and has the opportunity to provide SANDAG with input so plans can reflect the public's desire. SANDAG will review and update its Public Participation Plan and this policy periodically as required by law, but no less often than every five years. Various federal and state laws and regulations require that an agency such as SANDAG conduct and establish a Public Participation Plan to ensure that the public is involved and that community concerns are addressed. For example, planning of mass transit capital projects, development of short-range service policies and plans, and fare policy and structure changes to public transportation require public participation. The California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) also have public information components that require an agency such as SANDAG to conduct public participation programs to ensure that the public is involved and that community concerns are addressed.

A significant component of the SANDAG mission is a strong commitment to public participation and involvement to include all residents and stakeholders in the regional planning process. SANDAG recognizes that the public has a right to expect the business of SANDAG to be conducted with efficiency, fairness, impartiality, and integrity. SANDAG's work carries with it an obligation to the public interest. SANDAG officials and employees are expected to have high standards of honesty and professionalism, as well as a straightforward and transparent communication approach, in order to promote and maintain public confidence and trust.

This policy is consistent with the requirements of Section 450.316(a)(1)(x) of Title 23 in the Code of Federal Regulations and Public Utility Code Section 132360.1, which reads as follows:

(c) The agency shall engage in a public collaborative planning process; recommendations from that process shall be made available and considered for integration into the plan. A procedure to carry out this process including a method of addressing and responding to recommendations from the public shall be adopted.

# Social Equity and Environmental Justice

Ensuring the meaningful involvement of low income, minority, disabled, senior, and other traditionally underrepresented communities is a key component of SANDAG public participation activities. SANDAG policies, procedures, and programs are consistent with federal and state environmental justice laws, regulations, and requirements, Title VI, related nondiscrimination requirements, and reflect the principles of social equity and environmental justice. Social equity means ensuring that all people are treated fairly and are given equal opportunity to participate in the planning and decision-making process, with an emphasis on ensuring that traditionally disadvantaged groups are not left behind. Environmental justice means ensuring that plans, policies, and actions do not disproportionately affect low income and minority communities.

#### Data Collection

SANDAG collects and uses racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance through SANDAG programs and projects. The agency uses the data to confirm that populations protected by Title VI are not subject to discrimination or disparate impacts by SANDAG.

## Title VI Training

SANDAG provides training on Title VI, social equity, and environmental justice matters to its employees near the time of hire. Updates to Title VI training are provided periodically thereafter on an as-needed basis.

Complaint Process and Title VI Compliance Officer Contact Information

SANDAG does not discriminate on the basis of race, color, sex, creed, religion, national origin, age, marital status, ancestry, medical condition, disability, veteran status, or sexual orientation in conducting government business. Persons who believe they have been subjected to discrimination or have been denied access to services or accommodations required by law, have the right to use the discrimination complaint procedures in Board Policy No. 009. The SANDAG Office of General Counsel is the Title VI Compliance Officer for this policy and is responsible for administering this complaint procedure. as well as ensuring compliance with applicable laws. The Compliance Officer can be reached at: SANDAG, 401 B Street, Suite 800, San Diego, California 92101; (619) 699-1900. Scope of Public Participation Efforts

The policy addresses public participation policies and public information efforts in the following areas:

- A. Overall Public Participation Plan
- B. Short Range Program Regional Transportation Improvement Program
- C. Development Planning
- D. Design and Construction
- E. Fare Changes
- F. Short Range Transit Planning
- G. Native American Consultation
- A. Overall Public Participation Plan -- Unless otherwise noted or required, the Public Participation Plan provides SANDAG general policies for public participation for major planning initiatives such as the Regional Plan, Regional Short Range Transit Plan, and other planning and programming projects, including any tailored public involvement plans associated with them.
  - 1. The SANDAG Public Participation Plan is designed to inform and involve the region's residents in the decision-making process on issues such as growth, transportation, environmental management, housing, open space, air quality, energy, fiscal management, economic development, and public safety.

- 2. The Public Participation Plan seeks to involve all citizens, including but not limited to low income households, limited English proficient individuals, Hispanic, African American, Asian, Native American, senior, and other communities, persons with disabilities, as well as community and civic organizations, public agencies, business groups and associations, environmental organizations, and other stakeholders.
- 3. SANDAG Board meetings provide the public forum and decision point for significant regional issues. SANDAG Directors usually hold one or two Board meetings each month: a Board Policy Meeting the second Friday of each month and a Board Business Meeting the fourth Friday of each month. Meetings held at the SANDAG office are accessible by public transit. During these meetings, Directors adopt plans, allocate transportation funds, approve transit construction plans, approve transit fare changes, and establish policies and develop programs that are used by local governments as well as other public and private organizations.
- 4. The SANDAG Public Participation/Involvement Program shall comply with the Americans with Disabilities Act (ADA). SANDAG shall hold public meetings in buildings, rooms, or locations that are accessible to persons with disabilities. SANDAG shall provide public meeting information in alternate formats and shall provide special accommodations at public meetings with three business days notice.
- 5. The SANDAG Public Participation Plan is carried out as an integrated work element of the agency's Overall Work Program and Budget and as part of other programming, development, and implementation processes such as the Regional Plan, Regional Short Range Transit Plan, Regional Transportation Improvement Program, Environmental Impact Reports, transit capital project development, project construction, transit fare changes, corridor studies, and other projects.
- 6. SANDAG shall proactively seek and promote public participation in SANDAG workshops and public hearings, as well as participation and attendance at committees, working groups, and task forces. SANDAG shall follow local, state, and federal guidelines for posting public meeting and hearing notices. Depending upon the specific project, SANDAG shall endeavor to hold meetings at times that can attract as many participants as possible, including evenings and weekends and at locations in communities throughout the region. SANDAG shall endeavor to hold these meetings in locations that are accessible by public transit.
- 7. SANDAG shall inform the public in a timely manner about regional issues, actions, and pending decisions through a number of efforts. As needed or required, SANDAG shall post public notices in newspapers of general circulation for publication of legal notices. Other publication and distribution efforts can include mail distribution to residents, agencies, and city/county governments, the SANDAG website, email lists, text messaging, the SANDAG social media channels, and Region the SANDAG monthly electronic newsletter. As needed, SANDAG also shall distribute press releases and media alerts to local, regional, and Mexico border area print and broadcast media.
- 8. SANDAG shall regularly inform local print, online, and broadcast media about SANDAG decisions, events, research, and other issues. SANDAG shall regularly

distribute press releases to news services, Daily Transcript, East County Californian, El Latino, La Prensa, Los Angeles Times, San Diego Business Journal, San Diego Metropolitan, San Diego Union-Tribune, San Diego Voice & Viewpoint, The Star News, and numerous community newspapers. SANDAG shall also distribute information to local and Mexico radio and television stations.

- 9. SANDAG shall use its website and social media channels to provide the public with useful and timely information, including: project updates and construction information; meeting schedules and agendas; plans and environmental documents; reports and other publications; demographic profiles and data downloads; and interactive database and mapping applications.
- 10. As appropriate and as required by local, state, and federal guidelines, SANDAG shall translate into Spanish, and other languages, publications, announcements, and web content. In addition, numerous staff members are bilingual Spanish-English speakers and participate in public outreach and conduct presentations in Spanish. Translators shall be hired as outlined in the SANDAG Language Assistance Plan and as required by local, state, and federal guidelines to provide services in Spanish and other languages as appropriate.
- 11. SANDAG conducts periodic public opinion surveys as part of the outreach and citizen participation component of the SANDAG work program. These surveys shall be designed to include the San Diego region's residents in the regional planning process and to keep SANDAG officials aware of issues that are of concern to the people who live here.
- 12. SANDAG will endeavor to respond to general comments received by phone, fax, letter, or email within five (5) business days of receipt. Comments shall be routed to the SANDAG staff person who is responsible for that issue. Comments may be responded to in writing (email or letter) or may be resolved with the initial phone call. Some comments may need to be resolved by another agency or jurisdiction so the customer is referred to the appropriate entity. When a comment is submitted as part of a public review process (e.g., a plan or environmental report) the comment and response is logged into a database. Comments, concerns, and responses received as part of a public review process shall be included in the final plan or report. Comments received via SANDAG social media channels will be addressed as stated in the SANDAG Social Media Policy.
- **B.** Short Range Program Regional Transportation Improvement Program (RTIP) document updated every two years outlining major transportation projects to be implemented during a five-year period.
  - 1. SANDAG shall follow the latest federal and state regulations regarding participation by interested parties.
  - 2. As the document that implements the long range plan, the RTIP shall be incorporated as part of the Board-adopted public involvement process established for the Regional Plan, including participating in public outreach efforts, providing adequate public notice (legal notice publications), employing visualization techniques, and holding

- public meetings at convenient and accessible locations.
- 3. SANDAG shall respond to any significant public input or comment received during the development of the biennial update and/or during the amendment cycle as part of its report to the Board or Transportation Committee (as appropriate).
- 4. The biennial RTIP update will be noticed in newspapers of general circulation, including in alternate languages, and a public hearing shall be held prior to final adoption by the Board of Directors.
- 5. During the amendment cycle, SANDAG will provide a draft of the amendment to all interested parties for a 15-day comment period.
- **C. Development Planning –** *Planning, environmental, preliminary engineering activities on major capital projects.* 
  - 1. SANDAG shall follow current federal and state regulations regarding public involvement processes and procedures. SANDAG shall develop public involvement programs tailored to meet specific project needs which address the unique challenges presented by each project. Programs shall be developed using the joint Federal Highway Administration and Federal Transit Administration (FHWA/FTA) guidelines titled "Public Involvement Techniques for Transportation Decision-Making."
  - 2. The public involvement program shall set objectives, identify people to be reached, develop public involvement strategy, and define specific outreach techniques.
  - 3. The public involvement program shall be developed so that critical community concerns and technical issues are identified in the study. The issues need to address the engineering, environmental, economic, and financial analyses that respond effectively to community needs and preferences and satisfy local, state, and federal environmental clearance requirements.
  - 4. To facilitate community participation, lists of individuals, agencies, and organizations shall be developed for distribution of agency materials. These lists will include persons who have indicated an interest in transportation planning projects during previous public information efforts and/or focused on the specific project. Project information will be distributed to the persons on this list in conjunction with public meetings and workshops, to solicit comments and recommendations.
  - 5. Environmental documents shall be prepared in accordance with California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), as appropriate, and in coordination and consultation with various federal, state, and local agencies, and with elected officials, community leaders, organizations, and other individuals from the neighborhoods and communities potentially affected by the proposed action. Coordination and public involvement shall be achieved through a variety of means, such as formal public hearings and meetings, circulation of draft documents, mailings, focus group meetings, workshops, and individual/group contacts.

- 6. Formal scoping meetings, public hearings, and/or other meetings during the comment period and environmental document certification shall be held in accordance with the requisite environmental document. As required, meetings shall be announced in the Federal Register, local publications, and on the SANDAG website. Persons and organizations on the project mailing list and social media channels also will be notified. SANDAG shall endeavor to hold public meetings in locations accessible by public transit.
- 7. SANDAG shall prepare and distribute appropriate notices and communications to comply with CEQA and NEPA requirements.
- 8. A public information program shall be developed to inform the community of factors related to the project. The information program may include briefings for the news media, informational meetings, presentations to include community and professional associations and educational institutions, business groups and associations, environmental organizations, outreach via social media, and other public forums.
- 9. A project working group may be organized to review and comment on the project to build understanding and identify support for feasible alternatives. This group may consist of various elected officials/staff, community and neighborhood organizations, business organizations, property owners, and other stakeholders and interested parties. This group would be formed to provide comment and guidance regarding technical issues, review study alternatives and evaluation results, and provide community input regarding the alternatives. This iterative process would allow for identified issues and concerns to receive follow-up responses. Meeting summaries of project working group activities shall be produced. Meeting notices, agendas, and/or other information shall be posted to the SANDAG website.
- 10. Other public input opportunities include SANDAG Board of Directors meetings and meetings of SANDAG policy committees: Executive, Transportation, Regional Planning, Borders, and Public Safety. Other opportunities for public participation are at working group meetings, general public meetings, and presentations to planning and community groups.

# **D. Design and Construction –** *Design and construction of capital projects.*

- For all capital improvement projects with significant community impacts, SANDAG shall provide opportunities for members of the public to provide input and express concerns. SANDAG also shall implement a program designed to inform the public of progress, as well as safety and community impacts in the event of construction.
- SANDAG shall hold publicly noticed meetings at key stages of project development and implementation in the area(s) being impacted. The location of the meetings shall depend upon the geographic location of the project. Meetings concerning projects exclusively within the North County Transit District (NCTD) service area shall be held in North County locations, and if appropriate, at SANDAG offices. Meetings concerning projects exclusively within the Metropolitan Transit System (MTS) service area shall be held in MTS service areas affected, and if appropriate, at SANDAG offices. Meetings concerning all other projects shall be held at SANDAG offices or other

locations specified in SANDAG agendas. SANDAG, MTS, and NCTD offices are accessible by public transit. SANDAG shall endeavor to hold off-site public meetings at locations accessible by public transit.

- 3. SANDAG shall solicit input from the representatives of interest groups of the local population, such as community groups, planning groups, business groups and associations, business improvement districts, environmental organizations, neighborhood associations, limited English proficient populations, and senior and disabled riders. These stakeholders will be consulted during the design and construction of capital projects.
- 4. SANDAG shall work to advise the public regarding actual and perceived disruption during construction of capital projects by distributing informational, educational, and public information materials, and by using other traditional community relations tools.
- 5. SANDAG shall endeavor to meet citizen concerns as they arise and attempt to resolve those concerns.
- 6. For all projects requiring environmental review under CEQA and NEPA, such as major capital improvement projects, SANDAG shall provide opportunities for members of the public to provide input and comply with all related legal requirements.
  - 6.1 SANDAG shall solicit input from the representatives of interest groups of the local population, such as community groups, planning groups, business groups and associations, and neighborhood associations.
  - 6.2 SANDAG shall incorporate public input into project planning and development where practical and feasible.
  - 6.3 SANDAG shall hold a public hearing to seek public comment whenever required under CEQA and/or NEPA.
    - 6.3.1 Published notifications for such hearings shall be published in newspapers of general circulation for publication of legal notices. Notices also may be published in regional, community, or Spanishlanguage newspapers to reach the affected area.
    - 6.3.2 Any item subject to a public hearing will be listed and described in the Board's published agenda, which shall be posted at least 72 hours in advance of the meeting at the Board's meeting place and on the SANDAG website.
    - 6.3.3 Public hearings shall be conducted by SANDAG at the published date, time, and place. The public hearing will allow for interested parties to be heard. The Board also will consider any written comments that were forwarded to the Board prior to the hearing.

### E. Fare Changes

- SANDAG has adopted Board Policy No. 029 to provide policy guidance for fare changes. This section of this policy is designed to inform and involve public transit riders, stakeholders, and the general public about proposed changes in transit fares. It is not intended to apply to transit route changes within the purview of the transit operators.
  - 1.1 Consistent with Board Policy No. 004, SANDAG staff shall hold one or more public meetings to provide the public an opportunity to comment on proposed fare changes. A minimum of two public meetings shall be held prior to the first reading of any proposed fare change that affects services operating in both the MTS and NCTD service areas. At least one public meeting shall be held in the MTS service area, and at least one public meeting shall be held in the NCTD service area. If one or more public meetings are conducted by a public meeting officer pursuant to Board Policy No. 004, at least one of the public meetings shall be held with a starting time no earlier than 6 p.m. A public meeting for proposed fare changes that do not affect the entire region may be held exclusively within the general geographic area that is being affected by the fare change. Such public meeting shall be held at a time convenient for users and potential users of the affected service. Public meetings at which formal public testimony will be taken shall be held at locations that are accessible by users of public transit. An official transcriber or other means of recording all public input received shall be utilized at all public hearings, meetings, workshops or open-houses at which formal public testimony is taken. A record of the input received shall be provided to the Transportation Committee or Board of Directors at the time of the first and second readings of amendments to the fare ordinance for the purpose of adjusting fare prices.
  - 1.2 Public comments on proposed fare changes also shall be accepted at the SANDAG Board or Transportation Committee meeting before any final action is taken.
  - 1.3 Take One, Rider Alerts, or other public notices in both English and Spanish will be posted on all affected public transit vehicles within the affected area at least 15 calendar days prior to the public hearing and will include a description of the proposed fare change, the date, time, intent and location of the public meeting, and the deadline for written, email, and phone comments from the public. The notices will be posted to the SANDAG and Transit Agency website(s).
  - 1.4 Print notice of public meetings at which formal public testimony will be taken will be provided at least 15 calendar days prior to the public meeting date in newspapers of general circulation in the affected area(s), including appropriate minority and community publications. Public notices will be printed in Spanish in Spanish-language newspapers. Such public meeting notices will include a description of proposed fare changes, the date, time,

- intent, and location of the public meeting(s), and the deadline for written, email, and phone comments from the public.
- 1.5 An open phone line will be made available to take public comments at least 15 calendar days prior to adoption of fare changes.
- 1.6 A Transportation Committee and/or Board report (as appropriate) will be completed and available for public review at least 72 hours prior to the public meeting at which the fare changes are proposed for adoption and posted to the SANDAG website(s).
- 2. After a fare change is approved by SANDAG:
  - 2.1. The public will be notified via news release(s)
  - 2.2. Take One, Rider Alerts, or other public notices in both English and Spanish will be posted on all affected transit vehicles at least 15 calendar days prior to changes going into effect and posted to the SANDAG and Transit Agency website(s).
- 3. SANDAG shall follow federal Title VI and environmental justice requirements when implementing transit fare changes.
  - 3.1. Residential, employment, and transportation patterns of low-income, limited English speaking, and minority populations shall be identified so that their needs can be identified and addressed, and the benefits and burdens of transportation investments can be fairly distributed. SANDAG shall endeavor to involve the affected communities in evaluating the benefits and burdens of transportation investments.
  - 3.2. SANDAG shall evaluate and where necessary improve the public involvement processes to eliminate participation barriers and engage minority and low-income populations in transportation decision making.

#### F. Short Range Transit Planning

- 1. Public information and involvement programs for the Regional Short Range Transit Plan and the Coordinated Human Resources and Public Transit Transportation Plan shall be the responsibility of SANDAG.
- 2. Public information and involvement programs for transit service changes will fall under adopted policies of MTS and NCTD.

#### G. Native American Consultation

 SANDAG shall establish and adhere to government-to-government relationships when interacting with Tribal Governments, acknowledging these tribes as unique and separate governments within the United States.

- 2. SANDAG shall recognize and respect important California Native American rights, sites, traditions, and practices.
- 3. SANDAG engages in "consultation" with Tribal Governments prior to making decisions, taking actions, or implementing programs that may impact their communities.
- 4. To facilitate effective consultation with Tribal Governments, SANDAG has established a Tribal Government Liaison. The Liaison shall serve as an initial contact for Tribal Governments and communicates with tribal governments regarding SANDAG activities.
  - 4.1. "Consultation" is the active, affirmative process of: (1) identifying and seeking input from appropriate American Indian government bodies, community groups, and individuals; and (2) considering their interests as a necessary and integral part of the decision-making process.

Adopted November 2004 Amended March 2005 Amended January 2006 Amended December 2007 Amended December 2008 Amended January 2010 Amended November 2012 Amended September 2017 Amended February 2018

# Appendix F: Language Assistance Plan

# SANDAG

# LANGUAGE ASSISTANCE PLAN

# **AUGUST 2022**



Free Language Assistance | Ayuda gratuita con el idioma | Libreng Tulong sa Wika | Hỗ trợ ngôn ngữ miễn phí 免費語言協助 | 免费语言协助 | 中료 언어 지원 | کمک زبان رایگان | 無料の言語支援 | Бесплатная языковая помощь Assistência linguística gratuita | मुफ्त भाषा सहायता | Assistance linguistique gratuite | ជំនួយភាសាឥគិតថ្លៃ ఉచిత భాషా సహాయం | ການຊ່ວຍເຫຼືອດ້ານພາສາຟຣີ | Kaalmada Luqadda ee Bilaashka ah | Безкоштовна мовна допомога



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# **Definitions**

- **Bilingual:** Ability to speak two languages fluently and without effort; fluency and bilingual skills may be measured and certified.
- Community-Based Organization (CBO): A local, non-profit, non-governmental organization that represents the interests of a community or particular population within the community.
- **Cultural Competency:** Programs or content that understand and effectively respond to cultural diversity.
- **English Learner:** Students learning English as a second language as identified by the California Department of Education (DOE).
- **Equity and Equality:** Equity ensures access, opportunity, and advancement for all people, and strives to identify and eliminate barriers that prevent the full participation of some groups. Equality ensures the same access, opportunity, and advancement for all people; it aims to promote fairness but can only work if everyone starts from the same place.
- **Executive Order:** Rule or order issued by the U.S. President to an executive branch of the government and having the force of law.
- Federal Transit Administration (FTA): Operating administration of the U.S. Department
  of Transportation (U.S. DOT); it provides financial and technical assistance to the San
  Diego Association of Governments (SANDAG) (and SANDAG passes such funding through
  to local public transit systems).
- Four Factor Analysis: Framework developed by the U.S. DOT to help agencies determine the number of persons in their community that do not speak English very well and develop programs to assist Limited English Proficiency (LEP) persons in interacting with government agencies such as SANDAG.
- Interactive Voice Recognition (IVR) phone system: Automated phone system that callers interact with, and which gathers information from callers via a menu, without contact with a live person.
- Interpretation: Oral, real-time translation from one language into another.
- Interpretation (simultaneous versus consecutive): Through simultaneous interpretation, the interpreter speaks at the same time as the speaker and voices may overlap; through consecutive interpretation, the person with LEP speaks, followed by the interpreter, and there are pauses or breaks between sentences when each is speaking.
- "I Speak" cards: Tool which allows a person to identify what language they speak.
- Limited English Proficiency (LEP): Persons with LEP are those for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English; LEP designation includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.
- National Origin Discrimination: Treating people unfavorably because they are from a
  particular country or part of the world, including because of ethnicity, because they speak
  a foreign language, or because they speak English with an accent.

- Over the Phone Interpretation: Three-way call interpreting service, where the interpreter works during the conversation between two parties who speak different languages; this service is typically provided remotely.
- Safe Harbor Language: Language spoken by at least 1,000 persons with LEP in the SANDAG region, as defined by the FTA.
- **Title VI:** Title VI of the Civil Rights Act of 1964, which prohibits recipients of federal funding from discriminating on the basis of race, color, or national origin.
- **Translation:** Written rendering of text from one language into another while preserving meaning.
- **Vital Document:** A document that contains information that is critical for obtaining federal services and/or benefits, or is required by law.

# **Executive Summary**

# 1. Background and Introduction

Agencies that receive funds from the U.S. Department of Transportation (U.S. DOT) are responsible for providing language assistance measures to persons with Limited English Proficiency (LEP). To ensure compliance, the U.S. DOT developed a four-factor framework and guidance to help agencies determine the number of persons in their community that do not speak English very well and develop programs to assist them in interacting with government agencies such as the San Diego Association of Governments (SANDAG). The U.S. DOT guidance also requires agencies to prepare Language Assistance Plans to outline the measures that an agency will take to assist persons who do not speak English very well. This document summarizes the Four Factor Analysis conducted by SANDAG and identifies the language assistance measures provided by SANDAG. It also identifies how the agency trains employees and provides notice to people with LEP and details how the plan will be monitored. Providing language assistance is deeply connected with SANDAG's Commitment to Equity and to creating a San Diego region where every person who visits, works, and lives can thrive.

### 2. Four Factor Analysis

**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.

Following Factor 1 U.S. DOT Guidance, multiple sources—including the U.S. Census American CommunitySurvey (ACS), California Department of Education (DOE), County of San Diego Department of Behavioral Health Services, and San Diego Superior Court—were used to determine the number of people with LEP in San Diego County. According to these findings, about 400,000 people five years or older speak English less than very well. This accounts for 13% of the county's population. There are more than 245,000 Spanish speakers who speak English less than very well, and this is about 64% of the LEP population in San Diego County. Tagalog and Filipino, Vietnamese, Chinese (all dialects), and Arabic have between 15,000 and 30,000 speakers who don't speak English very well. Twelve other languages or language groups were identified as having more than 1,000 speakers who do not speak English very well. One thousand speakers is the minimum

Figure Ex-1: Safe Harbor Languages

# **Safe Harbor Languages**

- 1 Spanish
- 2 Tagalog (incl. Filipino)
- 3 Vietnamese
- 4 Chinese (Mandarin and Cantonese)
- 5 Arabic
- 6 Korean
- 7 Persian (incl. Farsi, Dari)
- 8 Japanese
- 9 Russian
- 10 Portuguese
- 11 Hindi
- 12 French (incl. Cajun)
- 13 Khmer
- 14 Telugu
- 15 Lao
- 16 Somali
- 17 Ukrainian

threshold for safe harbor protection established by the federal government.

Based on data in Factor 1, it is recommended that SANDAG provide safe harbor protections to speakers of the 17 languages shown in Figure Ex-1. Each of these languages is estimated to have at least 1,000 speakers who reside in San Diego County and who do not speak English very well.

**Factor 2:** The frequency with which LEP individuals come in contact with the program, activity, or service.

Information on the frequency that persons with LEP come in contact with SANDAG was assessed based on a survey of employees, follow-up interviews, focus groups made up of individuals with LEP from five language groups, and a review of available data collected by SANDAG on LEP contacts.

All SANDAG employees were sent an email with a link to an online survey regarding their interactions with individuals with LEP and the resources available for communication. About one fourth, or 103 employees, provided complete responses.

The focus groups were held to help understand, from the perspective of people with LEP, how frequently individuals with LEP come in contact with SANDAG programs, services, and staff. The language groups were selected based on the prevalence of speakers from the 2019 Factor 1 results and the availability of community-based organization (CBO) partners that could hold focus groups in those languages.

The greatest number of contacts with individuals who have LEP are in Spanish, which is consistent with the findings of Factor 1 and reflective of the cross-border planning relationship with and geographic proximity to Mexico. The absence of data showing contact with other language groups appears largely due to people not being aware of SANDAG, its role, and the services it provides. Part of this issue is that many recent immigrants and non-English speakers come from nations that do not have organizations like SANDAG that provide services such as FasTrak, or no-cost services such as 511, the Freeway Service Patrol, or highway call boxes. Greater awareness of SANDAG's role and services in the LEP community will increase contacts.

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

SANDAG is a multifaceted organization that carries out planning activities which rely on significant public input, and also provides services for the public. Many of the programs SANDAG administers and projects the agency builds have a direct impact on the public, including individuals with LEP.

Focus groups for individuals with LEP sought to identify the importance of SANDAG in their lives. The results from the focus groups generally found a low level of awareness of SANDAG programs and little contact with the agency. Most people were unaware they have a right to communicate with SANDAG in their native languages, and many stated they felt intimidated to communicate with a government agency because of their poor English. Spanish speakers seemed to be more aware of SANDAG programs and were more willing to communicate with the agency than members of other language groups.

The individuals who participated in the focus groups placed a high level of importance on being able to communicate with elected representatives though the Board of Directors and Policy Advisory Committees (PACs). Transit riders also felt it was important to be able to comment on fare changes. Even though few had used Motorist Aid, or even knew of its existence, the individuals participating in the focus groups found the Motorist Aid Services, including the Freeway Service Patrol and call boxes, to be particularly important. The 511 system, except for requesting Motorist Aid, was not seen as particularly important because more easily accessible traffic/transit information alternatives exist. iCommute was not viewed as important because none of the participants had a need for the services provided.

Factor 4: The resources available to the recipient and costs.

The U.S. DOT LEP guidance recognizes the level of language assistance provided by agencies will differ based on the size of the establishment and the resources or budget available. The guidance directs agencies to take reasonable steps to provide language access; if the costs substantially exceed the benefits, additional actions may not be necessary.

The total resources dedicated to supporting individuals with LEP is not available in a single, centralized location, making the estimation of total resources very difficult. Individuals with LEP constitute about 13% of the total population of San Diego County. As a rough measure, one would expect at least 13% of the total communications budget to be spent on communicating with individuals with LEP. With direct LEP costs estimated to be about \$282,000, the expenditure is equivalent to about 27% of the direct communications costs, excluding project communications costs, which are budgeted separately. Therefore, it appears that percentage of costs associated with providing service to individuals with LEP exceeds the percentage of LEP population in San Diego County. This is a rough indication that SANDAG resources are reasonable.

# 3. Language Assistance Measures

It is SANDAG's policy to provide timely, meaningful access for persons with LEP to its services and decision-making processes. SANDAG communicates with individuals with LEP in person and through virtual platforms, over the phone, in writing, and through digital media as provided in this Language Assistance Plan (LAP). The LAP is an important component of SANDAG's Commitment to Equity. An effective LAP will help ensure historically underserved, systemically marginalized, and otherwise linguistically isolated groups can receive the full benefit of SANDAG programs, services, and facilities, and can participate in public engagement opportunities conducted by SANDAG. SANDAG is committed to creating a region where every person, regardless of the language they speak, has a bright future.

This LAP for SANDAG has seven elements:

- 1. Identify a person, department, and staff advisory group responsible for ensuring LEP compliance
- 2. Identify existing language assistance measures
- 3. Identify vital documents
- 4. Provide training for staff on LEP requirements
- 5. Identify new services and resources to be made available for language services by functional area

- 6. Recommend an agency compliance monitoring process to ensure language access services are being made available and monitor encounters with individuals with LEP
- 7. Advocate internally and externally to enable SANDAG to better serve individuals with LEP

The plan also contains recommendations for updating the LAP and for monitoring language assistance efforts to ensure language access services are being made available.

The Four Factor Analysis identified 17 languages that meet the safe harbor threshold. The number of persons ranged from in excess of 245,000 Spanish speakers to more than 1,000 estimated Ukrainian speakers. Spanish is the language most spoken by persons with LEP and—given factors such as the historical role of Spanish in the region, the close relationship with Tijuana, and crossborder flows of people—Spanish has a unique importance for SANDAG. Four languages—Chinese, Tagalog/Filipino, Vietnamese, and Arabic—have significant populations of people with LEP, and those groups are substantially smaller than the Spanish-speaking LEP population. There are 12 additional language groups consisting of between 1,000 and 7,500 individuals that meet the threshold for safe harbor designation. The wide range in the sizes of the language group populations and the historical and geographic proximity issues support the use of a priority designation for the languages which were used to develop language assistance measures. The Language Priority Groups are shown in Figure Ex-2. (Language designations in this table are as provided in U.S. Census Bureau data.)

Figure Ex-2: Language Priority Groups

Priority 1	Priority 2	Priority 3
Spanish	Tagalog/Filipino Vietnamese Chinese: Mandarin (oral); Simplified (written) Arabic	Chinese: Cantonese (oral); Traditional (written) Korean Persian Japanese Russian Portuguese Hindi French Khmer Telugu Lao Somali Ukrainian

# 4. Monitoring and Updating

The Four Factor Analysis and LAP will be reviewed and updated, if necessary, every three to five years to ensure alignment with the most recent available data, the SANDAG Equity Action Plan, and any significant changes in the SANDAG Title VI Program. The Director of Diversity and Equity is responsible for the review and update of the document and for monitoring the implementation of the plan, which falls under the Department of Organization Effectiveness.

# 1. Introduction

### **About SANDAG**

SANDAG is the regional planning agency as well as the technical and informational resource for the San Diego, California area's 18 incorporated cities and the county government, which collectively make up the association of governments. A Board of Directors comprising elected officials from each of the 19 member agencies governs SANDAG. Advisory representatives from Imperial County, the U.S. Department of Defense, California Department of Transportation (Caltrans), Port of San Diego, San Diego County Water Authority, Metropolitan Transit System (MTS), North County Transit District (NCTD), Southern California Tribal Chairmen's Association, San Diego Regional Airport Authority, and Mexico supplement the voting members. The agency's planning boundary is the jurisdictional limits of the County of San Diego; in addition, SANDAG partners with agencies in Mexico and throughout Southern California. In 2020, the county population was estimated at 3,351,737.1

SANDAG was created in 1966 as a comprehensive planning organization (CPO) under a state-authorized joint powers agreement. The governor of California designated the CPO as the metropolitan planning organization for the region in 1970. In 1972, the CPO was established as a joint powers authority. It adopted its current name in 1980 to better reflect its purpose. In 1987, SANDAG added the responsibilities of administering the region's voter-approved half-cent sales tax for regional transportation projects—TransNet.

On January 1, 2003, Senate Bill 1703 (Peace, 2002) (SB 1703) was enacted and changed SANDAG's structure from a joint powers authority to a state-created regional governmental agency, which made it a permanent (rather than voluntary) association of local governments with increased responsibilities and powers. SB 1703 consolidated MTS's and NCTD's transportation planning and development functions into SANDAG so those activities would occur multimodally.

The roles and responsibilities of SANDAG, MTS, and NCTD are outlined in a master memorandum of understanding executed on April 23, 2004. SANDAG is responsible for transit planning, development, and construction, whereas MTS and NCTD are responsible for transit operations. MTS and NCTD also manage small construction projects with SANDAG's assistance, and SANDAG is responsible for establishing the regional fare policy.

# **SANDAG Commitment to Equity Statement**

In February 2021, the SANDAG Board of Directors adopted the following Commitment to Equity statement:

We hold ourselves accountable to the communities we serve. We acknowledge we have much to learn and much to change; and we firmly uphold equity and inclusion for every person in the San Diego region. This includes historically underserved, systemically marginalized groups affected by actions and inactions at all levels of our government and society. We have an obligation to end disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone.

<sup>&</sup>lt;sup>1</sup> Source: U.S. Census Bureau 2020 Census.

We have an obligation to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone. The SANDAG equity action plan will inform how we plan, prioritize, fund, and build projects and programs; frame how we work with our communities; define how we recruit and develop our employees; guide our efforts to conduct unbiased research and interpret data; and set expectations for companies and stakeholders that work with us.

We are committed to creating a San Diego region where every person who visits, works, and lives can thrive.

### **Background**

Title VI of the Civil Rights Act of 1964 (Title VI) states, "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance." In the 1974 case of *Lau v. Nichols* (414 U.S. 563), the Supreme Court interpreted the Title VI ban on national origin discrimination to hold that Title VI prohibits conduct that has a discriminatory impact on individuals with LEP.

On August 11, 2000, President Bill Clinton signed Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency. This executive order directs federal agencies to examine the services they provide and to develop and implement a system by which persons with LEP can access those services meaningfully. Federal agencies were instructed to publish guidance for their respective recipients to assist them with their obligations to persons with LEP under Title VI.

The U.S. DOT published guidance for its recipients in 2005, the *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons* (Volume 70, Number 239). The guidance states that Title VI and its implementing regulations require that U.S. DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals with LEP. The guidance also suggests recipients use the U.S. DOT LEP policy guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals with LEP. The guidance proposes a structure—the Four Factor Analysis—for determining the best approach to provide language assistance.

The Federal Transit Administration (FTA) Title VI circular 4702.1B provides the definition of LEP used in this report. It states persons with LEP are those "for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all."

SANDAG used these resources to guide development of this LAP. SANDAG intends this plan will address the needs of and provide meaningful assistance to individuals with LEP in San Diego County. The LAP summarizes findings of the Four Factor Analysis, identifies persons who need language assistance and how they will be notified about the availability of such assistance, details what language assistance measures SANDAG will take and how employees will be trained to carry them out, and specifies how the plan will be monitored and updated.

California law also provides protections for individuals with LEP, found in the California Civil Rights Act (Unruh Act; California Code 11135) and the Bilingual Services Act (California Code 7290). Unlike federal protections, these statutes do not have regulations that require proactive measures to identify LEP populations and develop programs to ensure their language needs are meet. Agencies have local discretion to determine how large the LEP population must be before providing services in another language. The best practice for local agencies is to adopt the state standard to provide services if any language group constitutes 5% of the population being served. As a result, compliance with California law will be attained if the federal requirements are met and implemented.

### The Four Factor Analysis and Language Assistance Plan

Guidance issued by the U.S. DOT and the FTA requires each agency that receives federal funding to prepare a Four Factor Analysis. The Four Factor Analysis must address the following four topics:

- **Factor 1:** The number or proportion of persons with LEP 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 individuals with LEP come in contact with the program, activity, or service
- **Factor 3:** The nature and importance of the program, activity, or service provided by the recipient to people's lives
- Factor 4: The resources available to the recipient and costs

The Four Factor Analysis provides the groundwork for developing this LAP which addresses how SANDAG will communicate with and provide services to persons with LEP.

# 2. Factor 1: Identifying Individuals with Limited English Proficiency Who Need Language Assistance

Federal guidance from the U.S. DOT requires federal funding recipients to identify the number or proportion of individuals who have LEP and are likely to come in contact with federally funded services and programs. Any individual older than five years of age who does not speak English very well is considered to have LEP, and every program at an agency that receives any federal funding must comply with the requirement, regardless of whether federal money funds the specific program.

The U.S. DOT and FTA guidance also address how to determine whether the population of speakers of a particular language reaches a minimum that would trigger a requirement to provide translated vital documents—the safe harbor requirement. The presence of at least 1,000 individuals or 5% of the population (whichever is less) who speak a language other than English and do not speak English very well triggers the safe harbor requirement.

The goal of Factor 1 is to determine which San Diego County populations meet the safe harbor threshold. The goal of the federal and state legislation, regulations, and guidance is to encourage government agencies to provide additional services in alternative languages to ensure individuals with LEP are not subject to discrimination.

### **Data Sources and Findings**

Determining the precise number of persons with LEP is more nuanced than simply consulting the U.S. Census Bureau because it's possible that not all limited English speakers are included in Census statistics, and the Census may inadequately stratify the languages found in all communities. In preparing Factor 1, other state and local data on language use and predominance supplemented Census data.

#### U.S. Census Bureau American Community Survey

The U.S. Census Bureau ACS replaced the long form of the decennial Census and is conducted continuously throughout the year. Nationally, about 250,000 households are surveyed monthly, and the survey includes questions about English language proficiency (unlike the decennial Census). Based on the survey results, estimates are prepared based on one year and five years of data (Figure 2-1). There can be differences between the one-year and five-year estimates, and by using both sets of data, a valid picture of a particular data set can be achieved. The most recent year of available ACS data is 2019. The one-year estimate shows almost 400,000 individuals with LEP in San Diego County (393,293), and the five-year estimate shows more than 425,000 individuals with LEP (426,297). Figure 2-1, Column 1 shows the one-year estimate for each language group at the county level, and Column 3 shows the five-year estimate based on the San Diego Public Use Microdata Areas (PUMAs). PUMAs are nonoverlapping, statistical geographic areas that partition each state or equivalent entity into geographic areas.

Figure 2-1: Limited English Proficiency Speakers in San Diego County by Language and Data Source

Part							y by Earliguage		
Individuals			2	3	4	5	6	7	8
Spanish	Language	Individuals; ACS B16001; 2019 1YR	LEP Individ-	Individuals; ACS B16001; 2019 5YR	LEP Individ-	Learner Data; SD County;	Court Interpretation Requests	San Diego Behavioral Health Services	Languages for Vital Documents
Tagalog	Spanish		63.63%	268,664	65.08%	67,546			114,295
Vietnamese         2,601         6,38%         25,411         6,16%         1,562         511         245         12,276           Chinese (Incl. Mandari)         22,033         5,72%         23,858         5,78%         1,007         243         42         7,161           Cantonese)         Arabic         15,274         3,96%         13,251         3,21%         2,668         733         330         5,091           Korean         7,824         2,03%         7,620         1,85%         574         40         39         2,855           Persian (Incl. Farsi, Dari)         7,501         1,95%         6,499         1,57%         905         240         42         1,301           Japanese         4,511         1,17%         5,288         1,28%         510         3         1,181           Russian         4,262         1,11%         4,376         1,04%         537         78         33           Portuguese         3,084         0,80%         2,301         0,56%         265         58         5           Hindi         2,086         0,54%         1,736         0,42%         147         7         147         147         147         148         149 </td <td>Tagalog (incl.</td> <td>29,583</td> <td></td> <td>32,705</td> <td>7.92%</td> <td></td> <td>207</td> <td>44</td> <td>7,988</td>	Tagalog (incl.	29,583		32,705	7.92%		207	44	7,988
Gincl.		24,601	6.38%	25,411	6.16%	1,562	511	245	12,276
Porsian (Incl.   Parallel   Par	(incl. Mandarin,	22,033	5.72%	23,858	5.78%	1,007	243	42	7,161
Persian (Incil.   7,501   1,95%   6,499   1,57%   905   240   42   1,301     Japanese   4,511   1,17%   5,288   1,28%   510   3   3,181     Russian   4,262   1,11%   4,176   1,01%   537   78   33     Persian (Incil.   2,086   0,54%   1,736   0,42%   1,47     French (Incil.   2,086   0,54%   1,736   0,42%   1,47     French (Incil.   2,011   0,29%   1,526   0,37%   203   8     Russian   908   0,24%   1,318   0,32%   65   1     Cajun)   1,110   0,29%   8,79   0,21%   1,75     Pashto   1,119   0,29%   8,79   0,21%   1,75     Pashto   1,119   0,29%   8,79   0,21%   1,75     Rurdish   (Rurdish (Rurdish Lao, or other Tai- Kadai languages   4,087   4,087     Thai   4   4   4   4   4     Amharic, Somali, or other Afro- Africa (Rurdish Somali, or other Afro- Africa (Rurdish Somali, or other Afro- Africa (Rurdish Somali)   1,718   1,989     Chaldean   5,993   8,405   8,405     Assyrian   Amharic   1,175   1,175   1,175     Ukrainian or other Slavic (Languages   1,466   1,175   1,175   1,175   1,175     Ukrainian or other Slavic (Languages   1,466   1,175   1,175   1,175   1,175     Ukrainian or other Slavic (Languages   1,466   1,175	Arabic	15,274	3.96%	13,251	3.21%	2,668	733	330	5,091
Farsi, Darit    7,501   1,95%   6,499   1,57%   905   240   4,2   1,501     Japanese   4,511   1,17%   5,288   1,10%   537   78   33     Portuguese   3,084   0,80%   2,301   0,56%   265   58   5     Hindi   2,086   0,54%   1,736   0,42%   147     French (incl. Cajun)   1,100   0,29%   1,526   0,37%   203   8     Richard   1,017   0,26%   1,670   0,40%   131   78   120     Italian   908   0,24%   1,318   0,32%   65   1     Felugu   1,119   0,29%   879   0,21%   175     Fashto   1,119   0,29%   879   0,21%   175     Fashto   1,119   1,119   1,119   1,119     Fashto   1,119   1,119     Fashto   1,119   1,119     Fashto   1,119	Korean	7,824	2.03%	7,620	1.85%	574	40	39	2,855
Russian   4,262		7,501	1.95%	6,499	1.57%	905	240	42	1,301
Portuguese   3,084   0.80%   2,301   0.56%   265   58   5	Japanese	4,511		5,288	1.28%				1,181
Hindi	Russian								
French (incl. Cajun)         1,110         0.29%         1,526         0.37%         203         8           Khmer         1,017         0.26%         1,670         0.40%         131         78         120           Italian         908         0.24%         1,318         0.32%         65         1           German         650         0.17%         1,259         0.30%         89         3           Telugu         1,119         0.29%         879         0.21%         175           Pashto           300            Kurdish (Kurdi, (Kurdi, (Kurdi, (Kurdi, Kurmanji)         411         14         6           Armanian         411         14         6         1           Polish         590         38         2         2           Thai, Lao, or other Tai- Kadai languages         3,221         4,087         4,087         4         23         1,347           Thai							58	5	
Cajun)         I,III         0.29%         I,526         0.37%         205         8           Khmer         1,017         0.26%         1,670         0.40%         131         78         120           Italian         908         0.24%         1,318         0.32%         65         1           German         650         0.17%         1,259         0.30%         89         3           Telugu         1,119         0.29%         879         0.21%         175           Pashto         310         310         30           Kurdish         Kurdish         220           Kurdish         84         2           Armenian         411         14         6           Turkish         84         2           Polish         590         38         2           Thai, Lao, or other Tai- Kadai         3,221         4,087           Lao         178         44         23         1,347           Thai         65         6           Amharic, Somali, or other Afro- Asiatic languages         8,405         1,718         1,989           Somali, Assyrian         54         54         1,591		2,086	0.54%	1,736	0.42%	147			
Italian   908   0.24%   1,318   0.32%   65   1     German   650   0.17%   1,259   0.30%   89   3     Telugu   1,119   0.29%   879   0.21%   175     Pashto	•								
German         650         0.17%         1,259         0.30%         89         3           Telugu         1,119         0.29%         879         0.21%         175           Pashto         310							78		
Telugu 1,119 0.29% 879 0.21% 175 Pashto Kurdish (Kurdish (Kurdish) 220 Kurmanji) Armenian 411 14 6 Turkish 590 38 2 Polish 590 38 2 Thai, Lao, or other Tai-kadai languages Lao									
Pashto								3	
Kurdish (Kurdi, Kurmanji)		1,119	0.29%	879	0.21%				
Turkish         84         2           Polish         590         38         2           Thai, Lao, or other Tai-kadai languages         3,221         4,087         4,087           Lao         178         44         23         1,347           Thai         65         6           Amharic, Somali, or other Afrodhaic languages         9,938         8,405         44         23         1,347           Chaldean Somali         1,718         1,989         1,989           Somali         796         1,591         1,591           Amharic         85         1,175         1,591           Ukrainian or other Slavic languages         1,466         1,175         1,175	Kurdish (Kurdi,								
Polish         590         38         2           Thai, Lao, or other Tai- Kadai languages         3,221         4,087           Lao         178         44         23         1,347           Thai         65         6           Amharic, Somali, or other Afro- Asiatic languages         9,938         8,405         8,405         1,718         1,989           Chaldean         1,718         1,989         1,989         5omali         796         1,591         1,591           Assyrian         54         1,591         Amharic         85         Ukrainian or other Slavic languages         1,466         1,175         1,175         1,466         1,175         1,175         1,466         1,175 <td>Armenian</td> <td></td> <td></td> <td>411</td> <td></td> <td>14</td> <td></td> <td>6</td> <td></td>	Armenian			411		14		6	
other Tai-Kadai languages     3,221     4,087       Lao     178     44     23     1,347       Thai     65     6       Amharic, Somali, or other Afro-Asiatic languages     9,938     8,405       Chaldean     1,718     1,989       Somali     796       Assyrian     54     1,591       Amharic     85       Ukrainian or other Slavic languages     1,466     1,175				590					
Thai 65 6  Amharic, Somali, or other Afro- Asiatic languages  Chaldean  Chaldean  Somali  Assyrian  Assyrian  Amharic  Ukrainian or other Slavic languages  1,466  1,175  1,175  1,175  1,175  1,175  1,175	other Tai- Kadai languages	3,221		4,087		170		27	17/7
Amharic, Somali, or other Afro- Asiatic languages  Chaldean Somali Somali Assyrian Amharic Ukrainian or other Slavic languages  1,466 1,175 1,175 1,175 1,175							44		1,547
Somali 796 Assyrian 54 1,591 Amharic 85 Ukrainian or other Slavic 1,466 1,175 languages	Amharic, Somali, or other Afro- Asiatic	9,938		8,405		63		· ·	
Assyrian 54 1,591  Amharic 85  Ukrainian or other Slavic 1,466 1,175									1,989
Amharic 85  Ukrainian or other Slavic 1,466 1,175  languages									
Ukrainian or other Slavic 1,466 1,175 languages									1,591
other Slavic 1,466 1,175 languages						85			
	other Slavic	1,466		1,175					
	Ukrainian					17			

The U.S. Census Bureau clusters some languages into families, which means it is impossible to determine whether some specific languages meet the safe harbor threshold requirement contained in the U.S. DOT guidance based on the ACS alone. Other data sources must be consulted to fully understand the San Diego region's limited English population.

### California Department of Education English Learner Data

The California DOE collects data from every kindergarten to grade 12 school in the state on the number of students learning English as a second language. The DOE data do not combine data into language families; therefore, the data sometimes can provide more detail about individual languages within the language families reported in the ACS. For example, the ACS lumps together Thai, Lao, and other Tai Kadai languages, while the DOE English Learner data show that this group is predominately Lao in San Diego County. Similarly, the ACS data do not specifically list Chaldean or Somali as separate languages—the ACS combines them in a language group with Amharic and other Afroasiatic languages. There is, however, an active Chaldean community in El Cajon, and CBOs report a recent influx of Somali-speaking immigrants. DOE English Learner data shows that Chaldean and Somali speakers account for most of the individuals in this ACS grouping.

The ACS data do not distinguish among Chinese dialects; this is a significant issue because someone who speaks one dialect may not understand someone who speaks a different dialect. A further complication arises in relation to written language, because immigrants from Taiwan, Hong Kong, and Macau—who speak different Chinese dialects—use the Traditional Chinese writing system rather than the Simplified system used in China and elsewhere. The DOE English Learner data show that of 1,019 Chinese-speaking English learners, about 84% are Mandarin speakers, and 15% are Cantonese speakers. Other dialects make up less than 1% of Chinese-speaking English learners.

The ACS one-year data show more than 1,400 individuals in San Diego County speak one of the languages in the "Ukrainian or other Slavic Languages" group, which includes Bulgarian and Czech in addition to Ukrainian. The DOE English Learner data list only Ukrainian students; none are shown for Bulgarian or Czech. In addition, recent news articles indicate that the war in Ukraine has increased refugee resettlement in San Diego County. For these reasons, the analysis suggests that it is appropriate to include Ukrainian in the list of languages which may exceed the 1,000-person safe harbor threshold.

The DOE English Learner data for San Diego County schools are shown in Figure 2-1, Column 5.

### San Diego Superior Court Interpretation Request Data

The San Diego Superior Court tracks interpretation requests for all nonfederal courts in San Diego County. These data reflect the language needs of participants in court proceedings, so they also may reflect the number of individuals involved in court proceedings by national origin. The data also show far greater demand for Lao interpretation (44 requests) than Thai (no requests). The San Diego Superior Court interpretation request data for 2019–2020 are shown in Figure 2-1, Column 6.

### County of San Diego Department of Behavioral Health Interpretation Services

The County of San Diego Department of Behavioral Health Services also tracks interpretation requests. The data appear to confirm Lao is the predominant Tai Kadai language in San Diego County. The Behavioral Health Services interpreter data for fiscal year 2021 are shown in Figure 2-1, Column 7.

### Metropolitan Transit System Four Factor Analysis

As a direct recipient of federal funding, MTS also must prepare a Four Factor Analysis and LAP based on the U.S. DOT regulations and FTA guidance. The area MTS serves is less than the entire county; however, any language that meets the safe harbor requirement in the portion of the county MTS serves also would meet the safe harbor requirement for SANDAG and the entire county. MTS prepared its most recent Four Factor Analysis in 2019, and it uses ACS data as well as an onboard survey and records from frontline staff to develop its estimate of LEP populations in San Diego. MTS defines a person with LEP as someone whose primary language is not English and who has a limited ability to read, write, speak, or understand English. This is slightly different from the definition used by SANDAG, which is anyone who speaks English less than very well.

As shown in Figure 2-1, Column 8, MTS concluded the counts of Lao, Chaldean, and Assyrian speakers with LEP exceed the 1,000-person safe harbor threshold.

### County of San Diego Registrar of Voters

The County of San Diego Registrar of Voters also must comply with both federal and state language assistance regulations. Although data are unavailable to support its decision on which language services are provided, translations are provided in Spanish, Filipino, Chinese, and Vietnamese, and machine translation is provided for other languages via Google Translate. Translated materials include the entire web page, voter pamphlets, and polling place signage and information.

### **Location of Populations with Limited English Proficiency**

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on national origin. National origin discrimination involves treating people unfavorably because they are from a particular country or part of the world, because of ethnicity, because they speak a foreign language, or because they speak English with an accent. All those factors can be taken as indicators of a person's national origin.

The map in Figure 2-2 shows the distribution of foreign-born persons in San Diego County. These are persons who are protected by the national origin clause of Title VI, even though they may speak English very well. There are large areas of the densely populated western portion of the county where between 25% and 50% of the population are foreign born. There are three principal areas—south of I-8, along the SR 56 corridor, and along the SR 78 corridor—with significant communities of foreign-born persons.

The map in Figure 2-3 shows the distribution of residents that speak a language other than English at home. The map in Figure 2-3 closely resembles the general patterns shown in Figure 2-2 with the addition of some large, low-density areas in east county where residents speak a foreign language at home. In a number of geographies, including several which share a border with Mexico, more than 50% of residents speak a language other than English at home.

Figure 2-4 identifies the areas of the county where there are concentrations of population that do not speak English very well. As previously stated, this is the definition of limited English proficiency as identified for protection by the U.S. DOT LEP regulations and FTA guidance. The purpose of this Four Factor Analysis is to identify the people and the languages they speak, regardless of where they were born. In western San Diego County, the areas with individuals with LEP follow the same patterns as in the previous maps, focused south of I-8 and along SR 56 and SR 78, with some additional pockets in the rural portions of the county. In general, these areas are smaller than the areas shown for foreign born or speaking a foreign language at home except in the rural part of the county.

Spanish speakers make up the largest percentage of individuals with LEP. Their distribution in San Diego County is shown in Figure 2-5. There are large concentrations south of I-8 and along SR 78 in western San Diego, as well as large parts of the rural areas in eastern San Diego. The corridor along SR 56—which showed large concentrations of foreign-born residents who speak a language other than English at home or residents with LEP—is not home to a concentration of Spanish speakers.

The four maps show that SANDAG should expect to encounter persons with LEP in most areas of the county, especially in the western and southwestern areas of the county.

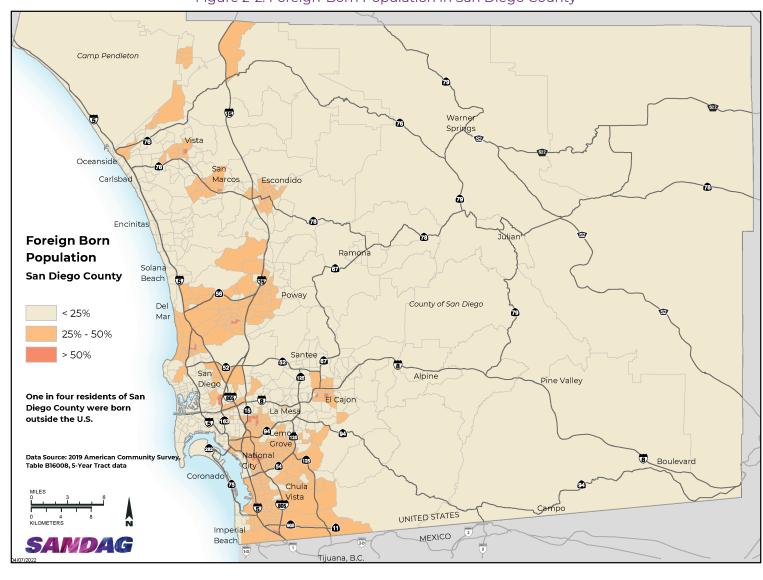


Figure 2-2: Foreign-Born Population in San Diego County

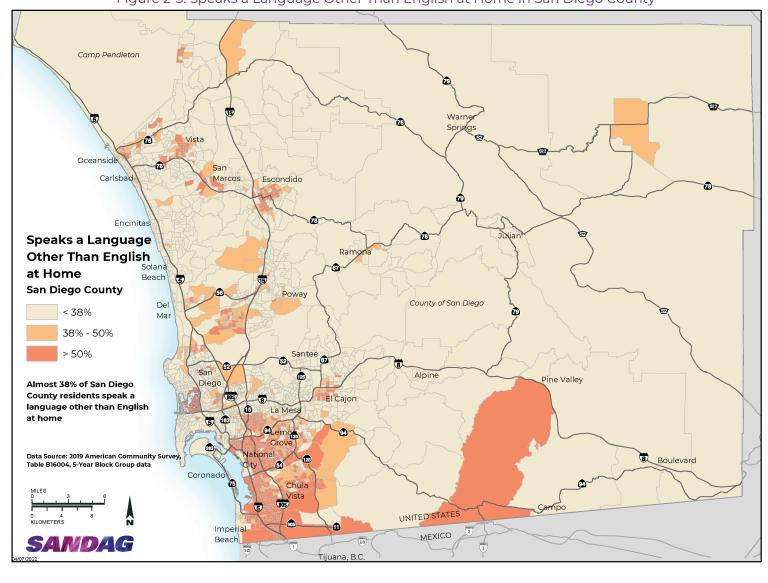


Figure 2-3: Speaks a Language Other Than English at Home in San Diego County

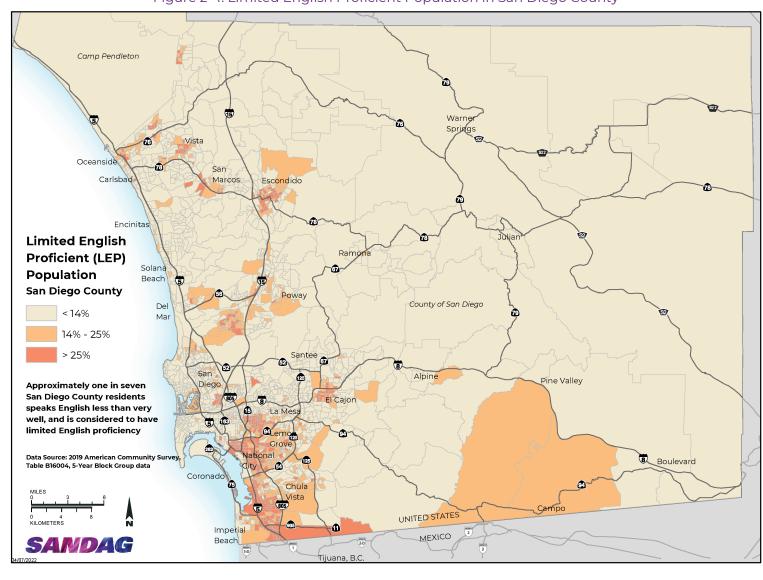


Figure 2-4: Limited English Proficient Population in San Diego County

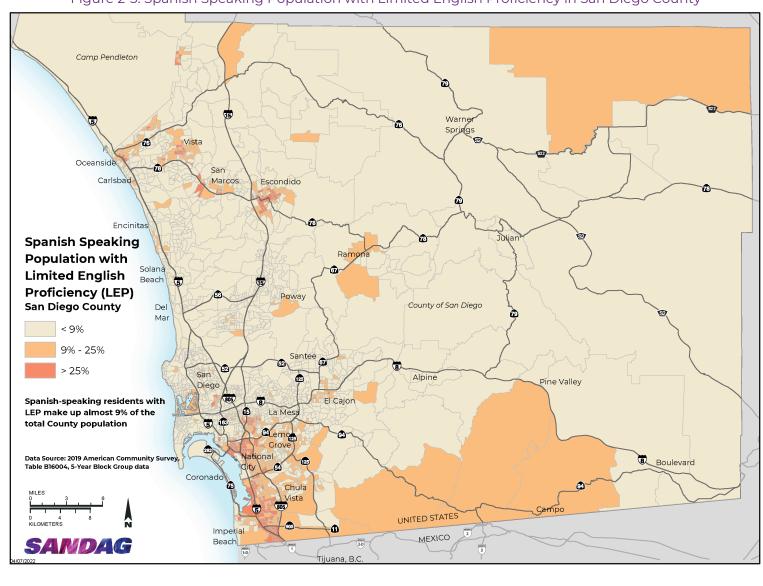


Figure 2-5: Spanish Speaking Population with Limited English Proficiency in San Diego County

### **SANDAG Safe Harbor Languages**

Based on data from multiple federal, state, and local sources, it is recommended that SANDAG provide safe harbor protections to speakers of the 17 languages shown in Figure 2-6. Each of these languages is estimated to have at least 1,000 speakers who reside in San Diego County and who do not speak English very well. Several of the languages have special considerations that are important to understand when providing language assistance.

#### Chinese

There are eight major Chinese dialects:
Mandarin (Putonghua), Cantonese (Yue),
Shanghainese (Wu), Fuzhou (Minbei),
Taiwanese (Minnan), Hakka, Xiang, and Gan.
Mandarin (or Putonghua, which means
"common language") is China's predominant
language; more than 80% of the population
uses it widely. Cantonese is spoken by many
who live in southern China and Hong Kong,
which is from where most of the early
immigrants to the United States originated. In
addition to the spoken dialects, there are two

Figure 2-6: Safe Harbor Languages

Safe Harbor Languages
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- 1 Spanish
- 2 Tagalog (incl. Filipino)
- 3 Vietnamese
- 4 Chinese (Mandarin and Cantonese)
- 5 Arabic
- 6 Korean
- 7 Persian (incl. Farsi, Dari)
- 8 Japanese
- 9 Russian
- 10 Portuguese
- 11 Hindi
- 12 French (incl. Cajun)
- 13 Khmer
- 14 Telugu
- 15 Lao
- 16 Somali
- 17 Ukrainian

forms of written Chinese. China, Malaysia, and Singapore use the fairly modern Simplified character system, while the Traditional character system continues to be used in Taiwan, Hong Kong, and Macau.

The DOE English Learner data suggest Cantonese speakers are about 15% of the total Chinese speakers, or about 3,400 individuals, which meets the safe harbor threshold. There is no information to determine what percentage of the Mandarin and Cantonese speakers use Traditional characters; however, it appears likely that a high percentage of Cantonese (from Hong Kong or Macau) and some Mandarin speakers (from Taiwan) use Traditional characters.

### Tagalog/Filipino

More than 180 languages and dialects are spoken in the Philippines, and Filipino, a standardized version of Tagalog, is the national language. Prior to 1987, because of the country's relationship with the United States, English was the sole language of instruction, and many immigrants from the Philippines spoke English very well. While English remains an official language, more people speak Filipino than English, and this is reflected in a shift of English language proficiency among immigrants to the United States. Data show that many Filipino immigrants today are likely to have LEP.

### French/Cajun

French is spoken in Canada; France; and former French colonies in Africa, the Caribbean, and Asia. Cajun is a version of French spoken in Louisiana that has evolved from the French spoken by the state's original settlers, who came from Nova Scotia, Canada. French is the standard written language in Haiti, used in official documents and the education system, and many Haitian refugees have found shelter in the San Diego region.

#### Persian, Farsi, and Dari

Persian is the name of the language known to English speakers. Farsi and Dari are the names of two distinct accents that Persian speakers use. Generally, Farsi is the name applied to the language spoken in Iran, and Dari is the name applied to the language spoken in Afghanistan. Dari and Farsi speakers can understand each other, and the accents' syntax and sentence structure are the same.

#### Ukrainian

As described above, many Ukrainians escaping war in spring 2022 have recently arrived in San Diego. Jewish Family Services, a refugee resettlement agency in the county, reported that 400 Ukrainians have resettled in San Diego in the past 12 months, and more are expected. The federal government has agreed to accept up to 100,000 refugees this year and many who cross the border from Mexico will land in San Diego. As of April 1, 2022, an estimated 1,500 Ukrainian speakers were waiting in Tijuana to enter the United States as refugees; although many will settle elsewhere in the country, some are likely to settle in San Diego County.

### Other Languages/Not Included—Chaldean

As noted above, the ACS combines Chaldean, Somali, Assyrian, Amharic, and other Afroasiatic languages together into one language "group" containing almost 10,000 individuals with LEP.

Unfortunately, the data specifically related to Chaldean is not very clear. While the DOE dataset shows approximately 1,700 Chaldean-speaking English learners in San Diego County, SANDAG's CBO partner working in the Chaldean community has suggested that there are an extremely small number of people with LEP. Chaldean is sometimes referred to as a language and sometimes as an ethnic, religious, or cultural group, and the language spoken by members of that community is sometimes also referred to as Suret, Neo-Aramaic, or Neo-Assyrian, making data collection and identification of translation and interpretation needs difficult (in fact, the translation/interpretation firm currently used by SANDAG does not have capacity to provide services in these languages).

Given these challenges, Chaldean is not included in the list of SANDAG safe harbor languages at the present time. We will continue to investigate this issue going forward, and—as with all other languages spoken by people with LEP—SANDAG will consider providing language assistance based on demand or if it is warranted by the location or specifics of a project or program.

# 3. Factor 2: Frequency that Persons with Limited English Proficiency Come in Contact with SANDAG

Information on the frequency that persons with LEP come in contact with SANDAG was assessed based on a survey of employees, follow-up interviews, focus groups made up of individuals with LEP from five language groups, and a review of available data collected by SANDAG on LEP contacts.

# **Staff Survey and Interviews**

There are approximately 400 employees at SANDAG, and all employees were sent an email with a link to an online survey regarding their interactions with individuals with LEP and the resources available for communication. About one fourth, or 103 employees, provided complete responses. The complete survey form is provided in Appendix 1. Among the respondents, about 37% have contact with the public at SANDAG Board of Directors and PAC meetings and 34% at general SANDAG meetings and outreach events. The complete responses are shown in Figure 3-1.

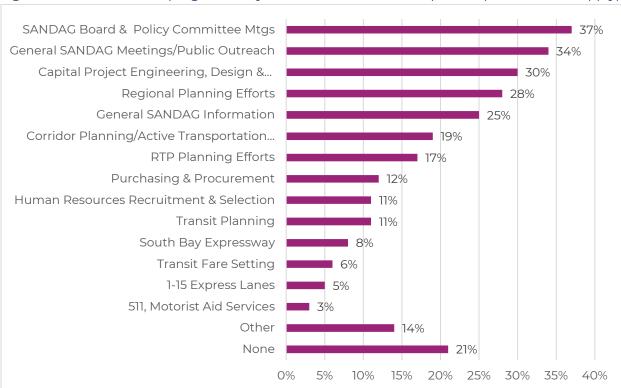


Figure 3-1: In which areas/programs do you have contact with the public? (Check all that apply)

Most of the contacts are in areas that generally receive input or comments on SANDAG plans and proposals. In areas where SANDAG is providing a service—such as 511, toll roads, or Motorist Aid—fewer responses reported contact with the public.

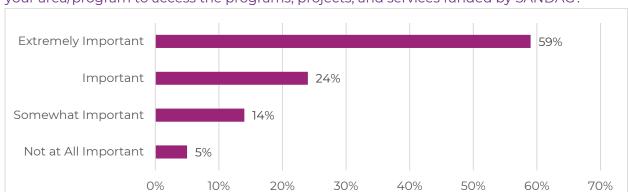


Figure 3-2: How important is it for limited English speakers to have information regarding your area/program to access the programs, projects, and services funded by SANDAG?

Figure 3-2 shows that most employees believe that providing individuals with LEP information about SANDAG programs, projects, and services is important. Only 5% of respondents believe it is not important for persons with LEP to have information in order to access programs and services.

However, when asked how often they interact with persons who have LEP, a majority (52%) say they rarely or never interact with persons with LEP (Figure 3-3). Further, 23% say they interact only a few times a year. This leaves 32% who interact with individuals with LEP at least monthly.

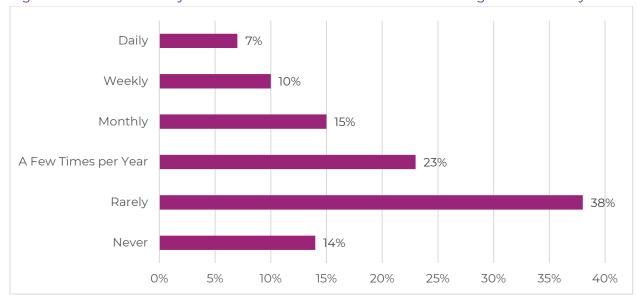


Figure 3-3: How often do you interact with individuals with Limited English Proficiency?

Employees were asked how they usually interact with individuals with LEP (Figure 3-4). The largest percentage report in-person contact as the way they typically interact with individuals with LEP. Virtual platforms, email, and social media are used by 29% to communicate with individuals with LEP, and 21% use a telephone for this purpose.

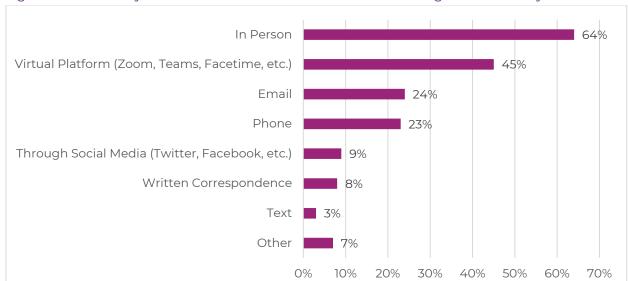


Figure 3-4: How do you interact with individuals with Limited English Proficiency?



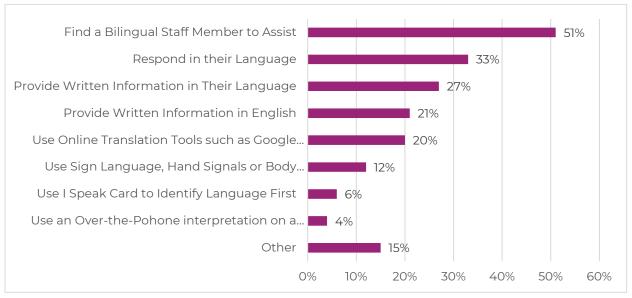


Figure 3-5 shows the most popular method to communicate with persons with LEP is to find a bilingual staff member to assist. A later question shows that there are few bilingual staff members who speak a second language other than Spanish, so this answer is only pertinent for Spanish language assistance. Six percent of respondents say they use the "I Speak" cards available at SANDAG, and only 4% use the over the phone interpretation service available at SANDAG. Twenty-one percent respond to a request by a person with LEP by providing written information in English rather than having materials translated or seeking interpretation assistance.

Employees were then asked about challenges when communicating with individuals who do not speak English very well. The comments are listed in Figure 3-6.

Figure 3-6: What are some of the challenges you face when communicating with individuals who do not speak English very well or not at all?

Ability to translate technical terms to similar meaning in their language

Accessing staff who speak their language

Availability of interpreters

Being able to communicate correct program information in their preferred language

Cannot understand what they are trying to say and cannot speak in their language

Determining which language they speak initially

Each member of public has varying levels of familiarity with planning concepts/vocabulary

Ensuring full understanding of the information I am providing

Ensuring proper translation is ready and available

Ensuring that the information that am providing them is clearly understood

Explain in mannerisms that are universal like a thumbs up or point to objects and directions.

Feeling unable to assist and/or unprepared to assist.

Finding support for a language I may not speak.

Having them understand how to get info on upcoming construction projects.

I am bilingual in Spanish, but one of my coworkers has very limited English conversation skills.

I depend on the translator.

I do not interact with individuals from the public very often, so this isn't a common issue for me.

I don't know how to find tools that SANDAG already has available for translation and interpretation.

I don't speak another language, so it is hard to translate on my own.

I find it challenging to get on the same page efficiently.

I have concerns about the ease of vendors to understand and respond to solicitations

I haven't faced this, but a challenge can be identifying the language being spoken.

I speak Spanish. I can communicate fluently with Spanish speakers.

I want to be able to help them and wish I could refer them to a help line with translation

I worry that I am being disrespectful when using hand signals, basic words, etc.

Identifying when this service is needed.

Inability to communicate decisively and concisely

It can be difficult to clearly convey planning/technical language.

It's difficult when translations are not accurate/fitting

Knowing about SANDAG resources to provide live interpreting services.

Knowing when to plan for interpretation services to be present (always?).

Knowing which meetings and documents to prepare in Spanish. Being sure I understand questions and can follow up.

Learning how to be patient and repeating what they say to confirm what they are saying.

Making sure I have someone who speaks their language and communicate our message.

Making sure nothing gets lost in translation and that the outcome for both parties is understood

Making sure they get the best support/service the need.

My failure to understand Spanish. I have mostly forgotten how to converse

Need more SANDAG staff who speak and resemble the communities we serve.

Not being able to understand questions/requests/input, therefore being able to respond effectively

Not having translation services readily available, not having text/docs in different languages

Not knowing what level of proficiency they're at.

Often individuals use improper terms or slang, so it's important to ID exactly what info they seek.

#### Overcoming frustration

Technical or jargon terms do not translate well into other languages. You need to explain the terms

The inability to communicate about projects and to understand their questions/input.

The most difficult issue is understanding their question or conversation.

They are shy to ask questions

Translating technical/programmatic information into colloquial Spanish.

Trying to get the information to someone, so they are informed correctly and can get the best use

Trying to help them without giving them any type of misleading information by accident

Trying to understand each other

Understanding and answering questions

Employees were asked to identify what tools they knew were available at SANDAG to assist individuals with LEP. Almost one third (29%) are not aware of any tools at SANDAG. The most frequently cited tool in Figure 3-7 is Google Translate or other web-based translation apps. It is worth noting that in the focus groups with individuals with LEP, use of Google Translate and other web-based translation apps is not well received. Only 10% of respondents are familiar with the over the phone interpretation service available at SANDAG, while a quarter are aware of the availability of bilingual employees.

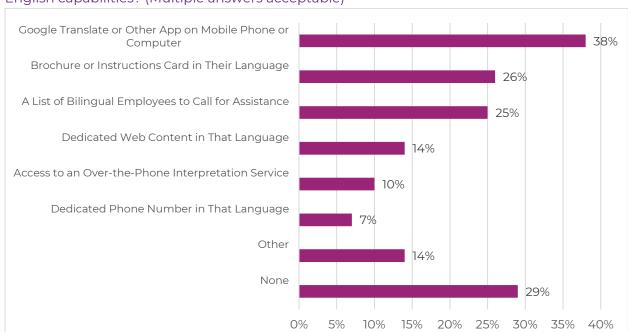
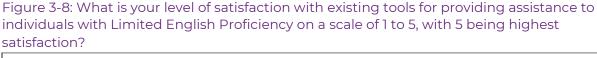
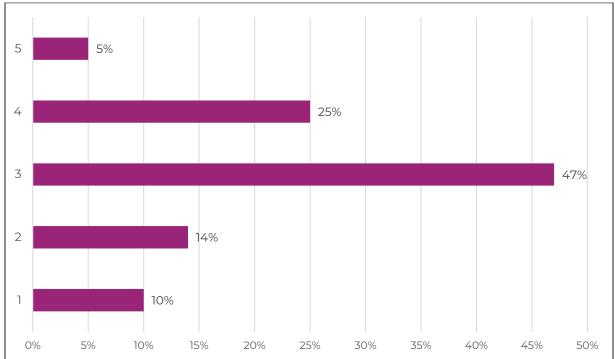


Figure 3-7: What tools do you have available to provide assistance to people with limited English capabilities? (Multiple answers acceptable)

The previous LAP prepared by SANDAG in 2019 offered several possible improvements for communicating with individuals with LEP. For this update, employees were asked if any improvements had been made in the past three years to enable their department to communicate more effectively with individuals with LEP. About one quarter (23%) said that no new initiatives had been taken since 2019, 6% say they sought training in using the over the phone interpretation service, and 4% requested "I Speak" Cards. The most popular responses were to use ethnic media to provide information or to purchase advertising in ethnic or non-English media (14% and 17%, respectively). Eighteen percent of respondents state that other unspecified programs were added to improve effectiveness.

Employees were asked to rank their satisfaction with the existing tools for assisting individuals with LEP. The results, shown in Figure 3-8, show that 30% of respondents rank their satisfaction with a 4 or 5, 47% rank their satisfaction in the middle (level 3), and 24% are dissatisfied with the existing tools for communicating with individuals with LEP.





Staff also were asked to identify other tools that could be used to improve communication with individuals with LEP. Figure 3-9 lists the many suggestions that were received. The suggestions marked with an asterisk (\*) exist and were not known to the person responding. Better awareness of existing and available tools would be a significant improvement to the language assistance program.

SANDAG created a list of bilingual or multilingual employees, however the list has not been kept up to date and has not been widely circulated. The table in Figure 3-10 shows that although many languages are spoken by employees who responded to the survey, few have more than one or two speakers, and many of the languages identified in Factor 1 (Arabic, Korean, Khmer, and Lao) have no speakers. Even if a list were widely circulated, it would be difficult to keep up to date with staff turnover, and people can be difficult to find because of meetings, vacations, illnesses, lunch breaks, and other reasons. Further, a person's own language skills do not necessarily reflect their ability to provide accurate interpretation.

The distribution of responses by SANDAG departments is shown in Figure 3-11. The data show that 23% of respondents work in the Regional Planning department, and 12% of employees are in that department. The Regional Transportation Services department, which includes Motorist Aid and other services, accounted for just 5% of the survey responses. Some frontline staff, such as tow truck drivers for the Freeway Service Patrol, are not SANDAG employees and were not surveyed. Public Affairs (comprising Government Relations and Communications) is a key department for provision of services for individuals with LEP, and 12% of the responses were from this group. Generally, the responses were proportional to the departments at SANDAG.

Figure 3-9: What other tools would help you to assist customers who speak limited English?

A better sandag.org website with enhanced "page translation" capabilities

A bilingual phone number or website\*

A liaison between SANDAG and limited speaking English communities.

A list of colleagues who are bilingual.\*

A list of employees who can translate.\*

A list of languages and types of availability and willingness to translate for staff members.\*

A list of SANDAG employees and the languages they speak\*.

A list of SANDAG staff who speak various languages\*. Materials in languages common to that area.

A list of what SANDAG/my department already has available would be a good start.

access to advertisement and communication sites where we can post notices in multiple languages\*

Access to language tools in languages other than Spanish.

An understanding of the tools not only for Spanish, but other languages.\*

Available materials or a list of bilingual staff to contact\*

Bi/multilingual individuals, translation guides, knowledge of basic SANDAG related terms

Budget for brochure and marketing materials to be translated and targeted to key populations\*

Creating visualizations with high level information

Google translate "stations" in meeting rooms or ability to take them to meetings

Google translate Podium Pc or pc devices to assist, technology

have other materials translated in other languages outside of English and Spanish\*

Have translators translate documents to Spanish or other languages\*

Having a SANDAG list where staff can identify other staff who are fluent in another language.\*

help cards or hiring people who speak in other languages besides English and Spanish\*

Hire more diverse, multilingual staff to be present at events.

I do not deal with customers face to face. It would be cool though to have a Spanish class offered

I personally think Google Translate helps enough.

I rarely speak to the general public but I have only had staff help to translate

I think we do a good job with Spanish-speakers at public meetings, but SANDAG staff also need help.

I think we do pretty well with what we have, but more funding earmarked for this effort would help.

I would like a better understanding of what tools are available and when they are appropriate

I would like more direction and consistency on when to include interpretation services at events.

increased pay for bilingual employees who interact with the public in multiple languages

Knowing what tools SANDAG offers free or for cost, verbal and written, how to access them.\*

#### Learn their language

Make it easier to obtain translation services over the phone\*.

Maybe have frequently asked questions translated so staff can try if tools aren't there

Maybe our business cards can have a phone number or a link to a site that could assist.

More awareness and information about the tools that are available.\*

More bilingual staff

#### More bilingual staff

more constantly having the tools and translators available or budget for them to be more inclusive

More materials available in languages other than Spanish.

More readily available info on SANDAG's LEP procedures and more access to translation services.\*

More translated we content, real-time interpretation of speakers at Board meetings.

More translations for specific program information

My position doesn't interact or communicate with the public.

Not sure beyond making sure that all documents and presentations have translations available.

Recruiting content in different languages specific to the San Diego region.

Something such as google translate that is simple to use.

Standardize all materials to be made available in at least English and Spanish.

The SANDAG tools are good. I do not have any specific suggestions.

Translator\*

Updated "I Speak" cards; interpretation resources for LEP callers\*

webpages, flyers, on demand SANDAG resources for translation services

Written materials are helpful.

Written materials\*

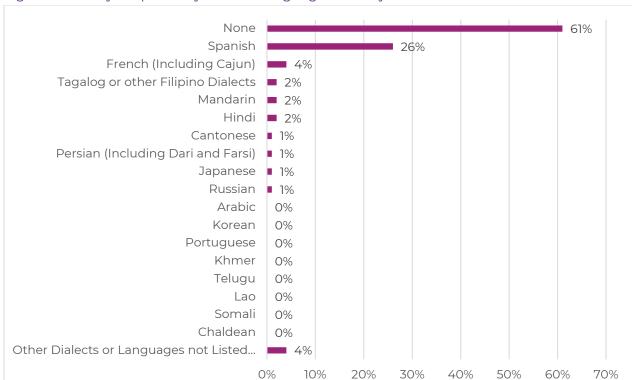
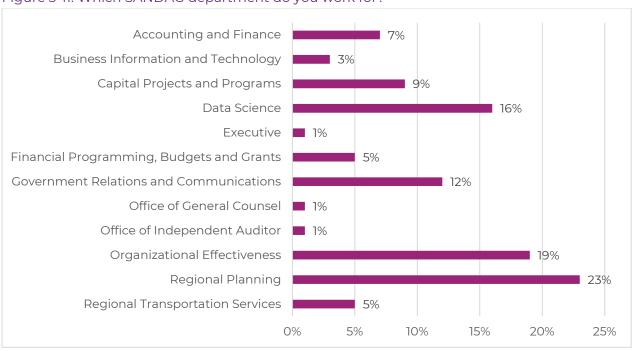


Figure 3-10: Do you speak any of these languages fluently?





#### **Focus Groups**

SANDAG arranged for focus groups to be convened by the CBOs that have a partnership contract with SANDAG. The CBOs were expected to hold six focus groups with individuals with LEP with Spanish as a first language; two in Arabic; and one each in Vietnamese, Tagalog, and Chinese (Mandarin). One CBO was unable to convene their Spanish language focus group, and as a result, only five Spanish focus groups were held. A \$20 gift card incentive was provided to each participant. The focus groups were held in-person or virtually using platforms such as Teams or Zoom. Figure 3-12 shows the name of the CBOs that hosted a focus group and the language of their group.

Figure 3-12: Community-Based Organizations and Focus Group Languages

Community-Based Organization	Focus Group Language
Alliance for Regional Solutions	Spanish
Bayside Community Center	Vietnamese
Casa Familiar	Spanish
City Heights Community Development Corporation	Arabic
Chula Vista Community Collaborative	Spanish
Environmental Health Coalition	Arabic
CSUSM National Latino Research Center	Spanish
Nile Sisters Development Initiative	Arabic
Olivewood Gardens Learning Center	Spanish
Samahan Health Centers	Chinese (Mandarin)
Urban Collaborative Project	Tagalog
Vista Community Clinic	Spanish

The focus groups were held to help understand, from the perspective of individuals with LEP, how frequently individuals with LEP come in contact with SANDAG programs, services, and staff. The language groups were selected based on the prevalence of speakers from the 2019 Factor 1 results and the availability of CBOs that could hold focus groups in those languages.

The questions for the focus groups were specifically targeted to understanding how well individuals with LEP are able to communicate with SANDAG and to highlight any communication issues. Training was provided by GCAP, the consultant SANDAG procured for the LAP update, for the CBO moderators and notetakers. The CBOs were instructed to select participants who have used a SANDAG service, had some contact with SANDAG in the past, or wanted to use a SANDAG service or contact SANDAG in the future.

The results of the focus groups generally showed that, in areas where SANDAG provides a direct service to the public—such as 511, Motorist Aid, or FasTrak—in all language groups, people were not extremely familiar with the services provided and rarely, if ever, used them. However, generally, all were interested in beginning to use these services upon understanding how they work and if the service was available in their language. Many participants were recent immigrants and appeared to have come from countries where government assistance was rare, and they were pleasantly surprised to find that assistance exists here and, in some cases, at no cost to the user.

The features of the 511 system generated some interest as it was explained to the groups, although it seemed like most people found workarounds or by using other sources (such as Google Maps and Google Translate) without actually having to use the service.

One of the areas with direct impact on recent immigrants with limited English is transit fare setting since many new arrivals depend on transit as they are getting established. Again, few participants were aware that SANDAG sets transit fares for the region, and almost none had participated in the outreach for the fare changes. Most seemed unaware that information is provided in multiple languages, and most had never seen notices or heard about changes until implemented.

Few have actually tried to contact SANDAG—partly because they had no need and partly because they are intimidated by contacting a government agency and are unaware that they have the right to receive assistance in their language.

Focus group participants from several of the groups had some contact with SANDAG for the regional planning process. In some cases, the outreach itself was handled by a CBO. Some provided input with the help of interpreters from the CBOs or family members; however, many were intimidated by the language barrier. Few had seen translated documents.

No one in any of the groups had ever used iCommute, and all were unaware of the services available.

## SANDAG Data on Contact with Limited English Proficiency Populations

The U.S. DOT and FTA guidance documents suggest that maintaining accurate information about the number and nature of contacts with LEP populations is important. SANDAG has not been consistent in recording LEP contacts in all departments. Records are available for the number of translation and interpretation requests made to the Public Affairs (previously Strategic Communications) department. The Toll Operations Center has data on the number of calls handled by English and Spanish telephone queues. In 2021, almost 10,700 calls (12% of all calls) to the call center were handled in Spanish. Data also are available for the number of minutes of interpretation requested, by language, for the over the phone interpretation service.

The Public Affairs department received about 200 requests for translation/interpretation in the most recent one-year period. The breakdown by language is shown in Figure 3-13. In addition, consultants working on projects for SANDAG also did translations.

Figure 3-13: Translation Requests by Language

Language	% of Translation Requests
Spanish	75.2%
Arabic	5.8%
Tagalog	5.8%
Farsi	3.6%
Chinese	2.2%
Korean	2.2%
Vietnamese	2.2%
Somali	1.5%
Pashtu	0.7%
English	0.7%

Simultaneous Spanish interpretation has been available at Board of Directors, PAC, and several other standing committees since May 2021. A record is not kept regarding the number of times members of the public speak in Spanish. The Clerk of the Board does not report any instances of requests for interpretation into languages other than Spanish. As of May 2022, no mention is being made in the agendas about the availability of simultaneous translation services.

Meeting agendas state that agenda materials can be made available in alternative languages with advance notice. The same notice is repeated in Spanish and Chinese but has not been provided in other languages such as Arabic, Vietnamese, or Tagalog.

Counts are not available for the number of documents printed in alternative languages or the number of pages added to documents for translated pages, and it is not known how much resources were spent on this effort.

Front-desk reception at 401 B Street does not keep a tally of calls received or persons arriving unannounced who require language assistance. Anecdotal information provided by reception indicates that fewer than 10 contacts per year are made, all in Spanish, with none in any other language. It is not known if friends or family provided interpretation assistance for any person contacting SANDAG. The Toll Operations Center has a separate telephone queue for Spanish customers staffed by bilingual operators.

There has been no recent tracking of the number of individuals with LEP who attend public outreach events. There also is no estimate of the reach of publications or electronic media in alternative languages. Based on the anecdotal information received from the focus groups, SANDAG communications are not being heard or seen widely in LEP communities.

Going forward, tracking should be implemented for the efforts mentioned above for which no data are available.

#### **Factor 2 Conclusions**

The greatest number of contacts with individuals with LEP are in Spanish, which is consistent with the findings of Factor 1 and reflective of the cross-border planning relationship with and

geographic proximity to Mexico. The absence of data showing contact with other language groups appears largely due to people not being aware of SANDAG, its role, and the services it provides. Part of this issue is that many recent immigrants and non-English speakers come from nations that do not have organizations like SANDAG that provide services such as FasTrak, or no-cost services such as 511, the Freeway Service Patrol, or highway call boxes. Greater awareness of SANDAG's role and services in the LEP community will increase contacts.

# 4. Factor 3: Nature and Importance of Contact with SANDAG to Persons with Limited English Proficiency

As already noted, SANDAG provides services, administers programs, and builds projects which have a direct impact on the public, including individuals with LEP. Accordingly, SANDAG's planning activities rely on significant public input.

Examples of such programs include setting fares for public transit and setting toll rates and rules for FasTrak facilities. Major transportation decisions can have a significant impact on individuals with LEP, although the impact of decisions made today on future corridors, modes, or terminals, and hubs may not be felt in the community for many years after being discussed and decided by the Board of Directors. SANDAG's regional planning efforts are critical to the livability of the region, and input from the public is needed, however the impact of the input received may not be immediately seen.

The 511 system provides information to the public that supplements the data available from other sources (e.g., traffic and transit information) and emergency response services through the call box program and Freeway Service Patrol that is not available from any other source.

SANDAG designs and builds active transportation projects, major transit infrastructure, and highway projects. Those projects require public input during the environmental and planning stages and involve the posting of safety warnings and construction notices, all of which should be communicated to LEP populations.

Some specialized programs within SANDAG have limited contact with individuals with LEP because they are designed primarily to work with businesses or other government agencies. Examples of such programs could include some aspects of iCommute, the Service Bureau, ARJIS and the criminal justice program. Nonetheless, even though these functions may not serve individuals with LEP directly, the products they produce or provide may be of interest to individuals with LEP.

#### **Focus Groups**

Focus groups for individuals with LEP sought to identify the importance of SANDAG in their lives. There were no control groups of non-LEP speakers with which to compare the results of the LEP focus groups; having such a control group would have made it easier to determine whether SANDAG was more or less important to individuals with LEP than to persons who speak English very well.

The results from the focus groups generally found a poor level of awareness of SANDAG programs and little contact with the agency. Most people were unaware they have a right to communicate with SANDAG in their native languages, and many stated they felt intimidated to communicate with a government agency because of their poor English. Spanish speakers seemed to be more aware of SANDAG programs and were more willing to communicate with the agency than members of other language groups.

The focus groups were asked to discuss seven specific areas:

- SANDAG meetings; transportation and regional planning
- Public transit fare setting

- 511 website and phone system
- Motorist Aid program
- iCommute
- FasTrak
- General SANDAG communications

A synopsis of the discussion by topic is provided in the following sections. The focus group moderator's guide and consent form are provided in Appendix 2.

#### SANDAG Meetings; Transportation and Regional Planning

Through the regional planning outreach process, SANDAG was able to connect with people in the major language groups, although not everyone who participated in the focus groups took part in or was aware of that activity. CBOs were able to generate interest in the process, and that supported SANDAG's efforts to reach disadvantaged populations. Many focus group participants noted the lack of translated written materials, however, and some said they were too intimidated by the language barrier to participate.

On the one hand, the level of participation indicated the LEP population seemed to find the regional planning process outreach effort to be important. On the other hand, few participants attended or took part in regular SANDAG Board or PAC meetings. Generally, participants believed SANDAG was not providing enough resources in their native languages.

#### Public Transit Fare Setting

Few participants in the focus groups were aware SANDAG sets the fares for all public transit in the region, and fewer actually participated in the outreach programs for fare changes, despite the importance of transit fare changes to many individuals with LEP. Many recent immigrants may have come from countries where outreach is not conducted for transit fare changes (or other government programs) and may not be aware they can provide input or comment on proposals. They may not have recognized the request for input or seen notices in their native languages. The Spanish language participants who were unaware of the SANDAG role expressed a strong interest in participating in the future.

#### 511 Website and Phone System

There was little knowledge about the 511 system. Usage seemed to be limited to emergencies (for Freeway Service Patrol and highway call boxes). It was reported that there were long waits for a Spanish-speaking telephone operator. When the system was explained, there was interest, however, the lack of other languages on the phone system would make it almost impossible for people who do not speak English or Spanish to use. Alternatives such as Google Maps and content provided by the local transit agencies (MTS and NCTD) offer comparable transit and traffic information with similar levels of language support. Access to the Motorist Aid Services appears to be the most important and unique aspect of the 511 San Diego system.

#### Motorist Aid Services Program

Few participants knew about the Freeway Service Patrol or highway call boxes. However, when the service was explained, the participants felt it was an important service that should be more widely advertised to individuals with LEP. There were some who had limited experience with using the service, and participants noted they encountered long wait times for assistance in Spanish. Some recent immigrants thought the Freeway Service Patrol was a form of police and something to avoid, rather than for a service they may turn to for help.

It was confirmed that the signs along freeways in San Diego County advising motorists of roadside assistance are in unilingual English (see Figure 4-1, left photo) and do not use pictograms, which may help explain the lack of familiarity with the service. This contrasts with the logo on the vehicles (see Figure 4-1, right photo), which is more self-explanatory.







Figure 4-2 shows that while signs for the call boxes (on the left) include a pictogram for a phone, they provide no information on the purpose of the call box, either in English or with a pictogram.

The unilingual call box sign in San Diego County is contrasted with a typical European sign (Figure 4-2, right), which uses the universal phrase, SOS, to identify that call boxes provide help.







#### *iCommute*

None of the participants were aware of the iCommute program. This lack of awareness was uniform across all languages. When the program was explained, there was some interest, but overall, it did not seem to be an important service for the participants in the focus groups. The impressions may have been quite different if any of the participants were specifically interested in joining a vanpool or participating in another commuter-related service.

#### FasTrak

There was limited familiarity with FasTrak (I-15 Express Lanes and South Bay Expressway/SR 125). Users of I-15 had heard of FasTrak but did not know what it was about or how to acquire a transponder. Several participants said they would be interested in getting a transponder if the information was available in their language. Some thought the signs (see Figure 4-3) on the freeway itself were for trucks because they were not highly informative and did not use pictograms or other languages. In Figure 4-4, examples are provided of European signs for electronic tolling, incorporating pictograms that are somewhat more self-explanatory without using a written language.



Figure 4-3: South Bay Expressway FasTrak Signage







#### General SANDAG Communications

Only a few of the participants ever tried to call or visit the SANDAG offices. When they attended a Board meeting, they used the interpretation service (Spanish). A Filipino participant attended a Board meeting and understood English enough not to need any interpretation, and noted only a Spanish interpreter was on site. Participants were not aware an interpreter for Tagalog could be provided upon advance request, likely because there was no notice of such availability on the agenda.

#### Note on Focus Groups

The input from the focus groups indicated that being able to participate in Board activities and public meetings and to request motorist aid were the most important points of communications with SANDAG. The focus group process could be improved in the future by having the groups facilitated by consultants preparing the study or including professional facilitators who can draw out more information. The selection of respondents should also be drawn from persons who have had contact with SANDAG. The CBOs were asked to engage people who were familiar or had contact with SANDAG, however, upon reviewing the results, it appears few had any contact with SANDAG or experience with SANDAG programs. If the same process is used in the future, then a control focus group of English speakers might also be included to determine whether the responses and level of contact of the individuals with LEP are different from those of non-LEP individuals.

#### **Factor 3 Conclusions**

The individuals who participated in the focus groups placed a high level of importance on being able to communicate with elected representatives though the Board and policy committees. Transit riders also felt it was important to be able to comment on fare changes. Even though few had used Motorist Aid, or even knew of its existence, the individuals participating in the focus groups found the Motorist Aid Services, including the Freeway Service Patrol and call boxes, to be particularly important. The 511 system, except for requesting Motorist Aid, was not seen as particularly important because more easily accessible traffic and transit information alternatives exist. iCommute was not viewed as important because none of the participants had a need for the services provided.

# 5. Factor 4: Resources Available to SANDAG and Estimated Costs

The U.S. DOT Guidance on LEP recognizes the level of language assistance provided by agencies will differ based on the size of the establishment and the resources or budget available. The guidance directs agencies to take reasonable steps to provide language access, but if the costs substantially exceed the benefits, additional actions may not be necessary. The guidance points out costs can be minimized through technology, reasonable business practices, sharing of language assistance materials, and partnering with advocacy or community groups. SANDAG has embraced new technology (e.g., Google Translate), adopted reasonable business practices (e.g., Toll Operations Customer Service Center bilingual resources), and incorporated partnering with community groups (e.g., Regional Plan Social Equity Working Group and CBO partners).

#### **Resources for Language Assistance at SANDAG**

The total resources dedicated to supporting individuals with LEP is not available in a single, dedicated location. Typical language assistance costs include the items listed below; actual costs are only available for the items marked with an asterisk (\*):

- One full-time, Spanish-speaking, translation/interpretation coordinator\*
- Translations sent to outside translator by SANDAG translation/interpretation coordinator\*
- Time spent by bilingual employees providing on-the-spot interpretation or reviewing translated documents
- Printing of separate or additional documents/items in Spanish and other languages
- Over the phone interpretation services\*
- Total advertising in foreign languages in print and electronic media
- Translation/interpretation costs by consultants working on SANDAG projects\*
- Interpretation at public outreach events and other public meetings\*
- Interpretation at Board and PAC meetings\*
- CBO partner relationships, which provide more engagement with LEP populations

Providing services for individuals with LEP is not a single-cost item in the budget, and the costs are not in a single department. Some costs (e.g., printing of multilingual documents) are not separately tracked. Specific projects, including planning and capital projects, may also spend resources to provide communications in other languages, but there is no tally of the costs.

#### **Identifying Language Assistance Expenditures**

A number of resources point to where else SANDAG might have assigned or spent funds for language assistance.

The SANDAG Overall Work Program (OWP) for FY 2022 includes a total of \$12.375 million for contracted services, of which \$1.682 million was allocated to support public engagement and communications. In the actual budget document, one contract had a specific line item for Spanish interpretation services (\$6,000), and many of the contracts also contained translation and interpretation services requirements for Spanish and other languages. In addition to translation and interpretation, there are costs for printing separate or additional pages for additional languages in reports and plans.

Chapter 1 of the FY 2022 OWP includes a statement on public involvement, and refers to the Commitment to Equity statement and the need to eliminate disparities and include opportunities for everyone. There is, however, no mention of any support for providing language assistance in social media, print and electronic media, or websites.

Board Policy No. 25, Public Participation Plan policy, includes specific requirements for ensuring public participation, such as measures that reach out to individuals who have LEP. Public involvement program strategies are found in several specific OWP task descriptions, and the need for providing language assistance activities is identified in one, Public Involvement. In this category, about 15% of \$610,000 is dedicated to communications for underrepresented communities, including low-income communities, people of color, persons with disabilities, older adults, tribal nations, and individuals with LEP. That includes production of materials in various other languages.

Content in other languages is produced for many projects, however, there is no acknowledgement of such tasks in the budget or specific budget allocation. Other budget elements also make no mention of the use of additional languages for any print, digital, and broadcast advertising copy, videos, public-facing websites, social media content, email blasts, or other forms of engagement.

The OWP for Government Relations likely includes some costs for language-related activities because it includes a cross-border working group and relations with agencies in Mexico. Major projects such as Otay Mesa East Crossing and Central Mobility Hub also include translation, interpretation, and media costs for other languages. iCommute has a contract with an external consultant for outreach, and the contact may include expenses directly related to individuals with LEP. The Office of Diversity and Equity has two OWPs which may include costs associated with language assistance initiatives.

A new cost code for translation and interpretation expenditures was created in the budget tracking system, and took effect on July 1, 2022; it is anticipated that this will streamline tracking of these expenses.

#### **Assessing Language Assistance Expenditures**

One possible means of measuring the reasonableness of expenditures on language assistance is to compare the percentage of funds expended with the percentage of LEP population in the SANDAG service area.

Individuals with LEP constitute about 13% of the total population of San Diego County. As a rough measure, one would expect at least 13% of the total communications budget to be spent on communicating with individuals with LEP. Because costs such as translation and interpretation increase the costs for communications to individuals with LEP, it would be reasonable to assume costs could be greater than just 13% of the total communications budget.

In the 2021 OWP, the total budget for external support and communications is \$6.76 million, of which \$1.06 million is directly allocated to public involvement and marketing. Known costs associated with meeting the requirement to serve LEP individuals are limited; they include, at a minimum:

Estimated annual cost for on-call contract for translation and interpretation	\$117,000
Annual fully burdened cost for in-house translator and language coordinator	\$115,000
Estimated cost: advertisements in foreign language media, printing, and miscellaneous*	\$50,000
Total estimated annual costs for providing service for individuals with LEP	\$282,000

<sup>\*</sup>Exact figures are not available; this is a rough estimate of costs.

With direct language assistance costs estimated to be about \$282,000, the expenditure is equivalent to about 27% of the direct communications costs, excluding project communications costs, which are budgeted separately. If more project communications costs are known and included the percentage for LEP communications would increase. Using this method, it appears that percentage of costs associated with providing service to individuals with LEP exceeds the percentage of LEP population in San Diego County. This is a rough indication that SANDAG resources are reasonable.

#### **Factor 4 Conclusions**

The federal guidance on providing service to individuals with LEP encourages agencies to provide as many services as reasonable to as many language groups as possible who meet the safe harbor threshold. The guidance leaves it to local decision makers to determine the appropriate level of service and determine whether the costs are reasonable and sustainable. To assess whether the costs and resources are reasonable, the expenses for communications with persons with LEP should be tracked, which is not currently happening at SANDAG. Without those records, it is impossible to positively determine whether the resources and level of effort for meeting the challenge of providing services to populations LEP are reasonable.

It is recommended that the financial record-keeping system be modified to capture costs associated with actual (and future) expenses in categories such as:

- Translation and interpretation services
- In-house translators and language coordination
- Advertising in foreign language media

- Over the phone interpretation service
- Printing documents in other languages
- Pay differential for bilingual employees (under consideration)
- Capital/leasing costs associated with multilingual Interactive Voice Recognition (IVR) systems
- Capital/leasing costs for interpretation hardware

Keeping good records of resources allocated to communicating with individuals with LEP is a best practice that will ensure the agency has documentation of expenditures which support SANDAG's commitment to providing language assistance.

As noted above, using a simple comparison between the percentage of the LEP population in San Diego County and the percentage of known budget committed to language assistance activities, SANDAG is meeting the standard suggested in the U.S. DOT guidance. The next section, the LAP, will review measures being taken and determine whether alternative or additional actions are needed.

### 6. Language Assistance Plan

#### Introduction

It is SANDAG's policy to provide timely, meaningful access for persons with LEP to its services and decision-making processes. SANDAG communicates with individuals with LEP in person and over virtual platforms, over the phone, in writing, and through digital media as provided in this LAP. The LAP will be updated every three to five years to ensure alignment with the most recent Four Factor Analysis, the SANDAG Equity Action Plan, and any significant changes in the SANDAG Title VI Program.

The LAP is an important component of SANDAG's Commitment to Equity. An effective LAP will help ensure historically underserved, systemically marginalized, linguistically isolated groups can receive the full benefit of SANDAG programs, services, and facilities, and can participate in public engagement opportunities conducted by SANDAG. SANDAG is committed to creating a region where every person, regardless of the language they speak, can thrive.

This LAP for SANDAG has seven elements:

- 1. Prioritize safe harbor languages to provide appropriate language assistance
- 2. Identify persons, departments, and staff advisory group language assistance responsibilities
- 3. Identify vital documents
- 4. Determine high-level and program-specific language assistance measures, including existing and proposed
- 5. Consider efforts to increase availability of bilingual employees
- 6. Provide training for staff on language assistance requirements
- 7. Advocate internally and externally to enable SANDAG to better serve individuals with LEP Each of these elements is described in the following sections.

#### Safe Harbor Languages and Language Priority Groups

The Four Factor Analysis identified 17 languages (including two dialects of Chinese) that meet the safe harbor threshold. The number of persons ranged from more than 245,000 Spanish speakers to an estimated 1,000 Ukrainian speakers. Spanish is the language most spoken by persons with LEP and—given factors such as the historical role of Spanish in the region, the close relationship with Mexico, and cross border flows of people—Spanish has a unique importance for SANDAG. Four more languages—Chinese, Tagalog, Vietnamese, and Arabic—have significant populations of LEP persons (15,000–30,000 individuals). There are 12 additional language groups consisting of between 1,000 and 7,500 individuals that meet the threshold for safe harbor designation. Language groups with fewer than 1,000 LEP individuals in San Diego County do not meet the requirement for safe harbor designation.

The wide range in the sizes of the language group populations and the historical and geographic proximity issues support the use of priority designations to develop language assistance measures. (Note that while Chinese is listed as one language in the safe harbor languages list, Mandarin (for oral communication) and Simplified (for written) are designated in Language Priority Group 2 and Cantonese and Traditional are designated in Language Priority Group 3.)

Figure 6-1: Language Priority Groups

Priority 1	Priority 2	Priority 3
Spanish	Tagalog/Filipino Vietnamese Chinese: Mandarin (oral); Simplified (written) Arabic	Chinese: Cantonese (oral); Traditional (written) Korean Persian Japanese Russian Portuguese Hindi French (incl. Cajun) Khmer Telugu Lao Somali Ukrainian

#### **Departments and Staff Responsibilities**

Implementation and monitoring of this plan is the responsibility of the Organization Effectiveness (OE) Department. The Office of Diversity and Equity, within OE, is responsible for compliance activities related to providing language assistance under the Title VI mandate, including updating the Four Factor Analysis and LAP, and developing and delivering Social Equity training. Other staff in OE have important responsibilities for implementing the LAP, including providing language assistance resources to project managers and coordinating translation and interpretation requests. OE staff partner closely with the Public Affairs Department responsible for developing outreach and public information and materials.

An interdepartmental working group was created to provide input to this LAP update. It is recommended that, going forward, the knowledge and experiences of that group be tapped to provide employee input on language assistance issues.

#### Vital Documents

The U.S. DOT LEP Guidance requires each agency to identify a list of vital documents that must be translated into the languages identified in the Four Factor Analysis. The U.S. DOT guidance states recipients are not required to provide written translations of vital documents for all safe harbor languages, however, if they do so, the FTA will consider it to be strong evidence of compliance with the recipient's written translation obligations. SANDAG has divided the 17 languages into three priority groups, as described above, and identified how the language groups prioritization shall be applied to the translation of vital documents. Language groups will be reevaluated when the LAP is updated.

#### Vital Document Identification

The determination of the *vital* status of a document is an ongoing process. Documents will evolve, and so will their importance. Thus, document classification is divided into the three tiers, as follows:

#### Tier 1 Documents

Tier I documents are the highest priority. They are considered vital documents and include documents and media that:

- Provide notice of a person's rights under Title VI of the Civil Rights Act and the processes by which complaints can be filed
- Allow persons with LEP to participate in the core functions of SANDAG, including providing public comment and accessing services
- Provide executive summaries of the Regional Plan and Title VI Program updates
- Provide notices on public safety or construction closures

All Tier 1 documents will be translated manually for Spanish (Priority Group 1) and Priority Group 2 languages. Translations for Tier 1 documents for languages in Priority Group 3 will be available on demand. Care should be taken to ensure the format of documents can facilitate machine translation, if that is the method provided for translations; upon special request, and depending on available resources, a decision may be made to provide manual translation of specific documents in this tier for language Priority Group 3.

Examples of Tier 1 documents include:

- Board Policies No. 07 (Equal Employment Opportunity (EEO) and Disadvantaged Business Enterprise (DBE) Programs) and No. 09 (Discrimination Complaint Procedures), and associated brochures, notices, and forms
- Fare change proposals and notices
- FasTrak user information including customer applications, agreements, terms and conditions, and instructions for how to access services
- Freeway Service Patrol user information, including how to access services
- Public safety and access information triggered by major regional planning efforts such as GO by BIKE and the Regional Plan
- · Information about ballot measures that concern funding for transportation and mobility

#### Tier 2 Documents

Tier 2 documents include documents and media that enhance a customer's experience or encourage involvement in the planning process. Tier 2 documents would be manually translated at all times for language Priority Group 1 and be available by machine translation for Priority Groups 2 and 3. Care should be taken to ensure the format of PDFs can facilitate machine translation. Upon request, and depending on available resources, a decision may be made to provide manual translation of specific documents in this tier for language Priority Groups 2 and 3.

Examples of Tier 2 documents include:

- Project fact sheets and other collateral pieces that are not deemed instructions for use;
   including maps and copy on images
- General Freeway Service Patrol, South Bay Expressway, and FasTrak information that is not deemed to be critical user information, including marketing materials and additional collateral and complete promotion terms and conditions
- 511 user information including how to access services
- Other civil rights policies such as the American with Disabilities Act policies

#### Tier 3 Documents

Tier 3 includes information that will enhance the role that all individuals, regardless of language ability, might have in SANDAG planning efforts, services, and operations. For Tier 3, machine translations should be available for all three priority groups. Upon request, and depending on available resources, a decision may be made to provide manual translation of specific documents in this tier for any of the language priority groups. Examples of Tier 3 documents include:

- Information regarding SANDAG Board of Directors, PAC, SSTAC and any other meetings subject to the Brown Act, including agendas and minutes
- Information regarding regional, corridor, and transit fare efforts, including study documents and reports
- General SANDAG information, including marketing materials and collateral
- General information regarding major regional planning efforts such as GO by BIKE and the Regional Plan
- General project and program information, including about 511, iCommute, Freeway
  Service Patrol, South Bay Expressway, and FasTrak, including marketing materials,
  additional collateral outside of instructions for use, and complete promotion terms and
  conditions

The form these translations will take should be determined on a case-by-case basis as the documents are published. In many cases, translation of an abbreviated summary document might be most appropriate. In some cases, notice of language assistance might be sufficient. Machine translation should always be available, and care should be taken to ensure the format of provided documents can facilitate machine translation. Upon request, and depending on available resources, a decision may be made to provide manual translation of specific documents in this tier for language Priority Groups 1, 2, and 3.

For each tier, SANDAG will assess documents against available resources or alternatives.

#### **Language Assistance Measures**

Existing and proposed language assistance measures at SANDAG are listed below. High level initiatives are followed by program-specific initiatives. In some cases, initiatives are shown which have been previously recommended and are not yet implemented (or fully implemented); in these cases, efforts are underway to implement promptly.

#### General SANDAG Communications

- Bilingual English/Spanish employees provide assistance on the phone and in person
- All staff have access to over the phone interpretation service
- "I Speak" cards for staff having public or customer contact
- In-house certified English/Spanish translator, and internal translation review by native Spanish speakers
- SANDAG webpages for many programs fully translated into Spanish; work toward ensuring that clicking on links within Spanish-language content does not lead to Englishonly content
- Google Translate toolbar on each webpage; work toward standardization of location and functionality
- Non-discrimination notice, including notice of Title VI rights and complaint procedures, and notice of availability of language assistance included in Board policies and on website
- Grant agreements contain language to ensure language assistance requirements are met by grantees
- On-call contracts for document translation and interpretation services
- Translation and interpretation tracking system
- Dedicated cost code streamlines tracking interpretation and translation expenditures in the budget system
- Spanish translation style guide and Spanish language glossary
- Internal intranet provides information about translation and interpretation services, including procedures, language assistance resources, vital documents guidelines, and more to all employees

#### Oral Interpretation

Oral interpretation services are an important element of language assistance. This effort can be improved by:

- Providing instructions and training on the use of over the phone interpretation service to all employees, including information about how to get interpretation during a public outreach event
- Ensuring front-line positions such as reception, tow truck drivers, and call centers are staffed with fluent bilingual English/Spanish employees
- Evaluating delays in responding to requests for service (general reception, motorist aid, 511, operations call center, iCommute) in languages other than English

- Providing notices on Board, policy committee, SSTAC, and other relevant agendas about the availability of Spanish simultaneous interpretation and means to request in other languages
- Developing protocols to ensure that bilingual employees are available at external events

#### Written Translation

The written translation services provided by SANDAG include:

- The SANDAG non-discrimination notice, including notice of Title VI rights and complaint procedure, is translated into Language Priority Groups 1 and 2 and available for use in a variety of written and digital materials
- Notice of the availability of language assistance is translated into all Language Priority
  Groups; in conjunction with the Free Language Assistance Notice (see below), it provides
  the means for persons with LEP to easily identify the availability of language assistance
- An icon which identifies toolbars, QR codes, links, or statements on language access has been developed and should be implemented wherever possible
- Manually translating documents and materials into languages other than those identified in the Tiers (above) when a project is located in a community with a large number of persons with LEP

#### Language Assistance Toolkit

SANDAG language assistance materials are collected and made available to all employees in one centralized location. This Language Assistance Toolkit contains the resources staff, especially project managers, are likely to need, including existing internal document translation and interpretation procedures (the Language Assistance Guidelines, SANDAG Translation Procedures, and Translation and Interpretation Request Form). The Toolkit should be reviewed, updated, and expanded regularly, distributed to project managers and other staff, and located in an easy to find section of the SANDAG intranet (SharePoint). Additional materials, such as training materials and videos, language glossaries, instructions for using the over the phone interpretation service, should be added to the Toolkit as they are developed.

#### Free Language Assistance Notice

SANDAG has made significant strides to provide language access through use of bilingual employees, over the phone interpretation services, and translated documents. To ensure all those with LEP understand the availability of these various efforts, the LAP proposes to implement a Free Language Assistance text block and image. This notice will be added to written content—both printed and digital—to notify the public that language assistance is available in all the safe harbor languages. The notice will contain a phone number for contacting SANDAG, and staff answering this number will use the over the phone interpretation service, if needed, to communicate with the caller. The notice will also direct an interested person to a dedicated webpage containing details about SANDAG's commitment to provide language assistance, translated content, and information about how to use available translation tools. Going forward, a QR code could be added to the Free Language Assistance notice to streamline access to this website.





Free Language Assistance | Ayuda gratuita con el idioma | Libreng Tulong sa Wika | Hỗ trợ ngôn ngữ miễn phí 免費語言協助 | 免费语言协助 | سکت زبان رایگان | 무료 언어 지원 | کمک زبان رایگان | 無料の言語支援 | Бесплатная языковая помощь Assistência linguística gratuita | मुफ्त भाषा सहायता | Assistance linguistique gratuite | ដំនួយភាសាឥតគិតថ្លៃ | ఉచిత భాషా సహాయం ການຊ່ວຍເຫຼືອດ້ານພາສາຟຣີ | Kaalmada Luqadda ee Bilaashka ah | Безкоштовна мовна допомога

sandag.org/LanguageAssistance | (619) 699-1900

#### Digital Information

Digital media is an increasingly important means of communicating with persons with LEP. Widespread access to smart phones and computers has made it easier and faster to get information into the hands of the public. Machine translation and interpretation is becoming more accurate every year and has significantly improved the ability of SANDAG to make information available to individuals with LEP.

LEP access to SANDAG digital media resources has not grown as quickly as access to information for persons who can speak English. Examples of areas with opportunities for improvement are web pages and social media, especially given tools on many digital platforms which provide users with the opportunity to set their own language preferences (triggering automatic translations).

#### Social Media Strategic Plan

Under development at the time of the preparation of this LAP, the Plan will address how SANDAG uses social media, including for communication with individuals with LEP. It is recommended that staff from appropriate departments (including OE, Office of Diversity and Equity, and Public Affairs) work together to ensure guidelines in the Social Media Strategic Plan align with the recommendations included in this LAP, and should include:

- Recommendations about when to translate content for social media
- Guidance about providing same information to speakers of different using culturally appropriate language
- A list of the top languages expected to be encountered in the social media realm, and recommendations for translating content, following requirements and recommendations in this LAP

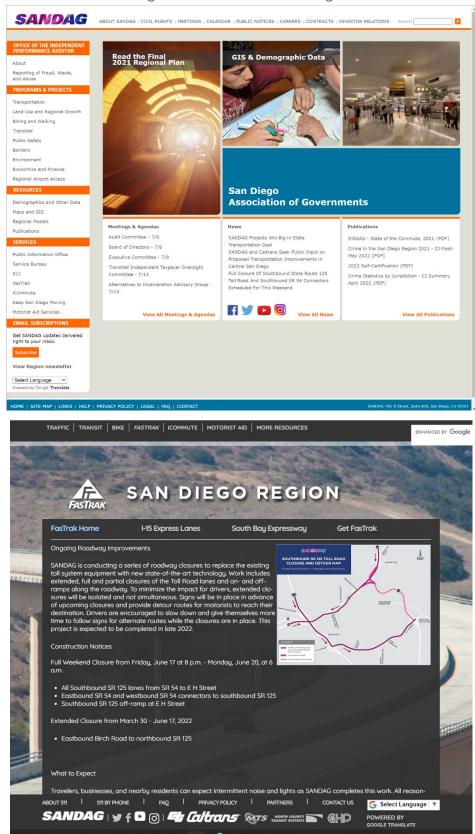
#### Websites

Websites are an important method for communicating with the public, including persons with LEP. A redesign of the SANDAG.org website is in progress, including improvements for language access and ADA accessibility. SANDAG already provides much content in Spanish along with the Google Translate toolbar for other languages, and SANDAG will continue to create dedicated Spanish language websites for certain projects.

A new SANDAG webpage (sandag.org/LanguageAssistance) was recently created. It is envisioned to be a centralized source of translated materials, information about SANDAG's language assistance efforts, and guidance about using translation tools and/or requesting translation or interpretation assistance. Links to this site will be located on other webpages throughout the SANDAG website. In conjunction with the Free Language Assistance Notice (above), it can provide a streamlined way for persons with LEP to use the SANDAG website.

A review of several SANDAG webpages revealed some inconsistencies with the Google Translate toolbar (see screenshots in Figure 6-3). On three pages, the toolbar was located at the bottom of the page and only labeled in English without any icon or pictogram. On one, the bottom of the page was more than a full page beyond the initial splash screen, although a link for Spanish content was found near the top. A fourth site, for the South Bay Expressway, which serves the Mexican border and covers an area with many Spanish speakers, did not have the translation toolbar.

Figure 6-3: SANDAG Web Pages



SANDAG Contact Us Log in South Bay Expressway My Account Our Roadways Pay a Violation Pay-by-Plate Learn More Get FasTrak Welcome to SANDAG FasTrak Your new portal for the I-15 Express Lanes and South Bay Expressway **Existing account holders must re-establish** a username and password for your FasTrak account when logging in for the first time. ONLINE ACCESS South Bay Expressivay Express Lanes COSTCO SBX125 Pay-by-Plate San Diego FORWARD About • 2021 Regional Plan • 2019 Federal Plan • Get Involved • Learn more about... **Pardon Our Dust** SANDAG FasTrak Transportation improvements in progress Regional Vision South Bay Expressway 2021 Regional Plan I-15 Express Lanes 2021 Regional Plan Toll Calculator FasTrak Fee Schedule 5 Big Moves Learn More FAQs Policies and Programs My Account Our Roadways Pay a Violation Pay-by-Plate Learn More Regulatory Requirements Planning Sustainable Communities EIR (888) 889-1515 or call 511 and say "FasTrak" View observed holidays and office closures. The SANDAG Board of Directors adopted the 2021 Regional Plan on December 10, 2021. Read the 2021 Regional Plan Ride 2045. ★ ADA Standards for. ★ ADA ABA Accessible. ¶g. Larry J. Sabato's Cyp. ● The National Transet. ☐ Foreign Rems ↑ DPRX Tours | YOUN. ● Colour Contrast Ch. Pulpersons - Investment Procuring 1990/9
Appendix F. Network Development and Performance Appendix (F. Cott Sattimation Methodology - Appendix F. Cotto Methodology - Appendix F. Cotto Methodology - Appendix (F. Cotto Methodology - Appendix P. Cotto Methodology - Appe Alternative languages Draft 2021 Regional Plan public comment period The public review and comment period for the <u>draft 2021 Regional Plan</u> was conducted from May 28 to August 6, 2021, and is now closed. Comments were accepted online and via email, volcemail, fax, and written mail. Responses to public comments submitted during this time are available in appendix of the final Baccyllags of the public hearings and informational open houses held during the public comment period can be access and viewed consistent of the public comments are comments.

Figure 6-3: SANDAG Web Pages (Continued)

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On the SANDAG pages with Google Translate where the viewer clicks on a link to a PDF, the PDF usually comes up in its original English form; no tools or instructions are provided for obtaining the information in alternate languages.

To enhance the experience of individuals with LEP, improvements to SANDAG's web presence through the website redesign should include:

- Improving usability of the translation toolbar by locating it at the top of each page, in a contrasting color, and including a special icon, such as shown on the MTS website (Figure 6-4)
- Ensuring that documents available on the website are either able to be translated in the browser or downloaded and easily translated to the greatest extent possible
- Ensuring information about requesting translation of documents found on SANDAG sites is easy to find and easily understood
- Eliminating the use of images containing text (which cannot be translated)
- Translating the South Bay Expressway website into Spanish, similar to the San Diego Forward web content

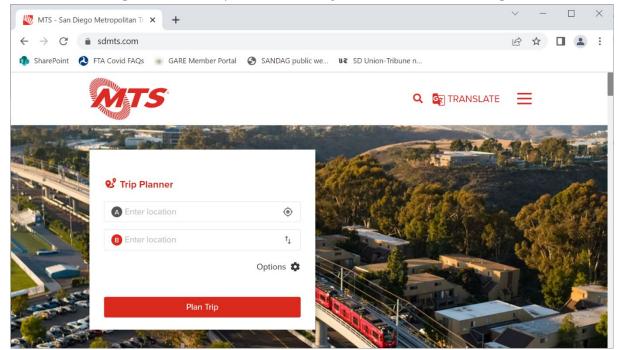


Figure 6-4: Metropolitan Transit System Website Home Page

In addition to high-level language assistance measures, program-specific language assistance measures at SANDAG include the following:

#### SANDAG Board, Policy Advisory Committees, Social Services Advisory Committee

- Simultaneous interpretation available in English/Spanish at every meeting, including virtual/hybrid meetings
- Notification of non-discrimination, Title VI rights, and complaint procedures provided on agendas
- Agenda notice that materials can be made available in alternate languages

#### Regional Planning, Transportation Planning, Corridor Planning

- Interpretation provided at public meetings/workshops based on invited or expected LEP audience
- Bilingual English/Spanish staff attend public meetings and workshops in areas with high concentrations of Spanish-speaking LEP populations
- Bilingual English/Spanish court reporter present at meetings where public comment is requested
- Notifications for document review and comment periods and for planned environmental analysis provided in English/Spanish
- Fact sheets, fliers, brochures, and comment cards; surveys for workshop/community
  meetings; and some web content produced in English/Spanish; some content in other
  languages produced as appropriate
- Informational videos and webinars in English/Spanish (voiceover or subtitles)
- Partnerships with Social Equity Working Group and other CBOs to encourage participation from and ongoing engagement with underrepresented groups including those with concentrations of LEP populations
- Periodic, region-wide public opinion surveys in English/Spanish
- Surveys translated to other languages depending on LEP populations in project areas
- Use of CBO database to provide information to organizations that serve LEP communities

#### 511 Website and Phone System

- Bilingual English/Spanish IVR phone system; work toward improving/streamlining Spanish voice recognition
- Bilingual English/Spanish operators at roadside assistance service centers

#### Transit Fare Changes

- Public comment information printed in English/Spanish in regional and local newspapers
- Bilingual English/Spanish staff attend public meetings and workshops in areas with high concentrations of LEP populations
- Public notices provided in English/Spanish when fare changes are being considered
- Community outreach materials provided in English/Spanish when fare changes take place
- Fact sheets and comment cards produced in English/Spanish in areas with high concentrations of LEP populations
- Onboard transit rider survey conducted in English/Spanish, and additional languages through digital format as needed

#### Motorist Aid

- Written and online customer survey produced in English/Spanish
- Web content provided in Spanish
- Bilingual English/Spanish Freeway Service Patrol drivers with one driver currently fluent in Chaldean (as available—bilingual skills not required by contract)
- Laminated information cards in Tier 1 and Tier 2 languages, with photo depictions of services offered: include notification of this feature on website
- Spanish language media purchased for marketing campaigns
- Informational rack card in English/Spanish
- English/Spanish informational insert in registration wallet that is handed to all motorists after receiving service
- English/Spanish card inviting motorists to share their experience by taking the survey or writing a review on Yelp

#### I-15 Express Lanes, South Bay Expressway, and FasTrak

- Bilingual English/Spanish IVR phone system; work toward improving/streamlining Spanish voice recognition
- 88% bilingual English/Spanish customer service representatives; additional representatives fluent in other safe harbor languages; Bilingual skills shown as preferred in job description
- Bilingual staff participate in outreach events in areas with high concentrations of LEP populations
- Printed and digital materials (brochures, application forms, marketing material) in English/Spanish
- English/Spanish automated cash machines at toll road on/off ramps
- FasTrak customer surveys translated into Spanish
- Spanish language media purchased for marketing campaigns

#### *iCommute*

- Bilingual English/Spanish operator
- Bilingual staff sent to employer and community meetings as needed
- Spanish language media purchased for marketing campaigns
- Program applications and rules/agreements, and Vanpool program webpage, provided in Spanish
- Collateral, including employee surveys, translated into Spanish and other languages as needed

#### **Bilingual Employees and Pay Policy**

Spanish is the only language in Language Priority Group 1. More than 240,000 Spanish-speaking residents in San Diego County do not speak English very well. As a border community, the region witnesses a large daily influx of Spanish-speaking individuals with LEP who may need to access services such as 511, Motorist Aid, or the South Bay Expressway. There is a demonstrable need for public offices in San Diego County to provide services to the Spanish-speaking population. Bilingual employees are the key to meeting that need. Currently, SANDAG has a number of bilingual employees in positions at the Toll Operations Center and other locations and on contracted service such as the Freeway Service Patrol. However, neither the positions not the contract are classified as requiring written or verbal communication skills in languages other than English.

Many California government departments and local governments across southern California have certain positions that require employees to be fluent in Spanish. In conjunction with this requirement, the agencies have implemented standards for demonstrating language abilities, and provide eligible employees a bilingual pay differential. Within San Diego County, the County and many cities (e.g., San Diego, Chula Vista, Carlsbad, Encinitas, Escondido, National City, Oceanside, etc.) have policies that provide bilingual pay, including processes for identifying and approving positions, testing procedures, and setting the additional amount of a pay an employee may receive. (It should be noted that State law provides that an employee in a position newly categorized as bilingual may not be terminated because of their inability to meet such a new requirement.)

This LAP proposes to increase the availability of bilingual employees at SANDAG though research and possible implementation of a new Bilingual Pay policy and related administrative procedures. Creation of a Bilingual Pay policy would provide an opportunity to test or certify employees to ensure those representing SANDAG have a sufficient grasp of the required language to represent the agency. The annual cost of providing a bilingual pay differential would be estimated as part of the initial research and development of the new policy; this estimate would include the identification of positions that might be designated as requiring bilingual staff and the costs for language testing to confirm the fluency of existing and potential new employees.

If a bilingual pay policy is implemented, it should include a procedure whereby Human Resources, program managers, and Directors would periodically evaluate job responsibilities to identify the employees who use bilingual (English/Spanish) skills on a regular basis. Further, as part of establishing eligibility for bilingual pay, the employee would be required to demonstrate proficiency through a standardized testing process offered by a third-party. Areas that may be reviewed in the development of the bilingual pay policy might include Toll Plaza attendants, Customer Service representatives, receptionists, those involved in Borders Programs, and Planners and Communications staff, to name a few examples.

Only 21 employees have currently agreed to be on the list of employees willing to use their second language abilities. In the survey conducted for this LAP update, 28 employees said they would be willing to use their second language skills. Putting extra attention and developing procedures for engaging employees' assistance, along with simply providing an opportunity for new employees to add their name to that list, could increase employee support for these efforts. A Bilingual Pay Policy may provide one additional incentive for bilingual employees to be recognized for using their language skills at work.

#### **Training on Limited English Proficiency Requirements**

The key to a successful LAP is having staff who understand the state and federal laws, regulations, and guidance for providing service to individuals with LEP and know what resources are available at SANDAG to meet the mandate.

As part of the orientation for new employees, a training session about civil rights and language assistance at SANDAG should be provided. The training should cover state and federal laws, regulations and guidance, and the resources available at SANDAG. Each new project manager should be provided with the Language Assistance Toolkit, and employees likely to receive phone calls from the public must be trained in the use of the over the phone interpretation service.

Language assistance training for continuing employees should be provided each time the LAP is updated; if convenient, the training can be combined with other civil rights training programs.

# Advocate for Measures to Advance Access for Persons with Limited English Proficiency

#### Internal

In the past, one of the challenges for SANDAG to providing service to individuals with LEP was the absence of a dedicated resource committed to overseeing the implementation of previous LAPs. Prior to 2018 and the creation of the Department of Diversity and Equity there were limited staff dedicated to Title VI and language assistance. There was no one at SANDAG actively looking at the LAP to ensure that recommendations were being implemented or that translation and interpretation were being provided appropriately. Today, responsibility is more clearly defined and going forward implementation and compliance will be enforced.

#### External

One of the issues that was raised in the focus groups was the lack of multilingual signage for SANDAG-provided services along highways in San Diego County. Signs for Motorist Aid/511, call boxes, and warning and explanations for the I-15 Express Lanes and South Bay Expressway were specifically mentioned in several focus groups for this project.

The Federal Highway Administration has developed signage standards for highways in the United States. The standards are found in the Manual on Uniform Traffic Control Devices (MUTCD); in addition, individual states can add on to the standards for signs found only in their state. California has created a California MUTCD that supersedes the federal document and contains a number of signs and devices unique to California.

Other states near the Canadian border have signs with English and French in recognition that there are a significant number of French-speaking persons who drive across the border into the United States. Examples of the signs are shown in Figure 6-5 and provide a variety of information, from directions to regulations or just welcoming visitors. In some cases, the signs have French and English side by side so that people can become familiar with the meaning and still understand the English version of the sign when the French version is not present farther from the border.

Figure 6-5: Examples of Bilingual U.S. Highway Signs Near Canadian Border







Vermont New York New York







Massachusetts

New Hampshire

New York

Caltrans District 11 includes San Diego and Imperial Counties and is the only district along the Mexican border. SANDAG should join with Caltrans District 11 and request that the California MUTCD be updated to include signage for use within fifty miles of the border that incorporates pictograms, universal symbols, or Spanish. The signs would not replace the existing signage; they would provide additional information to enable persons with LEP to understand the basic function of the toll roads, express lanes, emergency call boxes, and 511 Motorist Aid.

This change would be beneficial to local LEP residents as well as border crossers from Mexico, who contribute significantly to the San Diego economy. Caltrans receives federal funding and is therefore also subject to Title VI of the Civil Rights Act and its LEP requirements, as well as State of California requirements, to serve LEP communities. Advocating for improved highway signage for LEP communities within San Diego County is consistent with the SANDAG Commitment to Equity.

### 7. Monitoring and Updating

#### Introduction

The LAP will be reviewed and updated, if necessary, every three to five years, to ensure alignment with the most recent Four Factor Analysis, the SANDAG Equity Action Plan, and any significant changes in the SANDAG Title VI Program. The Director of Diversity and Equity is responsible for the review and update of the documents and for monitoring the implementation of the plan, which falls under the Department of Organization Effectiveness.

The overall goal of the monitoring program is to measure the performance of SANDAG's language services and make adjustments and improvements as required. Both qualitative and quantitative data should be examined. The monitoring program will ensure SANDAG is compliant with federal regulations and that its efforts to communicate to persons with LEP are cost-effective and provide meaningful access for target populations. The monitoring program will reveal the strengths and weaknesses of the current program and point toward potential enhancements.

As part of the update of the LAP, a working group of SANDAG staff members was convened to review the work and provide input on the project. Creating a permanent working group of staff members to provide input on language assistance services would be beneficial. Linking the group to the staff panel on social equity issues would reaffirm the importance of language assistance at SANDAG.

#### **Quantitative Data**

Monitoring quantitative data would aid in preparing updates of Factors 1, 2, and 4 in the Triennial Four Factor Analysis. There are four elements to measuring language programs quantitatively:

- Documenting the number of resources committed to the program
- Identifying the number of contacts with individuals with LEP
- Tracking the number of products produced in alternative languages
- Identifying changes in the demographics of the county that could affect the safe harbor language list

Documenting the number of resources committed to meeting LEP requirements will require additional changes to the accounting practices at SANDAG. It will not be possible to track every penny, however major expenses include:

- Number and costs for translations
- Number and costs for interpretations
- Capital costs or leasing costs for hardware and software related to interpretation
- Bilingual pay differentials (if implemented)
- Printing/design costs for products in alternative languages
- Costs for advertising in alternative language media including newspapers, television, social media, and the internet

- Costs of language assistance training programs including staff time
- Cost of reviewing and updating Four Factor Analysis and LAP
- Cost associated with handling of complaints for language issues
- Staff time associated with creating tracking systems and compiling reports

Other non-cost-related quantitative data that need to be collected to monitor the program include:

- Number of requests received for translations and interpretation from public
- Number of contacts made in person, by phone, electronically or in writing with individuals with LEP for all SANDAG locations/services
- Number of products produced in alternative languages (documents, videos, tweets, etc.)
- Monitoring utilization rates of bilingual IVR systems and over the phone interpretation service
- Records of the number of staff who have received training on LAP measures at SANDAG
- County demographics for persons who do not speak English very well broken down by their native language

County demographics usually do not shift radically in a relatively short period such as three years. However, recent events such as have those that occurred in Afghanistan and Ukraine have shown that the impact can quickly be felt in San Diego. Those speaking a particular language can quickly reach the 1,000-person level requiring safe harbor protection.

#### **Qualitative Data**

The monitoring of qualitative data will assist in completing Factor 3 of the Four Factor Analysis Updates and provide a picture of the effectiveness of the programs identified in the LAP in providing meaningful access to SANDAG programs, facilities, and services.

Qualitative data can be more difficult to collect and requires greater effort. Examples of the types of data that should be included are as follows:

- Surveying staff members about their use of language assistance services including translation/interpretation requests and the over the phone interpretation service
- Soliciting suggestions for improvements to the language assistance program from staff and individuals who are LEP and contact SANDAG
- Conducting surveys or focus groups of SANDAG's consumers about their experiences using SANDAG language assistance services
- Conducting surveys of focus groups with CBOs that act as intermediaries with disadvantaged groups in San Diego County on behalf of SANDAG
- Assessing how well staff members understand LEP policies and procedures and how to access resources
- Reviewing the nature and importance of activities to persons with LEP and identifying any trends that might influence how resources should be adjusted

A major source of information about the effectiveness of the language assistance services can include focus groups. Focus groups were used in the preparation of this plan. However, as discussed in Section 4.1, because the persons recruited to participate may not actually have had prior contact with SANDAG, they were unable to provide comments about the quality of the language assistance available at the agency.

# 8. Summary of Conclusions and Recommendations

#### Factor 1: Identifying Individuals with Limited English Proficiency

The following safe harbor languages were identified:

#### **Safe Harbor Languages** 1 Spanish 2 Tagalog (incl. Filipino) 3 Vietnamese Chinese (Mandarin and 4 Cantonese) 5 Arabic 6 Korean 7 Persian (incl. Farsi, Dari) 8 Japanese 9 Russian 10 Portuguese Hindi 11 French (incl. Cajun) 12 1.3 Khmer 14 Telugu 15 Lao 16 Somali Ukrainian 17

#### Factor 2: Frequency with Which Persons with LEP Come in Contact with SANDAG

The greatest number of contacts with individuals who have LEP are in Spanish, which is consistent with the findings of Factor 1 and reflective of SANDAG's cross-border planning relationship and San Diego County's geographic proximity to Mexico. The absence of data showing contact with other language groups appears largely to be due to people not being aware of SANDAG, its role, and the services it provides. Greater awareness of SANDAG's role and services in the LEP community will increase contacts.

#### Factor 3: Nature and Importance of Contact with SANDAG

The individuals who participated in the focus groups placed a high level of importance on being able to communicate with elected representatives though the board and policy committees. Transit riders also felt it was important to be able to comment on fare changes. Even though few had used the services, or even knew of their existence, the individuals participating in the focus groups found the Motorist Aid Services, including the Freeway Service Patrol and call boxes, to be particularly important. The 511 system, except for requesting Motorist Aid, was not seen as particularly important because more easily accessible traffic/transit information alternatives exist. iCommute was not viewed as important because none of the participants had a need for the services provided.

#### Factor 4: Resources Available to SANDAG and Estimated Costs

A full and accurate accounting of the cost of providing service in languages other than English is not possible because of previous limitations of the budgeting system used by SANDAG. Using a simple comparison between the percentage of the LEP population and an estimate of the percentage of budget committed to LEP communications, SANDAG is meeting the goal suggested in the U.S. DOT guidance for resourcing of LEP support.

A new cost code for translation and expenditures was created in the budget tracking system. It is hoped that the financial record-keeping system will more clearly capture costs associated with actual (and future) expenses.

#### Language Assistance Plan Recommendations

The 17 safe harbor languages have been divided into three priority groups, as shown below, based on LEP population and other factors such as geography and historical relationships:

Priority 1	Priority 2	Priority 3
Spanish	Tagalog/Filipino Vietnamese Chinese: Mandarin (oral); Simplified (written) Arabic	Chinese: Cantonese (oral); Traditional (written) Korean Persian Japanese Russian Portuguese Hindi French Khmer Telugu Lao Somali Ukrainian

A range of specific recommendations are included throughout the LAP, including:

 Follow Vital Documents and language group prioritization policies and procedures to guide translation efforts. Vital documents are organized into three tiers, with different translations requirements for each tier; Tier 1 documents—those with the highest priority—would be translated manually for all languages in Priority Groups 1 and 2, and made available in Priority Group 3 languages through machine translation.

- Continue to manually translate documents and materials into languages other than those identified above if/when a project is located in a community with a large number of persons with LEP.
- Improve oral communications by ensuring front-line positions include bilingual employees, delays for interpretation are tracked, interpreters are provided at public outreach events, and all staff are trained on use of the over the phone interpretation service. Identify availability of interpretation and languages available at Board and Committee meetings in notice requirements.
- Improve written communications by ensuring vital documents are correctly translated according to priority groups. Implement a designated icon or pictogram, along with a Free Language Assistance notice, to identify any toolbars, QR codes, or links to translated documents. Support improvements to SANDAG webpages which will improve language access (expected to be rolled out during the website redesign).
- Develop and distribute an updated Language Assistance Toolkit, and improve and distribute various other tools to expand employees' ability to provide language assistance
- Consider implementation of a bilingual pay differential program for positions in which speaking a Priority I language is required or desirable. Annual costs of providing a bilingual pay differential, identification of positions that might be designated as requiring bilingual staff, and requirements to confirm the fluency of existing and potential new bilingual employees should be estimated during development of the new policy.
- Provide training on communicating with individuals with LEP and the resources available at SANDAG for all new SANDAG employees. Training for continuing employees should be provided when the LAP is updated
- It is recommended that staff advocate for LEP measures throughout the agency, and that SANDAG advocate to the state for allowing signage to be placed along state-controlled freeways and highways that provides multilingual explanations of SANDAG programs and services, such as tolls and express lanes, call boxes, 511, and Highway Service Patrol. (Note that such improvements can be made as signage is added, updated, or replaced.)

#### Monitoring and Updating

The plan contains recommendations for updating the LAP and for monitoring language assistance efforts to ensure language access services are being made available. In particular, it is recommended that SANDAG significantly increase the collection of quantitative and qualitative data on services for and contacts with persons with LEP.

### 9. Appendix 1: Employee Survey Form



\* Required Information

# **SANDAG Employee Survey on Interaction with Persons**with Limited English Proficiency

The following survey questions are intended to identify the frequency of contact and challenges employees face when dealing with people with limited English language skills. This survey will help update the Language Assistance Plan and provides you with an opportunity to suggest potential solutions for increasing effective communication. Your participation is important and should take approximately ten minutes to complete. Please complete this survey by March 21.

* 1. In	which of the following areas/programs do you have contact with the public? (Check all that apply)
	SANDAG Board and policy committee meetings
	Regional planning efforts
	RTP Planning efforts
	Corridor planning/active transportation efforts
	I-15 Expressway
	South Bay Expressway
	511, Motorist Aid Services
	General SANDAG information
	General SANDAG meetings/public outreach
	Human resources recruitment and selection
	Transit fare setting
	Transit planning
	Capital project Engineering, Design and Construction
	Purchasing and procurements
	None
	Other (Please explain)
	How important is it for limited English speakers to have information regarding your area/program to access the programs, projects, and services funded by SANDAG?
	Extremely important
	Important
	Somewhat important
	Not at All important

f * 3. How often do you interact with people w	ho have limit	ed English s	peaking skills?	•	
Daily					
Weekly					
Monthly					
A few times per year					
Rarely					
Never					
NOTE: Branching Instructions Follow the branching rules in the sequence given specified in the rule are satisfied. Rule 1 IF ANSWER TO (Q3 is (Never) ) THEN GO TO Pag		to the page	as specified in	the branching rule if all the cond	ditions
I. How often do you interact with limited Englis If you never interact with a specific language	h proficiency please do no	persons whot check any	ose primary la boxes.	anguage is one of the following	g?
	Daily	Weekly	Monthly	A few times per year	Rarely
(a) Spanish					
(b) Tagalog (incl. Filipino)					
(c) Vietnamese					
(d) Chinese (all dialects)				0	
(e) Arabic					
(f) Korean					
(g) Persian (incl. Farsi, Dari)					
(h) Japanese					
(i) Russian					
(j) Portuguese				0	
(k) Hindi					
(I) French (incl. Cajun)					
(m) Khmer					
(n) Telugu			0	0	
(o) Lao				0	
(p) Chaldean				0	
(q) Somali					

* 5. How do you normally interact with limited English-speaking individuals?
☐ Via phone
Using a virtual platform (Zoom, Teams, Facetime, etc.)
☐ Though social media (Facebook, Twitter, etc.)
☐ In person
Email
☐ Text
Written correspondence
Other (Please specify)
* 6. What methods do you use to communicate with limited English-speaking individuals? (Check all that apply)
Use "I Speak" cards to identify language first
Use sign language, hand signals or body language
Respond in their language
Use online translation tools such as Google Translate
Use an over-the-phone interpretation on a 3-way call
Find a bilingual staff member to assist
Provide written information in English
Provide written information in their language
Other (Please specify)
7. What are some of the challenges you face when communicating with individuals who do not speak English very well or no at all.
[Please consider providing a response. This information will be helpful for survey administrators.]
* 8. What tools do you have available to provide assistance to people with limited English language capabilities (Check all that apply)
Brochure or instructions card in their language
A dedicated phone number in that language
Dedicated web content in that language
Access to an over the phone interpretation service
Google translate or other app on mobile phone or computer
A list of bilingual employees to call for assistance
U None
U Other (Please specify)

	Vhat efforts ndividuals ii				le to commu )?	nicate more	effectively	with limite	ed English-s	peaking
	Translate r	new written	materials							
	Provided in	nterpreters	at public me	etings and e	events					
	Have biling	gual staff at	tend events	more freque	ntly					
	Conduct m	eetings in r	eighborhood	ls with high	concentratio	ns of limited	English spe	akers		
	Work with	com munity	based organ	izations to l	nelp distribut	e informatio	n in languag	es other th	nan English	
	Use ethnic	media to pr	ovide inform	ation on SA	NDAG project	ts or progran	ns			
	Purchase a	ıdvertising i	n ethnic or n	on-English r	nedia					
	Sought out	t training or	to have acc	ess to telep	hone translat	tion service				
	Requested	or distribut	ed "I Speak	" cards in de	partment					
	No new ini	tiatives sinc	e 2019							
	Other (Plea	ase Explain)	<u> </u>							
* 10.	I am not fa No funds a I do not kr	<b>?</b> (check or amiliar with are not inclunded in the control of the	ne only) details of do ided budget are include	epartment b for this pur d in budget	-	ose	-	e to perso	ns with lim	ited English
11. *					ols for providin tisfaction? (Se			who speak	limited Engli	sh, on
	1	2	3	4	5					
	0	0	0	0	0					
					omers who s mation will b			ninistrator	s.]	

[P	o you speak any of these languages fluently? lease consider providing a response. This information will be helpful for survey administrators.]
	None
	Spanish
	Tagalog or other Filipino dialects
	Mandarin
	Cantonese
	Arabic
	Korean
	Persian (including Dari and Farsi)
	Chaldean
	Japanese
	Russian
	Portugese
	Khmer
	Hindi
	Tegulu
	Somali
	Lao
	French (including Cajun)
	Other dialects or languages not listed above (including other Chinese dialects)?
NOTE:	Branching Instructions
Follow t specified <u>Rule 1</u>	he branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions d in the rule are satisfied.
Follow t specified <u>Rule 1</u>	he branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions
Follow t specified Rule 1 IF ANSW	he branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions d in the rule are satisfied.  WER TO (Q13 is (None)) THEN GO TO Page 15  Ald you be willing to assist SANDAG to interact with individuals with limited English proficiency in the language(s) you speak?
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Follow t specifier Rule 1 IF ANSW  14. Woo can  N Y Y Y If Y	the branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions d in the rule are satisfied.  WER TO (Q13 is (None)) THEN GO TO Page 15  Ald you be willing to assist SANDAG to interact with individuals with limited English proficiency in the language(s) you speak?  Io (es, by speaking with members of the public in informal settings (not formal interpretation services such as at Board neetings)  (es, by internally reviewing translations of documents or other tasks that do not involve the public les, by participating in an advisory group to assist in improving language assistance measures at SANDAG
Follow t specified Rule 1  IF ANSW  14. Wood can  N Y Y If Y If  * 15.	the branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions d in the rule are satisfied.  VER TO (Q13 is (None)) THEN GO TO Page 15  Ald you be willing to assist SANDAG to interact with individuals with limited English proficiency in the language(s) you speak?  To (See, by speaking with members of the public in informal settings (not formal interpretation services such as at Board neetings)  The sees, by internally reviewing translations of documents or other tasks that do not involve the public sees, by participating in an advisory group to assist in improving language assistance measures at SANDAG for your answered Yes to any of the questions above please provide your name and email
Follow t specified Rule 1  IF ANSW  14. Wood can Y Y Y Y Y I I	the branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions of in the rule are satisfied.  WER TO (Q13 is (None)) THEN GO TO Page 15  Ald you be willing to assist SANDAG to interact with individuals with limited English proficiency in the language(s) you speak?  To (es, by speaking with members of the public in informal settings (not formal interpretation services such as at Board neetings)  To (es, by internally reviewing translations of documents or other tasks that do not involve the public es, by participating in an advisory group to assist in improving language assistance measures at SANDAG for your answered Yes to any of the questions above please provide your name and email  How long have you worked for SANDAG?
Follow t specifier Rule 1  IF ANSW  14. Wood can  Yellow t 15.	the branching rules in the sequence given below. Jump to the page as specified in the branching rule if all the conditions d in the rule are satisfied.  WER TO (Q13 is (None) ) THEN GO TO Page 15  Laid you be willing to assist SANDAG to interact with individuals with limited English proficiency in the language(s) you speak?  Loo ses, by speaking with members of the public in informal settings (not formal interpretation services such as at Board neetings)  Less, by internally reviewing translations of documents or other tasks that do not involve the public less, by participating in an advisory group to assist in improving language assistance measures at SANDAG for your answered Yes to any of the questions above please provide your name and email  How long have you worked for SANDAG?  Less than 1 year

* 16	Does your department at SANDAG record statistics on the number of contacts with persons who have limited English proficiency?
	) No
	Yes
	] I don't know
	If yes, who may we contact to obtain this data?
* 17	. Which SANDAG Department do you work for?
	Executive
	Office of General Counsel
	Business Information and Technology
	Organizational Effectiveness
	Data Science
	Regional Planning
	Region Transportation Services
	Government Relations and Communications
	Capital Projects and Programs
	Accounting and Finance
	Financial Programming, Budgets and Grants
	Office of Independent Auditor
	Optionally please provide your name and contact info to allow our consultants to follow up if they have any questions for you.

# 10. Appendix 2: Community-Based Organization Focus Group Moderator Guide and Consent Form

# SANDAG 2022 Language Assistance Plan Update Community-Based Organization Focus Group Moderator's Guide

**INTRODUCTION: (5 minutes)** 

		= -	about the San Diego on and some of the programs
today's discussion. I a		t, so you can ask qu	I will be moderating estions, but please know that
I am joined today by	(Ir	ntroduce the Noteta	aker)
	and my role at conversation today. [Me		I will be taking er if included.]
have indicated that y SANDAG wants to he	= -	e speaking in a lang and your experience	
	provide will help SANDA nes how SANDAG helps <sub>l</sub> and services.		
This session will last a	about two hours. If you n	eed to visit the rest	room during this session,

#### **GROUND RULES: (10 minutes)**

[insert location of restroom].

As your moderator, my role is to create a space where everyone feels comfortable to participate or ask questions, facilitate a discussion, and make sure that everyone has an opportunity to share, listen, and be heard. To that end, I would like to go over some guidelines to help the discussion go smoothly.

- We want to hear from each one of you, and I know some of you may be more comfortable speaking in groups than others. One of my roles is to make sure all of you have a chance to share, so if you are sharing a lot, I will probably ask you to give others time to speak, and if you aren't sharing much, I may call on you to share your opinion.
- We have a very full agenda. In addition to using a timer [only if a timer is being used], I may interrupt if the conversation seems to be going off topic or if there are many people that want to speak at the same time.

- Also, we expect there to be different perspectives; you may not agree with each other, but please listen respectfully as others share their views, and please do not counter or debate them.
- This is an information gathering session, so all perspectives are welcomed and encouraged.
- Please speak one at a time and do not interrupt. I will make sure you all have an opportunity to share and be heard.
- Idea sharing is the focus, and the views shared are confidential and will be summarized as a whole.

Does anyone have any questions about these ground rules? Does everyone agree to abide by these basic ground rules?

We will start with a brief introduction of SANDAG and what programs and services it provides and then we will narrow our discussion to cover a few of these items. Toward the end of this session, we will open it up to discuss anything we haven't covered yet.

But, before we continue, I would like everyone to have the opportunity to introduce themselves.

Please introduce yourself by letting us know your name (first name is okay) and if you are familiar with SANDAG.

#### **SANDAG INTRODUCTION: (10 Minutes)**

San Diego is a big place and people get around in different ways. How do you get around?

Some of you are familiar with SANDAG. You may not be aware of all the programs and services it offers residents in San Diego County. I'm going to name off a few of SANDAG's responsibilities. Please raise your hand for each one if you knew this before you were recruited for this group.

- SANDAG is the regional planning agency for San Diego and develops the long-range transportation plan that guides the development of roads, freeway, transit, and active transportation projects in the County as well as dealing with regional issues such as housing, social equity, transborder issues, energy, public safety, and shoreline preservation [Show photo/logo]
- SANDAG plans, designs and builds bus, Trolley, and train projects on behalf of MTS and NCTD and sets the fares that these agencies collect for their services [Show photo/logo]
- SANDAG manages the 511 phone system and website, a free service that consolidates the region's transportation information into a central resource for the public [Show photo/logo]
- SANDAG manages Motorist Aid Services, including the Freeway Service Patrol and Call Box Program [Show photo/logo]
- SANDAG manages the iCommute program, that includes Commuter Assistance, such as Guaranteed Ride Home and Vanpool Program, and Employer Services, such as the Commuter Benefits Program [Show photo/logo]
- SANDAG manages the FasTrak Program on the I-15 Express Lanes and operates the South Bay Expressway/SR 125 Toll Road [Show photo/logo]

As you can see, SANDAG is an organization with many programs and areas of service. For our purposes today, we are going to focus on a few specific topics.

We will spend approximately 10-15 minutes on each of these topics. As we mentioned earlier, we will leave time toward the end of the session to cover other topics that you are interested in.

#### **QUESTIONS:**

#### SANDAG Meetings, Transportation Planning and Regional Planning (15 minutes)

The first set of questions will focus on Transportation Planning and Regional Planning. Federal law requires SANDAG to prepare a Regional Transportation Plan every 3 years, and during that process the public is invited to participate in its development. SANDAG also deals with other regional issues such as housing, energy, shoreline preservation, public safety and cross border coordination.

- 1. Have you attended SANDAG board or committee meeting or public participation event?
  - Did you understand conversations in English? Did friends or family translate for you? Were SANDAG interpreters available?
  - Were you able to participate in the event?
  - If not was it due to language?
- 2. Have you tried to read or browse a SANDAG Planning report?
  - Was the report available in your language?
  - What was the subject?
  - If not available in your language, did you ask SANDAG or someone to translate the report for you?
  - Was the lack of a translated document a barrier for you?
- 3. What could be done to improve language access?

#### **Public Transportation (15 minutes)**

The next questions will focus on fare setting for public transportation including Trolley, Coaster, and the Sprinter in San Diego County.

- 1. Were you aware that fares on MTS and NCTD are set by SANDAG?
- 2. Are you aware that that the public is invited to comment on proposed fare changes?
  - If you did not know do you think it was due to a language barrier?
  - If you were aware of the opportunity, did you participate?
  - Were you able to participate in the language of your choice?
  - If language were less of a barrier, would you participate in the future?
- 3. Have you seen notices for public hearings about transit fares changes or increases?
  - Was language a barrier to understanding how fares might change?
- 4. What is the best means of reaching you in your language to discuss possible fare changes?

#### 511 Website and Phone System (15 minutes)

The next set of questions will cover the 511 system. As some of you may know, 511 is available through an automated phone line and online. 511 provides traffic information, transit schedules, traffic maps, and more. [NOTE FOR MODERATOR: The 511 automated phone system is available in Spanish. All SANDAG websites, including 511sd.com, have the Google Translate toolbar.]

- 1. Have you accessed the 511 system by phone or web?
  - If by phone did you speak English, have someone else speak in English for you or request an interpreter be brought onto the call?
  - Did you know that interpreters are available on 511 calls for your language?
  - If by web, did you, do it English? Have someone do it for you in English? Or did you use Google Translation online? Was Google Translate acceptable translation
- 2. How could it be made easier for you to use 511 in your language?

#### **Motorist Aid Services Program (15 minutes)**

Now we will move on to discuss the Motorist Aid Services Program. SANDAG administers services to aid distressed motorists and help remove stranded vehicles on the region's most congested freeways. Some of you may have recognized the Freeway Service Patrol trucks that patrol the highways to provide free roadside assistance. Motorists can call 511 from a cell phone for free roadside assistance, available on most urban freeways during peak commute periods. You also may have seen yellow call boxes on rural highways. These are free phones that connect stranded drivers in locations with poor cellular signal to an operator who can dispatch help, 24 hours a day.

- 1. Did you know about these services before today?
  - Have you used a highway call box?
  - What language did you use to speak with the operator?
  - Was the operator able to speak your language? Did someone with you interpret for you? Did SANDAG provide an interpreter?
  - Did you know you can request an interpreter?
- 2. Did you receive assistance from Freeway Service Patrol?
  - Did patrol driver speak your language? Did someone with you provide interpretation?
     Did the patrol driver get an interpreter on the phone?
- 3. What can be done to make these services more accessible for LEP persons?

#### iCommute (15 minutes)

Now let's talk about iCommute. iCommute provides information on transportation choices for commuters in the San Diego region including carpool services, a subsidized vanpool program, transit solutions, regional support for biking, the Guaranteed Ride Home program, information about teleworking, and bike and pedestrian safety program support for schools. iCommute has a commute cost calculator tool that allows you to see how much an alternative commute could save you, among other resources. iCommute also provides assistance to local businesses, helping them develop and implement customized employee commuter benefit programs.

- 1. Have you ever contacted iCommute? (Online, phone, or in person with an account executive)
- 2. If contact was in person or by phone, was it in English or was someone at iCommute able to help you in your language? Did someone at your end help you communicate with iCommute?
  - Did you know that you could request a translator on your call?
  - If contact was on the web was Google Translate used? And was it effective for you?
- 3. What ideas do you have for making this information easier to access and use for people who do not speak English very well?

#### FasTrak (15 minutes)

Our next section will cover the two toll roads in San Diego, the I-15 Express Lanes and the South Bay Expressway on SR 125, and FasTrak transponders.

- 1. Do you own and drive a car or truck?
- 2. Do you ever drive on I-15 or SR 125?
- 3. Do you have a FasTrak transponder? Are you familiar with FasTrak?
  - How did you learn about FasTrak? Was the information in your language? Did you use family or friends to translate? Did you get information from SANDAG in your language?
- 4. If you don't have FasTrak would you get a transponder if information was available in your language?

#### **Concluding Questions (15 minutes)**

Our final section will cover some general questions about SANDAG assistance to the public.

- 1. Have you ever tried to call SANDAG or visited SANDAG offices?
  - Were you able to communicate with SANDAG in your language?
- 2. Have you ever used the SANDAG or Regional Plan website?
  - Did you use in English or use Google Translate?
  - If you used Google Translate, was it effective?
- 3. What are some of the ways that SANDAG could do better in informing people who speak limited English?



# SANDAG 2022 Language Assistance Plan Update Focus Group Consent Form

<INSERT ORGANIZATION NAME> is helping the San Diego Association of Governments (SANDAG) assess ways to improve its programs and services. You have been invited to participate in a focus group as part of this effort. The purpose is to examine how people who do not speak English well use SANDAG programs and how to improve services for this group.

### Your participation is completely voluntary, and you may withdraw at any time without penalty.

Your participation may benefit you and others by helping to improve SANDAG programs and services. No risk greater than ordinary conversation is anticipated.

Everyone will be asked to respect the privacy of the other group members. All participants will be asked not to disclose anything said within the context of the discussion, but it is important to understand that other people in the group with you may not keep all information private and confidential.

Anonymous data from the focus group will be analyzed and reported to SANDAG. No individual participant will be identified or linked to the results. All information will be kept strictly **confidential**.

By signing this consent form, you are indicating that you fully understand the above information and agree to participate in this focus group.

Participant's signature	Date	
Printed name		

### Appendix G: List of Committees and Working Groups

#### **Policy Advisory Committees**

#### **Audit Committee**

The Audit Committee assists the Board of Directors in fulfilling its oversight responsibilities of the Independent Performance Auditor by recommending internal control guidelines and providing recommendations for the annual audit plan and annual financial statement audits. The Committee is also responsible for monitoring the implementation of any corrective actions arising from the audits. Recommendations of the Audit Committee are forwarded to the Board of Directors for action.

#### **Borders Committee**

The Borders Committee advises the Board of Directors on major interregional planning activities that impact the borders of the San Diego region. This includes Orange, Riverside, and Imperial Counties; the Republic of Mexico; and neighboring tribal nations. The preparation and implementation of SANDAG Binational, Interregional, and Tribal Liaison Planning programs are included under this purview. Recommendations of the Borders Committee are forwarded to the Board of Directors for action.

#### **Executive Committee**

The Executive Committee provides oversight for the preparation of the agency budget and work program, provides recommendations on legislative proposals and agency policies, and sets the Board of Directors agenda. Recommendations of the Executive Committee are forwarded to the Board of Directors for action.

#### **Public Safety Committee**

The Public Safety Committee advises the Board of Directors on major policy-level matters related to public safety. The goals of the Committee are to improve the quality of life in the region by promoting public safety and justice through collaboration, information sharing, effective technology, and objective monitoring and assessment. The Public Safety Committee receives input from the Chiefs/Sheriff's Management Committee. Recommendations of the Public Safety Committee are forwarded to the Board of Directors for action.

#### **Regional Planning Committee**

The primary role of the Regional Planning Committee is to provide recommendations on development and implementation of the Regional Plan and Sustainable Communities Strategy and advise the Board on other regional planning policy issues. The Regional Planning Committee receives input from the Sustainable Communities Working Group, Social Equity Working Group, Shoreline Preservation Working Group, and Military Working Group. Recommendations of the Regional Planning Committee are forwarded to the Board of Directors for action.

#### **Transportation Committee**

The Transportation Committee recommends policies to the Board of Directors related to transportation. The Committee oversees the Regional Plan and other regional transportation planning and programming efforts. It provides oversight of project schedules, costs, and scopes for the major highway, transit, regional arterial, and regional bikeway projects funded under the Regional Transportation Improvement Program, including the TransNet Program. The Transportation Committee receives input from the Mobility Working Group and Social Services Transportation Advisory Council. Recommendations of the Transportation Committee are forwarded to the Board of Directors for action.

#### **Working Groups**

#### **ITOC Selection Committee**

The ITOC selection committee shall be established to select an ITOC member from the list of qualified candidates recommended by a technical screening committee. The selection committee shall consist of the following: two members of the County of San Diego Board of Supervisors; the mayor of the City of San Diego; a mayor from the cities of Chula Vista, Coronado, Imperial Beach, or National City selected by the mayors of those cities; a mayor from the cities of El Cajon, La Mesa, Lemon Grove, or Santee selected by the mayors of those cities; a mayor from the cities of Carlsbad, Del Mar, Encinitas, Oceanside, or Solana Beach selected by the mayors of those cities; and a mayor from the cities of Escondido, Poway, San Marcos, or Vista selected by the mayors of those cities.

#### Chiefs'/Sheriff's Management Committee

The Chiefs'/Sheriff's Management Committee promotes regional collaboration in the acquisition, maintenance, and sharing of public safety technology. This Working Group approves and implements the Automated Regional Justice Information System (ARJIS) and Criminal Justice Research annual work program and budget. It establishes and recommends public safety policies that relate to ARJIS and Criminal Justice Research. The Chiefs'/Sheriff's Management Committee reports to the Public Safety Committee, which in turn reports to the SANDAG Board of Directors.

#### San Diego Regional Military Working Group

The San Diego Regional Military Working Group collaborates with various branches of the military to address mutual interests related to the San Diego region such as regional growth, habitat, transportation, housing, water, and energy. The San Diego Regional Military Working Group reports to the Regional Planning Committee, which in turn reports to the SANDAG Board of Directors.

#### **Mobility Working Group**

The Mobility Working Group provides input to address mobility challenges created by our region's growth. The working group makes recommendations to put forth public policies, strategies, and investments to help advance the implementation of the SANDAG Regional Plan. The Mobility Working Group reports to the Transportation Committee, which in turn reports to the SANDAG Board of Directors.

#### **Shoreline Preservation Working Group**

The Shoreline Preservation Working Group advises SANDAG on issues related to the adopted Shoreline Preservation Strategy and opportunities for beach replenishment and shoreline monitoring. The Shoreline Preservation Working Group reports to the Regional Planning Committee, which in turn reports to the SANDAG Board of Directors.

#### **Regional Plan Social Equity Working Group**

The Regional Plan Social Equity Working Group provides a collaborative open and public forum for community-based organizations to share ongoing public input from underserved and underrepresented communities in the region on key planning activities, including development of the Regional Plan and related activities with a focus on the social equity perspective. The Regional Plan Social Equity Working Group reports to the Regional Planning Committee, which in turn reports to the Board of Directors.

#### **Social Services Transportation Advisory Council**

The Social Services Transportation Advisory Council oversees work on federal and state requirements and local concerns regarding transportation accessibility issues for the elderly and persons with disabilities. The Social Services Advisory Council reports to the Transportation Committee, which in turn reports to the SANDAG Board of Directors.

#### **Sustainable Communities Working Group**

The Sustainable Communities Working Group serves as a critical resource to carry out and promote cross-agency coordination on the development and implementation of the Sustainable Communities Strategy (SCS) of the SANDAG Regional Plan. The Sustainable Communities Working Group reports to the Regional Planning Committee, which in turn reports to the SANDAG Board of Directors.

#### **Task Forces**

#### **Bayshore Bikeway Task Force**

Plans for future improvements on the Bayshore Bikeway, provides oversight and support for projects being developed, advocates for funding to plan and construct projects, coordinates with local land use authorities to provide for future bikeway right-of-way, and promotes the bikeway as a regional transportation facility.

#### **Regional Digital Divide Task Force**

The SANDAG Regional Digital Divide task force brings together a wide range of stakeholders to develop and implement the Regional Digital Equity Strategy and Action Plan and to collaborate and provide expert input on regional digital equity programs and projects.

#### **Freight Stakeholders Task Force**

Provides input on goods movement planning projects and activities to improve the efficiency of goods movement, advance the deployment of medium and heavy-duty zero-emission vehicles, and implement the SANDAG Regional Plan.

#### **Committee on Binational Regional Opportunities (COBRO)**

The Committee on Binational Regional Opportunities (COBRO) serves as a taskforce for the Borders Committee and facilitates better understanding of binational border-related issues and needs of the California–Baja California region. The membership consists of elected officials and staff, representatives of academia, business, community organizations, and the Mexican government.

#### **Interagency Technical Task Force on Tribal Transportation Issues**

Discusses and coordinates tribal transportation issues of mutual concern with the various public planning agencies in the region, including SANDAG, Caltrans, the County of San Diego, and the transit operators.

#### San Diego Region Conformity Working Group\*

Reviews and comments on Regional Transportation Plan and Regional Transportation Improvement Program transportation conformity and State Implementation Plan development or updates and fulfills federal and state requirements for interagency consultation.

\*name set by law but functionally a Task Force

#### **AB43 Task Force**

At its June 11, 2021, meeting, the SANDAG Executive Committee approved taking a support position on Assembly Bill (AB) 43 and on October 8, 2021, the bill was approved by the Governor. The bill grants the California Department of Transportation (Caltrans) and local authorities greater flexibility in setting speed limits, this Task Force focuses on the impacts of AB 43.

#### **ARJIS Business Working Group**

Provides input to the CSMC on ARJIS matters relating to criminal justice information-sharing, business practices, crime statistics, data quality, and budget.

#### **ARJIS Technical Working Group**

Provides input to the CSMC on ARJIS matters relating to state-of-the-art information technology that enhances both officer and public safety.

#### **Regional Digital Infrastructure Taskforce**

Provides technical input to SANDAG in developing regional permitting standards and practices that streamline deployment of digital communications infrastructure to advance intelligent transportation solutions, smart cities, and broadband in underserved areas.

#### **Regional Habitat Conservation Task Force**

Provides technical expertise, background knowledge and cross-agency coordination on regional habitat conservation issues, including input on issues related to coordination and implementation of the EMP.

### Appendix H: Social Equity Analyses

#### January 18, 2019

TO: The Project File

FROM: Audrey Porcella, Associate Regional Planner and Project Manager

SUBJECT: Social Equity Analysis for the Cycle 10 Section 5310 Program (5310) and Senior Mini Grant Program

(SMG)

#### I. Introduction

Staff conducted a Social Equity Analysis to determine whether the funding recommendations for the Cycle 10 Section 5310 Program and Senior Mini-Grant Program would result in an equitable allocation of funding expenditures and services for low income and minority areas of the County compared to non-low income and non-minority areas. Table 1, which is attached, shows the funding recommendations; the project service areas determined as low-income, non-low income, minority, and non-minority based on percentage of population as compared to the County of San Diego; and the resulting expenditure allocation percentages. The data in Table 1 was independently reviewed by Rebecca Grover, Associate GIS Analyst, to verify accuracy of the information contained.

#### II. Steps in the Social Equity Analysis

- 1. Using GIS, staff mapped the service areas for each project recommended for funding under the two grant programs. The two maps are attached to this memo.
  - Staff used the service area descriptions provided by applicants in their applications to map the project service area for each recommended grantee.
  - Staff aggregated the number of grantees within a given service area and displayed service areas using a
    gradient whereby the darker green represents more grantees providing service in an area and lighter
    green represents fewer grantees providing service in an area.
- 2. Staff determined the percent low income and percent minority within the service area of each project recommended for funding using the spatial data mapped in Step 1 and SANDAG 2016 Annual Estimates for demographic data. Low Income was defined as households with incomes at or below 200 percent of the 2012 federal poverty level adjusted for inflation. This definition of low income is consistent with the definition of low income used in San Diego Forward: The Regional Plan. Table 1 shows the list of projects recommended for

funding under both the Section 5310 and Senior Mini-Grant programs and the percentage low income and minority within each of the project's service areas. Next, staff compared these percentages to the percentage averages for low income and minority populations for the County of San Diego. Table 1 shows a "1" or a "0" next to each grantee project for each category (low income and minority), where a 1 means the project would serve an area with an equal or higher percentage than the County average, and a 0 means the project would serve an area with a lower percentage than the County average.

- 3. Based on the funding recommendations, staff next calculated the percentage of recommended funding for projects that would serve identified low income areas and the percentage of recommended funding to serve identified minority areas. This also is shown in Table 1.
- 4. The maps created in Step 1 were overlaid with the low income and minority populations for the County of San Diego. The population groups are displayed as dot densities where 1 dot is equal to 200 people.
- 5. Lastly, staff used the data in Table 1 and the maps to determine whether any disparate impacts or disproportionate treatment would be experienced by low income or minority populations as a result of the proposed funding awards.

#### III. Summary of Analysis

The analysis shows a broad geographic distribution of program funding would occur based on the service areas of the projects recommended for grant funding. The Section 5310 map shows that population groups within the Census-defined urbanized area will be served by at least one provider recommended for Section 5310 funding. The Senior Mini-Grant map shows that population groups within the entire County of San Diego will be served by at least one provider recommended for Senior Mini-Grant funding.

The analysis also shows that low income and minority populations would receive an equitable proportion of the Section 5310 and Senior Mini-Grant program benefits. Below are the more specific findings, both collectively, and by grant program.

#### Low-Income

Table 1 shows that 13 of the 17 Section 5310 projects recommended for funding have service areas that have a percentage of low income population equal to or greater than the County's overall average. The 13 projects represent a total of 11 service providers and 90.57% of Section 5310 funding to be awarded. Through the Senior Mini-Grant program, 8 of the 11 projects recommended for funding have service areas that have a percentage of low income equal to or greater than the County's overall average. The 9 projects represent a total of 6 service providers and 74.55% of Senior Mini-Grant funding to be awarded. Collectively, 83.64% of the Section 5310 and Senior Mini-Grant funds will serve low income populations.

#### **Minority**

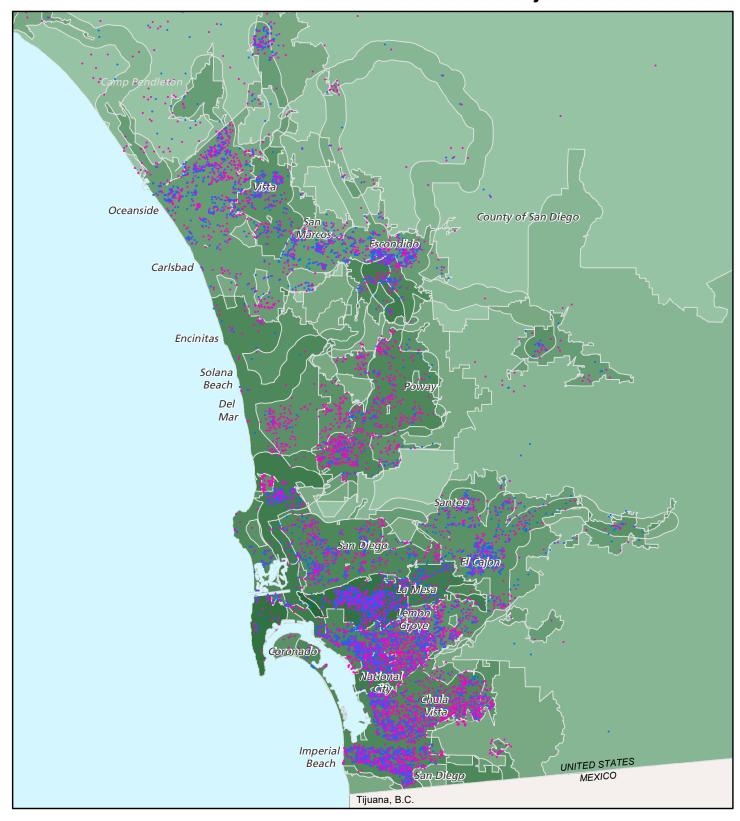
Table 1 also shows that 11 of the 17 Section 5310 projects recommended for funding have service areas with a percentage of minority population equal to or greater than the County's overall average. The 11 projects represent a total of 9 service providers and 65.99% of Section 5310 funding to be awarded. Through the Senior Mini-Grant program, 5 of the 11 projects recommended for funding have service areas with a percentage of minority population equal to or greater than the County's overall average. The 5 projects represent a total of 2 service providers and 47.85% of Senior Mini-Grant funding to be awarded. Collectively, 58.14% of the Section 5310 and Senior Mini-Grant funds will serve minority populations.

#### **IV.** Conclusions

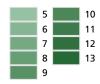
The analysis found that the funding recommendations proposed by the two Evaluation Committees for both programs will result in an equitable distribution of funds and services to low income and minority populations.



### SANDAG Social Equity Data Viewer Section 5310 Funded Projects







**Low Income Population** 

1 Dot = 200 people

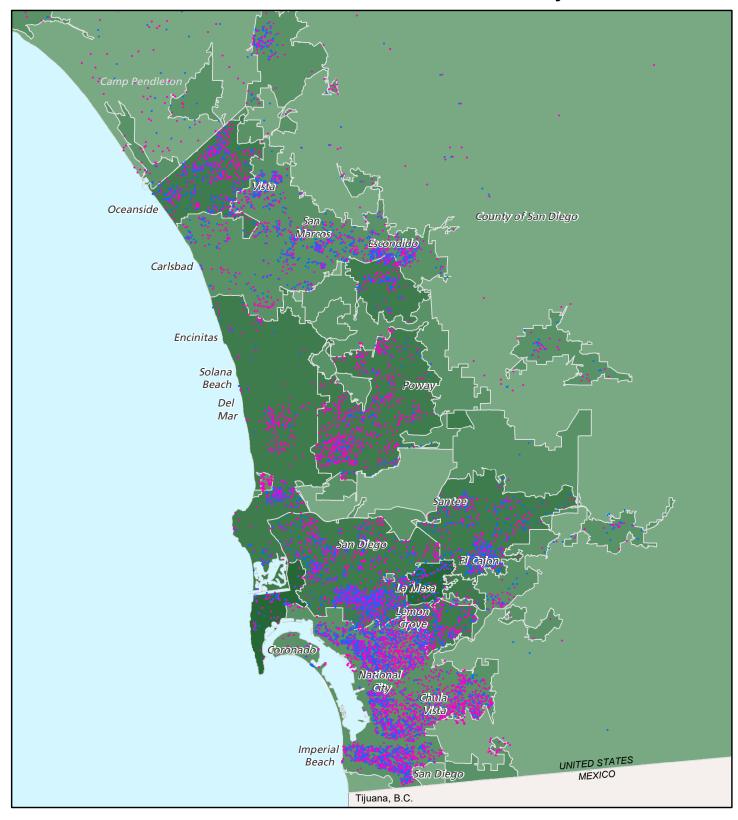
#### **Minority Population**

• 1 Dot = 200 people

Data Source: San Diego Forward: The Regional Plan SANDAG has prepared this map, data, metadata and information for internal use, but is making it available as a public record. Conclusions drawn from the information are the sole responsibility of the user. SANDAG disclaims all warranties, express or implied, as to the accuracy, reliability, utility or completeness of the information. SANDAG assumes no liability for errors, omissions or inaccuracies regardless of the cause of such, or for any decision made, or action taken or omitted in reliance thereon. Furthermore, SANDAG disclaims all warranties, express or implied, including but not limited to liability for quality, performance, merchantability, and fitness for a particular purpose arising out of the use of or inability to use the information.



## **SANDAG Social Equity Data Viewer Senior Mini-Grant Funded Projects**



#### **DRAFT Number of Projects**



Low Income Population
• 1 Dot = 200 people

1 DOC = 200 peopi

Minority Population
• 1 Dot = 200 people

Data Source: San Diego Forward: The Regional Plan SANDAG has prepared this map, data, metadata and information for internal use, but is making it available as a public record. Conclusions drawn from the information are the sole responsibility of the user. SANDAG disclaims all warranties, express or implied, as to the accuracy, reliability, utility or completeness of the information. SANDAG assumes no liability for errors, omissions or inaccuracies regardless of the cause of such, or for any decision made, or action taken or omitted in reliance thereon. Furthermore, SANDAG disclaims all warranties, express or implied, including but not limited to liability for quality, performance, merchantability, and fitness for a particular purpose arising out of the use of or inability to use the information.

Secti	on 5310 Projects Recommende	ed for Funding										
Grantee	Project Name	Service Area	Total Population	Minority Population	% Minority	Total Households	Low Income Households	% Low Income	% Minority at/above County	% Low income at/above County	Award Amount	% of Total Funding Available
ARC of San Diego	MCRD Transportation	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 303,408	7.5%
City of Vista	Vehicle Procurement	92081, 92083, 92084	117,900	66,319	56.25%	36,455	16,022	43.95%	1	1	\$ 166,127	4.1%
Facilitating Access to Coordinated Transportation	CTSA Services	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 200,000	4.9%
Facilitating Access to Coordinated Transportation	Brokerage Management	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 400,000	9.8%
Facilitating Access to Coordinated Transportation	RideFACT	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 400,000	9.8%
Jewish Family Services of San Diego	OTG Vehicle Procurement	San Diego County	1,337,688	625,607	46.77%	508,020	157,948	31.09%	0	0	\$ 200,053	4.9%
Jewish Family Services of San Diego	OTG North County Inland (OTG NCI)	92029, 92064, 92126, 92127, 92129, 92131, 92025 West of San Pasqual/Highland 8, Valley Road	385,740	197,912	51.31%	128,391	28,424	22.14%	0	0	\$ 73,247	1.8%
Jewish Family Services of San Diego	OTG Northern San Diego	92014, 92037, 92121, 92122, 92130, 92109, 92110 North of I-8, 92111, 92106, 92107, 92110	390,163	138,697	35.55%	157,724	39,870	25.28%	0	0	\$ 73,247	1.8%
Jewish Family Services of San Diego	OTG Eastern San Diego	91941, 91942, 92103, 92104, 92105, 92108, 92111, 92115, 92116, 92119, 92120, 92123, 92124	561,785	288,998	51.44%	221,905	89,654	40.40%	0	1	\$ 73,247	1.8%
Metropolitan Transit System	Vehicle Procurement	3/4 mile of MTS fixed-route	2,096,984	1,201,473	57.30%	728,720	283,164	38.86%	1	1	\$ 590,437	14.5%
North County Transit District	NCTD LIFT State of Good Repair Vehicle Replacement	3/4 mile of NCTD fixed-route	942,176	458,858	48.70%	321,403	116,433	36.23%	0	1	\$ 926,863	22.8%
Renewing Life	Vehicle Procurement	91950, 91910, 91911, 91913, 91914, 91915, 91932, 91902, 92074, 92154	377,791	98,049	25.95%	139,256		0.00%	0	0	\$ 37,364	0.9%
San Diego Center for the Blind	Vehicle Procurement	Urbanized Areas of San Diego County	3,176,459	1,716,550	54.04%	1,087,460	396,038	36.42%	1	1	\$ 67,260	1.7%
San Ysidro Health	Mobile Health Services Van Purchase	San Diego County's South, Central/Southeastern, and East Regions	1,582,171	962,183	60.81%	527,322	221,889	42.08%	1	1	\$ 83,581	2.1%
Sharp HealthCare Foundation	Mesa Vista 1 and 2	7850 Vista Hill Drive, San Diego, CA 92123 and surrounding zip codes of Central San Diego	641,161	411,747	64.22%	222,330	104,113	46.83%	1	1	\$ 235,621	5.8%
St. Madeleine Sophie's Center	Vehicle Procurement	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 111,307	2.7%
Travelers Aid Society of San Diego	RIDEFinder	Urbanized Areas of San Diego County	3,176,459	1,716,550	54.04%	1,087,460	396,038	36.42%	1	1	\$ 128,100	3.1%

3,288,612 1,766,752 53.72% 1,126,029

SAN DIEGO COUNTY

	Section 5310 Projects Recommended for Funding	Category	Amount Recommended for Funding	Percent of Total Available
	Recommended for Funding	Minority	\$ 2,685,841.00	65.99%
		Low-income	\$ 3,685,951.00	90.57%

Minority Low-Income

Projects per Category

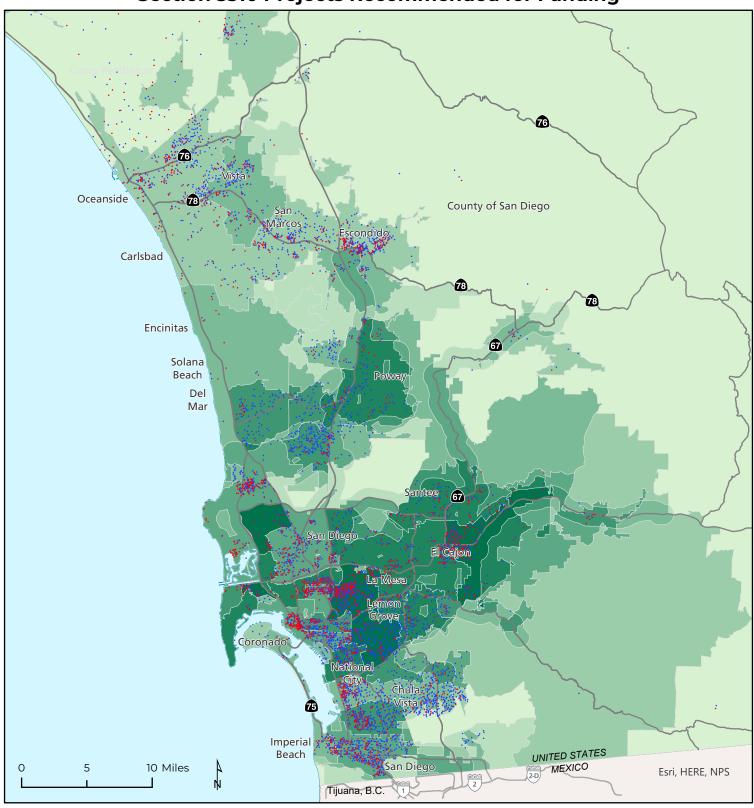
406,893 36.14%

**Total Projects** 

Sei	nior Mini-Grant Projects Recommended fo	or Funding	1									
Grantee	Project Name	Service Area	Total Population	Minority Population	% Minority	Total Households	Low Income Households	% Low Income	% Minority at/above County	% Low income at/above County	Award Amount	% of Total Funding
City of La Mesa	City of La Mesa Rides4Neighbors Program	La Mesa, Lemon Grove, Spring Valley, El Cajon, Santee, Lakeside	386,494	173,354	44.85%	134,611	54,624	40.58%	0	1	\$ 288,550	9.3%
City of Oceanside	Solutions for Seniors on the Go	92054, 92056, 92057, 92058	175,647	93,361	53.15%	60,735	24,211	39.86%	0	1	\$ 203,723	6.6%
Facilitating Access to Coordinated Transportation	Brokerage Management: Optimizing San Diego County Transportation Services	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 400,000	12.9%
Facilitating Access to Coordinated Transportation	CTSA Services: Access to Health & Wellbeing Through Coordinated Mobility	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 200,000	6.4%
Facilitating Access to Coordinated Transportation	RideFACT: Subsidized Countywide Rides for Seniors & Persons with Disabilities	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 400,000	12.9%
Jewish Family Service	On the Go Eastern San Diego (OTG ESD) Senior Mini-Grant	92029, 92064, 92126, 92127, 92128, 92129, 92131, 92025 West of San Pasqua/Highland Valley Road	561,785	288,998	51.44%	221,905	89,654	40.40%	0	1	\$ 336,364	10.8%
Jewish Family Service	On the Go Northern San Diego (OTG NSD) Senior Mini-Grant	92007, 92014, 92024, 92037, 92067, 92075, 92091, 92106, 92107, 92109, 92110, 92121, 92122, 92130	390,163	138,697	35.55%	157,724	39,870	25.28%	0	0	\$ 334,828	10.8%
Jewish Family Service	On the Go North County Inland (OTG NCI) Senior Mini-Grant	91941, 91942, 92103, 92104, 92105, 92108, 92111, 92115, 92116, 92117, 92119, 92120, 92123, 92124	385,740	197,912	51.31%	128,391	28,424	22.14%	0	0	\$ 323,290	10.4%
Peninsula Shepherd Center	Out and About Peninsula Senior Transportation	92106/92107/92110	83,178	26,429	31.77%	33,362	10,137	30.38%	0	0	\$ 132,000	4.3%
Travelers Aid Society of San Diego	SenioRide	San Diego County	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	1	1	\$ 400,000	12.9%
Travelers Aid Society of San Diego	RIDEFinder	Urbanized Areas of San Diego County	3,176,459	1,716,550	54.04%	1,087,460	396,038	36.42%	1	1	\$ 85,500	2.8%

SAN DIEGO COUNTY	3,288,612	1,766,752	53.72%	1,126,029	406,893	36.14%	Total Availa	ble Funding	\$	3,104,255	100.0%
						Î	Minority	Low-Income	T	otal Projects	11
					Projects per Ca	tegory	5	8	] "	otal Projects	11
					Senior Mini-Gran		Cate	gory	Reco	Amount mmended for Funding	Percent of Total Available
					Recommended for	r Funding		ority ncome	\$	1,485,500 2,314,137	47.85% 74.55%
					10	tai Available	Funding Combine	Low-Income	\$	7,174,117	l
					Projects per Ca	tegory	16	21	То	tal Projects	28
					Section 5310		Cate	gory	Reco	Amount mmended for Funding	Percent of Total Available
					Senior Mini-Gran Recommended fo		Min	ority	\$	4,171,341	58.14%
							Low in	ncome	ė	6,000,088	83.64%

# SANDAG Social Equity Data Section 5310 Projects Recommended for Funding



#### Number of Projects Section 5310



#### **Low Income Households**

• 1 Dot = 100 households

#### **Minority Population**

• 1 Dot = 300 people

SANDAG has prepared this map, data, metadata and information for internal use, but is making it available as a public record. Conclusions drawn from the information are the sole responsibility of the user. SANDAG disclaims all warranties, express or implied, as to the accuracy, reliability, utility or completeness of the information. SANDAG assumes no liability for errors, omissions or inaccuracies regardless of the cause of such, or for any decision made, or action taken or omitted in reliance thereon. Furthermore, SANDAG disclaims all warranties, express or implied, including but not limited to liability for quality, performance, merchantability, and fitness for a particular purpose arising out of the use of or inability to use the information.

Minority Pop is defined as any persons not identifying as non-Hispanic White. Low Income households are defined as households with a reported household income of \$44,999 or less.

Data Source: SANDAG Population and Housing Estimates, v2019, 2019



### **Specialized Transportation Grant Program**

Cycle 12 Call for Projects

### Social Equity Analysis

#### Introduction

Per Federal Transit Administration (FTA) Title VI and Environmental Justice requirements, staff conducted a social equity analysis of the FTA Section 5310 funding recommendations for the Specialized Transportation Grant Program (STGP) Cycle 12 Call for Projects to determine whether the recommended projects would carry a disparate impact<sup>1</sup> or disproportionate burden<sup>2</sup> for people of color (POC)<sup>3</sup> and low-income populations, respectively. A similar analysis was conducted for the Senior Mini-Grant (SMG) Cycle 12 funding recommendations.

#### Methodology

The following steps were employed:

- Before conducting any analysis, staff looked to identify a threshold for determining the existence
  of a disparate impact or disproportionate burden. Staff adopted the "four-fifths" or "80/20" rule
  used in the <u>Social Equity Analysis of the 2021 Regional Plan</u>, where a difference greater than 20
  percent is statistically unlikely to occur on a random basis and is therefore considered a potential
  disparate impact or disproportionate burden.
- 2. Staff from the SANDAG Data Solutions Team used the project service area maps and ZIP Code information provided by applicants to map the projected service area of each project recommended for funding. For the Section 5310 program, staff aggregated the projects recommended for funding and geospatially displayed their project service areas. A darker gradient was used to represent more projects providing service in the San Diego urbanized area and a lighter gradient was used to represent fewer projects providing service in this area. Using the same method, staff created a separate map for recommended SMG projects within the region. These two maps are included in the analysis.
- 3. Using the spatial data mapped in Step 2 and demographic data from the SANDAG Population and Housing estimates, vintage year 2021, staff from the SANDAG Data Solutions Team determined the total population, the POC population, and the low-income population within the service area of each project recommended for funding. POC was defined as a person who identifies as Black, Hispanic, Asian or Asian American, American Indian or Alaska Native, or Native Hawaiian or other Pacific Islander through the U.S. Census. Low-income was defined as total reported household income less than \$49,999.4 Staff then determined the POC and low-income percentages for each recommended project by funding source, as shown in Tables 1 through 4.

<sup>&</sup>lt;sup>1</sup> A disparate impact is defined as a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin.

<sup>&</sup>lt;sup>2</sup> A disproportionate burden is defined as to a neutral policy or practice that disproportionately affects low-income populations.

<sup>&</sup>lt;sup>3</sup> The term "People of Color" or "POC" is used to be consistent with the 2021 Regional Plan. It is used to mean "Minority" as defined by the U.S. Census and as written in many federal Title VI requirements.

<sup>&</sup>lt;sup>4</sup> This threshold was used to be compatible with demographic data from the SANDAG Population and Housing estimates; it is nearly identical as 200 percent of the Federal Poverty Level, the threshold used in the 2021 Regional Plan.

- 4. Next, Grants Division staff determined the POC and low-income population and percentages for the San Diego urbanized area for the Section 5310 program, which requires projects to be within the urbanized area to be eligible for Section 5310 funding. The SMG Program requires projects to be within the region. Thus, staff also determined the POC and low-income population and percentages for San Diego County for use in the SMG analysis.
- 5. For the Section 5310 program, Grants Division staff identified the percentage of funding recommended for projects with a POC population greater than, equal to, or less than that of the San Diego urbanized area (Table 1). Staff then conducted the same analysis for low-income populations (Table 2). For the SMG program, staff identified the percentage of funding recommended for projects with a POC population greater than, equal to, or less than that of San Diego County (Table 3). Staff then conducted the same analysis for low-income populations (Table 4).
- 6. Next, for the Section 5310 program, Grants Division staff calculated the relative change between the POC population percentage of the projected service area and that of the San Diego urbanized area. Staff performed the same calculations for the low-income populations. Staff then employed the same method for the SMG program, using San Diego County as the comparison. Staff then multiplied the relative change for each project by that project's percentage of the total recommended funding to derive a weighted finding.
- 7. A weighted finding that was a positive percentage would indicate that the project funding would benefit a higher percentage of POC or low-income people than in the urbanized area of San Diego (for the 5310 program) or San Diego County (for the SMG program). A weighted finding of 0% would be parity; in other words, the project would benefit the same percentage of POC or low-income populations as in the urbanized area of San Diego or San Diego County as a whole. The larger the positive percentage, the greater benefit is attributed to POC and low-income populations. A negative percentage would indicate that the project funding would benefit a population that was less POC or low-income than the comparison population.
- 8. Grants Division staff then summed the project weighted findings to calculate each grant program's aggregated weighted finding. Using the four-fifths rule, an aggregated weighted finding of -20% or lower would be considered to carry a potential disparate impact or disproportionate burden. If a potential disparate impact or disproportionate burden had been found, SANDAG would have conducted additional investigation and considered alternatives and mitigation that would reduce the impact or burden consistent with the STGP Cycle 12 Call for Projects.
- 9. The maps created in Step 1 were overlaid with the low-income and POC populations for the appropriate comparison population to visually confirm the calculations performed in prior steps. The low-income and POC populations are displayed as dot densities where one dot is equal to 100 households and 300 people, respectively.
- 10. Last, quality assurance analysts external to the Grants Division performed a quality assurance review of Tables 1 through 4 and the maps to verify the accuracy of the data, calculations, and visual representations.

#### **Summary of Analysis**

The analysis shows a broad geographic distribution of program funding would occur based on the service areas of the projects recommended for funding through the STGP Cycle 12 Call for Projects. The analysis also shows that the recommended Section 5310 and SMG funding would be equitably distributed among POC and low-income populations. Below are more specific findings by funding program.

#### Section 5310 Program

There are 11 projects recommended for Section 5310 funding through the STGP Cycle 12 Call for Projects from nine specialized transportation providers. The Section 5310 tables and map show that three providers would serve the entire Census-defined urbanized area, with the remaining six providers serving portions of the urbanized area. For this analysis, requests for multiple vehicles from an applicant were grouped together as one vehicle procurement project from that applicant. Below are specific results of the Section 5310 social equity analysis for POC and low-income populations.

#### **POC** Population

As shown in Table 1, the POC population represents approximately 54% of the San Diego urbanized area population. The analysis shows that approximately 58% of the recommended Section 5310 funding would benefit areas in which the POC population is greater than or equal to the POC population in the San Diego urbanized area. The analysis also shows that approximately 42% of the recommended Section 5310 funding would benefit areas in which the POC population is less than the POC population in the San Diego urbanized area.

Furthermore, the analysis shows a weighted finding of 0.48% based on the recommended funding distribution. This finding indicates that the total recommended Section 5310 funding would benefit a slightly higher percentage of POC than live in the San Diego urbanized area. This finding also is greater than -20%, suggesting the Section 5310 funding recommendations would not carry a potential disparate impact for POC populations based on the four-fifths rule.

#### Low-Income Population

As shown in Table 2, the low-income population represents approximately 32% of the San Diego urbanized area population. The analysis shows that approximately 63% of the recommended Section 5310 funding would benefit areas in which the low-income population is greater than or equal to the low-income population in the San Diego urbanized area. The analysis also shows that approximately 37% of the recommended Section 5310 funding would benefit areas in which the low-income population is less than the low-income population in the San Diego urbanized area.

Furthermore, the analysis shows a weighted finding of 2.37% based on the recommended funding distribution. This finding indicates that the total recommended Section 5310 funding would benefit a slightly higher percentage of low-income people than live in the San Diego urbanized area. This finding also is greater than -20%, suggesting the Section 5310 funding recommendations would not carry a potential disproportionate burden for low-income populations based on the four-fifths rule.

#### Senior Mini-Grant Program

There are four projects recommended for SMG funding through the STGP Cycle 12 Call for Projects, each from a unique specialized transportation provider. The SMG tables and map show that half of the providers recommended for funding would provide countywide service, and that the other half would serve portions of the County.

#### **POC** Population

As shown in Table 3, the POC population represents approximately 54% of the San Diego County population. The analysis shows that approximately 47% of the recommended SMG funding would benefit areas in which the POC population is equal to the POC population in the entire County of San Diego. The analysis also shows that approximately 53% of the recommended SMG funding would benefit areas in which the POC population is less than the POC population in the County of San Diego.

Moreover, the analysis shows a weighted finding of -4.45% based on the recommended funding distribution. This finding indicates that the total recommended SMG funding would benefit a slightly lower percentage of POC than live in the County of San Diego. Nevertheless, this finding also is greater than -20%, suggesting the SMG funding recommendations would not carry a potential disparate impact for POC populations based on the four-fifths rule.

#### Low-Income Population

As shown in Table 4, the low-income population represents approximately 31% of San Diego County population. The analysis shows that approximately 57% of the recommended SMG funding would benefit areas in which the low-income population is greater than or equal to the low-income population in the entire County of San Diego. The analysis also shows that approximately 43% of the recommended SMG funding would benefit areas in which the low-income population is less than the low-income population in the County of San Diego.

Moreover, the analysis shows a weighted finding of -1.50% based on the recommended funding distribution. This finding indicates that the total recommended SMG funding would benefit a slightly lower percentage of low-income people than live in the County of San Diego. Nonetheless, this finding also is greater than -20%, suggesting the SMG funding recommendations would not carry a potential disproportionate burden for low-income populations based on the four-fifths rule.

#### Conclusions

The analysis found that the STGP Cycle 12 funding recommendations for both the Section 5310 and SMG programs would cause neither potential disparate impacts for POC populations nor potential disproportionate burdens for low-income populations.

Applicant Name	Shortened Project Name	Project Service Area	Total Population	Person of Color (POC) Population	POC Percentage	Recomme Grant Aw		Percentage of Total Funding Recommended	Recommended Grant Award in which the POC Population in the Project Area is Greater than the POC Population in San Diego Urbanized Area	Recommended Grant Award in which the POC Population in the Project Area is Equal to the POC Population in San Diego Urbanized Area	Recommended Grant Award in which the POC Population in the Project Area is Less Than the POC Population in San Diego Urbanized Area	Relative Change Between POC Population in Project Area and San Diego Urbanized Area	Weighted Finding
Facilitating Access to Coordinated Transportation	CTSA Services	Urbanized Area of San Diego County	3,190,779	1,738,437	54.48%	\$ 7	90,758	15.29%		\$ 790,758		0.00%	0.00%
Home of Guiding Hands	HGH Vehicle Procurement	91901, 91941, 91942, 91945, 91977, 91978, 92019, 92020, 92021, 92040, 92071	451,686	203,654	45.09%	\$ 9	189,753	19.14%			\$ 989,753	-17.25%	-3.30%
Jewish Family Service of San Diego	OTG 5310	91941, 91942, 91945, 91977, 92007, 92014, 92019, 92020, 92021, 92024, 92025, 92026, 92029, 92037, 92040, 92064, 92067, 92071, 92075, 92091, 92102, 92103, 92104, 92105, 92106, 92107, 92108, 92106, 92107, 92110, 92111, 92114, 92115, 92116, 92117, 92119, 92120, 92121, 92122, 92123, 92124, 92126, 92127, 92128, 92129, 92130, 92131, 92139	1,895,765	933,927	49.26%	<b>\$</b> 9	70,000	18.76%	+	-	\$ 970,000	-9.58%	-1.80%
Operation Samahan	OS Vehicle Procurement	91902, 91910, 91911, 91932, 91945, 91950, 91977, 92114, 92115, 92126, 92129, 92130, 92131, 92139, 92154, 92173	831,312	600,875	72.28%	\$ 1	75,328	3.39%	\$ 175,328			32.67%	1.11%
Renewing Life	RL Vehicle Procurement	91902, 91911, 91913, 91914, 91915, 91919, 91932, 91950, 92154, 92173	398,476	329,797	82.76%	\$	61,405	1.19%	\$ 61,405			51.91%	0.62%
San Diego Metropolitan Transit System	SDMTS Vehicle Procurement	91901, 91902, 91910, 91911, 91913, 91914, 91915, 91932, 91935, 91950, 91977, 91978, 92014, 92019, 92020, 92021, 92025, 92029, 92037, 92040, 92064, 92067, 92071, 92093, 92111, 92123, 92124, 92126, 92127, 92128, 92129, 92130, 92131, 92139, 92145, 92154, 92154, 92154, 92154, 92154, 92154	1,506,371	886,135	58.83%	<b>\$</b> 9	52,861	18.43%	\$ 952,861			7.97%	1.47%
St. Madeleine Sophie's Center	SMSC Vehicle Procurement	91901, 91902, 91911, 91917, 91935, 91941, 91942, 91945, 91950, 91977, 91978, 92019, 92020, 92021, 92025, 92040, 92064, 92065, 92071	755,361	405,882	53.73%	\$ 2	12,672	4.11%			\$ 212,672	-1.38%	-0.06%
St. Paul's Senior Services	SPSS Vehicle Procurement	Urbanized Area of San Diego County	3,190,779	1,738,437	54.48%	\$ 2	78,469	5.39%	1	\$ 278,469		0.00%	0.00%
The Arc of San Diego	MCRD Contracted Transportation	91910, 91911, 91950, 91977, 92019, 92021, 92101, 92102, 92105, 92106, 92113, 92114, 92115, 92117, 92126, 92139, 92154	989,830	685,268	69.23%	\$ 4	67,200	9.04%	\$ 467,200			27.07%	2.45%
Traveler's Aid Society of San Diego	RIDEFinder 5310	Urbanized Area of San Diego County	3,190,779	1,738,437	54.48%	\$ 1	84,000	3.56%		\$ 184,000		0.00%	0.00%
Traveler's Aid Society of San Diego	Senior Solutions	Urbanized Area of San Diego County	3,190,779	1,738,437	54.48%	\$	87,784	1.70%		\$ 87,784		0.00%	0.00%

Summary	Total Population	Person of Color (POC) Population		Recommended Grant Award	Percentage of Total Funding Recommended	Recommended Grant Award in which the POC Population in the Project Area is Greater than the POC Population in San Diego Urbanized Area	which the POC Population in the Project Area is Equal to the POC Population in San	Recommended Grant Award in which the POC Population in the Project Area is Less Than the POC Population in San Diego Urbanized Area	Relative Change Between POC Population in Project Area and San Diego Urbanized Area	Weighted Finding
Total Cycle 12 Section 5310 Funding				\$ 5,170,230		\$ 1,656,794	\$ 1,341,011	\$ 2,172,425	Average	0.04%
Percent of Total Funding					100.00%	32.04%	25.94%	42.02%	Sum/ Weighted Finding	
Urbanized Area of San Diego County	3,190,779	1,738,437	54.48%							

Applicant Name	Shortened Project Name	Project Service Area	Total Population (Households)	Low-Income (LI) Population (Households)	LI Percentage	Recommende Grant Award	d Share of Total Funding Recommended	Recommended Grant Award in which the LI Population in the Project Area is Greater than the LI Population in the San Diego Urbanized Area	Recommended Grant Award in which the Li Population in the Project Area is Equal to the Li Population in the San Diego Urbanized Area	Recommended Grant Award in which the LI Population in the Project Area is Less Than the LI Population in the San Diego Urbanized Area	Relative Change Between LI Population in Project Area and the San Diego Urbanized Area	Weighted Finding
Facilitating Access to Coordinated Transportation	CTSA Services	Urbanized Area of San Diego County	1,118,146	352,193	31.50%	\$ 790,7	15.29%		\$ 790,758	-	0.00%	0.00%
Home of Guiding Hands	HGH Vehicle Procurement	91901, 91941, 91942, 91945, 91977, 91978, 92019, 92020, 92021, 92040, 92071	161,536	55,697	34.48%	\$ 989,7	19.14%	\$ 989,753	-	-	9.47%	1.81%
Jewish Family Service of San Diego	OTG 5310	91941, 91942, 91945, 91977, 92007, 92014, 92019, 92020, 92021, 92024, 92025, 92026, 92029, 92037, 92040, 92064, 92067, 92071, 92075, 92091, 92102, 92103, 92104, 92105, 92106, 92107, 92108, 92109, 92110, 92111, 9214, 92115, 92116, 92117, 92119, 92120, 92121, 92122, 92123, 92124, 92126, 92127, 92128, 92129, 92130, 92131, 92139	705,354	211,992	30.05%	\$ 970,0	00 18.76%	-	-	\$ 970,000	-4.58%	-0.86%
Operation Samahan	OS Vehicle Procurement	91902, 91910, 91911, 91932, 91945, 91950, 91977, 92114, 92115, 92126, 92129, 92130, 92131, 92139, 92154, 92173	268,865	89,990	33.47%	\$ 175,3	28 3.39%	\$ 175,328	-	-	6.26%	0.21%
Renewing Life	RL Vehicle Procurement	91902, 91911, 91913, 91914, 91915, 91919, 91932, 91950, 92154, 92173	117,053	41,203	35.20%	\$ 61,4	05 1.19%	\$ 61,405	-	-	11.75%	0.14%
San Diego Metropolitan Transit System	SDMTS Vehicle Procurement	91901, 91902, 91910, 91911, 91913, 91914, 91915, 91932, 91935, 91950, 91977, 91978, 92014, 92019, 92021, 92025, 92029, 92037, 92040, 92064, 92067, 92071, 92083, 9211, 92128, 92129, 92130, 92131, 92139, 92145, 92128, 92129, 92130, 92131, 92139, 92145, 92154, 92173, 92093, 92121, 92154	504,343	146,655	29.08%	\$ 952,8	18.43%	-	-	\$ 952,861	-7.68%	-1.42%
St. Madeleine Sophie's Center	SMSC Vehicle Procurement	91901, 91902, 91911, 91917, 91935, 91941, 91942, 91945, 91950, 91977, 91978, 92019, 92020, 92021, 92025, 92040, 92064, 92065, 92071	256,319	88,345	34.47%	\$ 212,6	72 4.11%	\$ 212,672		-	9.43%	0.39%
St. Paul's Senior Services	SPSS Vehicle Procurement	Urbanized Area of San Diego County	1,118,146	352,193	31.50%	\$ 278,4	5.39%		\$ 278,469		0.00%	0.00%
The Arc of San Diego	MCRD Contracted Transportation	91910, 91911, 91950, 91977, 92019, 92021, 92101, 92102, 92105, 92106, 92113, 92114, 92115, 92117, 92126, 92139, 92154	330,556	128,192	38.78%	\$ 467,2	9.04%	\$ 467,200		-	23.12%	2.09%
Traveler's Aid Society of San Diego	RIDEFinder 5310	Urbanized Area of San Diego County	1,118,146	352,193	31.50%	\$ 184,0	3.56%		\$ 184,000		0.00%	0.00%
Traveler's Aid Society of San Diego	Senior Solutions	Urbanized Area of San Diego County	1,118,146	352,193	31.50%	\$ 87,7	1.70%		\$ 87,784	-	0.00%	0.00%

Summary	Total Population (Households)	Low-income (LI) Population (Households)	LI Percentage	Recommended Grant Award	Share of Total Funding Recommended	Recommended Grant Award in which the LI Population in the Project Area is Greater than the LI Population in the San Diego Urbanized Area	Recommended Grant Award in which the LI Population in the Project Area is Equal to the LI Population in the San Diego Urbanized Area	Recommended Grant Award in which the LI Population in the Project Area is Less Than the LI Population in the San Diego Urbanized Area	the San Diego	Weighted Finding
Total Cycle 12 Section 5310 Funding	ı			\$ 5,170,230		\$ 1,906,358	\$ 1,341,011	\$ 1,922,861	Average	0.22%
Percent of Total Funding					100.00%	36.87%	25.94%	37.19%	Sum/ Weighted Finding	
Urbanized Area of San Diego County	1,118,146	352,193	31.50%							

#### Table 3: SMG Recommended Projects and POC Population

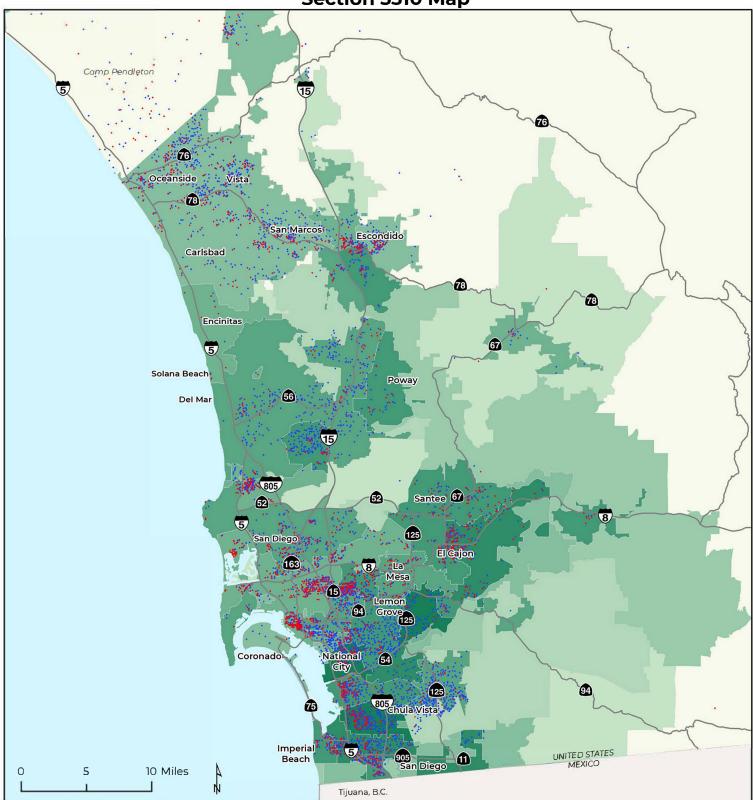
Applicant Name	Shortened Project Name	Project Service Area	Total Population	Person of Color (POC) Population	POC Percentage	Recommended Grant Award	Percentage of Total Funding Recommended	Recommended Grant Award in which the POC Population in the Project Area is Greater than the POC Population in San Diego County	Recommended Grant Award in which the POC Population in the Project Area is Equal to the POC Population in San Diego County	Recommended Grant Award in which the POC Population in the Project Area is Less Than the POC Population in San Diego County	Relative Change Between POC Population in Project Area and San Diego County	Weighted Finding
ElderHelp of San Diego	Seniors A Go Go	91941, 91942, 91943, 91944, 91945, 91977, 91978, 92019, 92020, 92021, 92037, 92071, 92101, 92102, 92103, 92104, 92105, 92106, 92107, 92108, 92109, 92110, 92111, 92113, 92114, 92115, 92116, 92117, 92118, 9219, 92120, 92122, 92123, 92124, 92126, 92127, 92128, 92129, 92131	1,611,682	825,864	51.24%	\$ 282,593	10.28%	-	-	\$ 282,593	-5.45%	-0.56%
Facilitating Access to Coordinated Transportation	CTSA Services	County of San Diego	3,315,404	1,796,907	54.20%	\$ 790,758	28.77%	-	\$ 790,758		0.00%	0.00%
Jewish Family Service of San Diego	OTG SMG	91941, 91942, 91945, 91977, 92007, 92014, 92019, 92020, 92021, 92024, 92025, 92026, 92029, 92037, 92040, 92064, 92067, 92071, 92075, 92091, 92102, 92103, 92104, 92105, 92106, 92107, 92108, 92101, 92111, 92114, 92115, 92116, 92117, 92119, 92120, 92121, 92122, 92123, 92124, 92126, 92127, 92128, 92129, 92130, 92131, 92139	1,895,765	933,927	49.26%	\$ 1,174,856	42.75%	-	-	\$ 1,174,856	-9.11%	-3.89%
Traveler's Aid Society of San Diego	SenioRide	County of San Diego	3,315,404	1,796,907	54.20%	\$ 500,000	18.19%		\$ 500,000		0.00%	0.00%

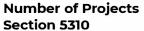
Summary	Total Population	Person of Color (POC) Population	POC Percentage	Recommended Grant Award	Percentage of Total Funding Recommended	Recommended Grant Award in which the POC Population in the Project Area is Greater than the POC Population in San Diego County	Recommended Grant Award in which the POC Population in the Project Area is Equal to the POC Population in San Diego County	Less Than the POC	San Diego	Weighted Finding
Total Cycle 12 SMG Funding				\$ 2,748,207		\$ -	\$ 1,290,758	\$ 1,457,449	Average	-1.11%
Percent of Total Funding					100.00%	0.00%	46.97%	53.03%	Sum/ Weighted Finding	-4.45%
County of San Diego	3,315,404	1,796,907	54.20%							

Applicant Name	Shortened Project Name	Project Service Area	Total Population (Households)	Low-Income (LI) Population (Households)	LI Percentage	Recommended Grant Award	Share of Total Funding Recommended	Recommended Grant Award in which the LI Population in the Project Area is Greater than the LI Population in San Diego County	Recommended Grant Award in which the LI Population in the Project Area is Equal to the LI Population in San Diego County	Recommended Grant Award in which the Li Population in the Project Area is Less Than the Li Population in San Diego County	Relative Change Between LI Population in Project Area and San Diego County	Weighted Finding
ElderHelp of San Diego	Seniors A Go Go	91941, 91942, 91943, 91944, 91945, 91977, 91978, 92019, 92020, 92021, 92037, 92071, 92101, 92102, 92104, 92105, 92106, 92107, 92108, 92109, 92110, 92111, 92113, 92114, 92115, 92116, 9217, 92120, 9122, 92123, 92124, 92126, 92127, 92128, 92129, 92131	608,807	195,229	32.07%	\$ 282,593	10.28%	\$ 282,593	-	-	2.35%	0.24%
Facilitating Access to Coordinated Transportation	CTSA Services	County of San Diego	1,159,439	363,280	31.33%	\$ 790,758	28.77%		\$ 790,758		0.00%	0.00%
Jewish Family Service of San Diego	OTG SMG	91941, 91942, 91945, 91977, 92007, 92014, 92019, 92020, 92021, 92024, 92025, 92026, 92029, 92037, 92040, 92064, 92067, 92071, 92075, 92091, 92102, 92103, 92104, 92105, 92106, 92107, 92108, 92109, 92110, 92111, 92114, 92115, 92116, 92117, 92120, 92121, 92122, 92123, 92124, 92126, 92127, 92128, 92129, 92130, 92131, 92139	705,354	211,992	30.05%	\$ 1,174,856	42.75%	-	-	\$ 1,174,856	-4.08%	-1.74%
Traveler's Aid Society of San Diego	SenioRide	County of San Diego	1,159,439	363,280	31.33%	\$ 500,000	18.19%		\$ 500,000	-	0.00%	0.00%

Summary	Total Population (Households)	Low-Income (LI) Population (Households)	LI Percentage	Recommended Grant Award	Share of Total Funding Recommended	Recommended Grant Award in which the LI Population in the Project Area is Greater than the LI Population in San Diego County	Recommended Grant Award in which the LI Population in the Project Area is Equal to the LI Population in San Diego County	Recommended Grant Award in which the LI Population in the Project Area is Less Than the LI Population in San Diego County	Relative Change Between LI Population in Project Area and San Diego County	Weighted Finding
Total Cycle 12 SMG Funding				\$ 2,748,207		\$ 282,593	\$ 1,290,758	\$ 1,174,856	Average	-0.38%
Percent of Total Funding					100.00%	10.28%	46.97%	42.75%	Sum/ Weighted Finding	-1 50%
County of San Diego	1,159,439	363,280	31.33%							

# Social Equity Analysis of the STGP Cycle 12 Funding Recommendations Section 5310 Map







#### Low Income Households

1 Dot = 100 households

#### **POC Population**

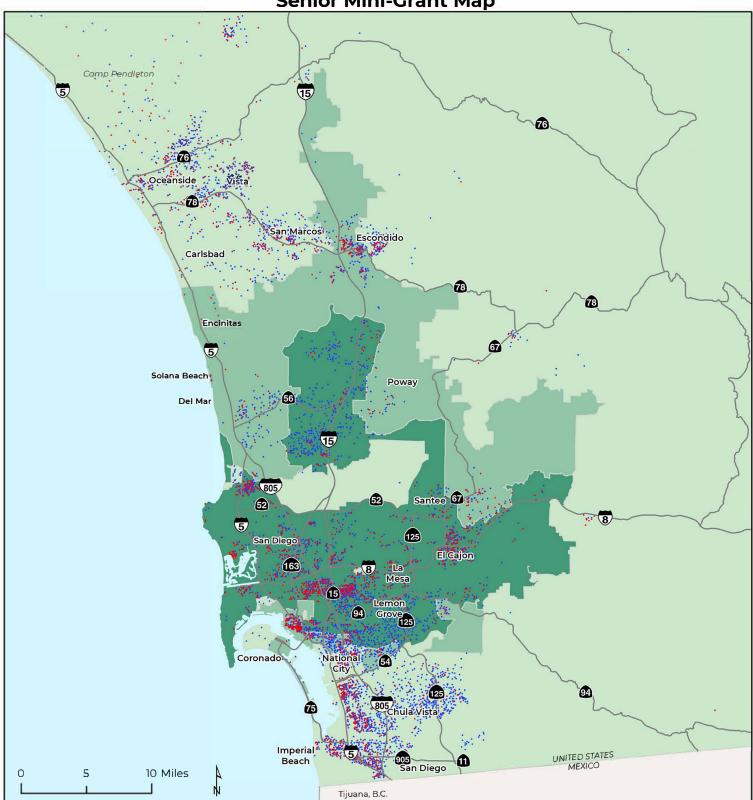
• 1 Dot = 300 people

#### www.SANDAG.org/DataTerms

Person of Color (POC) Population is defined as people who identify as Black, Hispanic, Asian or Asian American, American Indian or Alaska Native, or Native Hawaiian or other Pacific Islander through the U.S. Census. Low-income households are defined as households with a reported household income of less than \$44,999.

Data Source: SANDAG Population and Housing Estimates, 2021

Social Equity Analysis of the STGP Cycle 12 Funding Recommendations
Senior Mini-Grant Map



#### Number of Projects Senior Mini-Grant

2

3

4

#### Low Income Households

1 Dot = 100 households

#### **POC Population**

1 Dot = 300 people

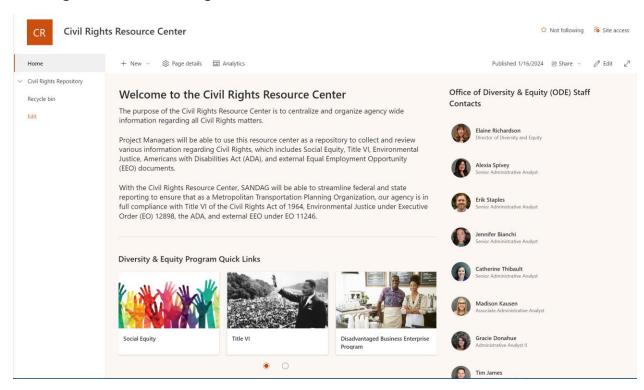
#### www.SANDAG.org/DataTerms

Person of Color (POC) Population is defined as people who identify as Black, Hispanic, Asian or Asian American, American Indian or Alaska Native, or Native Hawaiian or other Pacific Islander through the U.S. Census. Low-income households are defined as households with a reported household income of less than \$44,999.

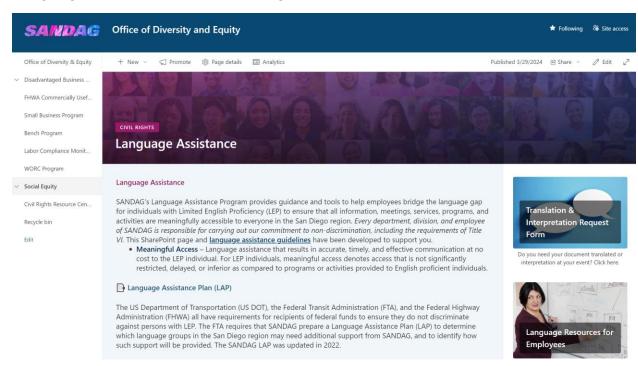
Data Source: SANDAG Population and Housing Estimates, 2021

# Appendix I: SharePoint Resources

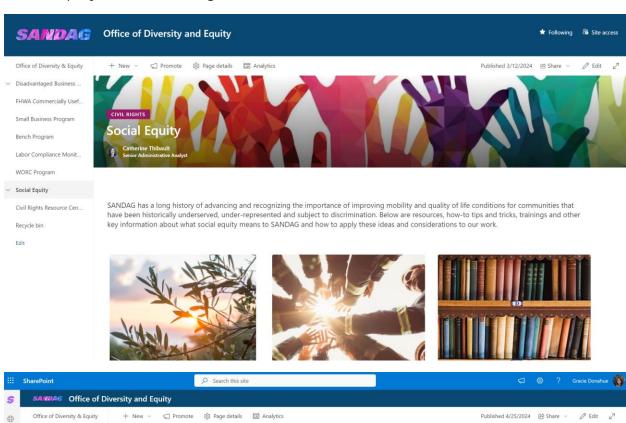
#### Civil Rights SharePoint Page

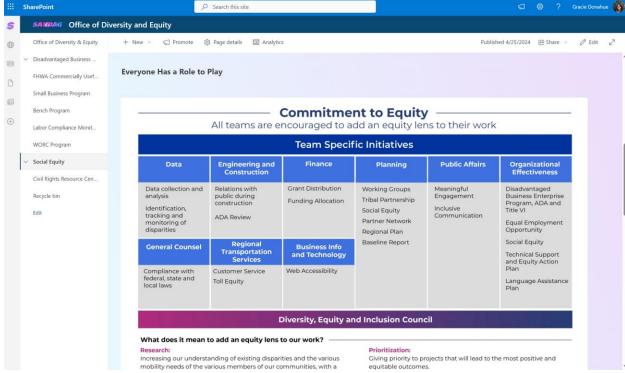


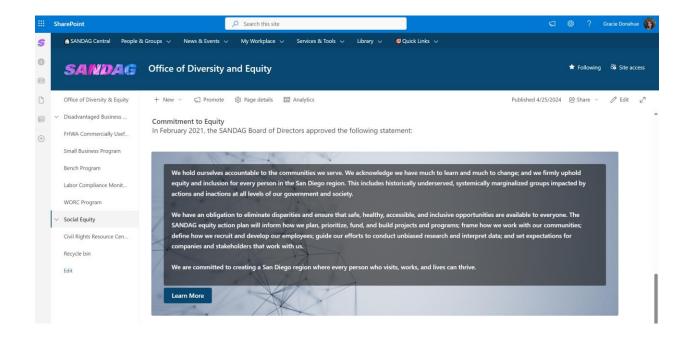
#### Language Assistance SharePoint Page



#### Social Equity SharePoint Page







# Appendix J: Social Equity Baseline Report





# SOCIAL EQUITY BASELINE REPORT

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Free Language Assistance | Ayuda gratuita con el idioma | Libreng Tulong sa Wika Hỗ trợ ngôn ngữ miễn phí | 免費語言協助 | 免费语言协助 | عساعة ترجمة مجانية | 무료 먼어 지원 | 무료 먼어 지원 | 無料の言語支援 | Бесплатная языковая помощь Assistência linguística gratuita मुफ़्त भाषा सहायता | Assistance linguistique gratuite | ជំនួយភាសាឥតគិតថ្លៃ ఉచిత భాషా సహాయం | ການຊ່ວຍເຫຼືອດ້ານພາ ສາຟຣି | Kaalmada Luqadda ee Bilaashka ah | Безкоштовна мовна допомога

sandag.org/LanguageAssistance | (619) 699-1900



# SANDAG

# COMMITMENT TO EQUITY

We hold ourselves accountable to the communities we serve. We acknowledge we have much to learn and much to change; and we firmly uphold equity and inclusion for every person in the San Diego region. This includes historically underserved, systemically marginalized groups impacted by actions and inactions at all levels of our government and society.

We have an obligation to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone. The SANDAG equity action plan will inform how we plan, prioritize, fund, and build projects and programs; frame how we work with our communities; define how we recruit and develop our employees; guide our efforts to conduct unbiased research and interpret data; and set expectations for companies and stakeholders that work with us.

We are committed to creating a San Diego region where every person who visits, works, and lives can thrive.



Transportation projects have a significant effect on the quality of life for a region's residents by shaping access to jobs, education, housing, services, and recreational opportunities. Without proper planning and development, transportation systems can have a negative impact on communities. The construction of roads, freeways, and rail transit systems have historically placed health and socioeconomic burdens on low-income communities and communities of color. Transportation projects may also physically divide communities, resulting in long-lasting social and economic costs.

It is important to understand the impacts of transportation investments on our most vulnerable communities, which is why San Diego Association of Governments (SANDAG) prioritized equity in the 2021 Regional Plan more than ever before. Adoption of a Commitment to Equity statement, coupled with the Regional Plan's prioritization of equity, lays the foundation for the agency to incorporate diversity, equity, and inclusion in all programs, projects, and policies. SANDAG's transformative 2021 Regional Plan envisions a transportation system that is faster, fairer, and cleaner. The Plan strives to make the region a better place for everyone who lives, works, and travels throughout the Region and shifts attention to communities that face social and economic injustice.

This Social Equity Baseline Report (Report) examines social equity through the context of race and ethnicity and is an early action of the 2021 Regional Plan. This report provides a snapshot of the region, catalogues equity through numerous indicators and thematic topics, and will be referenced during the next planning cycle. While the Report focuses on the San Diego region, it also offers some insights about local jurisdictions. Staff anticipates this report is the first of a series that will be updated as new data and emerging best practices become available.<sup>2</sup>

About SANDAG. San Diego Forward SANDAG. (n.d.). Retrieved June 7, 2022, from https://sdforward.com/about-san-diego-forward/about-sandag#:~:text=Our%20Commitment%20to%20Equity&text=We%20acknowledge%20we%20have%20much,of%20our%20government%20and%20society.

### HISTORICAL CONTEXT

A key racial equity practice is to cultivate a deep and nuanced understanding that goes beyond the question of what inequities exist to grasp why inequities exist. Different levels of government and sectors of society played a role in creating the persistent pattern of racial segregation and economic inequity that exist today. Housing and transportation policies and practices exacerbated racial/ethnic and socioeconomic issues through much of the 20th century. Building of the interstate highway system, for example, "[pushed] expressways through the social and physical fabric of American cities inevitably [resulting] in housing demolition on a large scale, the destruction of entire communities, severe relocation problems, and subsequent environmental damage". Planning practices, such as racial zoning, exclusionary zoning, and urban renewal are at the root of environmental injustice and inequitable development. Another example is the redlining which was established by the Home Owners' Loan Corporation, an agency of the Federal Government. The practice of redlining classified and colorcoded neighborhoods by their perceived level of lending risk - the best neighborhoods were labeled in green, while "red" neighborhoods were considered "hazardous". Areas with sizable Black and other minority populations were outlined in red ink, hence the term "redlining". The effect of redlining is that communities of color were isolated to areas that experienced lower levels of investment and less access to opportunity than White communities. These historical inequities matter, as do current and contemporary inequities. In tandem with communities, planners can play a pivotal role in restoring past harm by weaving the region's urban fabric back together.

Communities are empowered to guide government to achieve equitable outcomes by participating in the planning process to influence plans that affect their neighborhoods through community organizing and resident activism. The City Heights community's State Route (SR)-15 Visions Project is one of San Diego's many case studies that shows the successful role that community advocacy can have in physically and culturally reconnecting a community that was divided by the interstate system. This report highlights this story because it is supported by an award-winning City Heights Community Development Corporation documentary featuring in-depth interviews with City Heights community leaders from 1978-2018 that readers can access for more in-depth knowledge. In the mid-1970s, Caltrans shared initial project plans that would convert 40th Street in City Heights into a freeway. Called the missing link, the two-mile project area was the only incomplete segment of SR-15 between Canada and the San Diego region's South Bay. The trade-off of completing this missing link was that it would physically divide and culturally disconnect City Heights communities. Residents were concerned that construction would come at a cost of eight blocks of homes and businesses, so they began to organize. In 1981, the City Heights Community Development Corporation was formed and launched a community planning process called the Visions Project, which envisioned SR-15 as an underground freeway covered by parks, transit plazas, and included the development of housing and businesses. Although the City of San Diego and Caltrans scaled back City Heights' vision from four blocks of freeway cover to one block, the community considers the downsized version of the Vision Plan to be a success. The plan also included two freeway adjacent parks, two pedestrian bike bridges, two transit plazas, a separated bike path and centerline bus rapid transit stations. The first freeway cover park in California would later be known as Teralta Park.

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<sup>&</sup>lt;sup>3</sup>Mohl, R. A. (2004). Stop the road: Freeway revolts in American cities. Journal of Urban History, 30(5), pg. 674

<sup>&</sup>lt;sup>4</sup>Torres-Van Vleck, R. (2018). Visions To Victory: A People's History of the SR-15 Freeway. Reel House. Retrieved May 25, 2022, from https://www.reelhouse.org/cityheightscdc/visions-to-victory376/visions-to-victory-a-people-s-history-of





Teralta Park Image Source: San Diego Free Press

Policymakers play a role in addressing past mistakes as well. The Civil Rights Act of 1964 was prompted by calls to end discrimination and racism. The legislation prohibits discrimination based on race, color, religion, sex, or national origin. The nation's benchmark civil rights legislation prohibited discrimination in public accommodations and federally funded programs, such as those that support transportation and housing.<sup>5</sup>

Towards the end of the 20th century, the Federal government directed federal agencies to address negative effects their programs had on People of Color and low-income populations through Executive Order 12898. Environmental justice refers to the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice communities that experience disproportionately high and adverse health and environmental impacts are usually surrounded by freeways and industrial facilities, lack access to clean drinking water or sidewalks, and are excluded from public investments.

The State of California also enacted policies to correct systemic inequities. California extended housing discrimination laws to cover other groups not protected in the Fair Housing Act of 1968. Assembly Bill 686 requires all state and local public agencies to facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns of segregation. The Bill also creates new requirements that apply to all housing elements of comprehensive plans.<sup>8</sup>

<sup>&</sup>lt;sup>5</sup>Legal highlight: The Civil Rights Act of 1964. United States Department of Labor. (n.d.). Retrieved June 7, 2022, from https://www.dol.gov/agencies/oasam/civil-rights-center/statutes/civil-rights-act-of-1964#:~:text=In%201964%2C%20Congress%20passed%20 Public,hiring%2C%20promoting%2C%20and%20firing.

<sup>&</sup>lt;sup>6</sup>Environmental Protection Agency. (n.d.). Environmental Justice. EPA. Retrieved June 7, 2022, from https://www.epa.gov/environmentaljustice

<sup>&</sup>lt;sup>7</sup>Defining environmental justice communities: Using CalEnviroScreen in State policy. California Environmental Justice Alliance. (2016, November 18). Retrieved June 7, 2022, from https://caleja.org/2016/09/defining-environmental-justice-communities-using-calenviroscreen-in-state-policy/#:~:text=How%20do%20you%20know%20if,and%20excluded%20from%20public%20investments.

<sup>&</sup>lt;sup>8</sup>California Department of Housing and Community Development - HCD. (n.d.). Affirmatively furthering fair housing in California. AFFH / Fair Housing. Retrieved June 7, 2022, from https://www.hcd.ca.gov/community-development/affh/index.shtml#ab686



#### Who Calls San Diego Home?

The San Diego region has a total population of more than 3.3 million people and is the second-most populous county in the state. Race and ethnicity play an integral role in the rich, diverse history of San Diego County and should be considered in the planning and development process. This report identifies demographic indicators and sets the stage to highlight connections between certain socioeconomic characteristics and disparities throughout the region.

#### San Diego Region Population



Data Source: SANDAG Population and Housing Estimates 2019

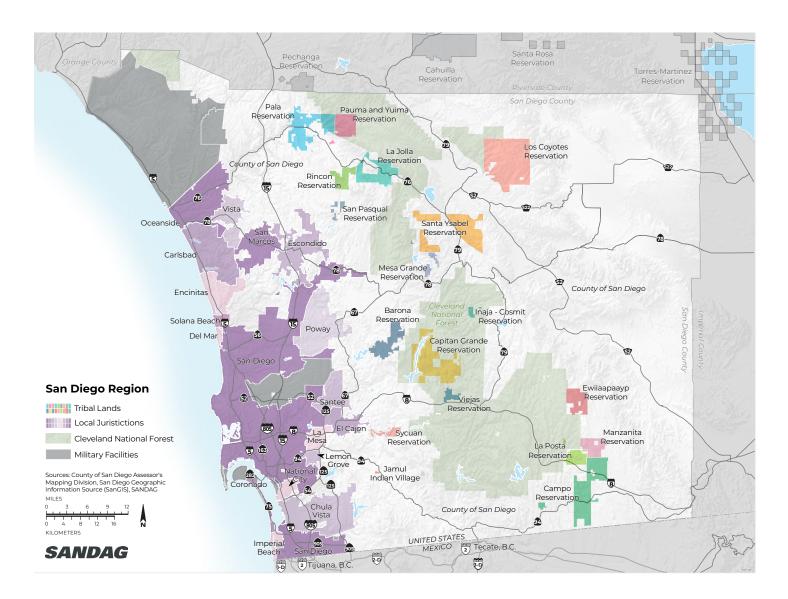
- Hispanic/Latino people make up about one-third of the county's population and nearly 90% of the region's Hispanic/Latino population are of Mexican descent.9
- 40% of the region's Asian population are ethnically Filipino.<sup>10</sup>
- · San Diego is home to 17 Federally Recognized Tribal Nations and 18 Reservations.
- Almost 54% of the county's population, or more than 1.8 million residents, are People of Color.11

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<sup>&</sup>lt;sup>9</sup>ACS 2019 5-Year Estimates, Table DP05

<sup>&</sup>lt;sup>10</sup>ACS 2019 5-Year Estimates, Table DP05

<sup>&</sup>quot;People of Color refers to all people who do not identify as White, Non-Hispanic. The term(s) are used as an inclusive and unifying frame across different racial groups that are not White, to address racial inequities.



The San Diego region spans approximately 4,261 square miles and is comprised of 18 incorporated cities and unincorporated lands. Almost 80% of the region's land area falls in the Unincorporated County, which mainly consists of rural areas that border Native American reservations, military installations, and other State and Federally-owned lands. Together, the local jurisdictions make up a considerable amount of land cover, however the cities of San Diego and Chula Vista are the largest by size and population. Almost two-thirds of the region's population lives in the City of San Diego, Chula Vista, and unincorporated San Diego County. The data sets for large cities like San Diego are not well-suited to capture the vast disparities in equity outcomes and lived experiences of underserved communities that are nested within much larger jurisdictions.

Tables containing jurisdictional data sets for some of this report's indicators can be accessed in the appendix.

#### Race/Ethnic Breakdown by Jurisdiction

Judication figures highlighted in purple have higher concentrations of racial/ethnic groups than that of the region.

	Total Population	County	Hispanic	American Indian/ Alaska Native	Asian	Black	Hawaiian / Pacific Islander	Other	Two or More	White
San Diego Region	3,333,319		34.06%	0.45%	10.62%	4.75%	0.44%	0.22%	3.34%	46.12%
Carlsbad	113,986	3.4%	18.93%	0.35%	8.06%	1.11%	0.39%	0.24%	3.30%	67.62%
Chula Vista	271,362	8.1%	60.06%	0.34%	11.92%	5.15%	0.38%	0.15%	2.85%	19.16%
Coronado	23,880	0.7%	17.99%	0.72%	3.67%	5.96%	0.52%	0.18%	2.64%	68.33%
Del Mar	4,288	0.1%	11.89%	0.35%	1.70%	0.65%	0.16%	0.30%	2.82%	82.11%
El Cajon	103,741	3.1%	27.59%	0.42%	4.65%	5.06%	0.50%	0.25%	3.57%	57.97%
Encinitas	62,296	1.9%	18.07%	0.41%	4.29%	0.56%	0.40%	0.22%	2.44%	73.62%
Escondido	151,311	4.5%	47.90%	0.40%	5.46%	2.50%	0.40%	0.16%	3.00%	40.18%
Imperial Beach	27,869	0.8%	51.56%	0.46%	5.90%	5.67%	0.36%	0.13%	3.17%	32.77%
La Mesa	59,833	1.8%	26.98%	0.33%	6.89%	7.05%	0.43%	0.31%	3.70%	54.32%
Lemon Grove	26,515	0.8%	44.74%	0.36%	5.84%	14.63%	0.49%	0.23%	3.76%	29.95%
National City	62,701	1.9%	59.17%	0.45%	14.47%	5.59%	0.44%	0.13%	2.84%	16.91%
Oceanside	177,365	5.3%	36.17%	0.47%	7.12%	4.35%	0.50%	0.20%	3.39%	47.79%
Poway	49,343	1.5%	17.68%	0.38%	11.57%	2.37%	0.50%	0.24%	3.71%	63.56%
San Diego	1,421,675	42.7%	30.44%	0.41%	14.97%	5.66%	0.44%	0.25%	3.54%	44.29%
San Marcos	96,865	2.9%	<b>37.74</b> %	0.48%	9.37%	2.10%	0.44%	0.19%	3.38%	46.29%
Santee	57,308	1.7%	21.46%	0.52%	4.55%	2.01%	0.45%	0.21%	3.82%	66.99%
Solana Beach	13,876	0.4%	17.19%	0.40%	6.68%	0.94%	0.40%	0.30%	3.70%	70.39%
Unincorporated	506,828	15.2%	29.77%	0.67%	6.01%	4.45%	0.44%	0.22%	3.23%	55.21%
Vista	102,277	3.1%	45.30%	0.43%	4.99%	3.73%	0.48%	0.20%	2.98%	41.88%

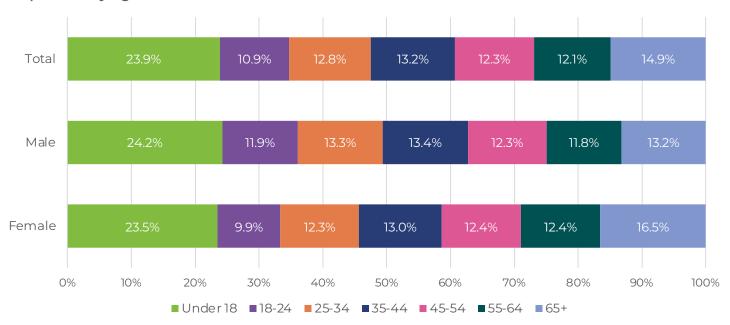
Data Source: SANDAG Population and Housing Estimates 2019

- The City of San Diego has the largest percent (42.7%) of the region's population, while Del Mar has the lowest (0.1%).
- · Lemon Grove as the highest percentage of Black Residents in the Region.
- Del Mar, Encinitas and Solana Beach all have White populations more than 70%.
- Over 80% of the residents in National City and Chula Vista are People of Color.

#### Age and Sex

Understanding the age distribution of the region can provide insight into projects and programs that address the varying transportation needs and barriers to mobility that are specific to different age cohorts, such as seniors and youth.

#### Population by Age and Sex



Data Source: SANDAG Population and Housing Estimates 2019

- The San Diego region is 49.6% female and 50.4% male.<sup>12</sup>
- Males comprise a larger percentage of the population in all younger age cohorts and females make up a larger percentage of older age cohorts.<sup>13</sup>
- The age group with the largest female-to-male ratio is the 65+ age group with 81.3 males for every 100 females.<sup>14</sup>
- · Chula Vista has the highest percentage of youth under 18 with 28.3%.
- Del Mar has the highest percentage of residents ages 65+ (25.8%).

#### **People with Disabilities**

People with disabilities continue to face systemic barriers to resources, services, and opportunities. The American Community Survey identifies disability as serious difficulty with any of the four basic areas of functioning: hearing, vision, cognition, and ambulation.<sup>15</sup>

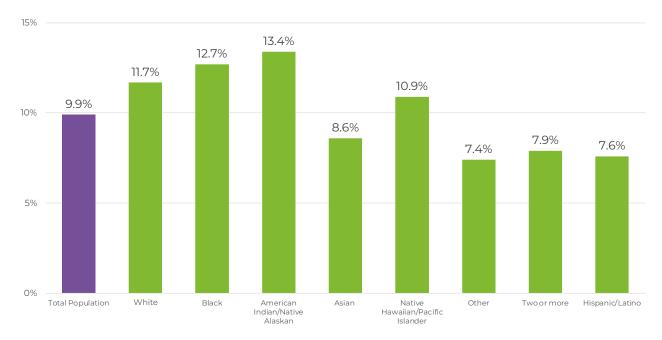
<sup>&</sup>lt;sup>12</sup>SANDAG Population and Housing Estimates 2019

<sup>&</sup>lt;sup>13</sup>SANDAG Population and Housing Estimates 2019

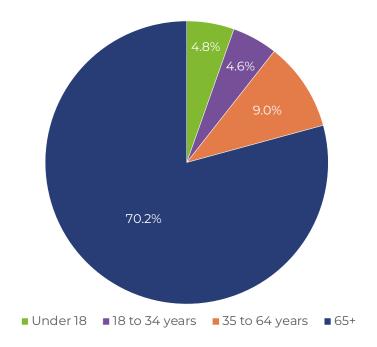
<sup>&</sup>lt;sup>14</sup>SANDAG Population and Housing Estimates 2019

<sup>&</sup>lt;sup>15</sup>ACS definition.

#### Disability by Race/Ethnicity



#### Disability by Age Range



Data Source: ACS 2019 5-Year Estimates, Table S1810 (Disability Characteristics)

- 9.9% of the region's total civilian noninstitutionalized population has a disability, totaling over 300,000 individuals.
- The disability rate for American Indian/Native Alaskans and Native Hawaiian/Pacific Islanders is high yet the number of individuals is lower than any other group due to their small total population.
- More than 50% of the disabled population is
  White, and more than 25% are Hispanic/Latino.<sup>16</sup>
- People age 65+ represent 46.2% of those with a disability, yet only 14.9% of the region's total population.
- Del Mar has the highest percentage of the population over 65 and the lowest percentage of people with a disability (5.4%).
- Almost half the regional population aged 75+ has a disability.<sup>17</sup>
- National City, El Cajon, Oceanside, and Lemon Grove have disability rates of more than 12%.
- 9.2% of the population in the City of San Diego has a disability; almost 40% of the region's residents with a disability live in the City.

#### **Linguistic Isolation**

The rich diversity of the San Diego region is reflected through the wide range of languages spoken by residents. The region's linguistic diversity is something to be celebrated. However, the dominance of English in regional institutions may serve as a barrier to access resources, services, and opportunities for the region's limited-English speaking population.

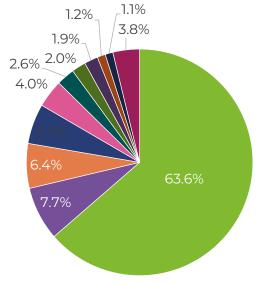
Data Source: ACS 2019 5-Year Estimates, Table S1602 (Limited English-Speaking Households)

Limited English-Speaking Households						
	Total Households	Limited English Households	Percent Composition			
All	1,125,286	71,038				
Spanish Speaking	259,591	39,810	56.0%			
Other Indo- European Language Speaking	51,469	6,131	8.6%			
Asian and Pacific Island Language Speaking	101,362	19,370	27.3%			
Other Language Speaking	19,838	5,727	8.1%			

#### People with Limited English-Proficiency (LEP)

- 38% of households in San Diego speak a language other than English at home. 6.3% qualify as limited English-speaking households.<sup>18</sup>
- More than 12% of the population are people with I FP.19
- Spanish is widely spoken by limited-English speakers across the region (63%).
- 23 percent of LEP individuals speak either Tagalog, Vietnamese, Chinese, or Arabic.
- The "other" language category includes and is not limited to Thai, Portuguese, Hindi, Telugu, and Ukrainian.20
- Del Mar and Solana Beach have the lowest percentage of limited English-speaking households.
- 16.9% of households in National City are limited English-speaking, which is more than 2.5 times that of the region.
- More than 50% of the region's limited Englishspeaking households live in the City of San Diego; 7.2% of households in the City are limited English-speaking.

#### Languages Spoken by LEP individuals



- Spanish
- Filipino (incl. Tagalog)
- Vietnamese
- Chinese (incl. Mandarin, Cantonese)
- Amharic, Somali, or other Afro-Asiatic languages
- Korean
- Persian (incl. Farsi, Dari)
- Japanese
- Russian

Data Source: ACS 2019 5-Year Estimates, Table B16001 (Language Spoken at Home by Ability to Speak English for the Population 5 Years and over)

<sup>18</sup> A "limited English-speaking household" is one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well."

<sup>&</sup>lt;sup>19</sup> People with LEP "includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all." 228



#### How the region's residents fare economically

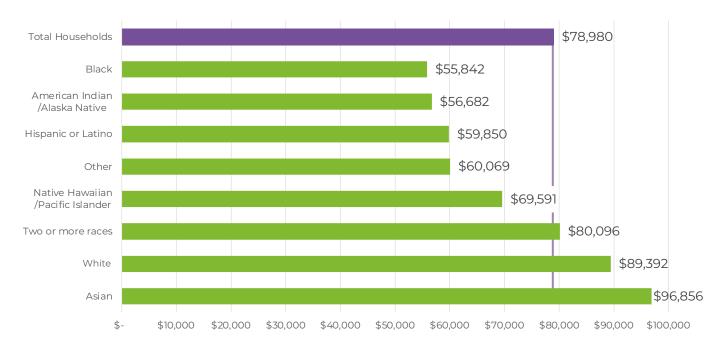
In an equitable economy, there would be no systematic differences by race and ethnicity while examining incomes, wages, unemployment rates, and homeownership.

#### Median Household Income

All workers would earn a living wage regardless of race and ethnicity in an equitable economy. Low wages and pay gaps by race and gender undermine workers and their communities, while reducing local spending and tax revenue.<sup>21</sup>

<sup>&</sup>lt;sup>21</sup>National Equity Atlas . (2022). Median Wages. Retrieved May 25, 2022, from https://nationalequityatlas.org/indicators/Wages\_Median#/

#### Median Household Income



Data Source: ACS 2019 5-Year Estimates, Table S1903 (Median Income in the Past 12 Months)

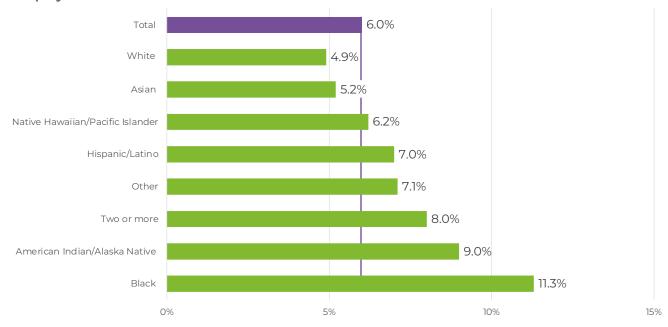
- · There are significant wage gaps between racial and ethnic groups in the San Diego region.
- The difference in the median income between the highest and lowest earners, the Asian and the Black populations, respectively, is \$41,014; the Asian median income is 73.4% higher than the Black median income.
- Black, Native American, and Hispanic/Latino populations have the lowest median income of all groups, earning at least \$19,000 less than the regional median income.
- SANDAG's Social Equity Working Group noted the high level of prosperity and household income for the Asian race does not reflect the lived experience of all nationalities and ethnic groups within the Asian community.
- The Asian and White population groups have the highest median income and the highest percent of population age 25+ with at least a Bachelor's degree (51.3% and 48.7%, respectively).<sup>22</sup>
- Del Mar and Encinitas have the highest median incomes of all jurisdictions. (median income for all jurisdictions can be found in the Appendix).
- National City and Imperial Beach have the lowest median household income, which are less than 70% of the region's median income.

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#### Unemployment

Employment is the predominant source of income for many working-age people.<sup>23</sup> In an equitable economy, everyone who wants to work would have a good job.

#### **Unemployment Rate**



Data Source: ACS 2019 5-Year Estimates, Table S2301 (Employment Status)

- The region's Black population experiences the highest unemployment rate (11.3%), nearly double the unemployment rate of the total population.
- · White and Asian people have the lowest unemployment rates, both less than 6%.
- · Chula Vista (9%) and Imperial Beach (8.7%) have the highest unemployment rates.
- Del Mar and Solana Beach have the lowest unemployment rates (3.2%).
- · Oceanside's unemployment rate matches that of the region (6%).

#### Households below 200% poverty

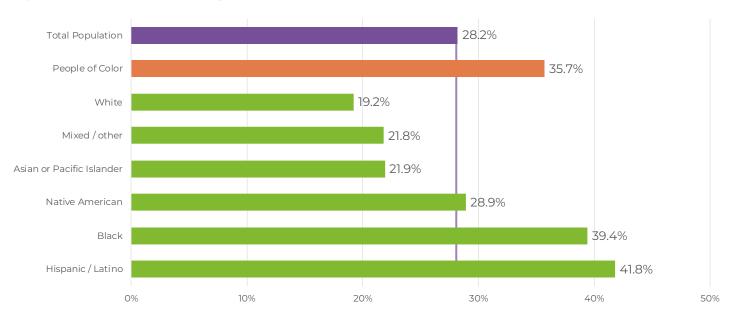
Lack of sufficient income has multiple negative consequences on health, well-being, and economic success. Children who experience poverty are at greater risk of starting school behind their peers, scoring lower on achievement tests, being unemployed, earning less as adults, and having poor health into adulthood.<sup>24</sup>

<sup>&</sup>lt;sup>24</sup>Hayes, A. (2022, May 25). Federal Poverty Level (FPL) definition. Investopedia. Retrieved May 30, 2022, from https://www.investopedia.com/terms/f/fpl.asp#:~:text=The%20federal%20poverty%20level%20(FPL)%2C%20also%20known%20as%20the,to%20receive%20certain%20welfare%20benefits.

Additionally, full-time jobs might not be enough to pull people from poverty. Many full-time jobs do not pay enough to keep workers out of poverty, leaving them struggling to pay their bills, and unable to invest in their future. Low-wage workers face the challenge of finding affordable childcare and experience greater family instability and overall worse health than higher-wage workers.<sup>25</sup>

The federal poverty level (FPL) is a measure of income that the Department of Health and Human Services (HHS) issues every year. The measure is guided by the yearly total cost that the average person incurs to cover necessities such as food, utilities, and accommodation. Federal poverty levels are used to determine one's eligibility for certain programs and benefits, including saving on Marketplace health insurance, Medicaid, the Children's Health Insurance Program (CHIP), and Supplemental Nutrition Assistance Program (SNAP).<sup>26</sup> SANDAG accounts for the higher than the national average cost of living in the region by using the 200% measure, which better adjusts for the region's high cost of living.<sup>27</sup> The 200% measure refers to double the nationally-averaged yearly total cost that the average person needs to cover their necessities.

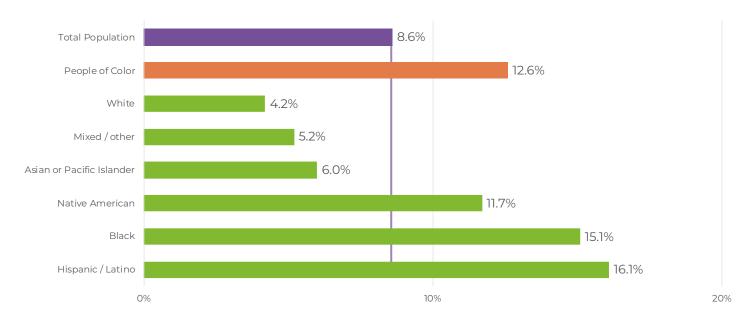
#### Population Below 200% Poverty Level



Data Source: National Equity Indicator, 2019 (Poverty Level: 200%)

<sup>&</sup>lt;sup>26</sup>U.S. Centers for Medicare & Medicaid Services. (2022). Federal Poverty Level (FPL) - healthcare.gov glossary. Federal Poverty Level (FPL) - HealthCare. gov Glossary |

<sup>&</sup>lt;sup>27</sup>Cost of living in San Diego, California. PayScale. (2022). Retrieved May 31, 2022, from https://www.payscale.com/cost-of-living-calculator/California-San-Diego



#### Working Poor: Full-Time Workers Below 200% of Poverty Level

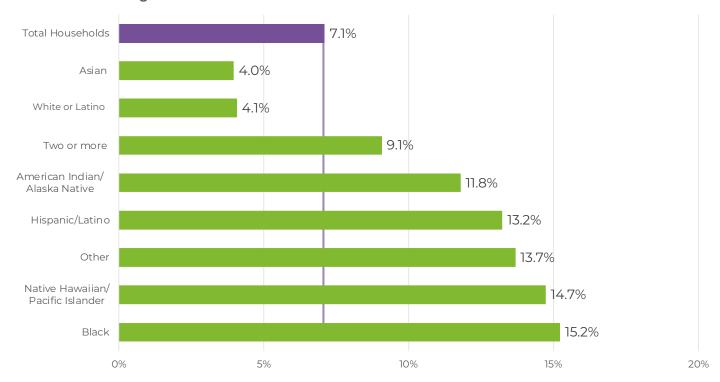
Data Source: National Equity Indicator, 2019 (Working Poor. Poverty: Below 200%; Workers: All workers)

- More than 28% of the total population and 8.6% of full-time workers fall below 200% of the Federal poverty level.
- The region's White population has the lowest percentage of the full-time working population below the 200% poverty line.
- The percentage of People of Color who work full-time and are below 200% Federal poverty level is three times that of their White peers.
- Latino/Hispanic people experience the highest percent of full-time workers below 200% of the Federal poverty level.
- The percent of the population below 200% poverty is over 40% in El Cajon, Imperial Beach, and National City.<sup>28</sup>

#### **SNAP Recipiency**

The Supplemental Nutrition Assistance Program (SNAP) is known as CalFresh in California. The program provides important nutritional support for low-income individuals, families, seniors, and people with disabilities living on fixed incomes. The indicator supports a regional understanding of food insecurity; however, actual levels of food insecurity might be higher than what the data reveals since not everyone who experiences food insecurity is a SNAP recipient. To qualify for the program, households generally must be at or below 130% of the poverty line.<sup>29</sup>

#### **Households Receiving SNAP**



Data Source: ACS 2019 5-Year Estimates Table S2201 (Food Stamps/Supplemental Nutrition Assistance Program -SNAP)

- 60% of households receiving SNAP include children under the age of 18.30
- Approximately 1 in 3 recipient households have at least one person with a disability.
- · Nearly 1 in 3 recipient households includes at least one person 60 years or older.
- Black households make up 5.1% of the county population yet comprise 11% of households that receive SNAP.
- · Hispanic/Latino households make up 25.4% of the region's households yet 47.5% of those that receive SNAP.

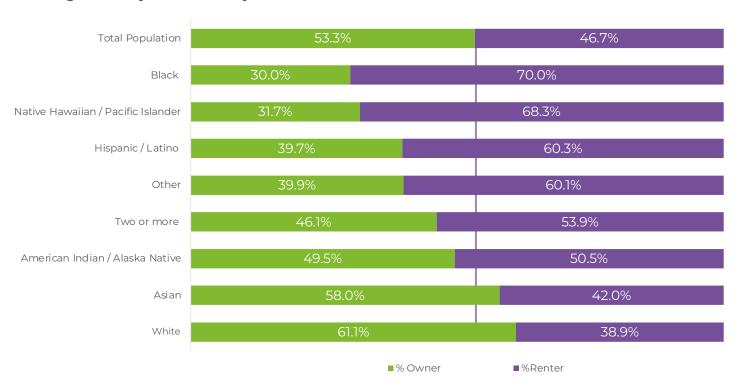
<sup>&</sup>lt;sup>29</sup>Policy basics: The Supplemental Nutrition Assistance Program (SNAP). Center on Budget and Policy Priorities. (2019, June 25). Retrieved June 1, 2022, from https://www.cbpp.org/research/food-assistance/the-supplemental-nutrition-assistance-program-snap

<sup>30</sup>ACS 2019 5-Year Estimates, Table S2201

#### **Occupied Housing Units by Tenure**

Homeownership can be a critical pathway to economic security and mobility. Owning a home can serve as a valuable asset to build wealth and create opportunity. However, the ability of homeownership to foster economic mobility depends on access to affordable, sustainable mortgage financing as well as home appreciation, both of which are affected by discriminatory lending practices and racial segregation.<sup>31</sup> Today, more U.S. households are renting than ever before. However, 72% of renters said that they would like to buy a house at some point, according to a 2016 National Pew Research Center survey.<sup>32</sup>

#### Housing Tenure by Race/Ethnicity



Data Source: 2019 American Community Survey 5 Year Estimates S2502 (Demographic Characteristics for Occupied Housing Units)

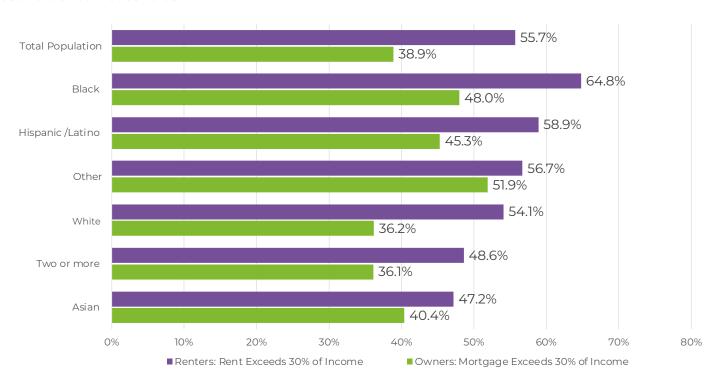
- There are more homeowners than renters in the region. Of the estimated 1,125,286 housing units in the region, more than half are owner-occupied.
- The highest rate of homeownership occurs in White households (61.1%), followed by Asian households (58.8%). These are the only two racial/ethnic groups with more homeowners than renters.
- Black households have the lowest rate of homeownership (30%), followed by Native Hawaiian/Pacific Islander (31.7%) and Hispanic/Latino (39.7%).

<sup>&</sup>lt;sup>32</sup>Cilluffo, A., Geiger, A. W., & Fry, R. (2020, May 30). More U.S. households are renting than at any point in 50 years. Numbers, Facts and Trends Shaping Your World . Retrieved May 25, 2022, from https://www.pewresearch.org/fact-tank/2017/07/19/more-u-s-households-are-renting-than-at-any-point-in-50-years/

#### **Housing Affordability**

A household that spends more than 30% of income on housing is considered cost burdened. All residents should have access to quality, affordable homes. Housing is the single largest expense for households, and far too many pay too much, particularly low-income renters. High housing costs squeeze family budgets and leave few resources to pay for other expenses, save for emergencies, or make long-term investments.<sup>33</sup>

#### **Cost Burdened Households**



Data Source: ACS 2019 1-Year Estimates Table S0201 (Selected Population Profile in the United States – with overlay)

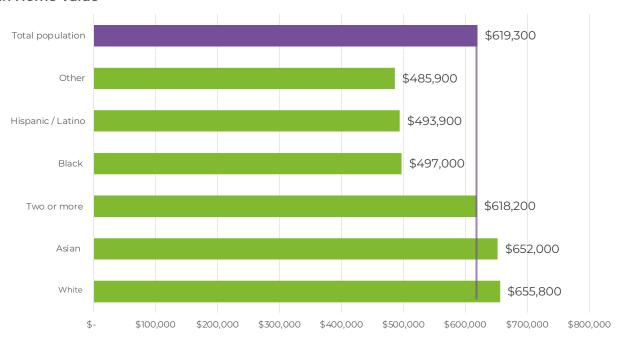
- Households across the region are dealing with affordability issues, regardless of race/ethnicity and whether they rent or own a home.
- Nearly 40% of all demographic groups who own a home and more than 55% of those who rent are housing burdened.
- · Households that own their home are less cost burdened than households that rent.
- Almost 65% of Black renter households are cost burdened, which is greater than all other ethnic and racial groups, followed by Hispanic/Latino households at nearly 60%.

#### **Owner-Occupied Unit Characteristics**

#### **Median Value of Owned Housing Units**

Across all homeowners, housing is typically their most valuable asset. The Brookings Institute found that owner-occupied homes in Black neighborhoods are undervalued by an average of \$48,000 per home nationally, amounting to \$156 billion in cumulative losses. The devaluation of assets in Black neighborhoods limits the ability to create intergenerational wealth.<sup>34</sup> It is important to note that this data does not reflect the highly inflated housing prices of 2022, and it can still be used to compare differences in median value across demographic groups.

#### Median Home Value



Data Source: ACS 2019 1-Year Estimates Table S0201 (Selected Population Profile in the United States – with overlay)

- The discrepancy between the median value of owner-occupied housing units of different racial/ethnic groups is significant in San Diego County and the effects of redlining are still visible.
- The median value of Black owner-occupied housing units is \$122,000 less than the median value for the total population in the region.
- The median value of Hispanic/Latino owner-occupied housing units in the region is 20% less than the median home value for all demographic groups.
- The median value of a White owner-occupied housing unit is nearly 1/3 higher than Black owned housing units.

<sup>&</sup>lt;sup>34</sup>Perry, A. M., Rothwell, J., & Harshbarger, D. (2022, March 9). The devaluation of assets in black neighborhoods. Brookings. Retrieved May 25, 2022, from https://www.brookings.edu/research/devaluation-of-assets-in-black-neighborhoods/



#### How does our environment impact regional health?

The San Diego region is a mosaic of the natural and built environment. The relationship between these two ecosystems has serious health implications that involve trade-offs between levels of mobility and environmental degradation. Air pollution is the easiest cost to identify with our built environment's transportation infrastructure. Reports by the American Public Health Association and others have linked air pollution to negative health outcomes, including asthma, respiratory illness, heart disease, poor birth outcomes, cancer, and premature death. However, transportation infrastructure has a positive effect on public health when it is designed to accommodate or even encourage nonmotorized transportation like biking and walking.<sup>35</sup> An equitable transportation system would balance its environmental costs and benefits throughout its service areas.

#### **CalEnviroScreen Pollution Burden**

#### CalEnviroScreen 4.0 Overview

California Communities Environmental Health Screening Tool, known as CalEnviroScreen, evaluates multiple pollution sources and stressors and considers low-income status to capture socioeconomic and health factors that may increase vulnerability to pollution. CalEnviroScreen 4.0 (CES 4.0) is an index and mapping tool that scores census tracts<sup>36</sup> in the state that meet the pollution exposure and demographic characteristics of a disadvantaged community. This score is determined by multiplying pollution burden by population characteristics. The California Environmental Protection Agency (CalEPA) uses the 25% threshold

# Pollution Burden Population Characteristics Pollution Burden Average exposures and environmental effects Average of sensitive populations and socioeconomic factors CalEnviroScreen score

<sup>&</sup>lt;sup>35</sup>Raynault, E., &amp; Christopher, E. (n.d.). How does transportation affect public health? How Does Transportation Affect Public Health? | FHWA. Retrieved June 8, 2022, from https://highways.dot.gov/public-roads/mayjune-2013/how-does-transportation-affect-public-health#:~:text=Transportation%20also%20is%20a%20source,%2C%20nitrogen%20oxide%2C%20and%20carcinogens.

(most vulnerable) to qualify a community as "disadvantaged". "Disadvantaged communities" in California are specifically targeted for investments aimed at improving public health, quality of life and economic opportunity, while also reducing pollution that contributes to climate change.<sup>37</sup> To account for varying levels of vulnerability and to also elevate the region's standard for measuring environmental vulnerability, SANDAG utilizes the top 50% threshold of CES scores (moderately vulnerable) to qualify an area as a "disadvantaged community" for the purpose of regional planning.<sup>38</sup>

Due to the repeal of California's 1996 Proposition 209 on Affirmative Action in 2020, CES 4.0 does not incorporate race and ethnicity into its cumulative impact scores. However, a report released by the Office of Environmental Health Hazard Assessment (OEHHA) found that areas with the highest percentages of People of Color in the state received the highest pollution burden scores.<sup>39</sup>

#### **POPULATION POPULATION BURDEN CHARACTERISTICS Exposures Exposures** · Asthma Ozone concentrations · Cardiovascular disease PM2.5 concentrations · Low birth weight infants · Children's lead risk from housing Diesel PM emmisions Drinking sater contaminents · Pesticide use · Toxic releases from facilities Traffic density Socioeconomic Factors · Educational attainment · Housing burdened **Environmental Effects** low-income households · Low birth weight infants · Solid waste sites and facilities Linguistic isolation Groundwater threats Poverty · Hazardous waste Unemployment · Impaired water bodies Cleanup sites

<sup>&</sup>lt;sup>37</sup>SB 535 Disadvantaged Communities: https://oehha.ca.gov/calenviroscreen/sb535

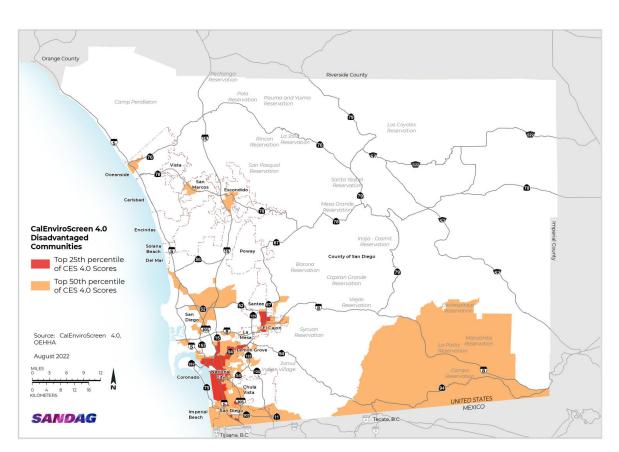
<sup>38</sup> California Environmental Protection Agency (CalEPA) uses the 25% threshold to qualify a community as disadvantaged

<sup>&</sup>lt;sup>39</sup>The full report can be accessed on the CES 4.0 web page via the OEHHA website.

CES 4.0 Score Percentage Range	American Indian	Asian	Black	Hispanic/ Latino	Other	Pacific Islander	Two or More	White
Bottom 50% (Least Vulnerable)	76%	83%	65%	73%	81%	75%	82%	84%
Top 50% (Moderately Vulnerable)	24%	17%	35%	34%	19%	25%	18%	16%
Top 25% (Most Vulnerable)	5%	4%	9%	9%	4%	5%	4%	3%

Data Source: Analysis of Race/Ethnicity and CalEnviroScreen 4.0

- The region's White and Asian populations are least vulnerable to pollution burden, while the Black and Hispanic populations are most vulnerable.
- Black and Hispanic populations are three times more likely to live in areas that are most vulnerable to pollution burden compared to the White population in the region.
- 84% of the region's White population live in census tracts that are least vulnerable to pollution exposure.
- Approximately 34% of the region's Black and Hispanic populations live in areas that SANDAG considers to be "disadvantaged".
- Close to a quarter of Pacific Islanders and Native Americans in the region live in areas that SANDAG considers disadvantaged.



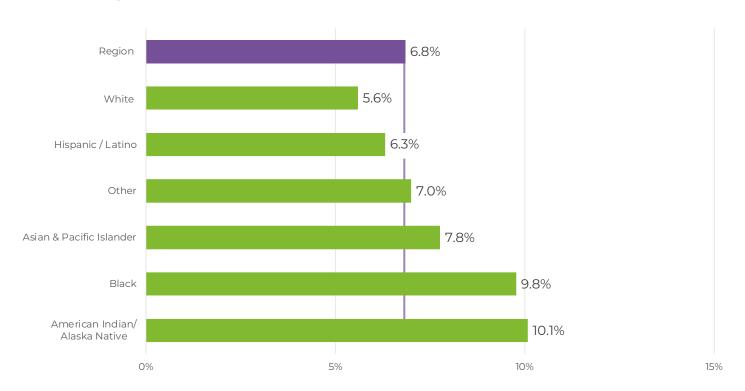
- · Vista, Carlsbad, Encinitas, Del Mar, Solana Beach, Poway, and Coronado do not contain any census tracts that are vulnerable to pollution burden.
- The cities of El Cajon, Lemon Grove, San Diego, National City, and Chula Vista contain at least some area of a census tract that is most vulnerable (Top 25%) to pollution burden.

#### Health

#### Low Birth Weight Rate

Birth weight rates are used to gauge the health of a community and are directly related to infant mortality. Pregnant women and fetuses are especially sensitive to air pollution due to physiological changes during pregnancy. Several studies have shown that an increase in air pollutants is associated with decreased average birth weight.<sup>40</sup>

#### Low Birth Weight



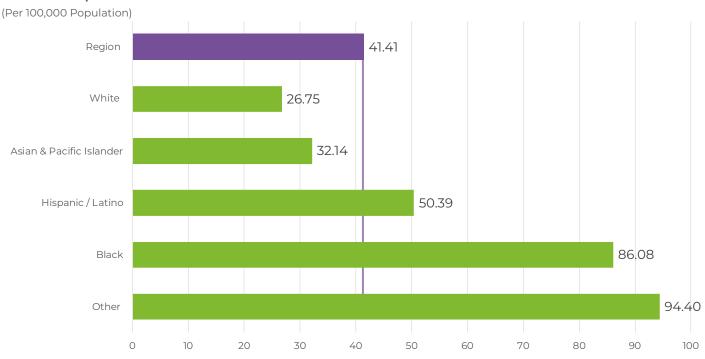
Data source County of San Diego, Health and Human Services Agency, Maternal Child Health, 2019

- 6.8% of babies born in the region in 2019 weighed less than 5 pounds, 8 ounces.
- · Approximately 1 in 10 American Indian/Alaska Native and Black newborns had low birth weights.
- · Hispanic/Latino and White newborns had the smallest percentage of low birth weights.

#### **Asthma Hospitalization**

Research shows that air pollution can worsen asthma symptoms. One study that tracked a youth camping trip suggested that children with moderate to severe asthma were 40% more likely to have acute asthma episodes on high pollution summer days than on days with average pollution levels. Additionally, another study found that older adults were more likely to visit the emergency room for breathing problems when summer air pollution was high.<sup>41</sup>

#### Asthma Hospitalization Rates



Data source County of San Diego, Health and Human Services Agency, Noncommunicable Chronic Disease, 2019

- The CES (4.0) analysis of race/ethnicity identified that People of Color, particularly Hispanic/Latino and Black people, disproportionately reside in the highest pollution burdened communities and these populations had the highest asthma hospitalization rates.
- The region's lowest median household income earners (Black households) show asthma hospitalization rates that are double the regional average.
- National City (76.43), El Cajon (60.18), and Lemon Grove (66.16) have the highest rates of asthma hospitalization in the region, which is still lower than overall asthma hospitalization rates for the region's Black population (86.08).<sup>42</sup>

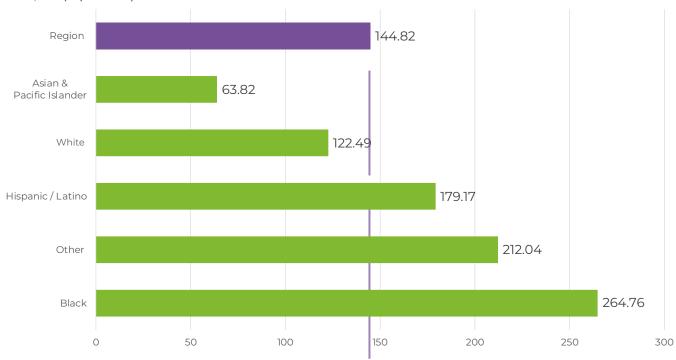
<sup>&</sup>lt;sup>41</sup>Asthma and Allergy Foundation of America. (2015). AAFA. Air Pollution . Retrieved June 9, 2022, from https://www.aafa.org/air-pollution-smog-asthma/

<sup>&</sup>lt;sup>42</sup>County of San Diego, Health and Human Services Agency, Noncommunicable Chronic Disease, 2019

#### **Diabetes Hospitalization**

The built environment consists of features that impact human health, including transportation systems, land development patterns, and microscale urban designs like sidewalks and curbs. Some of these components include infrastructure to enable active transportation and neighborhood walkability, which increases physical activity and lowers risk-factors for developing diabetes. Additionally, an *International Journal of Epidemiology* study concluded that transportation noise may be more relevant than air pollution in the development of diabetes due to noise-induced sleep disturbances.

# **Diabetes Hospitalization Rate** (per 100,000 population)



Data source County of San Diego, Health and Human Services Agency, Noncommunicable Chronic Disease, 2019

- The diabetes hospitalization rate for the Black population is nearly double that of the regional average and more than four times higher than the region's Asian & Pacific Islander populations.
- The race/ethnic groups with the highest diabetes hospitalization rate report the lowest median household incomes in the region.
- Lemon Grove has the highest diabetes hospitalization rate (352.84 per 100,000) for the region, which is more than 2.4 times higher than the regional average.<sup>45</sup>
- El Cajon (238.98 per 100,000) and National City (271.26 per 100,000) experience asthma hospitalization rates that are much higher than the regional average (144.82 per 100,000).<sup>46</sup>

<sup>&</sup>lt;sup>43</sup>Diabetes Canada . (2020, October). The Built Environment and Diabetes. Retrieved June 9, 2022, from https://www.diabetes.ca/DiabetesCanadaWebsite/media/Advocacy-and-Policy/The-Built-Environment-and-Diabetes-Position-Statement\_October-2020.pdf

<sup>&</sup>lt;sup>44</sup>Eze, I. C., Foraster, M., Schaffner, E., Vienneau, D., Héritier, H., Rudzik, F., Thiesse, L., Pieren, R., Imboden, M., von Eckardstein, A., Schindler, C., Brink, M., Cajochen, C., Wunderli, J.-M., Röösli, M., &amp; Probst-Hensch, N. (2017, March 13). Long-term exposure to transportation noise and air pollution in relation to incident diabetes in the SAPALDIA study. OUP Academic. Retrieved June 9, 2022, from https://academic.oup.com/ije/article/46/4/1115/3067664

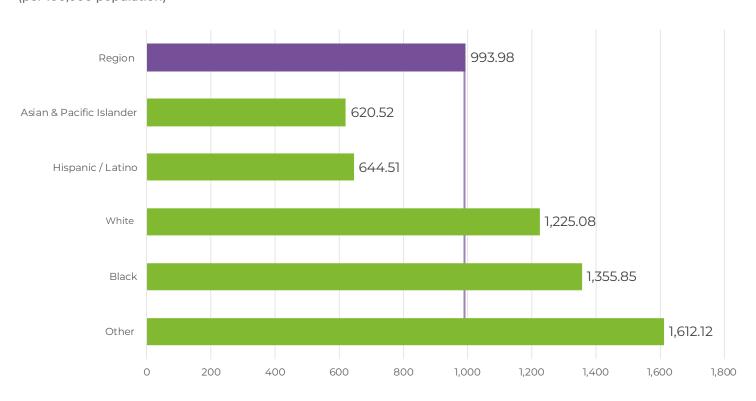
<sup>&</sup>lt;sup>45</sup> County of San Diego, Health and Human Services Agency, Noncommunicable Chronic Disease, 2019

<sup>&</sup>lt;sup>46</sup> County of San Diego, Health and Human Services Agency, Noncommunicable Chronic Disease, 2019

#### **Heart Disease**

Transportation planning affects cardiovascular health and its risk factors, including hypertension, physical activity, and obesity. Good evidence exists for a relationship between built environment measures (mixed land use, connectivity and walkability, and physical activity), environmental exposures (green space, air pollution, and noise), and cardiovascular disease and mortality.<sup>47</sup>

# Heart Disease Hospitalization Rate (per 100,000 population)



Data source County of San Diego, Health and Human Services Agency, Noncommunicable Chronic Disease, 2019

- · This indicator shows great disparity in heart disease hospitalization between racial/ethnic groups.
- It is unclear which of the main cardiovascular risk factors are coming together to impact heart disease hospitalization rates for different race/ethnicities.
- The rate of heart disease hospitalization rate in National City (1503.69 per 100,000) is significantly higher than the regional rate.<sup>48</sup>

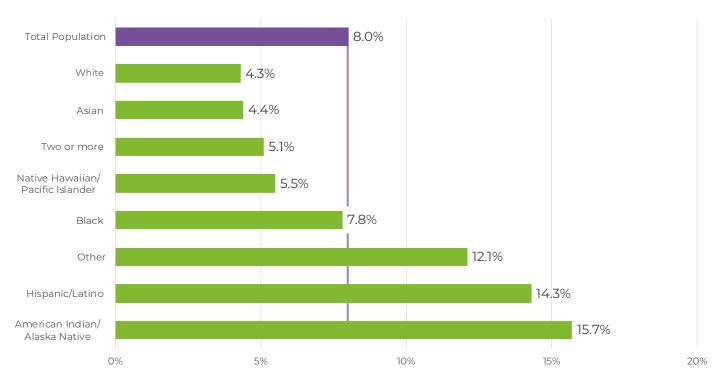
<sup>&</sup>lt;sup>47</sup>Nieuwenhuijsen, M. J. (2018, April 13). Influence of urban and Transport Planning and the city environment on cardiovascular disease. Nature News. Retrieved June 14, 2022, from https://www.nature.com/articles/s41569-018-0003-2#:~:text=Urban%20and%20 transport%20planning%20has,effects%3B%20and%20increases%20green%20space.

<sup>&</sup>lt;sup>48</sup>County of San Diego, Health and Human Services Agency, Noncommunicable Chronic Disease, 2019

#### **Health Insurance Coverage**

People who lack health care coverage may lack access to basic needs and be less willing to seek care when health issues arise.

#### Population Without Health Insurance



Data Source, American Community Survey 1 Year Estimates 2019 Table S2701 (Selected Characteristics of Health Insurance Coverage in the United States)

- There is a significant disparity in health insurance coverage between racial/ethnic groups in the San Diego region.
- American Indians/Alaska Natives have the highest percentage of population without health insurance followed by Hispanics/Latinos, and the number of uninsured between the two groups is significantly different (3,500 vs almost 160,000).<sup>49</sup>
- The percentage of Hispanic/Latino population that does not have health insurance coverage is more than three times higher than the rate for the region's White and Asian populations.

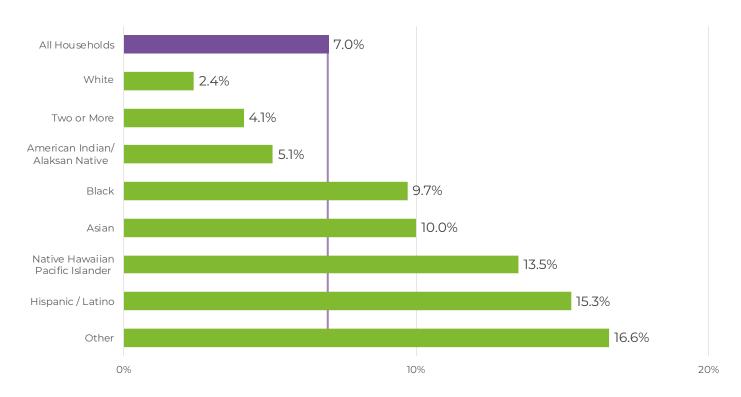
#### Overcrowded households

The U.S. Census defines an overcrowded unit as one occupied by 1.01 persons or more per room. Overcrowding increases health and safety concerns and stresses the condition of the housing stock and infrastructure. Overcrowding is strongly related to household size (particularly for large and very large households) and the availability of suitably sized housing. This indicator should be considered in the context

<sup>&</sup>lt;sup>49</sup>ACS 1-Year Estimates Table S2701

of the pandemic. One study done by the Royal Society for Public Health concluded areas in New York City with higher proportions of overcrowding were associated with increased rates of suspected severe COVID-19 cases because of the lack of space to physically distance during periods of home isolation.<sup>50</sup>

#### Percent of Overcrowded Households



Data Source: 2019 American Community Survey 1 Year Estimates B25014 A,B,C,D,E,F,G,I (Occupants per Room)

- · Of the 1,132,434 occupied housing units in the San Diego region, 79,461 or 7% are overcrowded.
- Hispanic/Latino households are among the most overcrowded households in the region.
- Overcrowding impacts both owners and renters; however, renters are generally more significantly impacted.<sup>51</sup> In the San Diego region, 3.1% of owner-occupied housing units are overcrowded vs. 11.1% of rental units.<sup>52</sup>
- National City (14.6%) and Vista (12.8%) have the highest rates of overcrowding.<sup>53</sup>
- Del Mar (1%) and Coronado (1.1%) have the lowest rates of overcrowding.<sup>54</sup>
- The rate of overcrowding in the City of San Diego is 3.5%, which is lower than the rate of the region.<sup>55</sup>

<sup>&</sup>lt;sup>50</sup>Ghosh, A. K., Venkatraman, S., Soroka, O., Reshetnyak, E., Rajan, M., An, A., Chae, J. K., Gonzalez, C., Prince, J., DiMaggio, C., Ibrahim, S., Safford, M. M., & Amp; Hupert, N. (2021, September). Association between overcrowded households, multigenerational households, and covid-19: A cohort study. Public health. Retrieved June 14, 2022, from https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8328572/#:~:text=In%20this%20ecological%20analysis%20 of,increase%20the%20risk%20of%20infection

<sup>51</sup>Office of Policy Development and Research, Blake, K., Simic, A., & Kellerson, R., Measuring Overcrowding in Housing 2–8 (2007). Fairfax, Virginia; ICF International.

<sup>&</sup>lt;sup>52</sup>ACS 5-Year Estimates Table B25014

<sup>53</sup>ACS 5-Year Estimates Table CP04

<sup>&</sup>lt;sup>54</sup>ACS 5-Year Estimates Table CP04

<sup>55</sup>ACS 5-Year Estimates Table CP04

#### Life Expectancy

Life expectancy is a marker for how the built environment and systemic injustices can result in varying health outcomes within different areas and populations. The Harvard School of Public Health published a study in 2020 that found significant disparities in U.S. life expectancy at census-tract level. Data on many public health indicators is gathered and analyzed at the county or state level, which may fail to highlight significant health disparities at the local level. This practice has important implications because legislation, policies, and programs that provide health care, economic assistance, and social services are often administered and implemented at the county and state level. In an equitable society, disparities in life expectancies would not exist between race/ethnicity and socioeconomic classes.<sup>56</sup>

Race / Ethnicity	Life Expectancy
All	80.96
Native American	76.43
Black	77.12
White	80.46
Hispanic/Latino	81.86
Asian or Pacific Islander	83.58

Data Sources: National Equity Atlas, Center for Disease Control (CDC), 2016 (Life Expectancy)<sup>57</sup>

- The Asian or Pacific Islander and Hispanic/Latino populations have the highest life expectancies throughout the region, both 80 years and older.
- Black and Native American people have the shortest life expectancy in the region at less than 80 years old.
- The life expectancy of Asian or Pacific Islander people is more than 7 years longer than Native American people.

<sup>&</sup>lt;sup>56</sup>Rura , N. (2020, July 22). Significant disparities in U.S. life expectancy found at census-tract level. News. Retrieved June 14, 2022, from https://www.hsph.harvard.edu/news/press-releases/significant-disparities-in-u-s-life-expectancy-found-at-census-tract-level/

<sup>&</sup>lt;sup>57</sup>The data for this indicator is a 2012-2016 average.



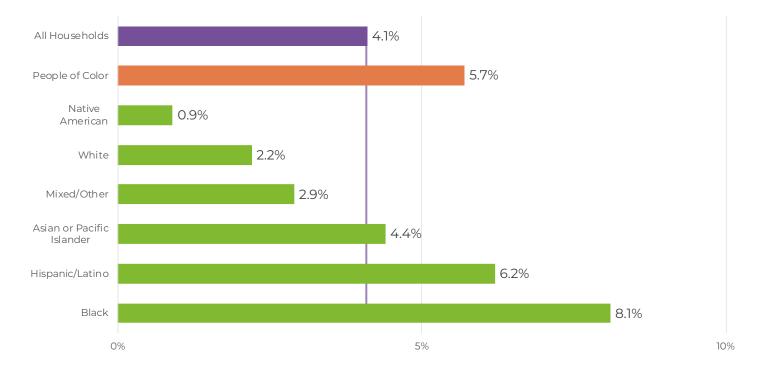
## Who has access to opportunities in the region?

Accessibility refers to people's overall ability to reach desired services and activities, which together are called opportunities. Accessibility is the goal of most transportation planning activities and is affected by factors like mobility, geographic proximity, connectivity, affordability, convenience, and social acceptance. Planning decisions often involve trade-offs between different forms of accessibility. For example, traffic engineers might design roads to be wider to maximize automobile traffic speeds. The trade-off is that wider roads create barriers to walking and biking. Additionally, the trade-off for improvements to walking, biking, and public transit accessibility is often a reduction in automobile travel speeds and parking supply. An equitable approach to accessibility and opportunity balances its evaluation and consideration of different accessibility factors so that planning paradigms can be more comprehensive.

### Households living in High-Poverty Neighborhoods

All neighborhoods should be communities of opportunity. People who live in high-poverty neighborhoods, which is defined as a census tract with a poverty rate of 30% or more, have less access to jobs, services, high-quality education, parks, safe streets, and other essential ingredients of economic and social success. People of Color are significantly more likely than their White counterparts to live in high-poverty neighborhoods, even if they themselves are not poor.<sup>58</sup>

#### Percent of Households that live in High Poverty Neighborhoods



Data Source: National Equity Atlas, 2019 (Neighborhood Poverty)

- The percent of Black households that live in high-poverty neighborhoods is almost double the rate for the region as a whole and close to four times higher than White households.
- The percent of People of Color households is higher than the percent of households in neighborhoods for the region as a whole.
- Less than 1% of Native Americans in the region live in high-poverty neighborhoods compared to 10.3% for the same demographic in the state of California.<sup>59</sup> This might not reflect the lived experiences of the region's Native American population who belong to different tribal nations that have vast disparities in reservation size, population, and institutional capabilities. It's possible that data collection for this indicator is a better representation of Native Americans who live off-reservation in either nearby unincorporated San Diego County or one of the region's local jurisdictions. Another possible explanation could be that many Native Americans live in geographically large census tracts that also include wealthy pockets of communities in unincorporated San Diego County near the Cleveland National Forest.<sup>60</sup>

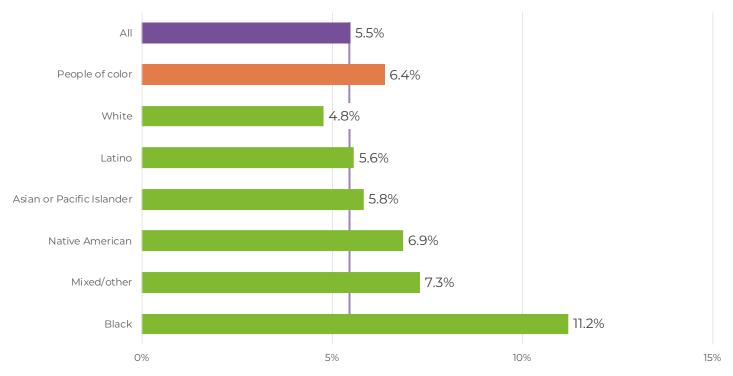
#### **Households without Vehicle Access**

Everyone needs safe, reliable, and affordable transportation to fulfill basic needs and access opportunities. However, the region's land use pattern is historically characterized by sprawl which created a dependency on cars. Aggressive state climate goals are designed to transition development away from sprawl, increase transportation options, and decrease traffic congestion and air pollution.

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<sup>59</sup> National Equity Atlas, 2019 (Neighborhood Poverty)

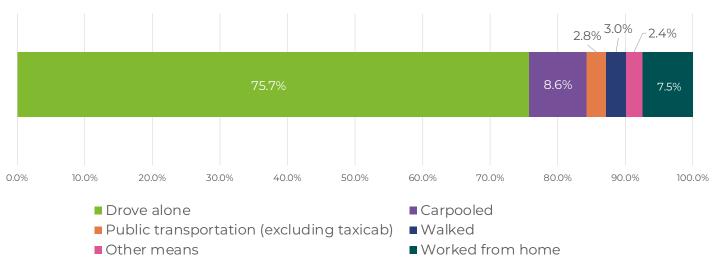
#### Percent of Households with No Vehicle



Data Source: National Equity Atlas (Car access)

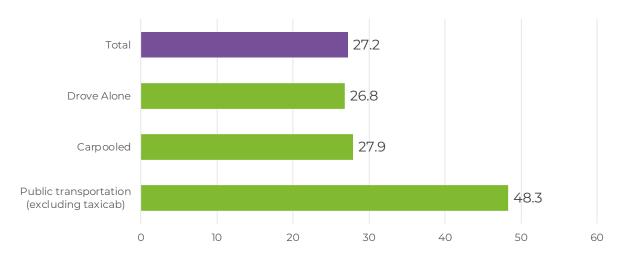
- Less than 5% of White households do not have access to a car while more than 11% of Black households do not.
- National City (11.2%), La Mesa (8.0%), and El Cajon (9.2%) have the highest percent of households with no vehicle. 61
- Del Mar has the lowest percent of households with no vehicle (2.9%).62

#### Commuting to Work



Data Source: ACS 1-Year Estimates Comparison Profiles - Table CP03 (Comparative Economic Characteristics)

# Indicator: Mean Travel Time to Work (In Minutes)



Data Source: ACS 1-Year Estimates Comparison Profiles – Table S0802 (Means of Transportation to Work by Selected Characteristics)

- There are more than 1.6 million workers 16 years and older in San Diego and 7.5% of them work from home.
- More than 80% of the population in the region commutes to work in a personal vehicle.
- More than 40% of workers who take transit are Hispanic/Latino and more than 45% of those who drive alone are White.<sup>63</sup>
- Approximately 80% of workers who take public transportation make less than \$50,000 a year.<sup>64</sup>
- · Almost 20% of workers who take public transportation do not have a vehicle available.
- The mean travel time for workers who take public transportation is more than 20 minutes longer than for those who commute in a vehicle.
- More than 39% of those who use public transit have commutes of 60 minutes or more.<sup>65</sup>

#### **Traffic Violence**

Motor Vehicle injuries and traffic deaths should not be considered an inevitable consequence of road travel. In Southern California, traffic collisions are one of the top causes of injury and death. Pedestrians are among the most vulnerable road users.

Injuries to Motorists & Pedestrians			
	Death	Hospitalization	ED Discharge
Injuries to Motorist	258	2,349	19,340
Injuries to Pedestrian	84	890	301

Data source County of San Diego, Health and Human Services Agency, Injury, 2019

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<sup>&</sup>lt;sup>63</sup>ACS 1-Year Estimates Table 0802

<sup>&</sup>lt;sup>64</sup>ACS 1-Year Estimates Table 0802

Motorist Injuries (Rates per 100,000)				
	Death	Hospitalization	Emergency Department Discharge	
Total Rate	7.70	70.08	577.01	
White	7.61	71.44	427.12	
Black	14.84	89.04	1,116.62	
Hispanic/Latino	8.51	63.20	677.99	
Asian/Pacific Islanders	3.39	35.30	307.09	
Other	7.26	162.66	1,382.65	

Motorist Caused Injuries to Pedestrians (Rates per 100,000)			
	Death	Hospitalization	Emergency Department Discharge
Total Rate	2.51	26.55	8.98
White	2.05	18.21	7.22
Black	6.53	52.24	21.37
Hispanic/Latino	8.51	32.65	9.05
Asian/Pacific Islanders	3.20	13.58	5.88

Data source County of San Diego, Health and Human Services Agency, Injury, 2019

Figures in purple indicate racial/ethnic groups that have a higher rate of than that of the total rate.

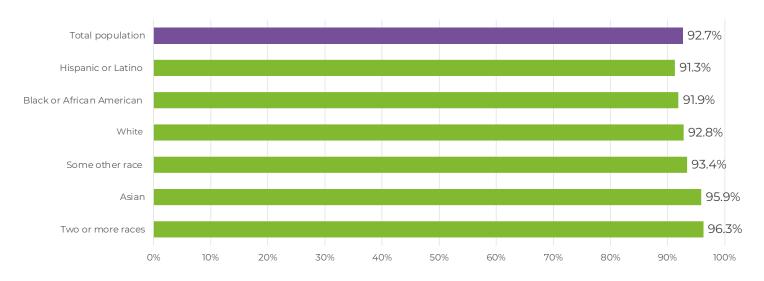
- In 2019, 258 people were killed while using our roads and over 20,000 people went to the hospital due to their motor-vehicle related injury.
- · Motor vehicle related injuries disproportionately impact People of Color.
- Black and Hispanic/Latino pedestrians have higher rates of death, hospitalization and emergency department discharge than the region.

## Connectivity

#### **Indicator: Broadband Access**

The digital divide is the growing gap between people with and without reliable access to broadband service and an adequate device for connecting to the internet. These disparities have heavily impacted unserved and underserved San Diego County residents, especially seniors, low-income households, rural communities, and people on tribal lands.

#### **Broadband Subscription**



Data Source: ACS 2019 5-Year Estimates Table S2802

- · This data does not capture broadband connection speed or cost.
- Over 17% of American Indian/Alaska Native population in households with a computer does not have a broadband subscription.
- Almost 17% of the senior (65+) population in households with a computer does not have a broadband subscription.<sup>66</sup>
- This data is limited because it shows broadband subscription rates among those who own or use computers but does not capture broadband subscriptions of those people who do not own computers.



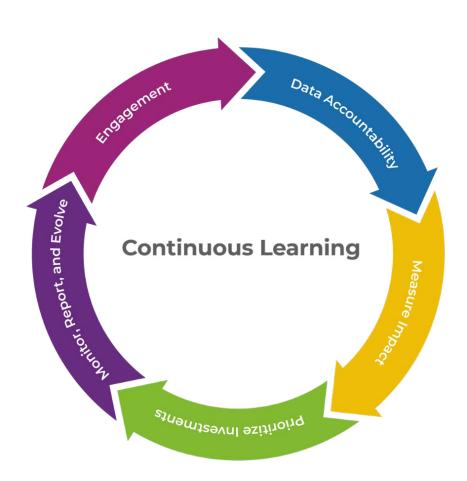
This report used 25 indicators to measure the state of equity within the San Diego region and found significant differences in outcomes across each thematic area. These differences were most obvious in the Economic Vitality thematic area. The consequences of decades of intentional actions to cut off low-income, minority, and most notably Black communities from lending, investment, and social participation is reflected in today's data. As of 2019, only 30% of the region's Black population owned a home. Today, communities are still disconnected from each other due to physical barriers in the built environment - like highways and interstates - and financially through the concentration of poverty in some neighborhoods and not others. There are ways that SANDAG and its member agencies can act to improve equitable outcomes across all demographics and socio-economic statuses in the region, and examples of where SANDAG has already invested in weaving our region's diverse communities back together.

A recent example of transportation infrastructure bringing communities back together can be observed through the Mid-Coast extension of the UC San Diego Blue Line Trolley, which runs between Downtown San Diego and La Jolla to connect corridor residents with other Trolley lines serving Mission Valley, East County, and South County. As an extension of the existing Metropolitan Transit System Blue Line Trolley, it offers a one-seat (no transfer) ride from the U.S./Mexico Border and connects environmental justice communities south of Downtown San Diego to the University City Community.

SANDAG also has invested in the region's youth through the pilot Youth Opportunity Pass, approved by the Board of Directors in October 2021, which offers free fares for anyone 18 years or younger throughout all the region's transit network. This pilot program provides youth from transit-dependent communities with access to opportunities outside of their communities and connects them to high-opportunity neighborhoods and amenities. It also includes improvements on high-demand routes, increases in bus frequency, and access to night services on certain lines.

SANDAG is taking its commitment to equity seriously and is embarking on planning activities not previously taken on by the agency and that go beyond state or federal law. For example, the agency started to analyze its Regional Transportation Improvement Program (RTIP) through an equity lens to map out where and how much is being invested in transportation infrastructure throughout environmental justice communities. This baseline report is another example of SANDAG's increased and proactive strides towards equity.

SANDAG will not stop there. The agency acknowledges that there is still much left to learn and change and will continue to make investments that reduce the inequitable socio-economic and health outcomes that redlining, segregation, and other practices brought to the region. The agency will do this by implementing the Regional Social Equity Planning Framework throughout all SANDAG's projects, programs, and activities. The Framework is a key pillar of the 2021 Regional Plan and will be included in the development of the next Regional Plan. The Framework is comprised of five inter-reliant actions: engagement, data accountability, measuring impact, prioritizing investments, and monitoring and evaluation. Together, SANDAG strives to uplift the region to be a place where everyone has an opportunity to thrive.



Regional Social Equity Planning Framework: Five Inter-reliant Actions

# OPPORTUNITIES FOR IMPROVEMENT

### **Recommendations Based on Demographic Insights**

- Standardize an explicit and inclusive definition of racial/ethnic categories that discourages the use of 'other' category due to the difficulty of drawing conclusions from the entire dataset.
- Delineate between White, Hispanic/Latino and Hispanic/Latino populations that fall in other racial categories due to possible differences in lived experiences.
- Find and standardize the use of data sources that can disaggregate the Asian racial group into those nationalities and ethnic groups of the Asian diaspora that are prominent to the San Diego region.
- Include a separate Native American population whenever data is available and avoid grouping the
  population within another category, especially considering that San Diego County is home to the most
  Federally Recognized Tribes in the country.
- Incorporate gender into demographic analyses and show respect to the region's non-binary population through use of inclusive language.
- Focus the 2021 Regional Plan's Flexible Fleets strategy to address the mobility needs of an aging population with disabilities by expanding transportation options.
- Build on the research component of SANDAG's Public Involvement Plan by collecting more robust data about public participation to ensure broad and diverse representation.
- Continue engagement with underserved populations to elevate the agency's responsiveness to community accessibility needs and overall barriers to transportation-related resources, services, and opportunities.
- · Verify that transportation project outcomes do not negatively impact the region's most vulnerable areas.

### **Recommendations Based on Economic Vitality Insights**

- Strategize a comprehensive evaluation of affordability with updated data that measures housing and transportation costs relative to someone's income.
- Investigate census tracts with higher-than-average unemployment rates to determine if these areas are disconnected from employment centers or lack broadband capacity for remote work.
- Encourage implementation of SB 9 and SB 10 and support local jurisdictions to add new housing in the region's most sought-after neighborhoods.
- Educate communities about how collectively limiting housing supply in some places constrains economic opportunities and enforces racial segregation.
- Investigate data sources that can provide "median" indicators, such as median household income and median home value, for the Unincorporated County for comparison to the other jurisdictions.

### **Recommendations Based on Environment and Health Insights**

- Continue to build a variety of strategies that reduce Vehicle Miles Traveled (VMT) and improve roadway operations to reduce air pollution, greenhouse gas emissions and fuel use from transportation.
- Include congestion relief projects and incentives to encourage people to bike and walk, expansion
  of commuter choices, workplace flexibility to reduce commutes, and value pricing in strategies to
  reduce VMT.
- Ensure future development does not increase pollution burden in the region's most vulnerable areas.
- Expand climate-resiliency documents to go beyond addressing climatic impacts on regional transportation infrastructure to examine areas and demographics that are especially vulnerable.

## **Accessibility and Opportunity Recommendations**

- Include a more comprehensive analysis of accessibility in planning that expands the scope of potential solutions to transportation problems through creativity and judgement, incorporating new accessibility factors.
- · Include a more integrated analysis of connectivity among non-auto modes.
- Consider the distances between activities, and therefore development density and mix through more comprehensive analysis of land use accessibility.
- Consider a more comprehensive analysis of the density of roadway connections and directness of travel between destinations by considering impacts to accessibility.
- Improve understanding of the mobility and access choices that people would make in specific conditions by conducting more comprehensive travel surveys, statistics and analysis of travel demands.
- Include more multimodal evaluation (speed, convenience, comfort, safety, etc.) of walking, biking, public transit, taxi, and ride hailing, etc.
- Continue applying transportation management strategies to increase system efficiency.
- Investigate how the region could better support local jurisdictions identify and resolve safety issues that disproportionally affect low-income communities and communities of color.

# A GLOSSARY OF KEY TERMS

SANDAG recognizes the ever-evolving language and terms connected to equity and racial and ethnic groups. The terms used throughout this report are drawn from numerous sources, including the U.S. Census, ACS Community Survey They may not always represent current best practice, and may in fact be offensive, triggering, or erasing to some communities. SANDAG's use of these terms is done out of a need for consistency with data and information used is not intended to cause offense or harm.

#### Equity

Fairness and justice in policy, practice, and opportunity consciously designed to address the distinct challenges of non-dominant social groups, with an eye to equitable outcomes.<sup>67</sup>

#### **Racial Equity**

Racial equity is the condition that would be achieved if one's racial identity no longer predicted, in a statistical sense, how one fares. Racial equity describes the actions, policies, and practices that interrupt bias and barriers that have historically and systemically marginalized communities of color, to ensure all people can be healthy, prosperous, and participate fully in civic life.<sup>68</sup>

#### Race

Race refers to the group or groups that a person self-identifies with as having similar physical traits that are regarded common among people of a shared ancestry. In the context of the U.S. Census, race reflects a self-identification within its social definitions. It does not attempt to define race biologically, anthropologically, or genetically.<sup>69</sup>

#### **Ethnicity**

A social construct that divides people into smaller social groups based on characteristics such as shared sense of group membership, values, behavioral patterns, language, political and economic interests, history, and ancestral geographical base.<sup>70</sup>

#### **Demographic Categories:**

Source: U.S. Census Bureau

- **Black** A person having origins in any of the Black racial groups of Africa.
- White A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.
- Asian A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Other A person who identifies as Other includes people who do not identify as any of the racial categories listed.
- Mixed/Two or more A person who identifies as two or more races of the racial categories listed.
- American Indian and Alaska Native (AIAN) A
   person having origins in any of the original peoples of
   North and South America (including Central America)
   and who maintains tribal affiliation or community
   attachment.
- Native Hawaiian and Other Pacific Islander (NHPI) –
   A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- Hispanic A person whose heritage, nationality, lineage, or country of birth is a Spanish-speaking country. People who identify as Hispanic, Latino, or Spanish may be any race.
- Latino A person having origins in any of the racial groups of Latin America, some sovereign Caribbean nations, and Puerto Rico. People who identify as Latino may be any race. Most people who identify as Latino speak Spanish or Portuguese.

<sup>&</sup>lt;sup>67</sup>City of Alexandria Virgina, 2022

<sup>&</sup>lt;sup>68</sup>Southern California Association of Governments , 2021

<sup>&</sup>lt;sup>69</sup>United States Census Bureau , 2022, Department of Labor and Workforce Development, 1990

<sup>&</sup>lt;sup>70</sup>Southern California Association of Governments, 2021

#### Diversity

Diversity includes all the ways in which people differ, and it encompasses all the different characteristics that make one individual or group different from another. It is all-inclusive and recognizes everyone and every group as part of the diversity that should be valued. A broad definition includes not only race, ethnicity, and gender—the groups that most often come to mind when the term "diversity" is used—as well as age, national origin, religion, disability, sexual orientation, socioeconomic status, education, marital status, language, and physical appearance. It also involves different ideas, perspectives, and values.<sup>71</sup>

#### Discrimination

The unequal treatment of members of various groups based on race, gender, social class, sexual orientation, physical ability, religion, and other categories.<sup>72</sup>

#### Disability

A disability is considered one in which a person has serious difficulty with any of the four basic areas of functioning: hearing, vision, cognition, and ambulation.<sup>73</sup>

#### **Limited English Speaking Proficient (LEP)**

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP."<sup>74</sup>

#### **Poverty**

In this report, and to adjust for the high cost of living in San Diego, poverty is 200% below the Federal Poverty Line (FPL), which is estimated to be 47% higher than the national average, according to payscale.com.<sup>75</sup>

#### **Exclusionary Zoning**

The illegal practice of excluding low-income and minority residents under the guise of zoning use classifications – which municipalities, planners, and the legal system are challenged by in contemporary community development and planning.<sup>76</sup>

# Community-Based Organizations (CBOs) and Collaboratives

- Community-Based Organizations –For benefit service providers that work with target populations in their communities and are part of the community fabric, and advocate for their needs. CBO staff often reflect the demographics of the communities they serve.<sup>77</sup>
- Collaboratives broader organizations made up of a variety of organizations, including social service providers, ethnic associations, schools, churches, chambers of commerce, and other CBOs within an underserved and systemically marginalized identified community, including low-income communities and communities of color.<sup>78</sup>

#### People of Color / Communities of Color

The collective term referring to all people who do not identify as White, Non-Hispanic. The term(s) are used as an inclusive and unifying frame across racial groups that are not White, to address racial inequities.

#### Redlining

The color-coded system established by the Home Owners' Loan Corporation to classify neighborhoods by their perceived level of lending risk. This system formed the basis for the color-coding of neighborhoods as such: green for "best", blue for "still desirable", yellow for "definitely declining", and red for "hazardous". Areas with sizable Black and other minority populations were outlined in red ink, which is where the term "redlining" came from.

<sup>&</sup>lt;sup>71</sup>MP Associates, Center for Assessment and Policy, Development, and World Trust Education Services, 2021

<sup>&</sup>lt;sup>72</sup> MP Associates, Center for Assessment and Policy, Development, and World Trust Educational Services, 2021

<sup>&</sup>lt;sup>73</sup> San Diego Association of Governments SANDAG, 2021

<sup>&</sup>lt;sup>74</sup> U.S. Department of Justice, 2022.

<sup>&</sup>lt;sup>75</sup> Dotdash Meredeith - Investopedia, 2022, Payscale, 2022

<sup>&</sup>lt;sup>76</sup> UC Berkeley College of Environmental Design, 2008

 $<sup>^{77}</sup>$  San Diego Association of Governments (SANDAG), 2021

<sup>78</sup> San DiegaMBACia20024oTitle/AfinProgrammAUpdate2021

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# **Appendix – Selected Jurisdiction Data**

Age							
	Under 18	18-24	25-34	35-44	45-54	55-64	65+
Carlsbad	21.6%	8.7%	11.3%	12.6%	13.7%	14.1%	17.9%
Chula Vista	28.3%	11.1%	13.0%	12.6%	12.4%	10.9%	11.8%
Coronado	14.2%	22.0%	15.8%	11.8%	9.9%	10.5%	15.8%
Del Mar	14.8%	6.1%	11.4%	13.8%	13.3%	14.9%	25.8%
El Cajon	24.8%	9.6%	12.0%	12.3%	12.3%	13.0%	16.0%
Encinitas	20.2%	8.0%	11.0%	13.4%	13.6%	14.5%	19.3%
Escondido	27.8%	10.4%	12.2%	12.3%	11.9%	11.4%	14.0%
Imperial Beach	25.5%	11.1%	13.2%	13.8%	11.9%	11.9%	12.5%
La Mesa	19.8%	7.9%	13.6%	14.6%	13.1%	13.6%	17.3%
Lemon Grove	26.0%	10.6%	12.8%	12.9%	12.0%	12.4%	13.4%
National City	27.3%	15.9%	14.4%	11.5%	10.5%	9.5%	10.9%
Oceanside	25.0%	9.6%	12.8%	12.5%	12.0%	12.4%	15.7%
Poway	23.9%	9.5%	11.6%	10.8%	11.9%	14.8%	17.5%
San Diego	22.6%	10.9%	13.2%	14.5%	12.6%	11.8%	14.5%
San Marcos	27.0%	11.3%	12.3%	12.1%	12.5%	10.9%	14.0%
Santee	23.0%	9.2%	12.1%	12.6%	13.0%	13.7%	16.4%
Solana Beach	18.4%	7.5%	11.7%	14.3%	13.0%	13.9%	21.2%
Vista	27.4%	10.6%	13.1%	12.2%	11.8%	11.6%	13.3%
Unincorporated	23.6%	12.1%	12.3%	11.5%	11.6%	12.7%	16.2%
County Total	23.9%	10.9%	12.8%	13.2%	12.3%	12.1%	14.9%

Data Source: SANDAG Population and Housing Estimates 2019

Disability				
	Non- institutionalized Population	Population with a Disability	% of Jurisdiction	% of Region
Carlsbad	113,484	9,834	8.7%	3.1%
Chula Vista	264,327	25,515	9.7%	8.0%
Coronado	19,259	1,558	8.1%	0.5%
Del Mar	4,331	235	5.4%	0.1%
El Cajon	101,356	12,622	12.5%	4.0%
Encinitas	62,274	5,476	8.8%	1.7%
Escondido	149,990	15,698	10.5%	4.9%
Imperial Beach	26,346	3,056	11.6%	1.0%
La Mesa	58,193	6,332	10.9%	2.0%
Lemon Grove	26,378	3,253	12.3%	1.0%
National City	55,546	7,078	12.7%	2.2%
Oceanside	172,681	21,368	12.4%	6.7%
Poway	49,164	5,295	10.8%	1.7%
San Diego	1,372,837	125,899	9.2%	39.6%
San Marcos	94,936	8,323	8.8%	2.6%
Santee	55,366	6,247	11.3%	2.0%
Solana Beach	13,329	802	6.0%	0.3%
Vista	477,809	52,946	11.1%	16.7%
Unincorporated	98,720	6,387	6.5%	2.0%
County Total	3,216,326	317,924	9.9%	100.0%

Data Source: ACS 2019 5-Year Estimates, Table S1810 (Disability Characteristics)

Limited English-Speaking Households					
	Total Households	Limited English Speaking	% of Jurisdiction	% of County	
Carlsbad	43,531	1,007	2.3%	1.4%	
Chula Vista	79,671	7,685	9.6%	10.8%	
Coronado	8,435	134	1.6%	0.2%	
Del Mar	2,008	0	0.0%	0.0%	
El Cajon	32,950	3,964	12.0%	5.6%	
Encinitas	24,422	492	2.0%	0.7%	
Escondido	47,101	4,363	9.3%	6.1%	
Imperial Beach	9,547	669	7.0%	0.9%	
La Mesa	23,288	938	4.0%	1.3%	
Lemon Grove	8,494	454	5.3%	0.6%	
National City	16,658	2,812	16.9%	4.0%	
Oceanside	61,600	2,590	4.2%	3.6%	
Poway	15,946	665	4.2%	0.9%	
San Diego	507,580	36,300	7.2%	51.1%	
San Marcos	29,771	1,956	6.6%	2.8%	
Santee	19,200	441	2.3%	0.6%	
Solana Beach	5,571	49	0.9%	0.1%	
Vista	159,345	5,123	3.2%	7.2%	
Unincorporated	30,168	1,396	4.6%	2.0%	
County Total	1,125,286	71,038	6.3%	100.0%	

Data Source: ACS 2019 5-Year Estimates, Table S1602 (Limited English Speaking Households)

Median Household Income		
	Median Household Income <sup>79</sup>	
Carlsbad	\$97,929	
Chula Vista	\$69,066	
Coronado	\$93,106	
Del Mar	\$104,728	
El Cajon	\$50,267	
Encinitas	\$98,834	
Escondido	\$57,989	
Imperial Beach	\$48,214	
La Mesa	\$59,149	
Lemon Grove	\$57,329	
National City	\$43,108	
Oceanside	\$62,591	
Poway	\$94,512	
San Diego	\$70,123	
San Marcos	\$67,893	
Santee	\$74,818	
Solana Beach	\$95,807	
Vista	\$62,119	
Unincorporated	\$71,899	
County Total	\$69,256	

Unemployment Rate		
	Rate	
Carlsbad	4.9%	
Chula Vista	9.0%	
Coronado	4.3%	
Del Mar	3.2%	
El Cajon	8.0%	
Encinitas	3.8%	
Escondido	4.7%	
Imperial Beach	8.7%	
La Mesa	7.0%	
Lemon Grove	8.1%	
National City	6.6%	
Oceanside	6.0%	
Poway	5.6%	
San Diego	5.8%	
San Marcos	3.9%	
Santee	5.3%	
Solana Beach	3.2%	
Vista	4.4%	
Unincorporated	6.6%	
County Total	6.1%	

Data Source: SANDAG Population and Housing Estimates 2019

Data Source: ACS 2019 5-Year Estimates, Table DPO3 (Selected Economic Characteristics)

Households Below 200% Poverty		
	Percent Population Below 200% Poverty	
Carlsbad	14.4%	
Chula Vista	25.8%	
Coronado	13.5%	
Del Mar	10.6%	
El Cajon	41.7%	
Encinitas	14.8%	
Escondido	37.0%	
Imperial Beach	42.0%	
La Mesa	29.1%	
Lemon Grove	34.0%	
National City	44.9%	
Oceanside	27.2%	
Poway	17.3%	
San Diego	28.5%	
San Marcos	29.4%	
Santee	18.4%	
Solana Beach	15.6%	
Unincorporated	24.8%	

Data Source: ACS 2019 5-Year Estimates, Table
S1701 (Poverty Status in the Past 12 Months)

Median Home Vaue		
	Median Home Value	
Carlsbad	\$814,700	
Chula Vista	\$492,700	
Coronado	\$1,617,000	
Del Mar	\$2,000,000+	
El Cajon	\$445,600	
Encinitas	\$947,700	
Escondido	\$450,200	
Imperial Beach	\$563,600	
La Mesa	\$530,400	
Lemon Grove	\$432,000	
National City	\$402,000	
Oceanside	\$492,600	
Poway	\$686,400	
San Diego	\$602,600	
San Marcos	\$538,200	
Santee	\$445,500	
Solana Beach	\$1,192,600	
Unincorporated <sup>80</sup>		

Data Source: ACS 2019 5-Year Estimates, Table DP04 (Selected Housing Characteristics)

<sup>&</sup>lt;sup>80</sup>Median Home Value for the Unincorporated County is not available. ACS only provides data for the jurisdictions (Census defined places). The unincorporated area is calculated by subtracting the total of jurisdictions (18 Cities) from the total of all census tracts (County Total).

# Appendix K: Equity Inventory

Equity A	ctivity		Link(s) / Lead	Lead Employee/ ) Position(s) Equity Statem	Define	Partner		Performance	Add	itional CDFID Ali				
Activity	Type Policy	Current/ Ongoing/ Recurring Recurring Compose  Current/ Composing/	More Info Department(s BP 007 Organization Effectiveness  ut ted	Director of Organization Effectiveness Director of Diversity & Equity Statem  "define how we develop our em expectations for stakeholders the Equity of the Province of the Pr	recruit and No ployees"; #"set r companies and	Agencies	Populations Considered  Seniors; #Low-income people; #People of Color; #People with disabilities/different abilities; #People with limited English proficiency (LEP); #Women	Monitoring		EXTERNAL: Listen & Serve Society (Community,	to Goal 5. Achieve gender equality and empower all women and girls; #Goal 8. Promote sustained, ts, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels	Notes	Item Type	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Social Equity Cor Working Group	е (	Current/ A collaborative forum of compoing/ community-based organization that gathers input from disadvantaged and underrepresented populations and highlights social equity in projects and programs. The SEWG generates ongoing publinput from underrepresented in historically marginalized communities about key activitias associated with developing the 2021 Regional Plan and related planning activities with a focus social equity. The 12 voting members of the 2021 Regional Plan Social Equity Working Grare representatives from community-based organization or community collaboratives serving underserved communities. They are selecte by SANDAG through a competitive Request for Proposals process. The 2021 Regional Plan Social Equity Working Group reports to the Regional Planning Committee which in turn reports to the Bo of Directors.	s our olic and ties e d s on I oup ons	Jane Clough "inform how we fund, and build programs"; #"fre work with our co	projects and ame how we		Low-income people; #People with limited English proficiency (LEP); #Seniors; #People of Color; #People with disabilities/different abilities			& Serve Society (Community,	to Goal 1. End poverty in all its forms everywhere; #Goal 3. Ensure healthy lives and promote well-ts, being for all at all ages; #Goal 5. Achieve gender equality and empower all women and girls; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Regional Pr Social Equity Planning Framework for the 2021 Regional Plan		Current/ To guide how we approach, Dngoing/ incorporate, and prioritize social Recurring equity in all SANDAC plans, programs, and projects	Appendix Regional ial H - pg 74 Planning	Tuere Fa'aola "inform how we Jane Clough fund, and build programs", #"fa work with our o #"guide our effo unbiased resear data"	projects and ame how we ommunities";		Seniors; #Low-income people; #People of Color; #People with disabilities/different abilities; #People with limited English proficiency (LEP)	CalEnviroScreen			Goal 1. End poverty in all its forms everywhere; #Goal 3. Ensure healthy lives and promote wellbeing for all at all ages; #Goal 5. Achieve gender equality and empower all women and girls; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Develop Pro Language Assistance Plan and Implement All Related Activities	_	Current/ The purpose of this effort is to develop a plan which meets the Federal Transit Administration (FTA) requirement to provide language assistance to person with limited English Proficienc (LEP). The LAP identifies number of persons in the service area was LEP and the languages spoker them; outlines current and futted language assistance measures development and delivery of printed, verbal, and online agepublications and materials; describes how the agency trainstaff and provides notice to LEI individuals; and details how the plan will be monitored. It is updated regularly as data become available.  Implementation: Provide SANDAG staff with support to implement LAP recommendations, including translation & interpretation, monitoring activities for languages assistance, and regularly updating the LAP.	Language Equity, Assistanc #Strategic e Plan Communications s  Expression in the communication is series with an by the communication is series for series with a series for serie	"frame how we' communities"	work with our		People with limited English proficiency (LEP)		Federal	EXTERNAL: Listen & Serve Society (Community, Services & Product Marketing, Responsible Sourcing)	to		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity Status	Purpose Link(s	)/ Lead	Lead Employee/ Equity Statement Alignment Define		Populations Considered	Performance Fu	nding Additional	GDEIB Alignment	SDG Alignment	Notes	Item Type	e Path
Training Resource Ongoing	More Ir  Develop internal capacity to integrate equity into all SANDAG work efforts, and to provide employees tools to analyze equity concerns for all activities. Develop and deliver trainings for all staff on Social Equity topics: Title VI, Environmental Justice, Limited English Proficiency, Disability Rights, Social Equity Impact Analysis.	ifo Department(s)  Diversity and  Equity	Sally "frame how we work with our No Goodman/Social communities"; #"inform how we Equity Analyst plan, prioritize, fund, and build projects and programs"; #"guide our efforts to conduct unbiased research and interpret data"	- Agencies	People of Color, #Low-income people; #People with limited English proficiency (LEP), #People with disabilities/different abilities	Monitoring  Post training survey Other	comes out of the operating budget f				Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Early Action Ongoing	Fequity early action budget amendment: Stakeholders advocating for equity have asked for immediate investment in public transit projects, policies, or programs that will benefit the most marginalized members of our region. Toward this end, select projects from the draft 2021 Regional Plan will be brought forward as pilots.	Planning	Brian Lane "inform how we plan, prioritize, No fund, and build projects and programs"		Seniors; #Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities			EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Digital Equity Ongoing	The global pandemic highlighted SANDA all of the disparities and inequities Digital that many communities without Equity adequate broadband access face – school, work, telehealth. This work was spurred by Executive Order N-73-20, signed by Gov Newsom in August 2020, directing state agencies (e.g., Caltrans, CA Dept of Tech, etc.) to increase access to high-quality broadband statewide. Following the EO, the SANDAG Board adopted a resolution (Board Resolution 2021-09) in January 2021 committing to develop a Digital Equity Strategy and Action Plan that leads to rapid broadband deployment and adoption in the San Diego region. The Strategy is intended to be completed in a few months (tentatively Sept) and the Action Plan will be completed by the end of this calendar year. This work not only supports state initiatives but is imperative to realizing the 5 Big Moves and technology advancements that the 2021 Regional Plan envisions for our region. Providing connectivity in the region will ensure that	Innovation	Krystal Ayala "inform how we plan, prioritize, Yes Antoinette Meier fund, and build projects and programs"	be achieved by Regional Digita	e cic			the Strategy (Vision, Leadership, Structure); #EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)	Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning popportunities for all; #Goal 7. Ensure access to affordable, eliable, sustainable and modern energy for all; #Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 9. Build esilient infrastructure, promote nclusive and sustainable nclusive and sustainable nnotystrailization and foster nnovation		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Inclusive Training/ Plannec Language Resource Future Glossary	/	Strategic Communication s	Irene n McCormack Phoenix Smith Kim Walters								Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Digital Divide e Ongoine	The Regional Digital Divide Taskforce consists of public and grivate stakeholders that are actively working to bridge the digital divide. The Taskforce is providing technical input and informing the development of the Regional Digital Equity Strategy and Action Plan. Members of the Taskforce are multidisciplinary and consists of government organizations, educational institutions, tribal nations, community-based organizations, Internet Service Providers, community technology training and network providers, and other social service and civic organizations.	al Mobility and Innovation	Antoinette Meier "inform how we plan, prioritize, Krystal Ayala fund, and build projects and programs"; #"frame how we work with our communities"								Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

	Activity Sta	atus	Purpose	Link(s) / Lead More Info Department(s)	Lead Employe	<sup>e/</sup> Equity Statement Alignmen	Define Equity?	Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding Additiona Resource		SDG Alignment	Notes	ltem Typ	e Path
_	Program Plar	tuture a k k k k k k k k k k k k k k k k k k	As a public agency, SANDAG addressing the growing need for workforce equity by developing a program to open doors of job opportunities for disadvantaged workers. The SANDAG Workforce Opportunities for Rising Careers (WORC) program is a new workforce utilization and development program that focuses on creating construction career pathways throughout the transportation industry for disadvantaged individuals. The goal of the WORC program is to work with the existing preapprenticeship program partnerships (e.g. Apprenticeship Readiness Collaborative (ARC) program) to prioritize jobs for workers with disadvantaged and ow-income backgrounds.	Diversity and Equity	Elaine Richardson	"set expectations for companie and stakeholders that work wit us"				Low-income people; #People of Color; #Other; #Women; #Military/Veterans			& Serve Society (Community,	o Goal 1. End poverty in all its forms everywhere; #Coal 3. Ensure healthy lives and promote well- being for all at all ages; #Goal 5. Achieve gender equality and empower all women and girls		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Pre- P Apprenticesh ip Program	Ong	going/ fi	This is an earn and learn program for underserved workers in San Diego/Imperial Counties; it prepares students to enter an apprenticeship program or career n construction. Lessons include Math, English, OSHA training, plueprint reading, and interview preparation. A \$1.5 million SB 1 Grant for the Pre-Apprenticeship Program was awarded to the San Diego region and SANDAG partnered with the San Diego Workforce Partnership and San Diego Building Trades to develop a system that tracks students' progress throughout their careers. An estimated 160 disadvantaged individuals will participate in this program.	Diversity and Equity	Elaine Richardson	"frame how we work with our communities", #"set expectations for companies an stakeholders that work with us			San Diego Workforce Partnership San Diego Building Trade	Low-income people; #People of Color; #Women; #Military/Veterans; #Formerl incarcerated people; #Foster youth	у		& Serve Society (Community,	o Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning, opportunities for all; #Goal 5. Achieve gender equality and empower all women and girls		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
	Resource Ong	going/ Activities going/ Activities going/ Activities going/ Activities going	SANDAG recently initiated an Asian Pacific Islander affinity group to provide a safe space to discuss, acknowledge, and learn from recent events and to provide an opportunity to open up the conversation to discuss cultural challenges we face, and to connect us as a community. This informal group is an early example of what SANDAG could do with Employee Resource Groups (ERGs).	Organization Effectiveness	Elaine Richardson Victoria Stackwick Rhea Prenatt Tala Pinones Leeanne Wallace Yen Ho Marlene Whitir Betsy Crescin Heather Zahn Marcus Pascua Thanh Bui Venessa Sphabmixay		No	N/A	N/A	People of Color	N/A		INTERNAL: Attract & Retain People (Recruitment, Benefits, Compensation, Benefits & Flexibility			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Diversity, Co Equity, and Inclusion (DEI) Council	e Ong	going/ a curring N e e e e e e e e e e e e e e e e e e	The DEI Council serves as both an advisory and working group. Membership is composed of 12 employees who represent a wide spectrum of diversity within the agency (e.g., age, gender, race, ethnicity, sexual orientation, religion, ability, position, tenure/seniority, department, and work location). The SANDAG DEI Council was established in December 2020 with an internal focus to provide input on matters related to the SANDAG employee experience.	Organization Effectiveness; #Diversity and Equity; #Regional Planning	Director of	ne es pl	No	N/A	N/A	People of Color; #People with disabilities/different abilities	The Council prepares an Annual Work Plan for review with the Senior Leadership Team		INTERNAL: Attract & Retain People (Recruitment, Benefits, Compensation, Benefits & Flexibility			ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Status	Purpose	Link(s) / Lead	Lead Employee	e/ Equity Statement Alignment	Define Equity Definition	Partner	Populations Considered	Performance		dditional	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Activity Type  Title VI & Program Environment al Justice Programs	Current/ Ongoing/	Meet the Federal Transit Administration (FTA) requireme to develop and submit a Title VI Program every three years to demonstrate compliance with Title VI of the Civil Rights Act of 1964, civil rights-related Executiv Orders, U.S. Department of Transportation regulations, and FTA guidance. The Program describes existing practices and provides a roadmap for future improvements in policies and practices to avoid discriminatior on the basis of race, color, natior origin/limited English proficienc and income. Provide oversight and support for all staff/departments to ensure tha SANDAG programs, policies, and activities comply with Title VI of the Civil Rights Act of 1964, Environmental Justice mandate and regulations, and associated Executive Orders and regulation A&F Dept: Ensure Regional Tran Capital Improvement Program i compliant with Title VI. SANDAG requires that MTS and NCTD provide their Title VI analysis to SANDAG for review to establish that the analysis of low income and minority populations was conducted by each operator in conjunction with the annual Transit CIP process.	https://w Diversity and nt www.sanda Equity; g.org/uplo #Accounting ads/meeti and Finance ngid/meet ingid_479 e 3_24547.p df  nal by, t t d ss. ssit	Elaine Richardson/ Director of Diversity and Equity	"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"; #"inform how we plan, prioritize, / fund, and build projects and programs"	Equity? Equity Definition	Agencies	Low-income people; #People of Color; #People with limited English proficiency (LEP)	Monitoring	Re	esources	EXTERNAL: Listen to 0 & Serve Society i (Community, c Services & Products, j Marketing, a	Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels	The Title VI Program update was adopted by the Board of	Item	sites/WTiibrar y/Lists/Equity Related Activities Tracker
Social Committe Services e Transportatio n Advisory Council	Ongoing/	To review, recommend, and promote the development and use of accessible transportation services within the San Diego region by, promoting the coordination of transportation serving seniors, individuals with disabilities, and persons of limite means; advising on transportation facilities' compliance with the requirements of the Americans with Disabilities Act (ADA), the Rehabilitation Act, and the building standards in Title 24 of the California Code of Regulations; and advising on thaccessibility and usability of transportation facilities beyond strict interpretation of regulation based on actual experience and knowledge. (consists of 21 members who represent social service agencies, individuals, transportation providers, and the Consolidated Transportation Services Agency).	Transport ation Advisory Council advisory	Lisa Madsen	"frame how we work with our communities"; #"inform how we plan, prioritize, fund, and build projects and programs"		NCTD, MTS	Seniors; #People with disabilities/different abilities				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Interagency Committe Technical e Working Group on Tribal Transportatio n Issues	Ongoing/	To serve as a forum for tribal governments in the region to discuss and coordinate transportation issues of mutual concern with the various public planning agencies in the region including SANDAG, Caltrans, the County of San Diego, and the transit operators. In partnership with the Southern California Trik Chairmen's Association (SCTCA) the Working Group will monitor and provide input on the implementation of the strategie and planning activities related to transportation mutually developed through the San Dieg Regional Tribal Summit.	opal Se	Jane Clough	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"		Tribal Covernments Southern California Tribc Chairmen's Association Bureau of Indi Affairs Caltrans County of San Diego MTS NCTD	al an				& Serve Society (Community, i Services & Products, i Marketing, Responsible f Sourcing); #BRIDGING: Align & c Connect (Assessment, I Communications, I Learning, I	Goal 1. End poverty in all its forms everywhere; #Goal 10. Reduce inequality within and among countries; #Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels; #Goal 17. Strengthen the means of implementation and revitalize the global partnership for sustainable development		ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s)	Lead Employee/ Position(s)		Define Equity Definitio	n Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	e Path
Climate Action Data Portal	Project	Ongoing/	The Climate Action Data Portal is an online resource for climate planning data for the San Diego region. The site builds off the guidance provided in ReCAP and provides online access to the greenhouse gas inventory and activity data included in the ReCAP Snapshots. SANDAG plans to update the Climate Action Data Portal annually with any newly available climate data.	matedata. Planning sandag.or g				Caltrans (funded development of the site), Energy Policy Initiatives Center (helps collect data for the site), HNTB (helps prepare coding and other webbased updates for the site)		Data is collected using a task order with the Energy Policy Initiatives Center (EPIC) through the Climate Resilience on-call. While not every dataset is available annually, data is gathered on an annual basis and uploaded to the site; every other year, "ReCAP Snapshots", or greenhouse gas inventory and climate monitoring reports, are also prepared. A list of data sources can be found here: https://www.sandag.org/uploads/projectid/projectid_565_27749.pdf	State		& Serve Society (Community, i Services & Products, Marketing, Responsible Sourcing)	Goal 13. Take urgent action to combat climate change and its mpacts*		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
SANDAG Open Data Portal	Project	Planned/ Future		Data and Modeling												Item	sites/WTlibrar y/Lists/Equity Related Activities
Borders Committee	Committe e	Ongoing/	To provide oversight for planning activities that impact the borders of the San Diego region (Orange, Riverside and Imperial Counties, and the Republic of Mexico) as well as government-to-government relations with tribal nations in San Diego County. The preparation and implementation of SANDAG's Binational, Interregional, and Tribal Liaison Planning programs are included under this purview. It advises the SANDAG Board of Directors on major interregional planning policy-level matters.  Recommendations of the Borders Committee are forwarded to the SANDAG Board of Directors for action.	Committe Relations e	Borders fund, a Program progra	m how we plan, prioritize, and build projects and ams"; #"frame how we with our communities"		Caltrans Ti Mexico Orange County Riverside County COGs San Diego County Water Authority SCAG Southern California Tribal Chairmen's Association	ribes				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	Tracker sites/WTlibrar y/Lists/Equity Related Activities Tracker
Committee on Binational Regional Opportunitie s (COBRO)	Committe e	Ongoing/	Serves as a working group to the SANDAG Borders Committee to facilitate a better understanding of binational border-related issues and needs of the California-Baja California region. Advises the SANDAG Borders Committee concerning both short and long-term binational related activities, issues and actions; provides recommendations regarding binational border-related planning and development; and identifies ways to assist and coordinate with existing efforts in the binational area.	Relations	Borders fund, a Program progra	m how we plan, prioritize, and build projects and ams"; #"frame how we with our communities"							EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Board Policy No. 025, Public Participation/ Involvement Policy	Policy	Ongoing/	Establishes a process for obtaining input from and	•		e how we work with our nunities"		(L p	eople with limited English proficiency, .EP); #People of Color; #Low-income eople; #People with isabilities/different abilities; #Seniors				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing); #BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Board Policy No. 009, Discriminatio n Complaint Procedures	Policy	Ongoing/	This policy is intended to establish a procedure under which	Policy No. Counsel	l John Kirk, "frame General Counsel comm	e how we work with our nunities"		d p	eniors; #Low-income people; #People f Color; #People with limited English roficiency (LEP); #People with isabilities/different abilities; #Women; Military/Veterans; #LGTBQIA							ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker

uity Activit	y Status	Purpose	Link(s) /	Lead Department(s)	Lead Employee Position(s)	e/ Equity Statement Alignment	Define	Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	e Path
vity Type Project nentat ation ortatio egies	Ongoing/	identified climate risks and needs by holistically implementing	SANDAG Climate	Regional	Katie Hentrich,	"inform how we plan, prioritize, fund, and build projects and programs"		recognizes the disproportionate burden of climate impacts on marginalized communities and foregrounds	Caltrans, University of Sa Diego (Energy Policy Initiatives Center, San Diego Regional Climate Collaborative), Dudek	n :	There will be no somotioning for this project, as the Scope of Work and funding are tied to a Caltrans Adaptation Planning Grant.		Equity could be furthered by implementing the guidance documents and training curriculum being prepared as deliverables for this grant. Resources required to do so would include funding, staff, and a Task Order with an entity qualified to conduct trainings that stem from the curriculum.	EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible	Goal 13. Take urgent action to combat climate change and its impacts*, #Goal 11. Make cities at human settlements inclusive, safe, resilient and sustainable			sites/WTlibra y/Lists/Equity Related Activities Tracker
nable Project	Ongoing/	What are Sustainable Development Coals? The Sustainable Develop Goals (SDGs) are 17 global goals adopted by all United Nations Member States in 2015 through the 2030 Agenda for Sustainable Development to serve as a global blueprint for sustainable growth. The Agenda is a plan of action for people, planet and prosperity and seeks to strengthen universal peace in larger freedom. The 17 SDGs and 169 targets are integrated and indivisible and balance the three dimensions of sustainable development: the economic, social and environmental. Beyond Environmental Sustainability, the SDGs holistically address Economic Development and Social Inclusion. The SDGs stimulate action in areas of critical importance: people, the planet, prosperity, peace, and partnership. How do SDGs benefit the San Diego region? Local governments around the world are taking the lead on climate action. At a regional level, the SDGs align efforts to link across silos, provide transparency and accountability, support evidence- based policy ideas, tell a story with data, and elevate regional efforts to the global stage. Globally, cities use the SDGs as a planning tool. Many local jurisdictions and regional bodies in the United States have already begun using SDGs to support planning and sustainable development including: San Jose, New York City, Los Angeles, and State of Hawaii. Why SANDAG? Sustainable development decision making requires broad participation of all. As the San Diego regional government agency, SANDAG or brighter strength of Global Policy, our member agencies, and other key stakeholders, SANDAG can brighter of Global Policy, our member agencies, and other key stakeholders, SANDAG can bring together policymakers and researchers to inform evidence- based solutions for a sustainable future. The SDG roject will also serve as a tool to centralize and		Data Science and Analytics; #Regional Planning		a "frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"; #"inform how we plan, prioritize, fund, and build projects and programs"		See language above in purpose	Global Policy, CBOs, member	Seniors, #Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Military/Veterans; #Formerly incarcerated people; #Foster youth; #Tribes; #LGTBQIA	The measures used are the I7 SDCs and its 169 targets. The project team will work to determine which targets SANDAG will focus on first and which indicators can be applied best to the San Diego region. This tool will be a performance monitoring tool to measure our region's success in the various targets.						Item	sites/WTlibra y/Lists/Equity Related Activities Tracker

future. The SDG Project will also serve as a tool to centralize and streamline many existing and overlapping SANDAG efforts including but not limited to

performance monitoring, equity action plan, climate action portal,

and more.

Equity Activity Activity Type	Status Purpose	Link(s) / Lead More Info Department	Lead Employee/ Equity Statement Alignment t(s) Position(s)	Define Equity Definitio	n Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Typ	e Path
San Ysidro Project Mobility Hub Planning	Current/ Ongoing/ Recurring  Recurring  Recurring  Community is a major transportation hub located junorth of the San Ysidro Land of Entry – one of the busiest laborder crossings in the world one of the busiest stations in MTS network the SYTC is an anchor station for the regions transit system and major hub domestic and international transit pedestrian and vehicular concircuitous ingress and egress constrained rail service capacas well as other challenges. The recent expansion and modernization of the San Ysis LPOE significantly increased processing capacity for perso travel – urging investment in multimodal facilities serving the area. The San Ysidro Mobility Planning effort will develop conceptual design alternative the future San Ysidro Mobility. Hub while identifying near-teimprovements to enhance connectivity and mobility, improve safety, and introduct innovative Mobility Hub featut to facilitate critical existing an planned network connection	Regional Planning st Planning	Zach Hernandez, "inform how we plan, prioritize, Associate fund, and build projects and Regional programs"; #"frame how we Planner (Project work with our communities" Manager) Phil Trom, Principal Regional Planner Marisa Mangan, Senior Regional Planner		San Diego Metropolitan Transit System (SDMTS), California Department of Transportation (Caltrans), City of San Diego	proficiency (LEP)		5	As part of the effort we would be exploring potential land use and housing considerations to incorporate into the conceptual design for the future San Ysidro Mobility Hub. Additional focus areas around this topic could include opportunities to explore policies or programs for lowincome housing that considers both current US residents as well as current Mexican residents that have been priced out of the San Diego housing market. Innovative mobility solutions proposed as part of the project could also be a focus area that helps address equity. For example, a flexible fleet pilot program could be implemented to serve disabled individuals completting trips where ADA infrastructure may be lacking. Another related focus area could incorporate programs that highlight and serve the binational workforce (crossborder commuters) while connecting them to employment center.		Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Coal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Coal 13. Take urgent action to combat climate change and its impacts*; #Coal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Coal 10. Reduce inequality within and among countries		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Comprehensi Project ve Multimodal Corridor Plans	Current/ Comprehensive Multimodal Ongoing/ Recurring driven plans that offer solution reduce congestion; support climate action initiatives; generations that offer solutions reduce congestion; support climate action initiatives; generation choices; and increase access for residents, commuters, visitors, and good movement. CMCPs help SAN and Caltrans compete for state and federal funding, including Senate Bill 1 funds.	ns to g.org/inde x.asp?sub erateclassid=83 &fuseacti on=home. bs subclassh DAG ome e	Rachel Kennedy, "Inform how we plan, prioritize, Corridor fund, and build projects and Planning programs"; #"frame how we Manager work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"	The CMCPs include focus on developing transportation solutions to improve mobility and access to opportunities for People of Color, people with low incomes, and seniors.	NCTD, local jurisdictions, Airport Authority, Port of San Diego, tribal nations,	Seniors; #Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Militany/Veterans; #Tribes	e The CMCPs will be evaluating different transportation solutions for their respective corridors using a number of performance measures. These measures include metrics specific to access and impacts for social equity focus communities.	Federal; #Local		EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Advanced Project Planning for Next Generation Rapid	Current/ Ongoing/ Recurring transit agencies, SANDAG wil analyze potential route alignments, station locations, transit priority measures on the Next Generation Rapid router routes 625, 471, and 41, which serve the cities of San Diego, Escondido, Chula Vista, and National City. The advanced planning for these routes will ready them for design and implementation and allow SANDAG to line up quality, shovel-ready projects to comfor state and federal funding, help achieve local, state, and national climate action goals. project will be guided by activation by project partn and the public to ensure thes routes meet the unique need the communities they serve, including low-income and disadvantaged populations.	and pree  pete pete find  The e e ers	Brian Lane "inform how we plan, prioritize, fund, and build projects and programs"	Yes		Low-income people; #People with limited English proficiency (LEP); #People of Color; #Seniors; #People wi disabilities/different abilities; #Women		Federal; #Local		Connect (Assessment, Communications, Learning, Sustainability); #EXTERNAL: Listen to & Serve Society (Community,	Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; #Goal 7. Ensure access to affordable, reliable, sustainable and modern energy for all; #Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 10. Reduce inequality within and among countries; #Goal 13. Take urgent action to combat climate change and its impacts*		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Activity 1	ctivity Statu Type		Link(s) / Lead More Info Department(s	Lead Employee ) Position(s)	Equity Statement Alignmen		Equity Definition	7.gee.es	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	
Transit Oriented Developmen t	Ongoi Recurr	nt/ This project will maximize planned transit investments in the 15-mile segment of the Blue Line Trolley Corridor between Downtown San Diego, a major regional employment center, and the U.SMexico border crossing a San Ysidro, the nation's busiest land border crossing. The project will develop an implementation strategy to improve multimodal connectivity and community integration of shared-use mobility options, pedestrian and bicycle improvements, emerging technologies, and urban design enhancements. The Corridor includes several environmental justice communities and provide the backbone of transit for people throughout South County, including people living, working, and accessing community resources. This study will explore opportunities for transit-oriented development at up to four Blue Line Trolley stations areas and identify complementary multimodal transportation services, programs, amenities, and capital improvements. The project will promote multimodal access to transit stations and improve connectivity and access to essential services for residents, employees, and visitors.	t y		"inform how we plan, prioritize, fund, and build projects and programs", #"frame how we work with our communities"			MTS	Low-income people; #People of Color; #Seniors; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Military/Veterans; #Foster youth				& Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)	Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 10. Reduce inequality within and among countries; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 13. Take urgent action to combat climate change and its impacts*; #Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels		Item	sites/WTiibrar y/Lists/Equity Related Activities Tracker
Youth Pro Opportunity Passes (YOP)	Ongoi	nt/ Consider opportunities for g/ providing no-cost transit passes for all youth to ensure generations of lifelong transit riders and encourage significant mode shift. Connect youth to school, work, internships and other early-career opportunities.	Regional Planning	Brian Lane	"inform how we plan, prioritize, fund, and build projects and programs"	Yes	ı	MTS and NCTE	) Low-income people; #Foster youth				& Serve Society (Community,	Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Equal Pro Employment Opportunity Program	Ongoi	nt/ The EEO program is designed to ensure fair treatment of all individuals with respect to recruitment and hiring; training, development, and advancement opportunities; compensation and benefits; and the application of employment policies and practices.	Effectiveness				It is the policy of SANDAG to actively recruit, hire, train, promote, and make all other employment decisions for all applicants and employees without regard to race, color, religious creed (including religious creed (including religious cress and grooming practices), national origin, ancestry, age, gender (including gender identity and gender expression), sex (including pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), medical condition (including AIDS/HIV, history of cancer), disability (including mental or physical), genetic information, sexual orientation, marital status, military or veteran's status, or any other category protected under federal or state law.									Item	sites/WTiibrar y/Lists/Equity Related Activities Tracker

Equity Activity Activity Type	Status Purpose Link(s More I	s) / Lead Info Department(s	Lead Employee/ ) Position(s)	Define Equity Definition	on Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Subrecipient C	Current/ Ongoing/ Recurring ensure subrecipient compliance with the Title VI of Civil Rights Act of 1964 and related regulations and executive orders. This involves reviewing draft subrecipient Title VI Plans for compliance areas such as Title VI Notice, Form and Complaint Procedures; Language Assistance Plan that ensures meaningful access to vital documents for users who are Limited-English Proficient; and rider/client demographic data.	le VI or	Zachary Rivera/ Business Analyst 1	Yes		People with limited English proficiency (LEP); #People with disabilities/differen abilities; #Seniors; #People of Color		-ederal		& Serve Society (Community, Services & Products, Marketing, Responsible Sourcing); #BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability)	aal 10. Reduce inequality within d among countries		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Fleets C	Current/ Develop a plan for implementing Ongoing/ near-term Flexible Fleet pilots Recurring with a strong focus on CBO communities. As part of this project, mobility needs assessments will be developed for each CBO organization based on survey data and other quantitative/qualitative data from CBO coverage areas.	Mobility and Innovation	Eva Sanchez, "frame how we work with our Regional communities" Planner	No	CBOs, MTS, NCTD	Low-income people; #People of Color; #People with disabilities/different abilities; #Seniors							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
eBike Program P Incentive Pilot			Marisa Mangan, "inform how we plan, prioritize, Senior Mobility fund, and build projects and strategist programs"; #"frame how we work with our communities" iCommute Program Manager Eva Sanchez, Regional Planner	No Has not been defined yet.	Rider Safety Visibility	Low-income people; #People with disabilities/different abilities	TBD F	-ederal					Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Clearinghous C	Current/ Ongoing/ Recurring Recurring Will collect and manage micromobility device data which Cities can leverage to determine whether mobility devices are being distributed equitably.	Mobility and Innovation	Marisa Mangan, "guide our efforts to conduct Senior Mobility unbiased research and interpre data"; #"Inform how we plan, projects and programs" Information Systems Analyst	No t	Local jurisdictions, private mobilit operators, universities	ty							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

	Activity	Status	Purpose	Link(s) / Lead	Lead Employe		Define Equity Definition	n Partner	Populations Considered	Performance	Funding	Additional	GDEIB Alignment	SDG Alignment	Notes	Item Typ	e Path
Activity Chula Vista Mobility Hub Concept of Operations Stakeholder Interviews	Type Project	Past/	The project included stakeholder	Mobility and	Danielle Kochman, Mobility Planning Manager	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"	Equity?	II Agencies	Low-income people; #Seniors; #Military/Veterans; #People with disabilities/different abilities	Number of trip planning requests/ bookings by low- income, seniors, and other disadvantaged communities  Number of multimodal trips planned/paid for at a kiosk by unbanked, underbanked and travelers without access to technology.  Customer satisfaction of disadvantaged groups: ease of use, accessibility, overallexperience		Resources				Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Mid-Coast Mobility Hub Implementat ion	Project	Ongoing/	While the Mid-Coast stations are well positioned to connect people to the surrounding community, there are several access constraints for people walking, biking, taking other transit services (e.g., buses), and using shared mobility services - as well as for people with mobility limitations. Low-income and minority populations residing in the region's South Bay communities also face significant barriers in accessing the Clairemont and Mission Bay communities due to lack of safe infrastructure. SANDAG has completed and is currently leading several projects to address these challenges including:  Mid-Coast Mobility Hub Strategy Social Equity Memo Pacific Beach Neighborhood Electric Shuttle Clairemont Complete Corridor Designs Quick-build projects near stations to improve active transportation projects	Mobility and Innovation		an, "frame how we work with our N ty communities"	lo	City of San Diego, MTS, Caltrans, Parking Districts, and various community organizations.	Low-income people; #Military/Veteran #Women; #People with disabilities/different abilities; #People of Color; #Seniors	s;	Federal; #State; #Local					Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Peer Review of Project Labor Agreement Requirement s for Diversity and Equity	Project		PRP 116 - Project Labor Agreement Requirements for Diversity and Equity was a structured review of the datasets and methods used to define eligibility and targeting for workplace equity and disadvantaged worker participation measures.	Diversity and Equity; #Research and Program Management; #Data and Modeling; #Dat Science and Analytics		"inform how we plan, prioritize, N fund, and build projects and programs"; #"guide our efforts to conduct unbiased research and interpret data"	lo						Connect i (Assessment, communications, p	Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Peer Review of Digital Divide Broadband Gap Analysis Data Sources	Project	Past/ Previous	PRP 129 - Digital Equity Strategy - Broadband Gap Analysis was a structured peer review of data sources used in Digital Divide broadband gap analysis. This included review of data set quality, coverage gaps, and potential biases in the data used.	Mobility and Innovation; #Data and Modeling; #Research and Program Management		"guide our efforts to conduct Nunbiased research and interpret data", #"inform how we plan, prioritize, fund, and build projects and programs"	lo						EXTERNAL: Listen to 6 & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)	Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning popportunities for all; #Coal 8. Promote sustained, inclusive and sustainable economic growth, ful and productive employment and decent work for all; #Goal 9. Build resilient infrastructure, promote nclusive and sustainable ndustrialization and foster nnovation		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
CBO Mobility Needs Assessments	Project	Past/ Previous	Conducted surveys to better understand mobility challenges, needs, opportunities in underserved communities in partnership with CBO Outreach team.	Mobility and Innovation; #Regional Planning		/ "inform how we plan, prioritize, Normal fund, and build projects and programs"; #"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"; #"set expectations for companies and stakeholders that work with us"	lo	CBOs	Low-income people; #People of Color; #People with limited English proficien (LEP); #People with disabilities/differer abilities; #Seniors				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s)	Lead Employe	<sup>e/</sup> Equity Statement Alignment	Define Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Accelerate to Zero Emissions (A2Z)		Ongoing/	The purpose of the Accelerate to Zero Emissions Collaboration is to Sevelop a vision and implement a San Diego Regional Electric Vehicle (EV) Strategy that will accelerate investment in zeroemission vehicles "ZEVs" and EV infrastructure that reduces air pollution and greenhouse gas emissions to combat climate change. The A2Z Gap Analysis was published in July 2021, with an EV Strategy in development intended to meet the needs assessed in the Gap Analysis.	https://a2z Mobility and sandiego. Innovation	Susan Freedman, Senior Regiona	"inform how we plan, prioritize, fund, and build projects and al programs"; #"set expectations for companies and stakeholders that work with us"		Agendes		nomoning		Resources				Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
CALeVIP (EV Charger Incentive Program)	Program	Ongoing/	The San Diego County Incentive Project promotes easy access to zero-emission vehicle infrastructure for the purchase and installation of eligible electric vehicle (EV) chargers in San Diego County – with a total of \$21.7 million in available funds over three years.	evip.org/i Innovation ncentive- project/sa n-diego-	Senior Regiona	"inform how we plan, prioritize, fund, and build projects and al programs"; #"frame how we work with our communities"										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Plug-in San Diego	Project; #Program		In July 2015, SANDAG launched Plug-in San Diego (Plug-in SD) through a two-year California Energy Commission (CEC) grant. Plug-in SD implemented recommendations from the Electric Vehicle (EV) Readiness Plan through a combination of resource development, training, technical assistance through an	ww.sanda Innovation; g.org/inde #Data and x.asp?clas Modeling; #Data sid=17&su Science and bclassid= Analytics 46&projec tid=511&fu seaction=	Jeff Hoyos, Associate Regional Planner	"guide our efforts to conduct unbiased research and interpret data"; #"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"										ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Regional EV Charger Managemen t Strategy		oing/Recurri	SANDAG and NCTD were nawarded a Caltrans Planning Crant to develop a Regional EV Charger Management Strategy. This project will develop a regional electric vehicle (EV) charger management strategy to support the continued reliable operation and expansion of public EV charger infrastructure at park & ride lots and other public parking areas managed by public agencies.	Mobility and Innovation	Associate Regional	"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
MD/HD Zero- Emission Vehicle Blueprint	Project	Ongoing/	SANDAG is currently awaiting final approval of a CEC grant which will support the development of a medium- and heavy-duty zero-emission vehicle blueprint through coordinated engagement with regional stakeholders.	Mobility and Innovation; #Regional Planning	Jeff Hoyos, Associate Regional Planner	"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"										ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Zero- Emission Vehicle Incentive Program	Program		SANDAG is resubmitting a Caltrans grant application to receive funding for the planning and execution of a ZEV incentive program, which will further expand access to zero-emission vehicles in the region.	Mobility and Innovation; #Contracts and Grants		"inform how we plan, prioritize, fund, and build projects and al programs"										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
2023 RTIP Developmen t	Project; #Program		Integrating equity into the development of the 2023 RTIP.	Regional Planning	Department; other relevant departments, a	"inform how we plan, prioritize, hund, and build projects and programs"; #"frame how we so work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"	o						EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing); #BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

	ctivity Type	Status		Link(s) / Lead More Info Department(s	Lead Employee, ) Position(s)	/ Equity Statement Alignment	Define Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignmen	t SDG Alignment	Notes	Item Type	e Path
Intraregional Pro Tribal Transportatio n Strategy	roject		The Intraregional Tribal  Transportation Strategy (Strategy) v is the result of a collaborative effort between SANDAG and the	https://w Regional ww.sanda Planning g.org/uplo ads/public attionid/pu blicationi d_4480_2	Jane Clough, Senior Regional	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"		Southern Tribal California Tribal Chairmen's Association (SCTCA)	95	The strategy section of this document is the result of the collaboration and conversations that took place during the study. This section contains a list of strategies with short-term and ongoing actions, as well as tools and resources that support their implementation. The strategy is intended to serve as a guide for stakeholders to advance the transportation goals of tribal communities now and into the future.	State	Supporting the short-term and ongoing actions identified for implementation.	& Serve Society (Community,	o Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 9. Build resilient s, infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 10. Reduce inequality within and among countries; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels		ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Climate Change Solutions Report	roject	Past/ Previous	The Climate Change Solutions (CCS) report series establishes a foundational understanding of statewide climate change policies and programs, including climate mitigation and adaptation; describes the ways in which SANDAG currently supports state and local goals in this space; and, identifies and analyzes opportunities for SANDAG to implement new or expanded climate activities in the region.	Regional Planning	Senior Regional	"inform how we plan, prioritize, fund, and build projects and programs"	Yes Procedural equity is about creating outreach, engagement, and involvement processes that are transparent, fair, and inclusive. It focuses on increasing opportunities for engagement and ownership in decision-making, in all aspects of climate resilience planning, by the communities that are disproportionately impacted by and most vulnerable t climate change. Distributional equity is about the fair distribution of resources, benefits, and burdens that result from climate resilience planning decisions. Distributional equity means prioritizing the allocation of finite resources and designing planning strategies to benefit communities that experience the greatest climate and environmental inequities and have the most unmet environmental health needs, while also ensuring that these communities do not disproportionately experience economic, social, or environmental burdens as a resu of such planning decisions. Structural equity involves making planning decisions. Structural and derlying planning decisions that recognize and address the underlying structural and structural a				State; #Local	Funding to suppor implementation of the action items included in the Climate Change Solutions report (summary report h succinct list of suggested opportunities for SANDAG).	Connect (Assessment, Communications, Learning, Sustainability)	Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Stat	us Purpose	Link(s) / Lead More Info Department	Lead Employee/ (s) Position(s)	Define Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Border	Droject - C	t/ The study identified health	https://www.Docional	Jane Clough — "inform however also priorities. N	systems that are at the root of economic, social, and racial inequities. It is an approach to decision making that overtly seeks to correct past harms and to anticipate and prevent future unintended consequences for disadvantaged social and racial groups. An approach based on structural equity examines whether planning decisions to achieve climate resilience also eliminate poverty, create workforce development opportunities, address racism, increase civic participation and social cohesion, protect housing availability and affordability, increase educational outcomes, and improve public health outcomes.	Casa Eamiliar Louis		Monitoring and	State	While SANDAG	EYTEDNAL-Listen to C	ical 3 Engure healthy lives and		Itam	sites/A/Tibbaa
Border Health Equity Transportatio n Study: A Case Study of the San Ysidro Community	Project Pas Previ	t/ The study identified health disparities in San Ysidro and quantified the possible impacts transportation and other improvement projects on community health to help both community members and city planners to prioritize projects a programs to reduce health disparities.	x.asp?proj ectid=445 a &fuseacti on=projec	Jane Clough, "inform how we plan, prioritize, N Senior Regional fund, and build projects and Planner programs"		Casa Familiar, Low-ii Human Impact Partners, Caltrans	ncome people; #People of Color	Monitoring and Evaluation Plan included Methodology, Performance Targets, BHETS Framework, Monitoring and Evaluating: Mobility/Built Environment, Health Impact, Planning Process Outcomes	State	While SANDAG conducted the study, the agency is not involved in planning or funding the implementatio of the recommended projects.	& Serve Society p (Community, a Services & Products, Marketing,	ioal 3. Ensure healthy lives and promote well-being for all at all ges			sites/WTlibrar y/Lists/Equity Related Activities Tracker
Regional Climate Action Planning Framework (ReCAP)	#Program Ongo	ent/ ReCAP establishes a technical framework for regionally consistent climate action planning that preserves local policy flexibility for the unique needs and circumstances of ea local jurisdiction. ReCAP comprises a summary docume and six technical appendices. Timethodologies presented in ReCAP represent the best available science at the time.	ch bclassid= 46&projec ent tid=565&f	Katie Hentrich, "inform how we plan, prioritize, N Associate fund, and build projects and Regional programs" Planner	lo			As part of ReCAP,		and its associated programs/projects (ReCAP Snapshots and Climate Action Data Portal) does n have sustained or	Connect si (Assessment, w Communications, 7 Learning, re ot Sustainability); e	ioal 6. Ensure availability and ustainable management of vater and sanitation for all; #Goal c. Ensure access to affordable, eliable, sustainable and modern energy for all; #Goal 13. Take urgent action to combat climate hange and its impacts*			sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(	Lead Employe s) Position(s)	e <sup>/</sup> Equity Statement Alignment Define Equity	E Equity Definition Part Part		Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Mobility Solutions for Environment al Justice Communities : Existing Conditions Report and Mobility Barriers Assessment	Project		The project identifies key barriers to mobility experienced by City Heights community members, and provides a Toolkit with possible solutions to improve mobility. Areas of study include socio-economic and cultural characteristics, access to transit, available transit services, active transportation infrastructure, and transportation demand management programs. The Existing Conditions Report and Mobility Barriers Assessment utilize demographic data, transit data, and testimonies from community members to identify mobility barriers as they relate to the above areas of study.	ww.sanda Planning g.org/uplo ads/projec tid/project id_546_22 814.pdf	Jane Clough, Senior Regiona Planner	"frame how we work with our No il communities"; #"inform how we plan, prioritize, fund, and build projects and programs"	Caltrans, Mobility Solutions Environr Justice Commu City Heig Commu Developi Corporat	ental ities, nts ity nent		State			oal 3. Ensure healthy lives and omote well-being for all at all es		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Regional Adaptation Needs Assessment	Project	Past/ Previous	The Regional Adaptation Needs Assessment aims to increase understanding of adaptation planning needs and opportunitie and advance coordination across adaptation projects throughout the San Diego region.	ww.sanda Planning g.org/inde esx.asp?clas s sid=17&su	Katie Hentrich, Associate Regional Planner	"inform how we plan, prioritize, Yes fund, and build projects and programs"; #"frame how we work with our communities"	Equity is both the fair and just distribution of societal benefits and burdens and the ability of marginalized communities to influence decisions in a way that addresses their needs and concerns.  San Dieg Regiona Climate Collabor. The San Foundat Tijuana Foundat Tijuana Foundat Research Reserve	tive, Diego on, ver		State	from this report are being incorporated into the ongoing Holistic Implementation of Adaptation and Transportation Resilience Strategie	(Assessment, Communications, Learning, Sustainability); #EXTERNAL: Listen to & Serve Society s (Community, Services & Products,			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Curb Access Managemen t Concept of Operations	Project		The Curb Access Management Concept of Operations(ConOps) served as the first step in planning out the Curb Access Management technology, a Next OS concept, that would reallocate curb space from traditional vehicle storage use, thereby opening accessibility and mobilit for many other users. The development of the Curb Access Management ConOps identified and evaluated the needs of all road users and put the needs of users that are most vulnerable at the top of the prioritization list. Through the consideration of how the technology will be used by all users, the ConOps aims to prioritize equity and accessibility in curb management ensuring that the curb management strategies add value and access the community with a focus on disadvantaged groups to ensure no undue burden is placed on any group or population.	g : e y y	Alex Estrella, Technology Program Manager	"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"		Seniors; #People with disabilities/different abilities			action is.				Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Cash and Credit accepted at Toll Booths on SR 125	Service	Ongoing/	Customers using SR 125 may pay for their travel at the time of the trip with cash or credit/debit card Ramp locations offer automated toll payment machines and the main line plaza allows customers to interact with a toll attendant at the toll booths.	Transportation I. Services	Dennis Llavore Emily Munic	, "frame how we work with our communities"		Seniors; #Low-income people; #Pe of Color; #People with limited Eng proficiency (LEP); #People with disabilities/different abilities; #Woi #Military/Veterans; #Formerly incarcerated people; #Tribes; #LO	ylish men;	Local		EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Smart Intersection System Concept of Operations	Project		The Smart Intersection System Concept of Operations (ConOps) served as the first step in planning out the Smart Intersection technology, a Next OS concept, that would allow for greater coordination across agencies to assess priorities, optimize networ performance, and increase resilience to disruptions. The development of the Smart Intersection Systems ConOps identified and evaluated the needs of all road users and put the needs of the most vulnerable users at the top of the prioritization list. To address the identified needs, the ConOps identified system goals and objectives that primarily focus on improving safety, and prioritizing equity and accessibility for the most vulnerable road users.	g k	Alex Estrella, Technology Program Manager	"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"		People with disabilities/different a #Seniors	bilities;						Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity Status Activity Type	Purpose Link(s) / Lead More Info Department(	Lead Employee/ s) Position(s) Equity Statement Alignment Equity?	/ Definition Partner Populations Considered	Performance Funding Additiona Monitoring Resources		Notes Item Type Path
Disadvantag Program Current/ ed Business Ongoing	The United States Department of https://sa Diversity and ndag.shar Equity epoint.co enterprise (DBE) Program aims to m/sites/Of increase the participation of ficeofDive minority and women owned businesses in state and local transportation projects that are funded by the Department through the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA). As a direct recipient of FTA funding, SANDAG is required to implement a FTA DBE Program. In addition, as a subrecipient of FHWA funding through Caltrans, SANDAG is required to adhere to the Caltrans FHWA DBE Program.	Elaine "inform how we plan, prioritize, Richardson, Director of programs"; #"set expectations Diversity and Equity that work with us"	#Other (	DBE Program Plan Federal (FTA, FRA, FHWA), FTA triennial DBE goal Development and Annual Review, Contract specific DBE goal setting, Compliance Information System (CIS), Monthly/Quarterly/S ermi-Annual Reporting, Commercially Useful Function (CUF) Reviews, Prompt Payment monitoring	EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)	Item sites/WTlibrar y/Lists/Equity Related Activities Tracker
	SANDAG has developed a robust / Small Business (SB) Program for g federal, state, and local funded procurements. The purpose of the m/sites/Of SB program is to remove barriers, spand contracting poportunities, and promote quity/Site quity in the participation of small Pages/Sm businesses by leveling the playing procurements.  https://sa Diversity and ndag.shar Equity spoints/Of sB program is to remove barriers, ficeofDive rsityandE quity/Site quity/Site quity/Site quity/Site quity/Site quity/Site squity/Site squity/S	Elaine "inform how we plan, prioritize, Richardson, fund, and build projects and Director of programs", #"set expectations Diversity and for companies and stakeholders Equity that work with us"	l	Compliance Local; #State; Information System #Federal (CIS), Bench Reports	EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)	Item sites/WTlibrar y/Lists/Equity Related Activities Tracker
Program for Ongoing	The SANDAG Bench is a nationally recognized program gue to major success in creating significantly more contracting opportunities for small and diverse firms to participate on SANDAG contracts and procurements. The Bench is a tool Pages/Be nath SANDAG On-Call Primes Consultants can access to obtain lists of certified Disadvantaged Business Enterprise (DBE) and Small Business (SB) firms to utilize on their on-call task orders as subconsultants. The Bench Program is applicable to SANDAG On-Call Contracts for Architecture and Engineering (A&E), Construction Management (CM), and Planning Services. The purpose of the speed networking session is to connect potential On-Call Architecture and Engineering (A&E), Construction Management (CM), and Planning Prime Consultants with small and diverse firms on the Bench Program in order to build their teams and respond to the SANDAG request for qualifications. The Prime Consultants and Bench firms have 5-minute sessions to hold a short but focused discussion where Bench firms must effectively utilize their time to market their firm's capabilities with Prime Consultants and share valuable information.	Elaine "set expectations for companies and stakeholders that work with us"  Diversity and Equity	People of Color; #Women	Federal; #State; #Local	EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)	Item sites/WTlibrar y/Lists/Equity Related Activities Tracker
Americans Ongoing	The purpose of the external ADA and Accessibility Program is to prohibit discrimination against persons with disabilities in several areas including transportation, public accommodations, and communication. Ultimately, the program also guarantees equitable access for persons with disabilities to all SANDAG programs, policies, and projects.  https://sa Diversity and ndag.shar Equity epoint.co report wistes/Of riceofDive rsityandE quity/Site Pages/Am erican.asp	Elaine "inform how we plan, prioritize, Richardson, Director of programs"; #"frame how we Diversity and Equity  "inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"	People with disabilities/different abilities	Federal; #State	EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)	Item sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity Activity Type	Status	Purpose	Link(s) / Lead More Info Department(	Lead Employee	/ Equity Statement Alignment	Define	Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	ltem Typ	e Path
Regional Project Mobility Hub Strategy		As part of the fulfillment of San Diego Forward: The Regional Plan, SANDAG has developed a Regional Mobility Hub Strategy I demonstrate how transportation services, amenities, and supporting technologies can work together to make it easier for communities to access trans and other shared mobility choices. As part of this effort, SANDAG has also developed an Equity memo that assessed how mobility hubs can best serve disadvantaged communities in San Diego and Imperial counties Some of the equity-related benefits, challenges, and best practices associated with differe mobility hub features have beer identified to recommend featur that could benefit disadvantage populations at 11 mobility hub design prototypes around San Diego County.	https://w ww.sdfor ward.com to /mobility- negionalm obilityhub	Marisa Mangan, Senior Mobility	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"	<u>L</u> quity.		Agenties	Low-income people; #Seniors; #People of Color			Resources				Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Environment al Mitigation Program 10th Call for Projects		The Environmental Mitigation Program (EMP) provides funds through TransNet to protect, preserve, and restore native habitats as offsets to disturbance caused by the construction of regional and local transportation projects. The 10th Call for Project will include social equity criteria part of the grant program.	ww.sanda Planning g.org/inde x.asp?clas e sid=17≺ ojectid=26 n 3&fuseacti s on=projec	Kim Smith, Senior Environmental Planner	"inform how we plan, prioritize, Y fund, and build projects and programs"		Disadvantaged communities are defined as areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation or areas with concentrations of people that are of low-income, high unemployment, low levels of home ownership, high rent burden, sensitive populations, or low levels of educational attainment. Further information on disadvantaged communities can be found at CalEnviroScreen 3.0 tool represent the SANDAG Community-Based Organizations (CBO) Network Communities. Project applications that receive a minimum of 40 points will be eligible to receive an additional 5 points for social equity. Scores for this criterion will be based on the following parameters: higher points will be awarded to projects that utilize multiple methods of incorporating CBO Network Communities and/organizations (USO) Network organizations (USO) Network organizations that receive a minimum of 40 points will be based on the following parameters: higher points will be awarded to projects that utilize multiple methods of incorporating CBO Network Communities and/organizations; O				Local		Connect (Assessment, Communications, Learning, Sustainability)	Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainat manage forests, combat desertification, and halt and reverse land degradation and hibiodiversity loss	approve in Octob 2021.	ge; I to	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status		Link(s) / Lead More Info Departme	Lead Employe	re/ Equity Statement Alignment Equ	ine Equity Definition	n Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
							points will be awarded if this criterion is not met. Examples for fostering social equity or providing cobenefits to surrounding communities include restoring open space in CBO Network Communities, providing educational opportunities on environmental conservation in San Diego to CBO Network Communities, employing the California Conservation Corps to conduct invasive species removal, employing a minority owned organization to conduct work on the project, etc.										
Next OS Concept White Paper	Project	Previous	transform the San Diego region's current transportation system into a world-class network by becoming the digital platform that connects the technologies of the other four Big Moves. To guide the development and deployment of Next OS, SANDAG has identified the potential challenges and opportunities that the platform presents for equity issues in the region. The developed equity considerations highlighted equity challenges and opportunities and also	ward.com /docs/defa uit- source/20 21- regional- plan/san- diego- forward_n ext-os- concept-	Alex Estrella, Technology Planning Manager	"inform how we plan, prioritize, fund, and build projects and programs"; #"guide our efforts to conduct unbiased research and interpret data"	are project, etc.										sites/WTlibrar y/Lists/Equity Related Activities Tracker
SR 67 Dig Once Demonstrati on	Project	Ongoing/ Recurring	The SR 67 Dig Once Demonstrtion intends to expand affordable high-quality broadband to East County residents by implementing vital digital infrastructure that enables remote work, telehealth, and distance learning. This project will inform state and regional Dig Once-Dig Smart policy and improve safety and mobility through specific intelligent transportation solutions (ITS) and smart signal applications.	Mobility and Innovation	Meier, Director Mobility and Innovation, and	"inform how we plan, prioritize, No of fund, and build projects and programs"; #"set expectations d for companies and stakeholders that work with us"		Caltrans and San Diego County	Low-income people; #Seniors; #Military/Veterans; #People with disabilities/different abilities		State;#Local						sites/WTlibrar y/Lists/Equity Related Activities Tracker
Social Equity Impact Analysis for New MTS Division 6 Bus Maintenance Facility		Ongoing/	To determine if there would be any disparate/disproportionate impacts to people with low-income and people of color in the siting of the maintenance facility (in compliance with Title VI of Civil Rights Act and EO 12898).	Regional Planning	Environmenta Planner, Tim Pesce	"inform how we plan, prioritize, No fund, and build projects and programs"; #"frame how we work with our communities"		MTS	Low-income people; #People of Color		Local; #Federal		EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)				sites/WTlibrar y/Lists/Equity Related Activities Tracker
Social Equity Impact Analysis for Downtown Layover Project	Project	Ongoing/ Recurring	To determine if there would be any disparate/disproportionate impacts to people with low-income and people of color in the siting of the Downtown Bus Stopover project (in compliance with Title VI of Civil Rights Act and EO 12898).	n Planning Stopover		"inform how we plan, prioritize, No fund, and build projects and programs"; #"frame how we work with our communities"		MTS	Low-income people; #People of Color		Federal; #Local		EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)				sites/WTlibrar y/Lists/Equity Related Activities Tracker
Encourage project managers to break large projects into smaller procurement s when appropriate	Process	Current/ Ongoing/	Allow small business and DBE firms to more easily compete for contract awards	Contracts a Grants	nd Kelly Mikhail	"set expectations for companies Yes and stakeholders that work with us"; #"frame how we work with our communities"	The terms "small business" and "disadvantaged business enterprise" are defined in law.		People of Color; #Military/Veterans; #Women; #Other	SB and DBE usage are both monitored by ODE		Insurance and bonding programs for small businesses so they can qualify id do business on bigger SANDAG projects.	(Community, econor o Services & Products, product	ve and sustainable mic growth, full and			sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity	Activity	Status	Purpose	Link(s) / Lead	Lead Employee	/ Equity Statement Alignment	Define Equity Definition	Partner	Populations Considered	Performance	Funding	Additional	GDEIB Alignment	SDG Alignment	Notes	Item Type	e Path
Activity Holding public meeting with interpreters, being sensitive to primary language spoken in communities where projects are located	Type Project	Current/	To ensure equitable access to project specific information	More Info Department(s Engineering ar Construction	, ,,		No	Agencies	People with limited English proficiency (LEP)	Monitoring	· ·····································	Resources	EXTERNAL: Listen to G & Serve Society se	oal 11. Make cities and human ettlements inclusive, safe, ssilient and sustainable	Hotel	Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Offering assistance at public meetings for the hearing impaired	Project		To ensure equitable participatior in public process for all persons	n Engineering ar Construction			No		People with disabilities/different abilities				& Serve Society se	oal 11. Make cities and human ettlements inclusive, safe, ssilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Scheduling public meetings when people are most likely able to attend	Project	Ongoing/	To ensure maximum participation by public in project related communication	Engineering ar Construction			No		Low-income people; #Other				EXTERNAL: Listen to G & Serve Society se	oal 11. Make cities and human ettlements inclusive, safe, ssilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Advertise SANDAG solicitations for procurement of goods and services and outreach to potential vendors using multiple methods	Process	Ongoing/	To provide opportunities for a large array of businesses to work with SANDAG	https://w Contracts and www.sanda Grants g.org/inde x.asp?fuse action=rfp s.home	Kelly Mikhail, Contracts Manager	"frame how we work with our communities"; #"set expectations for companies anstakeholders that work with us	d		Women; #People of Color; #Low-income Nepeople	Ione at this time.	Federal; #State; #Local; #Other	Advertising on more websites, blogs, etcetera used by a wider variety of vendors. Research needed to identify these webpages.	& Serve Society in (Community, ed. Services & Products, p	oal 8. Promote sustained, iclusive and sustainable conomic growth, full and roductive employment and ecent work for all	Activities include: Send public works solicitations to the Small Business Opportunity Center for posting; encourage registration of all firms on BidNet so they receive notice of procurements online and via emai provide transparency regarding contract awards and copies of award documentation via public records requests; conduct post-award debriefings to unsuccessful proposers on how t improve; arrange outreach workshop and meetings for vendors to assist them with solicitation understanding and business networking	); O S	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Scheduling public meetings so people both with and without computers can participate	Project	Ongoing/	To ensure maximum participation in public process related to projects	Engineering ar Construction	nd Project Managers in partnership with Communicatior s	1			Low-income people					frastructure, promote inclusive nd sustainable industrialization	_	Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department	Lead Employe (s) Position(s)	e/ Equity Statement Alignment	Define Equity Defil	nition Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	e Path
Attending training on equity	Training/ Resource	Ongoing/	Engineering and Construction: To ensure all SANDAG staff working in Engineering & Construction are appropriately trained to be proactive in supporting equity in all facets of the work we do. Accounting and Finance: Managers and supervisors attend training on managing diverse teams and how to think, act and lead inclusively.	Engineering a Construction; #Accounting and Finance	Leeanne	"define how we recruit and develop our employees" or			Other							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Internal controls on micro purchases	Process		Ensure SANDAG micro purchases are spread to more vendors	Contracts and Grants	Kelly Mikhail, Contracts Manager	"frame how we work with our communities"; #"set expectations for companies and stakeholders that work with us"			Other	None	Federal; #State; #Local; #Other		& Serve Society (Community,	o Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Designing infrastructure to be ADA compliant	Project	Ongoing/	To ensure all infrastructure constructed by SANDAG is fully compliant with all applicable ADA regulations.	Engineering a Construction		"inform how we plan, prioritize, fund, and build projects and programs"			Other					e Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Designing infrastructure being sensitive to equity related issues (i.e. cultural, regional, etc.)		Ongoing/	To ensure that all infrastructure constructed by SANDAG reflects a sensitivity to cultural/regional issues where construction occurs and is designed/reflective of the community we serve.	Engineering a Construction		"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"			Other				the Strategy (Vision, Leadership, Structure); #EXTERNAL: Listen			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Notice of Funding Opportunitie s sent to tribes and CBOs	Process	Ongoing/	Ensure tribes and CBOs are aware of upcoming funding opportunities and ways SANDAG can help them (letters of support, project partner, etc.) with grant applications	Contracts and Grants	Jenny Russo	"frame how we work with our communities"; #"set expectations for companies and stakeholders that work with us"		Tribes CBOs	Seniors; #Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Tribes		Federal; #State; #Local; #Other	SANDAG could assi member agencies	st Connect (Assessment, Communications, Learning, Sustainability); #FOUNDATION: Drive the Strategy	Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 7. Ensure access to affordable, reliable, sustainable and modern energy for all; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 13. Take urgent action to combat climate change and its impacts*; #Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Identify projects to implement that provide new or enhanced transportation services in underserved communities and those subject to environment al injustices	Program	,	To ensure that there is equitable distribution of improvement funds across the region.	Regional Planning; #Engineering and Construction		"inform how we plan, prioritize, fund, and build projects and programs"			Low-income people; #People of Color; #Seniors				the Strategy (Vision, Leadership, Structure); #EXTERNAL: Listen to & Serve Society (Community,	e Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable, industrialization and foster innovation; #Goal 10. Reduce inequality within and among countries; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Source funding and share	#Training/ Resource	Current/ Ongoing/ Recurring	Bridge the digital divide.	Contracts and Grants	Jenny Russo	"frame how we work with our communities"; #"set expectations for companies and stakeholders that work with us"		All member agencies	Low-income people; #People of Color; #Tribes	Tracking of grants identified, applied for, and received.		Staff needed to solicit vendors and partners to carry ou broadband projects	the Strategy (Vision, t Leadership, s. Structure); #EXTERNAL: Listen to & Serve Society (Community,	e Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; #Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employe	e/ Equity Statement Alignment Define Equity Definiti	on Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Typ	e Path
Enhance regional digital performance, equity, and inclusion	Program	Planned/ Future	To enhance equal access to digital media for all through collaboration with digital divide planning team, support the development of the Digital Equit and Action plan, and develop the County Broadband Masterplan to support smart city and other technological applications.	Engineering an Construction; #Regional Planning Y	d Chip Finch and representative	"inform how we plan, prioritize, No fund, and build projects and programs"; #"frame how we work with our communities"		Other				the Strategy (Vision Leadership, Structure); #EXTERNAL: Listen to & Serve Society (Community, Services & Products Marketing, Responsible Sourcing);	e Goal 10. Reduce inequality within and among countries; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 4. Ensure inclusive and equitable quality, education and promote lifelong learning opportunities for all; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Grant Distribution Programs	Program	Ongoing/	Provide funding to member agencies and non profits for projects that support housing, smart growth, active transportation, providing rides for disabled and senior populations, and environmental protection.		Jenny Russo Coleen Clementson	"inform how we plan, prioritize, No fund, and build projects and programs"; #"frame how we work with our communities"; #"set expectations for companies and stakeholders that work with us"		of	Quarterly reports to FiTOC, PAC, and BOD # on number and types of projects completed		Staff needed in Regional Planning for new REAP housing grant program.	the Strategy (Vision Leadership, Structure); #EXTERNAL: Listen to & Serve Society (Community,	e Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 9. Build, resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 12. Ensure sustainable consumption and production patterns; #Goal 13. Take urgent action to combat climate change and its impacts*; #Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Standard code of conduct for use by Grantees and their clients	Policy		Ensure ADA and Civil Rights obligations are upheld and due process rights are not being violated by grantees	Contracts and Grants	Jenny Russo	"frame how we work with our communities"; #"set expectations for companies and stakeholders that work with us"	San Diego an	of People of Color; #People with limited d English proficiency (LEP); #Seniors; before with disabilities/different abilities; #Women; #Military/Veterans; #LGTBQIA	checklists used for	ederal; #State; :Local	More staff needed for onsite monitorin and surveys of grantees' clients	g & Serve Society (Community,	o Goal 8. Promote sustained, inclusive and sustainable economic growth, full and , productive employment and decent work for all; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Align Grant Criteria and Performance Measures with Equity Action Plan			Synergize efforts to implement Equity Action Plan and Regional Plan by requiring SANDAG grantees to compete for funds and implement projects in alignment with these plans.	Contracts and Grants; #Regional Planning	Jenny Russo Coleen Clementson	"frame how we work with our No communities"; #"set expectations for companies and stakeholders that work with us"; #"inform how we plan, prioritize, fund, and build projects and programs"		ncy Seniors; #Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Tribes	#	ederal; #State; :Local	to assist with setting grant criteria and goals, and creation and implementatio of Equity Action Pla	the Strategy (Vision g Leadership, Structure); #EXTERNAL: Listen n to & Serve Society n (Community, Services & Products Marketing, Responsible Sourcing);	e Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 10. Reduce inequality within and among countries; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 12. Ensure sustainable consumption and production patterns; #Goal 13. Take urgent action to combat climate change and its impacts*; #Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Onboard Transit Passenger Survey	Project	Planned/ Future	Conduct an onboard transit passenger survey every 5 years to meet Federal Transit Administration mandate to ensure Title VI is being implemented properly.		Cindy Burke Grace Mino	"guide our efforts to conduct Yes unbiased research and interpret data"; #"inform how we plan, prioritize, fund, and build projects and programs"	MTS and NCT	D Low-income people; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #People of Color	This data is used for so many different efforts for the transit operators. Fare analysis, transfers, and first and last mile. This data is also used for the Activity Based Model for forecasting.	ederal		& Serve Society (Community,	o Goal 7. Ensure access to affordable, reliable, sustainable and modern energy for all, #Coal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s)	Lead Employe Position(s)	e <sup>/</sup> Equity Statement Alignment	Define Equity Defir	nition Partner Agencies	Populations Considered	Performance Monitoring		itional GDEIB Alignme	nt SDG Alignment	Notes	ltem Type	e Path
Annual Telework Survey	Project	Ongoing/	residents. A survey was first	dhttps://w Research and ww.sanda Program g.org/inde Management x.asp?new sid=1285&f useaction	Cindy Burke Grace Mino	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpre data"	No	, g	Low-income people; #People of Color		Federal; #Local	EXTERNAL: Lister & Serve Society (Community,	to Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization ts, and foster innovation		ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Cross Border Travel Behavior Survey	Project	Past/ Previous	Behavior Survey every ten years to see how resident's of Mexico's travel patterns impact the San		Cindy Burke Grace Mino	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpre data"			People with limited English proficiency (LEP); #People of Color		Federal	Connect (Assessment,			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Fastrak collateral available in English and Spanish	Service	Ongoing/	welcome materials, terms and conditions, and promotional items, are made available to customers in both English and Spanish. This helps both English and Spanish speaking customers make sure they can fully understand the benefits of their	s https://511 sd.com/do	Emily Munic	"frame how we work with our communities"			People of Color; #People with limited English proficiency (LEP); #Seniors; #Low-income people; #People with disabilities/different abilities; #Women; #Military/Veterans; #Formerly incarcerated people		Local	EXTERNAL: Lister & Serve Society (Community, Services & Produc Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Fastrak Customers may choose to receive account information in Spanish	Service		In the future, Fastrak customers will be able to select if they would like their account communication in English or Spanish.	Regional Transportation	Emily Munic	"frame how we work with our communities"			People with limited English proficiency (LEP)		Local	EXTERNAL: Lister & Serve Society (Community, Services & Produc Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Customer Service Staff is Bilingual	Service	Ongoing/	Most of the SANDAG Customer Service team is bilingual in English and Spanish. As Spanish i the most common non-English language requested by customers, this enables customers to receive support in person, over the phone, or by email in either English or Spanish		Emily Munic	"frame how we work with our communities"			People with limited English proficiency (LEP); #People of Color; #Low-income people; #Seniors; #People with disabilities; different abilities; #Women; #Militany/Veterans; #Formerly incarcerated people		Local	EXTERNAL: Lister & Serve Society (Community, Services & Produc Marketing, Responsible Sourcing); #BRIDGING: Align Connect (Assessment, Communications Learning, Sustainability)	ts,		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
In person support for Tolling Projects	Service	Ongoing/	SANDAG offers a Walk In Center to assist customers who use SR 125 or the I-15 Express Lanes. This also allows us to accept cash payments while offering an option for customers who prefer an in-person interaction. Staff working in the Walk In Center are typically bilingual in English and Spanish.			"frame how we work with our communities"			Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Military/veterans; #Formerly incarcerated people; #Seniors		Local				Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Engaging ODE and coordinating periodic ADA reviews of plans and construction	Project; #Program	Ongoing/	To ensure all plans/construction in full compliance with applicable ADA regulations and ODE has reviewed and certified	in Engineering and Construction; #Diversity and Equity	d	"inform how we plan, prioritize, fund, and build projects and programs"			People with disabilities/different abilities				ive Goal 9. Build resilient on, infrastructure, promote inclusive and sustainable industrialization and foster innovation		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Presenting relevant projects to SSTAC	Project	Ongoing/	To ensure SSTAC has the opportunity to weigh in on ADA related project elements	Engineering and Construction		"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"			People with disabilities/different abilities			FOUNDATION: D the Strategy (Visic Leadership, Structure); #EXTERNAL: Liste to & Serve Society (Community, Services & Produc Marketing, Responsible Sourcing)	n		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employe s) Position(s)	e/ Equity Statement Alignment	Define Equity Definition Equity?	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	t SDG Alignment	Notes	Item Type	Path
Monitoring and enforcing DBE requirements in the administratio n of construction contracts	Project	Ongoing/	To ensure all construction activities are completed in full conformance with applicable DBE requirements	Engineering ar Construction		"inform how we plan, prioritize, fund, and build projects and programs"			People of Color; #Women; #Military/Veterans							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Impacts of Border Delays at California- Baja California Land Ports of Entry Study	Project	Past/ Previous	This study assesses and quantifier the economic and air quality/climate impacts due to border delays experienced at all of the California-Baja California Lan Ports of Entry. The study also estimates future impacts that consider planned border infrastructure investments including the Otay Mesa East-Mesa de Otay II POE. It also provides recommendations for reducing border delays and associated impacts including further investment in POE infrastructure and physical capacity, strategies for improving operations, enhancing transportation access and services connecting to a POE, and long-term strategies for supporting binational coordination and planning.	ww.sanda Planning g.org/inde ofx.asp?clas d sid=19≺ ojectid=53 5&fuseacti on=projec ts.detail	Corridor Planning Manager	y, "inform how we plan, prioritize, N fund, and build projects and programs"; #"guide our efforts to conduct unbiased research and ez, interpret data"	lo	Imperial County Transportation Commission (ICTC), Caltrans District	Other		State; #Local	and on the international border between California and Mexico have been shown in tools such as CalEnvrioScreen to face disadvantages and disproportionat	& Serve Society (Community, Services & Products Marketing, Responsible Sourcing); #FOUNDATION: Drive the Strategy e (Vision, Leadership, Structure)	o Goal 10. Reduce inequality within and among countries; #Goal 8. Promote sustained, inclusive and sustainable economic growth, fu and productive employment and decent work for all; #Goal 13. Take urgent action to combat climate change and its impacts*	entry and the I individuals that II cross them each da I represent a unique e segment of the	y O	sites/WTlibrar y/Lists/Equity Related Activities Tracker
	Committe s;#Process	Ongoing/	To provide an increased level of accountability for expenditure of TransNet funds, help ensure all voter mandates are carried out, and develop recommendations for improvements to the financia integrity and performance of the program. Specifically, ITOC will be considering the creation of new ITOC member positions that alig with the agency's social equity efforts. The ITOC also will be considering Ordinance amendments that help promote equity like the Bike EAP, Dig Once, and others.	ww.sanda Planning and g.org/inde Budgeting x.asp?co mmitteei al d=75&fuse e action=co e mmittees. detail	Ariana zur Nieden, Senior Financial Programming and Project Control Analyst	"inform how we plan, prioritize, Nund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"	do	all TransNet recipient agencies			Local				national economy.	Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Diversity and Equity Outreach Program	Program	Ongoing/	The purpose of the Diversity and Equity outreach is to improve awareness of SANDAG equity programs, promote engagemen within our businesses, workforce and communities, and strengthen partnerships with other local agencies and organization.	ndag.shar Equity epoint.co at m/sites/Of	Elaine Richardson, Director of Diversity and Equity	"set expectations for companies and stakeholders that work with us", #"frame how we work with or communities", #"inform how we plan, prioritize, fund, and build projects and programs"		Consortium	Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Military/Veterans; #Formerly incarcerated people; #Foster youth; #Tribes; #LGTBQIA; #Other; #Seniors				EXTERNAL: Listen to & Serve Society (Community, Services & Products Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Mid-Coast Trolley Project Disadvantag ed Business Enterprise (DBE) and Small Business (SB) Subcontracti ng Plan Program	Project	Ongoing/	The Mid-Coast DBE and SB Subcontracting Plan is a tool use by SANDAG to monitor the Prim Contractor's commitment to subcontract work to DBE and SB firms on the Mid-Coast Project. The purpose of the DBE and SB Subcontracting Plan is also to ensure that DBE & SB program compliance is achieved on the project. Overall, the plan enhances opportunities for small and disadvantaged firms to work on a SANDAG mega project.	https://sa Diversity and dad.shar Equity; e epoint.co #Engineering m/sites/Of and diceofDive Construction rsityandE quity/Site Pages/Mid-Coast.asp x x	Elaine Richardson, Director of Diversity and Equity	"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"			Women; #People of Color; #Other				EXTERNAL: Listen to & Serve Society (Community, Services & Products Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employe s) Position(s)	e/ Equity Statement Alignment Define Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	e Path
Small Business Mentoring Programs	Program	Ongoing/	SANDAG, along with Caltrans District II, are founding members and active participants of the Calmentor Program. This program's mission is to increase the pool of small Architecture and Engineering (A&E) professional services firms participating in transportation projects by providing them opportunities to network and partner with large Prime companies. In addition, SANDAG is also a committee member of the Construction & Collaboration (C&C) Mentor Protégé Program, which aims to assist small construction businesses grow and develop in the San Diego region through voluntary partnerships with larger firms and public agency support.	Diversity and Equity	Elaine Richardson, Director of Diversity and Equity	"set expectations for companies Yes and stakeholders that work with us"		Women; #People of Color; #Other				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Compliance Information System (CIS)	Other	Ongoing/	This web-based system supports our commitment to maximize and report the utilization of small and disadvantaged businesses by providing visibility, accountability and transparency throughout the entire compliance reporting process.	ndag.sbd Equity be.com/D efault.asp	David Santos, Senior Compliance Analyst	"set expectations for companies and stakeholders that work with us"; #"inform how we plan, prioritize, fund, and build projects and programs"									Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
SANDAG Vendor Portal (BidNet Direct)	Other	Ongoing/	SANDAG utilizes BidNet Direct as a bidding platform and vendor portal for potential vendors to receive notifications of SANDAG contract opportunities. BidNet Direct also currently hosts the application for the Bench Program for Disadvantaged Business Enterprise (DBE) and Small Business (SB) certified firms interested in getting certified for the Architecture and Engineering (A&E), Construction Management (CM), and Planning Bench Programs.	ww.bidne Equity; tdirect.co #Contracts and	1	"set expectations for companies and stakeholders that work with us"									Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Pre-Proposal and Pre-Bid Small Business Networking	Other	Ongoing/	During pre-proposal and pre-bid meetings, SANDAG has carved out time for small and disadvantaged business have an opportunity to meet with Prime contractors and consultants to discuss subcontracting opportunities on SANDAG contracts and procurements. The purpose of this is to further expand contracting opportunities for small and disadvantaged firms.	Contracts and Grants; #Diversity and Equity	Richardson,	"set expectations for companies and stakeholders that work with us"						EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
	#Training/ Resource	Ongoing/	The DICE program is designed to enhance communication between the Office of Diversity and Equity and SANDAG Project Managers to address potential DBE program deficiencies before it is too late in the contract or task order. The main purpose of the DICE Program is to have one on one communication to help Project Managers oversee their contracts and to provide a comprehensive service regarding the DBE program. The Office of Diversity and Equity will review DBE commitments and attainments throughout each project to avoid issues that arise prior to completion.	Diversity and Equity	David Santos, Senior Compliance Analyst Erik Staples, Senior Compliance Analyst	"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"									Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity Activity Type	Status	Purpose Link(s) / More Info	Lead Department(s)	Lead Employee Position(s)	/ Equity Statement Alignment	Define Equity Definition Equity?	Partner Agencies	Populations Considered	Performance Monitoring	Funding Additi Resou		SDG Alignment	Notes	Item Type	Path
	and certifica working with Affirmative A Compliance, Disadvantag Business Ent Compliance, Business Det Equal Emplo As a membe bring these l	ontract Compliance (ACCA) which delivers mprehensive training tion to practitioners hin the fields of Action, Contract A, Minority/Women/ ged/Small/Emerging terprise, Labor , Economic & velopment, and byment Opportunity. er, SANDAG is able to best practices from mplement into	Equity	Elaine Richardson, Director of Diversity & Equity	"inform how we plan, prioritize, fund, and build projects and programs", #"set expectations for companies and stakeholders that work with us"						EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
	network of g and organiz achieve racia opportunitie of SANDAC's join a cohort maintain ou achieving ra	the Government E Race and Equity #	Equity; ‡Organization Effectiveness	Elaine Richardson, Director of Diversity and Equity Elizabeth Cox, Principal Business Analysi	"inform how we plan, prioritize, fund, and build projects and programs"									Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
	Current/ Title II of the Ongoing/ Disabilities A July 26, 1990, local governi discriminatir with disabilities A SANDAG per evaluation to and services by processible as compliance. Access Plan. reviewed ani staff. The AD SANDAG per to describe to making any SANDAG act accessible as evaluation. The prepared put intended to by which challength.	Americans with CAMPA, enacted on prohibits state and ments from a gagainst persons ties or from excluding in or denying rograms, services, or persons with serequired by Title II, rformed a self-person examine its activities pidentify problems, or riers that may limit to such activities and	Equity	Elaine Richardson, Director of Diversity and Equity	"frame how we work with our communities"		Pe	eople with disabilities/different abilities			EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Diversity and Resource	Ongoing/ is responsible Recurring functions at set up a Shal internal reso information	F Diversity and Equity e for most Civil Rights adag.shar E SANDAG. ODE has rePoint to share furces and agency-wide on the Rights programs at	Equity		"inform how we plan, prioritize, fund, and build projects and programs"						EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Projects	Current/ To provide a Ongoing/ schedule, ris Recurring that will supp and project t	framework (cost, http://tran Fix, scope, funding, etc) snettrip.sa Figort all stakeholders ndag.org/ Eteams to improve the Snapshot. of successful delivery.	Planning and	Michelle Smith/Chelsea Gonzales	"inform how we plan, prioritize, N fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"	F	altrans, lailPros, and arious onsultants			ederal; #Local; State		structure, promote inclusive sustainable industrialization		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employe s) Position(s)	e/ Equity Statement Alignment	Define Equity	ty Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Regional Bike Map	Training/ Resource	Ongoing/	The Regional Bike Map provides current information on the San Diego bikeways, bike parking facilities, and other resources for bike riders such as riding rules, tips and connections to transit. By accessing this information, more people can take advantage of the regional bike network and infrastructure, to go where they want to go (work, school, transit stations, etc.). This tool helps to decrease the impact of not having a vehicle in the quality of life for people with no access to a car. The Regional Bike Map is also a free resource, available printed and online, so it is accessible for a larger variety of users (those with access to the internet, those who prefer to request a copy by phone or in person -when SANDAG offices are open to the public-). Currently, the online version of the map uses a color blind friendly palette (this will be incorporated in the next printed version), so this map is available to colorblind people.	mmutesd. Transportation com/bike/ Services bikemap.a spx	Dalila Ramos	"inform how we plan, prioritize, fund, and build projects and programs"	No			Low-income people; #People with disabilities/different abilities; #Other; #Seniors	The regional bike map impact can be monitored by looking at indicators such as:  • burn rate for printed version of map  • webpage visits for interactive version of map			& Serve Society (Community, Services & Products,	Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal Take urgent action to combat climate change and its impacts'	- youth people	Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Park and Ride Lots Map	Training/ Resource	Ongoing/	bike parking and transit) at these facilities for the rideshare	ww.icom Transportation mutesd.co Services m/Comm uters/Park NRide.asp x		"inform how we plan, prioritize, fund, and build projects and programs"	No	C P th lo ir ir	currently: caltrans, RCTC planned (when he transit P&R ots are ncorporated hto the map): MTS and NCTD	Other	The Park & Ride map impact can be monitored by looking at indicators such as:  • webpage visits for online version of map  • copies requested for printed copy of the Park & Ride lots table		Demand study (occupancy counts) to identify areas wit vulnerable populations that are in need of more Par & Ride lots and partnerships/subsid es to meet the identified demand as needed	& Serve Society n (Community, Services & Products, Marketing, k Responsible Sourcing)	Goal 13. Take urgent action to combat climate change and its impacts*; #Goal 11. Make cities at human settlements inclusive, safe, resilient and sustainable			sites/WTlibrar y/Lists/Equity Related Activities Tracker
DataSurfer		Ongoing/		https://dat Data and asurfer.sa Modeling ndag.org/	David Tedrow/ Manager, Economic and Demographic Analysis and Modeling	"inform how we plan, prioritize, fund, and build projects and programs"	No						products that support equity that	EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Census Complete Count Committee	Committe e	,	To distribute funds and bring awareness to the 2020 decennial census operations for the region. To ensure a complete census enumeration.	Data and Modeling		"frame how we work with our communities", #"guide our d efforts to conduct unbiased research and interpret data"	No	Ji U C	Inited Way, BOs, the US	Low-income people; #Seniors; #People of Color; #People with limited English proficiency (LEP); #Other; #People with disabilities/different abilities; #Women; #Military/Veterans; #Formerly incarcerated people; #Foster youth; #Tribes; #LGTBQIA		State		EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Fulfilling customized data requests	Service	Ongoing/	To create custom tabulations of data, or other products for external partners, researchers, and the public to inform programs, research, policies, etc. to assess and/or improve equity in the region.	Data and Modeling	Pat Landrum/ Director, DAM Department			d ag P D	listricts and gencies, Fire Protection	Seniors; #Low-income people; #People of Color; #People with limited English proficiency (LEP); #Other; #People with disabilities/different abilities; #Women; #Military/Veterans; #Tribes				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing); #BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employee/ s) Position(s) Equity Statement Alignment	Define Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	e Path
Review Social Equity Impact Analyses; Review plans, projects for possible equity concerns	l Training/ Resource; #Other	Ongoing/ Recurring	The purpose of this equity activity is for the Office of Diversity and Equity to support any department to review projects and plans for Social Equity Impact Analysis and to help address and provide solutions to possible equity concerns.	Diversity and Equity; #Regional Planning	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"			People with limited English proficiency (LEP); #People of Color; #Low-income people				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Provide equity-related information, including data, to external stakeholders	Training/ Resource; #Other	Ongoing/ Recurring	Build and establish relationships with agencies, organizations, and other external stakeholders to share equity-related information and collaborate best equity practices to advance equity within our agency.	Diversity and Equity	Elaine "frame how we work with our Richardson, Director of Diversity and Equity Sally Goodman, Social Equity Analyst							EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Respond to External Request for Information (RFIs) and Letters of Support Regarding Equity Concerns	Project	Ongoing/	Develop responses to RFIs and letters of support to ensure that SANDAG Civil Rights concerns are represented in any equity-related legislations and regulations.	Diversity and Equity	"set expectations for companies and stakeholders that work with us"							EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
San Diego and Imperial Counties Sustainable Freight Implementat ion Strategy	Project	Future	California has established ambitious climate, air quality, and public health goals and has recently prioritized transitioning the freight sector to sustainable technologies through the California Freight Mobility Plan 2020, California Sustainable Freight Action Plan (CSFAP), California ZEV Action Plan, California Zeva Action, California Califor		Keri Robinson - "inform how we plan, prioritize, Senior Regional fund, and build projects and Planner, Goods programs"; #"frame how we Movement Planning  work with our communities"	No	San Diego and Imperial Counties	Low-income people; #People of Color; #Tribes	•	State				Focus will be on AE 617 Community Air Protection Progran Communities and their vulnerability to goods movement- related impacts	า	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Otay Mesa East Port of Entry	Project	Current/ Ongoing/ Recurring	The SR II/OME POE Corridor Program will be the nation's first transformative land POE to integrate innovative technologies that improve regional security and safety, bolster binational economic productivity, provide resiliency to the border transportation network, enhance mobility and efficiency, reduce greenhouse gas emissions, enhance health in surrounding environmental justice communities, and foster innovative strategies. The OME POE will facilitate fast, predictable, and secure border crossings in a region that is a national gateway for more than \$48.3 billion in annual cross-border trade. The OME POE addresses a variety of transportation-related problems in the California-Baja California border region. Using variable tolls	Regional Planning; #Engineering and Construction	Movement; work with our communities"	No	Caltrans	Low-income people; #People of Color	Air quality monitors to measure impact of vehicle emissions at the POEs, City of San Diego's Climate Equity Index to assess vulnerability to climate change and opportunity in impacted communities, border wait time monitors to facilitate faster crossing and reduced waiting/idling, Community Benefit Agreement to maintain accountability,						Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employee/ ) Position(s)	Equity Statement Alignment	Define Equity Definition	n Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
			to manage traffic demand, the POE will provide a new relief valve, resulting in decreased congestion and wait times at the other San Diego land POEs. The innovative technologies and strategies deployed through this POE will result in strategic, economic, financial, and operational project benefits that will improve and enhance conditions for community members and the private sector on both sides of the border. In addition to the benefits highlighted in Figure 3, the OME POE also will enhance community health by mitigating freight-related impacts within surrounding environmental justice communities.														
DUPLICATE Border Health Equity Transportatio n Study			While it is known that the	ww.sanda Planning f g.org/uplo ads/public ationid/pu blicationi d d_1933_18 e 945.pdf	Jane Clough - "Senior Regional or Planner"	frame how we work with our communities"	No	Chen Ryan Associates, Human Impact Partners, Casa Familiar	Low-income people; #People of Color							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
			Ensure agency language includes key messaging relevant to the SANDAG Equity Statement and Equity Action Plan.	ww.sanda Communication	n McCormack fi F v d c d t c	inform how we plan, prioritize, und, and build projects and orcograms"; #"frame how we vork with our communities"; #"define how we recruit and levelop our employees"; "guide our efforts to conduct unbiased research and interpret lata"; #"set expectations for one plant with us"	Yes		Seniors; #People of Color; #Low-income people; #Other; #People with disabilities/different abilities; #Women; #Military/Veterans; #Formerly incarcerated people; #Foster youth; #Tribes; #LCTBQIA; #People with limited English proficiency (LEP)				BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability); #FOUNDATION: Drive the Strategy (Vision, Leadership, Structure)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Interpretatio n Services for BOD and PAC meetings		Ongoing/	A language interpreter for meetings and conversations is important to serve the diverse population of the San Diego region and ensure the objectives of the SANDAG Language Assistance Plan for the U.S. Department of Transportation funding requirements are met. It allows people to have access to information and opportunities to participate in meetings or provide comments regardless of language barriers.		Laura Valdez, "	frame how we work with our	Yes		People with limited English proficiency (LEP)				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing); #BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Translation of documents to non- English languages (Spanish, Tagalog, etc.)		Ongoing/	Translated documents allow people to have access to information and opportunities to participate in meetings, or provide comments regardless of language barriers.	Language Strategic Assistanc Communication e Plan s		frame how we work with our communities"	Yes		People with limited English proficiency (LEP)							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / More Info	Lead Department(s)	Lead Employee Position(s)	e/ Equity Statement Alignment	Define Equity D	efinition Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Incorporate inclusive language and images into social media posts	Process	Ongoing/	Ensure inclusive language is used in all social media posts (sometimes including non-English languages) and ensure diverse groups are represented ir photos selected for all platforms. The San Diego region is populated by diverse communities, we must aim to represent them equally.	n	Strategic Communication s		, "frame how we work with our communities"	Yes		Seniors; #Low-income people; #People of Color; #People with disabilities/different abilities; #Women; #Military/Veterans; #Tribes; #LGTBQIA; #Formerly incarcerated people; #Foster youth; #Other						SANDAG social media channels: Facebook, Twitter, LinkedIn, YouTube, Instagram	Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Consider ADA best practices in developing charts, maps, etc.	Process	Ongoing/	As maps, charts, and other graphics are developed for PowerPoint presentations or reports, ADA best practices for color selection, etc. are considere before documents are finalized.		Strategic Communication s	Lisa Starace	"frame how we work with our communities"	Yes		People with disabilities/different abilities							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Alternative Text	Process; #Service	Ongoing/	Ensure that all non-decorative images and graphics include alt text in documents, charts, and maps that are available to the public.		Strategic Communication s	Lisa Starace	"frame how we work with our communities"	Yes		People with disabilities/different abilities				BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Contract with community- based organizations from environment al justice communities to conduct outreach	Process	Ongoing/	Working with local businesses serves the diverse population of the San Diego region, and promotes local investments.		Strategic Communication s	Tedi Jackson	"frame how we work with our communities"	Yes		People of Color; #Other; #Women; #Military/Veterans; #LGTBQIA; #Seniors; #Low-income people				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Use visual content blocks to organize content	Process; #Service	Ongoing/	Ensure content blocks are used in newsletters to group information and provide easily digestible content and visuals.	า	Strategic Communication s		"frame how we work with our communities"			People with disabilities/different abilities; #People with limited English proficiency (LEP)							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Offer phone lines for stakeholder calls in public comment periods	Service	Ongoing/	Providing a direct point of contact with SANDAG to provide public comments.		Strategic Communication s		"frame how we work with our communities"	Yes		Seniors; #People with disabilities/different abilities; #Other							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Public Meetings Accommoda tions			g Schedule public meetings at n locations that are accessible by multiple modes, including bus, and with affordable parking options.		Strategic Communication s		"frame how we work with our communities"; #"set expectations for companies and stakeholders that work with us"	d		People with disabilities/different abilities; #Seniors; #Low-income people; #People of Color; #Other				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Use header features in MailChimp to support e- readers	Process		Ensure that information is accessible to e-readers of all abilities.		Strategic Communication s		"frame how we work with our communities"			People with disabilities/different abilities				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
SDForward Open Data website	Service	Ongoing/	To provide the public with data used in the Regional Plan for research purposes	https://sdf orwarddat a- sandag.hu b.arcgis.c om/	Modeling	Pat Landrum/Direct or, DAM	"inform how we plan, prioritize, t fund, and build projects and programs"; #"guide our efforts t conduct unbiased research and interpret data"			Seniors; #Low-income people; #People of Color; #Women							ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Regional Census Data Center	Program	Ongoing/	To provide the public with information and resources pertaining to data and information collected and distributed by the US Census Bureau		Modeling		"guide our efforts to conduct unbiased research and interpre data"; #"frame how we work with our communities"; #"infor how we plan, prioritize, fund, an build projects and programs"	t n						EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing); #BRIDGING: Align & Connect (Assessment, Communications, Learning, Sustainability)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) /	Lead Department(s	Lead Employee	Equity Statement Alignment	Define Equity?	Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
CBO Outreach Team Network	Program	Ongoing/	A supplement to the CBO Social Equity Working Group, the CBO Outreach Team attends monthly team meetings to provide regula updates on outreach progress, share lessons learned, and discus upcoming outreach activities with the SANDAC staff. In addition, the CBO Outreach Tean attends educational sessions given by SANDAC staff on key elements of the regional planning process to ensure that team members fully understand the regional planning process and can relay the information to their community members.	r ir iss m	Regional Planning	Jane Clough,	"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"	,,-,-		Agencies	Low-income people; #People of Color; #Seniors; #People with limited English proficiency (LEP); #People with disabilities/different abilities	Monitoring			& Serve Society (Community,	Goal 1. End poverty in all its forms everywhere; #Goal 3. Ensure healthy lives and promote wellbeing for all at all ages; #Goal 5. Achieve gender equality and empower all women and girls; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Yearly Population and Housing Estimates	Program	Ongoing/	Provide researchers and decision makers with current data on household income, age, sex, and race ethnic composition of the population as well as location of housing in the region to inform programs and policies to benefit the region.		Data and Modeling	r, Economic and	"inform how we plan, prioritize, e fund, and build projects and d programs"; #"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"				Seniors; #Low-income people; #People of Color; #Women				EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Guaranteed Ride Home Program	Service; #Program	Ongoing/	An emergency ride home up to three times per year for those who took an alternative mode of transportation to work.	ww.icom	Transportation o Services e u	Jay Faught	"frame how we work with our communities"; #"inform how we plan, prioritize, fund, and build projects and programs"				Low-income people; #People with limited English proficiency (LEP); #People with disabilities/different abilities	Number of members registe each FY, number rides taken		operate under a	Marketing, Responsible			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Bike Parking Program	Program; #Service		A secure place to park your bike while at work or school.	https://icc mmutesd com/docs default- source/bi ke- month/fy 19_bike- parking- participat on- agreement.pdf?sfvr sn=6d974 29_8	I. Transportation  if Services	Jay Faught	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"	o d ir S c si d		ltrans, Airpor	Low-income people; #People with t, disabilities/different abilities d	Number of bike parking participa usage of lockers	Federal nts,	stations inside lockers, fix it stations at locker sites, add app for easy pay and to reserve and check availability	the Strategy (Vision, Leadership, Structure); #EXTERNAL: Listen	e Coal 3. Ensure healthy lives and promote well-being for all at all ages; #Coal 7. Ensure access to affordable, reliable, sustainable and modern energy for all		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Regional Housing Incentive Program					Regional Planning	Tuere Fa'aola Sam Solis	"inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"; #"guide our efforts to conduct unbiased research and interpret data"; #"set expectations for companies and stakeholders that work with us"				Low-income people; #People of Color; #People with limited English proficience (LEP); #Other; #People with disabilities/different abilities; #Women; #Seniors; #Military/Veterans; #Formerly incarcerated people; #Tribes; #LGTBQIA		State			Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; #Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; #Goal 10. Reduce inequality within and among countries; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 13. Take urgent action to combat climate change and its impacts*; #Goal 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employee ) Position(s)	Equity Statement Alignment	Define Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring		dditional esources	GDEIB Alignment	SDG Alignment	Notes	Item Typ	e Path
Mobility Solutions for Environment al Justice Communitie: Toolkit		Past/ Previous	barriers. The Toolkit is intended to	ww.sanda Planning; g.org/uplo #Contracts and ads/public Grants ationid/pu blicationi d_2069_21 070.pdf	Associate	, "inform how we plan, prioritize, fund, and build projects and programs"; #"frame how we work with our communities"	No	City Heights CDC IBI	People of Color; #Low-income people; #People with disabilities/different abilities; #Seniors		State		& Serve Society (Community,	Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation		ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Bike Month	Program	Ongoing/	The focus of Bike Month is the San Diego Regional Bike to Work Day and the GO by BIKE Mini-Grants Program Bike to Work Day (BTWD) is an annual campaign to build awareness and support for biking as a viable transportation choice and invites regional commuters to try biking. The campaign coincides with National Bike Month in May and includes a variety of pre-event preparation activities delivered through our partners, employer clients and member agencies. GO by BIKE Mini-Grants Program (GBB) provides \$60,000 of grant funding to local government agencies, community-based and non-profit organizations, and education institutions. The program swards grants of up to \$3,000 to eligible applicants for programs or projects that promote biking through outreach and education in low-income, disabled, and minority communities.	ww.icom Transportation mutesd.co Services mylevents/ bike- month	Patty Talamantes, Associate Account Executive	"frame how we work with our communities"	No		Low-income people	GBB can be monitored by the number of applications received and upon each program/projects completion by recipients final reports that summarizes the activities, challenges successes, and participation rates.BTWD can be monitored by specific goals set and are measured by participation targets			& Serve Society (Community, Services & Products, Marketing, Responsible	Goal 3. Ensure healthy lives and promote well-being for all at all ages; #Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable; #Goal 13. Take urgent action to combat climate change and its impacts*	-GBB webinar assistance with application-BTWD: sweepstakes available to all, othe languages for collateral and webinars, events fo those who don't have a bike		sites/WTlibrar y/Lists/Equity Related Activities Tracker
SANDAG Vanpool Program	Program; #Service	Ongoing/	Provide a monthly subsidy to assist with the lease cost for a vehicle to use for vanpooling for your commute to work	Regional Transportation Services	Michelle Porter Jay Faught											Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
iCommute Employer Outreach	Program	Ongoing/	commuter surveys in Spanish and Tagalog, surveys can be printed and distributed to employees. Data entry is provided by the agency. Account Executives promote commuter solutions that are customized for the work location.	ww.icom Transportation mutesd.co Services m/docs/de fault- source/e mployer/i commute   employer- services- and- recognitio n-	,	1 "frame how we work with our communities"; #"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"			Low-income people; #People with limited English proficiency (LEP); #Military/Veterans	Salesforce reports with industry and location fields, augmented with Account Executive notes; Survey Monkey filtered by language; Basecamptasks. We are not actively monitoring this but it is possible.	o					Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity Status Activity Type		_ink(s) / Lead lore Info Department(s)	Lead Employee/ Position(s)	Equity Statement Alignment	Define Equity Definition	Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
diverse and #Training/ Ongoing/	Look for possible diversity blocks in the interview and onboarding processes. This might include:  • Test job descriptions across several individuals in the organization to remove any requirements that could be bias.  • Involve people with different backgrounds in the interview process.  • Foster an environment that values effective communication and healthy work relationships where all thoughts and ideas are valued — especially when those ideas differ from their colleagues.  Provide tools and resources to outline steps for advancement in the Accounting and Finance department.  Improve efficiency and productivity through:  • Setting clear goals and objectives  • Customer focus  • Delivering quality at all times  • Accountability	Accounting and Finance		"define how we recruit and develop our employees"							INTERNAL: Attract & Retain People (Recruitment, Benefits, Compensation, Benefits & Flexibility)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Stewardship Process; Current/ of Regional #Program; Ongoing/ Transportatio #Service Recurring n Revenue.	Manage FTA grants to ensure maximum flexibility for project	Accounting and Finance		"set expectations for companies and stakeholders that work with us"							FOUNDATION: Drive the Strategy (Vision, Leadership, Structure)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
arrest and Ongoing/	Annual and every other year reports produced by the Criminal Justice Clearinghouse	Research and Program Management	-	"guide our efforts to conduct unbiased research and interpret data"										ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Various Project Past/ studies Previous looking at disparity among juvenile justice populations		Research and Program Management	-	"guide our efforts to conduct unbiased research and interpret data"										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Various Project Current/ studies Ongoing/ looking at Recurring how to invest low income communities		Research and Program Management	-	"guide our efforts to conduct unbiased research and interpret data"										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Create an Process Planned/ advisory Future group to ensure our research is unbiased		Research and Program Management	,	"guide our efforts to conduct unbiased research and interpret data"										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
County of e; #Policy Ongoing/	To examine, inform, and modify any practices and policies that may be contributing racial and ethnic disparities in San Diego County's Juvenile Justice System.	Research and Program Management	CJ Manager	"inform how we plan, prioritize, `fund, and build projects and programs"	'es				G	rant				Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s)	Lead Employe Position(s)	e <sup>/</sup> Equity Statement Alignment E	efine Equity Defi quity?	nition Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Type	Path
Annie E. Case Skills to Accelerated Results (STAR) trained	Training/ Resource		STAR trains leaders in public sectors to help their organization achieve better and equitable outcomes for communities	Research and Program Management	Sandy Keaton	"guide our efforts to conduct unbiased research and interpret data"; #"frame how we work with our communities"; #"set expectations for companies and stakeholders that work with us"; #"inform how we plan, prioritize, fund, and build projects and programs"	EQUITY: Equ defined as "Is state, quality ideal of bein impartial an The concept equity is synonymou fairness and justice. It is It to think of e as not simpl desired state affairs or a le value. To act and sustain it needs to b thought of a structural ar systemic co https://www.org/blog/ra justice- definitions	or or j just, at fair."  of with elpful quity /a / of fty every equity, es a d cocept.	Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Formerly incarcerated people; #Foster youth; #Tribes; #LGTBQIA	y	Local					Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
County of San Diego Reducing Racial and Ethnic Disparities	Policy; #Committ ee	Ongoing/	Identify, inform, change, and modify any practices contributing to racial/ethnic disparities in San Diego County's Juvenile Justice system.	Research and Program Management	Sandy Keaton	"inform how we plan, prioritize, No fund, and build projects and programs"; #"guide our efforts to conduct unbiased research and interpret data"			i.	SANDAG conducts I periodic reports and reviews data. San Diego County monitors by using the Relative Rate Index	Local					Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Clinton Health Matters Initiative	Committe e		being of all people by activating individuals, communities, and organizations to make meaningful contributions to the health of others. The goals of this work are to reduce the prevalence of preventable health outcomes and close health inequity and disparity gaps by improving access to key contributors to health for all people. The Clinton Foundation achieves its goals through	w.clinto Program foundati Management n.org/our  vork/clint n- lealth- natters- nitiative/ rograms/ bout- linton-	Sandy Keaton - CJ Manager	"frame how we work with our No communities"		and San Dieg Foundation	Seniors; #Low-income people; #People of Color; #People with limited English proficiency (LEP); #People with disabilities/different abilities; #Women; #Military/Veterans; #Formerly incarcerated people; #Tribes; #LGTBQIA	performance metrics - Live Well San Diego						Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
QA/QC reviews for Equity related data and analysis products	Program	Ongoing/	QA/QC includes both proactive efforts to ensure accuracy of data and quality reviews of data products. Both help ensure the quality and usability of our products.	Research and Program Management	Purva Singh	"guide our efforts to conduct No unbiased research and interpret data"; #"inform how we plan, prioritize, fund, and build projects and programs"										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Peer Reviews for Equity related data and analysis	Program	Ongoing/	Ensures accuracy and usablity of our data and analysis products and provides transparency on our choices made during analysis.	Research and Program Management	Mike Duncan	No										Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Lunch & Learn	Program	Ongoing/	To bring employees agency-wide together to collaborate and learn about various cultures		DEI Council											Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Motorist Aid program	Program	Ongoing/	The Motorist Aid programs include: Freeway Service Patrol, a service service that improves safety for stranded motorists and reduces traffic congestion. And, the call box program, a free service designed to help travelers who experience vehicle problems on the highway. Motorists may always call 511 from a cell phone to be connected to the motorist aid call center.	toristaid/ Services IotoristAi	Aaron Moreno	"frame how we work with our communities"										ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Employee Resource Groups (ERG)	Other		To promote a culture of diversity, respect, equity and inclusion; network opportunities and a sense of belonging at SANDAG		DEI Council	Yes							INTERNAL: Attract & Retain People (Recruitment, Benefits, Compensation, Benefits & Flexibility)			ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity	Activity	Chataur	D.	Link(s) / Le	ad Lead Employ	<sup>ee/</sup> Equity Statement Alignment	Define Facility Deficition	Partner	Donales and an idea d	Performance	From ellin m	Additional	CDEID Alleman	CDC Alimmer and	Net	la ana Ta	Dark -
Activity buddy Program Refresh	Type Program		Purpose  To improve new hire experience at SANDAG.		ment(s) Position(s) DEI Council	Equity Statement Alignment	Define Equity Definition Equity?	n Agencies	Populations Considered	Monitoring	Funding	Resources	INTERNAL: Attract & Retain People (Recruitment, Benefits, Compensation, Benefits & Flexibility)	SDG Alignment	Notes	Item Type	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Trainings	Training/ Resource		To provide voluntary agency-wide training addressing various DEI matters such as: emotional intelligence, unconscious bias, micro-aggression, inclusive communications/language, social equity, and ally-ship.		DEI Council	"define how we recruit and develop our employees"					Other		INTERNAL: Attract & Retain People (Recruitment, Benefits, Compensation, Benefits & Flexibility)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Community Benefits Agreement (Disadvantaged and Targeted Workers Program; Helmets to Hardhats (Veterans) Program)	#Policy	Planned/ Future	One of the major objectives of establishing the Community Benefits Agreement (CBA) is to work with the trades to ensure that SANDAG can fill the pipeline with skilled and trained workforce to include underrepresented individuals that will participate on future SANDAG projects. Components of the proposed CBA include community and local hire participation, disadvantaged area worker programs, and targeted worker programs, and targeted worker provisions. Implementing a CBA on SANDAG construction projects will allow SANDAG to incorporate WORC program provisions that will benefit the local community. The SANDAG approach is to advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.		Richardson, ment Director of	"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholder that work with us"; #"frame how we work with our communities	/	County Building #I & Construction (L Trades Council #I	ow-income people; #People of Color; People with limited English proficience EP); #Women; #Military/Veterans; Formerly incarcerated people; #Foster buth; #Tribes				& Serve Society (Community, p Services & Products, or Marketing, responsible in Sourcing)  For p  for p  a a	coal 4. Ensure inclusive and equitable quality education and promote lifelong learning apportunities for all; #Coal 9. Build esilient infrastructure, promote nclusive and sustainable ndustrialization and foster nnovation; #Coal 16. Promote peaceful and inclusive societies or sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all evels		Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Lunch & Learn	Program	Ongoing/	To bring employees agency-wide together to collaborate and learn about various cultures		DEI Council Members											ltem	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Deployed Cultural Awareness Mobile Application on over 1500 smartphones issued to law enforcement personnel in the region	Training/ Resource	Past/ Previous	In order to provide equitable and effective public safety, law enforcement professionals need to be able to function effectively within the context of cultural beliefs, behaviors, and needs of all members of the community. Understanding a person's practice of cultural norms can allow officers to quickly build a rapport and ensure effective communication. The San Diego County District Attorney's Interfaith Advisory Board is committed to supporting and fostering culturally competent law enforcement officers. The board conducted focus groups with various cultural groups to gather content for this app that law enforcement officers can use to respectfully respond to nonemergency situations. To learn more about the DA's inter-Faith Advisory Board and other crime prevention and interventions programs, please visit: Prevention and Intervention Programs - San Diego County District Attorney (sdcda.org)	ww.sdcda. org/office/ communit y- programs. html	Lloyd Muenze	r "frame how we work with our communities"	No	#1	ow-income people; #People of Color; People with limited English proficienc EP); #Women; #LGTBQIA; #Other							Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

Equity Activity	Activity Type	Status	Purpose	Link(s) / Lead More Info Department(s	Lead Employee,  ) Position(s)	/ Equity Statement Alignment	Define Equity Definition	n Partner Agencies	Populations Considered	Performance Monitoring	Funding	Additional Resources	GDEIB Alignment	SDG Alignment	Notes	Item Typ	e Path
AB 1747 - CLETS Purpose Code Support	Policy	Ongoing/ Recurring	We updated our mobile app (SRFERS) to comply with ABI747, ARJIS mobile phones not updated to SRFERS version 4.3.0.0 will not obtain CLETS results on queries of persons or vehicles. The SRFERS mobile application will require users to enter a purpose code for each transaction to comply with the law. California Department of Justice CALIFORNIA JUSTICE INFORMATION SERVICES DIVISION (CJIS) - Implementation of Assembly Bill (AB) 1747 Pertaining to use of the California Law Enforcement Telecommunications System (CLETS). The purpose of this Information Bulletin is to notify your agency about new statutory restrictions and requirements governing the use of CLETS. Among other things, starting July 1, 2021, your agency will need to implement programming changes to provide a "Purpose Code" for every CLETS transaction. Background - Under existing law, the California Values Act generally prohibits California law enforcement agencies (LEAs) from using money or personnel to investigate, interrogate, detain, detect, or arrest persons for immigration enforcement purposes, including providing personal information for that purpose. (Gov. Code, § 7284-6, subd. (a) (II)(D)) The specific requirements for LEAs under the Values Act are set forth more fully in prior Information Bulletins: 2018-DLE-01, 18-02-CJIS, and 18-10-CJIS.		An, Nidhi Jain, Ken Amerige, Ion Surugiu, Pau Lin, Eric Wood			Cajon, La Mesa, National City, Coronado, San Diego, San Diego Sheriffs, Carlsbad, San Diego Harbor	LGTBQIA; #Tribes; #Women; #Other; #People with limited English proficienc (LEP); #People of Color; #Low-income people	cy generated for each ARJIS member agency to view their agency personnel who are using CLETS queries for purposes other than criminal justice in order to verify the purpose was correct or to retrain their personnel.						Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Stakeholder S Engagement on Capital Projects		Ongoing/	We include translation, interpretation, and other areas of social and environmental justice, stakeholder engagement, etc. in our capital project outreach activities.	Strategic Communication s	r of Outreach	"frame how we work with our e communities"; #"inform how we plan, prioritize, fund, and build projects and programs"; #"set expectations for companies and stakeholders that work with us"	e d	Caltrans, MTS, NCTD			Federal; #State; #Local		EXTERNAL: Listen to & Serve Society (Community, Services & Products, Marketing, Responsible Sourcing)			Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker
Inclusive Photographi I	Training/ Resource		Build a photographic library that intentionally represents underrepresented communities.	Strategic Communication s	Lisa Starace n	"frame how we work with our communities"	No									Item	sites/WTlibrar y/Lists/Equity Related Activities Tracker

# Appendix L: Section 5310 Program Record of Funding Requests

## **Summary Section 5310**

### A. Project Counts

	Number of Projects Recommended for Full or Partial Section 5310 Funding	Number of Projects NOT Recommended for Section 5310 Funding	Total
Number of projects that would use Section 5310 funds to provide assistance to predominantly minority populations	8	1	9
Number of projects that would NOT use Section 5310 funds to provide assistance to predominantly minority populations	3	1	4
Total	11	2	13

### **B. Funding Recommendations**

	Total Grant Request for Projects Recommended for Full or Partial Section 5310 Funding	Total Grant Request for Projects NOT Recommended for Section 5310 Funding	Total
Total Grant Request for projects that would use Section 5310 funds to provide assistance to predominantly minority populations	\$3,150,563	\$360,000	\$3,510,563
Total Grant Request that would NOT use Section 5310 funds to provide assistance to predominantly minority populations	\$1,993,183	\$400,000	\$2,393,183
Total	\$5,143,746	\$760,000	\$5,903,746

### **Summary SMG**

### A. Project Counts

	Number of Projects Recommended for Full or Partial SMG Funding	Number of Projects NOT Recommended for SMG Funding	Total
Number of projects that would use SMG funds to provide assistance to predominantly minority populations	1	3	4
Number of projects that would NOT use SMG funds to provide assistance to predominantly minority populations	3	5	8
Total	4	8	12

### **B. Funding Recommendations**

	Total Grant Request for Projects Recommended for Full or Partial SMG Funding	Total Grant Request for Projects NOT Recommended for SMG Funding	Total
Total Grant Request for projects that would use SMG funds to provide assistance to predominantly minority populations	\$1,200,000	\$675,424	\$1,875,424
Total Grant Request that would NOT use SMG funds to provide assistance to predominantly minority populations	\$1,573,351	\$962,983	\$2,536,334
Total	\$2,773,351	\$1,638,407	\$4,411,758

# **Section 5310 Applications**

Full Applicant Name	Applicant Type	Full Project Name	Project Type	Funding Source	Grant Request Amount	Title VI: Would the proposed project use STGP funds to provide assistance to predominantly minority populations? (Yes or No)	Title VI: Recommendation for Funding
City of San Diego	Local Governmental Authority	Balboa Park Shuttle for Seniors and Individuals with Disabilities	CAP Contract Transportation Services	Section 5310	\$360,000	Yes	Not Recommended for Funding
Facilitating Access to Coordinated Transportation	Private Nonprofit Organization	CTSA Services: One-Stop Access	Mobility Management	Section 5310	\$790,758	No	Recommended for Funding
Facilitating Access to Coordinated Transportation	Private Nonprofit Organization	RideFACT: Affordable Countywide Rides	Operating	Section 5310	\$400,000	No	Not Recommended for Funding
Home of Guiding Hands	Private Nonprofit Organization	HGH Vehicle Procurement	CAP Vehicle and Other Equipment Procurement	Section 5310	\$989,753	No	Recommended for Funding
Jewish Family Service of San Diego	Private Nonprofit Organization	On the Go 5310	Operating	Section 5310	\$970,000	Yes	Recommended for Funding
Operation Samahan	Private Nonprofit Organization	Samahan Senior Shuttle Project: Capital	CAP Vehicle and Other Equipment Procurement	Section 5310	\$175,328	Yes	Recommended for Funding
Renewing Life	Private Nonprofit Organization	Vehicle Procurement	CAP Vehicle and Other Equipment Procurement	Section 5310	\$61,405	Yes	Recommended for Funding
San Diego Metropolitan Transit System	Local Governmental Authority	FY 24 ADA Bus Procurement	CAP Vehicle and Other Equipment Procurement	Section 5310	\$952,861	Yes	Recommended for Funding
St. Madeleine Sophies Center	Private Nonprofit Organization	Vehicle Procurement	CAP Vehicle and Other Equipment Procurement	Section 5310	\$212,672	No	Recommended for Funding
St. Paul's Senior Services	Private Nonprofit Organization	St. Paul's Episcopal Home, Inc. Accessible Vehicles	CAP Vehicle and Other Equipment Procurement	Section 5310	\$278,469	Yes	Recommended for Funding
The Arc of San Diego	Private Nonprofit Organization	The Arc of San Diego's MCRD Contracted Transportation Services Program	CAP Contract Transportation Services	Section 5310	\$467,200	Yes	Recommended for Funding
Traveler's Aid Society of San Diego	Private Nonprofit Organization	RIDEFinder 5310	Mobility Management	Section 5310	\$87,300	Yes	Recommended for Funding
Traveler's Aid Society of San Diego	Private Nonprofit Organization	Senior Solutions	Operating	Section 5310	\$158,000	Yes	Recommended for Funding

# **SMG Applications**

Full Applicant Name	Applicant Type	Full Project Name	Project Type	Funding Source	Grant Request Amount	Title VI: Would the proposed project use STGP funds to provide assistance to predominantly minority populations? (Yes or No)	Title VI: Recommendation for Funding
City of Escondido	Local Governmental Authority	Senior Transportation Program	Operating	SMG	\$92,463	Yes	Not Recommended for Funding
ElderHelp of San Diego	Private Nonprofit Organization	Seniors A Go Go	Operating	SMG	\$282,593	No	Recommended for Funding
Facilitating Access to Coordinated Transportation	Private Nonprofit Organization	CTSA Services: One-Stop Access	Mobility Management	SMG	\$790,758	No	Recommended for Funding
Facilitating Access to Coordinated Transportation	Private Nonprofit Organization	RideFACT: Affordable Countywide Rides	Operating	SMG	\$400,000	No	Not Recommended for Funding
Foundation for Senior Care	Private Nonprofit Organization	SMG-Fallbrook Area Senior and Disabled Transportation Services	Operating	SMG	\$100,000	No	Not Recommended for Funding
Jewish Family Service of San Diego	Private Nonprofit Organization	On the Go SMG	Operating	SMG	\$1,200,000	Yes	Recommended for Funding
Operation Samahan	Private Nonprofit Organization	Samahan Senior Shuttle Services	Operating	SMG	\$342,961	Yes	Not Recommended for Funding
Peninsula Shepherd Center	Private Nonprofit Organization	Out and About Peninsula Senior Transportation Program	Operating	SMG	\$124,000	No	Not Recommended for Funding
Renewing Life	Private Nonprofit Organization	Volunteer Driver Program	Operating	SMG	\$240,000	Yes	Not Recommended for Funding
San Ysidro Health	Private Nonprofit Organization	MHCC Senior Nutrition Program	Operating	SMG	\$154,983	No	Not Recommended for Funding
Traveler's Aid Society of San Diego	Private Nonprofit Organization	SenioRide	Operating	SMG	\$500,000	No	Recommended for Funding
Traveler's Aid Society of San Diego	Private Nonprofit Organization	RIDEFinder SMG	Mobility Management	SMG	\$184,000	No	Not Recommended for Funding

# **All Applications**

Full Applicant Name	Applicant Type	Full Project Name	Project Type	Funding Source	Grant Request Amount	Title VI: Would the proposed project use STGP funds to provide assistance to predominantly minority populations? (Yes or No)	Title VI: Recommendation for Funding
City of Escondido	Local Governmental Authority	Senior Transportation Program	Operating	SMG	\$92,463	Yes	Not Recommended for Funding
Jewish Family Service of San Diego	Private Nonprofit Organization	On the Go SMG	Operating	SMG	\$1,200,000	Yes	Recommended for Partial Funding
Operation Samahan	Private Nonprofit Organization	Samahan Senior Shuttle Services	Operating	SMG	\$342,961	Yes	Not Recommended for Funding
Renewing Life	Private Nonprofit Organization	Volunteer Driver Program	Operating	SMG	\$240,000	Yes	Not Recommended for Funding

## Appendix M: Regional Transit Service Planning and Implementation - Board Policy No. 018



# BOARD POLICY NO. 018

#### REGIONAL TRANSIT SERVICE PLANNING AND IMPLEMENTATION

This policy specifies the transit service planning and transit development project planning responsibilities of SANDAG (the consolidated agency) and the transit agencies (Metropolitan Transit System and North San Diego County Transit Development Board), and outlines a framework for transit service planning and roles and responsibilities for project development planning. Figure 1.1 includes a flow chart, based on the framework that documents the processes for transit service planning and implementation, for new services and adjustments to existing services. Figure 1.2 identifies the lead and support (active participant) agency responsibilities for both long and short-range transit service planning and development project planning.

This policy will allow the transit system to quickly and efficiently respond to changes in travel demand and operating/fiscal environment, while ensuring that the system is adjusted and developed consistent with longer range regional transportation and land use goals as incorporated into the Regional Plan (the combined Regional Comprehensive Plan (RCP) and the Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]), the *TransNet* Ordinance, the Coordinated Plan (the Regional Short-Range Transit Plan & Coordinated PublicTransit-Human Services Transportation Plan), or any other regional planning or legislative documents concerning regional projects (collectively referred to in this Policy as "Regional Planning Documents"). As a result, transit service changes that relate directly to implementation of regional policies, goals, and objectives (service changes with regional significance) are generally those that:

- Serve regional travel demand corridors that cross transit agency jurisdictional boundaries;
- Significantly affect passenger trip making (as defined by the guidelines contained in the Coordinated Plan; for example, would be found to potentially have a detrimental impact on geographic connections, timed transfers, and the frequency/service span consistency of such services);
- Require additional regional operating funds above the overall transit agency-adopted budget and projected budget capacity; and
- Affect the policies, projects, services, and facilities included in Regional Planning Documents.
- 1. Agency Responsibilities SANDAG and transit agency responsibilities are described below and further specified in Figure 1.2. There is an inherent overlap of some of the responsibilities between SANDAG and the transit agencies in conducting transit service planning and development project planning, as exhibited in Figure 1.2. In addition, SANDAG responsibilities pursuant to the Title VI Requirements and Guidelines for Federal Transit Administration Recipients (Circular 4702.1B) and Environmental Justice Policy Guidance for Federal Transit Administration Recipients (Circular 4703.1) should be coordinated with the related Title VI responsibilities of the transit agencies. Therefore, all planning responsibilities shall be conducted with coordination and consultation between SANDAG and the transit agencies. SANDAG responsibilities are described in Sections 1.1 and 1.2. Transit agency responsibilities are described in Section 1.3.

- 1.1 **SANDAG Planning Responsibilities** carried out in collaboration with the transit agencies:
  - 1.1.1 Prepare long-range transit plans and corridor studies consistent with Regional Planning Documents.
  - 1.1.2 Prepare, no less often than every four years, the five-year Coordinated Plan that: (1) establishes the goals and objectives for short-range transit services and human services transportation; (2) defines the existing transit and human services transportation system; (3) sets the framework for a transit operations performance monitoring program as required by the Transportation Development Act and a monitoring program for human services transportation as defined by the Federal Transit Administration (FTA); (4) identifies transit and human service gaps and deficiencies; (5) evaluates existing transit and human services transportation services and programs; (6) establishes parameters for short-range (0-5 years) new and revised service development, as well as regionally significant and all other service adjustments; (7) defines a methodology for evaluating proposals for new and revised service; (8) identifies and prioritizes regional and subarea transit planning studies; and (9) evaluates and prioritizes new and revised services for implementation, including the adoption of an annual Regional Service Implementation Plan.
  - 1.1.3 Conduct regional and subarea planning studies as prioritized in the Regional Planning Documents.
  - 1.1.4 Develop proposals and service plans for new services or for service adjustments with regional significance, with active participation from the transit agencies, in response to changes in regional travel demand, to address regional service gaps and deficiencies, and to implement plans and programs identified in Regional Planning Documents.
  - 1.1.5 Plan, locate, and design transit infrastructure and facilities (stations, priority treatments, supporting facilities, etc.) for regionally significant transit projects and services identified in Regional Planning Documents with active participation from the transit agencies.
  - 1.1.6 Develop proposals for new and revised services to be included in the Regional Service Implementation Plan.
  - 1.1.7 Ensure that all new and revised services and service adjustments of regional significance are consistent with the goals and objectives of the Coordinated Plan.
  - 1.1.8 Coordinate with transit agencies to provide community outreach and conduct market research.
  - 1.1.9 Conduct regional performance monitoring to provide input into the Coordinated Plan and other short-range transit studies. The regional performance monitoring will be based on the type of service and type of service area.
  - 1.1.10 Provide technical assistance to transit operators for local route planning.

- 1.1.11 Develop and update, as required, with input from the transit agencies, the Coordinated Transportation Plan for San Diego County as required by legislation. SANDAG also will manage the competitive process for granting FTA funds available as a result of production of a Coordinated Transportation Plan.
- 1.1.12 Participate in development of transit vehicle specifications for vehicles acquired for regionally significant projects and services that are funded through projects identified in Regional Planning Documents.
- 1.1.13 Collaborate with the transit agencies on a branding framework, compatible with the transit agencies' individual branding programs, that incorporates regionally significant projects and services identified in the Regional Planning Documents. The transit agencies and SANDAG will undertake a study to develop a mutually agreed upon branding framework for the region.
- 1.2 **SANDAG FTA Responsibilities** carried out in collaboration with the transit agencies:
  - 1.2.1 Fare Changes. SANDAG recognizes that the revenues generated from customer fares are a critical part of the respective transit agencies achieving a balanced budget that supports the provision of the highest levels of service. To the maximum extent possible, SANDAG will conduct its analyses in a manner that is consistent with the budget goals established by the transit agencies while adhering to the requirements specified by the FTA. SANDAG will evaluate, prior to implementation in the Fare Ordinance, all fare changes, to determine whether those changes will have a disparate impact on minorities (based on race, color, or national origin) or result in a disproportionate burden on low-income persons. SANDAG will prepare Environmental Justice or Title VI reports in accordance with SANDAG disparate impact and disproportionate burden analysis methodologies, which are defined below.

- 1.2.1.1 SANDAG will determine the existence of disparate impacts to minority populations for all Fare Ordinance changes. Pursuant to Title VI of the Civil Rights Act, disparate impacts are found when there is a difference in adverse effects between minority and non-minority areas of ten percent (10%) or more. Minority populations will be deemed adversely affected when the proportion of minority persons adversely affected by the change exceeds the average proportion of minority persons in the analysis service area. If SANDAG, in consultation with the transit operators, chooses to implement a proposed fare change in the Fare Ordinance despite a finding of disparate impact on minority populations, or if SANDAG finds, in consultation with the transit operators, even after the revisions, that minority populations will continue to bear a disproportionate share of the adverse effects of a proposed fare change, SANDAG may implement the fare change only if:
  - 1.2.1.1.1 There is a substantial legitimate justification<sup>1</sup> for the proposed fare change, and
  - 1.2.1.1.2 A finding is made that there are no alternatives that would have a less disparate impact on minority populations and still accomplish the legitimate goals of the fare change.
- 1.2.1.2 SANDAG will determine the existence of disproportionate burdens on **low-income** populations for all Fare Ordinance changes. Pursuant to Executive Order 12898 (Clinton 1994), disproportionate burdens are found when there is a difference in adverse effects between lowincome and non-low income populations of ten percent (10%) or more. Low-income populations will be deemed adversely affected when the proportion of low-income persons (using a threshold of at or below 200 percent of the U.S. Department of Health and Human Services poverty guidelines) adversely affected exceeds the average proportion of low-income persons in the analysis service area. If SANDAG chooses, in consultation with the transit operators, to implement a proposed fare change in the Fare Ordinance despite a finding of disproportionate burden on low-income ridership, or if SANDAG finds, in consultation with the transit operators, even after the revisions, that low-income riders will continue to bear a disproportionate burden due to the proposed fare change, SANDAG may implement the fare change only if the transit agency(ies) show that they will:
  - 1.2.1.2.1 Take steps to avoid, minimize, or mitigate impacts where practicable, and
  - 1.2.1.2.2 Provide a description of alternatives available to low-income populations affected by the fare changes.

<sup>&</sup>lt;sup>1</sup> This standard is met if the fare change is needed to meet a goal that is legitimate, important, and integral to the agency.

- 1.2.2 Reporting. SANDAG will prepare Title VI reports in accordance with this policy, which shall be posted to the SANDAG website, as required by FTA for Metropolitan Planning Organizations and transit agencies.
- 1.2.3 Service Changes. SANDAG will notify the transit agencies of any service changes that may be required as a result of New Start, Small Start, or other new transit capital projects that will be constructed by SANDAG in adequate time to allow the transit agency(ies) to conduct a service change equity analysis at least six months prior to the beginning of revenue operations. SANDAG will provide information and cooperate with the transit agency(ies) on any service change equity analyses that are needed as a result of such construction.
- 1.3 Transit Agency Responsibilities carried out in collaboration with SANDAG:
  - 1.3.1 Develop service and schedule adjustments to ensure system optimization and to respond to immediate operational issues (e.g., detours, overcrowding, on-time performance, and minor out-of-direction routing changes).
  - 1.3.2 Conduct local transit studies and analyses within the transit agency's service area in response to changes in local travel demand, to address service gaps and deficiencies, to develop service reductions/efficiencies, to address operating budget deficits, and to address goals and implement plans developed in the Coordinated Plan.
  - 1.3.3 Develop proposals for new and revised services to be included in the Regional Service Implementation Plan.
  - 1.3.4 Develop proposals to reallocate unproductive resources to implement unfunded services identified as high priority in the Regional Service Implementation Plan or consistent with the Coordinated Plan.
  - 1.3.5 Develop a public input process and hold required public hearings for service changes. The transit agencies should ensure that the public input process for public hearings on service changes would be conducted in a manner to facilitate public input from the affected area.
  - 1.3.6 Develop marketing and branding programs for the transit services within its jurisdiction and collaborate with SANDAG on a compatible branding framework that incorporates regionally significant projects and services identified in Regional Planning Documents. The transit agencies and SANDAG will undertake a study to develop a mutually agreed upon branding framework for the region.
  - 1.3.7 Provide community outreach and conduct market research, in coordination with SANDAG.
  - 1.3.8 Develop operating plans for special event transit service and service contingencies.
  - 1.3.9 Monitor existing operations and services to provide input into service analyses and short-range transit studies.
  - 1.3.10 Conduct bus stop location planning.

- 1.3.11 Implement service, including scheduling, run-cutting, operations, contract services, service management, and labor contract administration.
- 1.3.12 Provide input on long- and short-range transit plans, and regional performance monitoring.
- 1.3.13 If a service addition or change will last longer than twelve months and qualifies as a major service change, or if a New Starts, Small Starts, or other new fixed guideway capital project is proposed, conduct a service change equity analysis consistent with the FTA Circulars if required by FTA for transit agencies, and provide the reports to SANDAG and FTA.
- 1.3.14 Actively participate in the development of service plans for service adjustments with regional significance, in response to changes in regional travel demand, to address regional service gaps and deficiencies and to implement plans and programs identified in Regional Planning Documents.
- 1.3.15 Actively participate in the planning, location and design of transit infrastructure and facilities (stations, priority treatments, supporting facilities, etc.) for regionally significant transit projects and services identified in Regional Planning Documents.
- 1.3.16 Develop transit vehicle specifications, with active participation from SANDAG, for vehicles for all service types, including local bus, shuttles, bus rapid transit, rail, and others.
- 1.3.17 Conduct a fare equity analysis for promotional or temporary fare changes when required by FTA and provide the analysis to SANDAG in the event the fare change must be incorporated into the Fare Ordinance.
- 2. **Transit Service Planning Framework** This framework allows the transit system to quickly and efficiently respond to changes in travel demand and operating/fiscal environment, while ensuring that the system is adjusted and developed consistent with longer range regional transportation and land use goals.

#### Step 1: Guidance

A Coordinated Plan, consistent with SANDAG's RTP and RCP, will be drafted every four years by SANDAG, with active participation from the transit agencies. The Coordinated Plan will establish goals and objectives and provide guidance for service planning and will balance the needs of optimizing the transit system in response to operational and financial constraints, with the mid- and long-range system development goals established in the long-range plans.

#### Step 2: Develop Service Adjustments

Throughout the year, transit agency and SANDAG staff develop proposals, in accordance with the Coordinated Plan, to adjust existing services and develop new services. These service adjustments help to optimize existing services, reflect changes to the operating and fiscal environment, respond to customer comments and requests, and begin to implement and support services envisioned in the long-range plans. Service adjustments can be a result of such things as schedule analysis, trip and route level evaluation, and subregional and regional transit studies. Service adjustments with regional significance should be developed as collaborative efforts between SANDAG and transit agency staff.

#### Step 3: Evaluation and Approval

Prior to approval for implementation, all service adjustments should be:

- Consistent with the Coordinated Plan;
- Presented for public hearing in the impacted service area if required by SANDAG, the appropriate transit agency, or by FTA policies and regulations; and
- Fully funded either through a reallocation of resources or as part of the budget process.

Service adjustments with regional significance should be endorsed by the appropriate transit agency and determined to be consistent with regional policies, goals and objectives by SANDAG prior to public hearing and implementation, while local and minor service adjustments may be approved for implementation by the transit agencies after advising SANDAG of the proposed changes.

#### Step 4: Implementation

As a general practice, service changes should be implemented during a regularly scheduled service change date (scheduled for winter, spring, and summer). Implementation of major service changes should be preceded by community outreach, a marketing campaign, and public notices, as appropriate. Service implementation is the responsibility of the transit agencies.

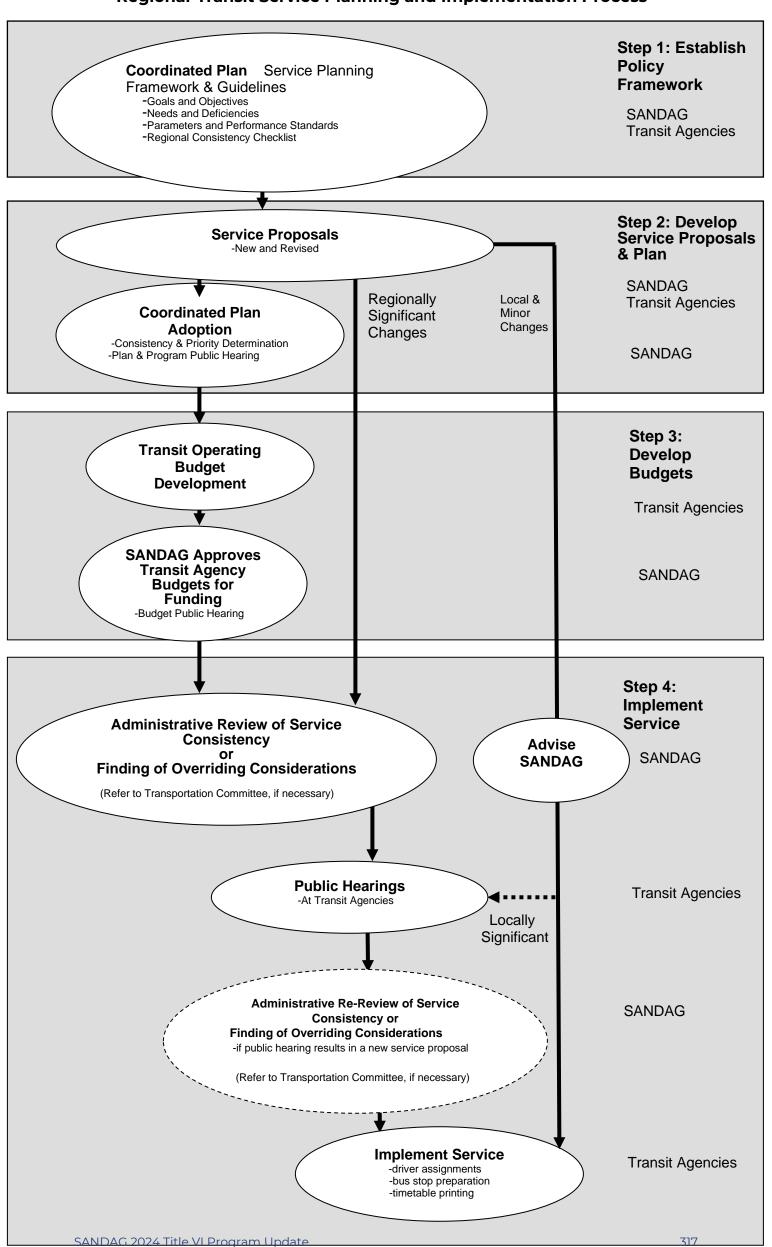
#### Step 5: Monitoring

Performance monitoring will be conducted on an ongoing basis to evaluate new and existing services and service adjustments. SANDAG will monitor the transit system performance on a systemwide and transit agency level on an annual and quarterly basis. Transit agencies will monitor their operations performance on an annual, quarterly, and monthly basis, as appropriate. Performance measures will evaluate productivity, cost-effectiveness, and quality of service. Performance results will be used as a basis for developing the Coordinated Plan, and other planning studies and analysis.

Attachments: Figure 1.1 – Regional Transit Service Planning and Implementation Process Figure 1.2 – Roles and Responsibilities for Service Planning Activities

Adopted June 2003
Amended September 2004
Amended March 2005
Amended August 2006
Amended December 2008
Amended February 2012
Amended May 2013
Amended January 2017
Amended November 2022

Figure 1.1
Regional Transit Service Planning and Implementation Process



# FIGURE 1.2 ROLES AND RESPONSIBILITIES FOR TRANSIT PLANNING AND IMPLEMENTATION ACTIVITIES

	TRANSIT AGENCY			SANDAG			
	Ser				Long		
				vice	Development	Range	
DOLLOV AND CHIDANICE	Operations	Marketing	Pian	ning	Planning	Planning	
POLICY AND GUIDANCE Regional Transportation Plan (RTP)						Lead	
Short Range Transit Plan (SRTP)				Lead		Leau	
Short Range Transit Flair (SKTF)				Leau			
LONG-RANGE SERVICE DEVELOPMENT							
Subarea Studies						Lead	
Cabarda Gladio						Lodd	
MID-RANGE SERVICE DEVELOPMENT							
BRT/Rail System Development (Service Plan)*					Lead		
Transit Centers (Station Location/Facility Design)					Lead		
Regional Branding Framework			Sha	red			
-							
SHORT RANGE SERVICE RESTRUCTURING							
Feeder Bus Studies/BRT Supporting Networks				Lead			
Subarea Studies (e.g. Downtown, NB/PB/LJ, Univ. Ave)			Sha	ared			
Systemwide Service Optimization (e.g. COA)			Lead				
COMMUNITY OUTREACH							
Service Change Public Hearings			Lead				
Developer Plan Review - land use, regional plan conformity				Lead			
Developer Plan Review - community liaison			Lead				
Market Research		Sha					
Transit Liaison to Communities		Sha					
Respond to Community Service Requests			Sha	ared			
Respond to Operational Issues	Lead						
Marketing/Branding Jurisdiction Services		Lead					
PERFORMANCE MONITORING							
Annual Route Monitoring			Lead				
New Service Proposal Evaluation				ared			
Performance Improvement Program			OH	Lead			
Quarterly Operations Evaluation			Lead	Leau			
Operational Data Collection			Lead				
Assistance to Transit Operators (ATO) Data Collection			Load	Lead			
Monthly Operations Reporting			Lead	Load			
National Transit Database (NTD) Reporting			Lead				
Trade in the second of the sec							
ROUTE SPECIFIC ADJUSTMENTS							
Bus Stop Location Planning			Lead				
Trip Level Schedule Adjustments			Lead				
Minor Route Changes			Lead				
Service Reductions - Minor			Lead				
Service Reductions - Regionally Significant				Lead			
OPERATIONS AND MAINTENANCE							
Scheduling			Lead				
Runcutting	Lead		Lead				
Driver Bids	Lead						
Ensure Implementation of Service Plans	Lead						
Service Provision	Lead						
Vehicle Specification/Procurement	Lead						
* Include Mid Occat I DT/DDT and Occat Documents M							

<sup>\*</sup> Includes Mid-Coast LRT/BRT and South Bay to Sorrento Mesa BRT Revised December 2016

Lead- Primary or Lead Function- Active Participation and Support

#### Appendix N: Regional Fare Policy and Comprehensive Fare Ordinance - Board Policy No. 029







#### **REGIONAL FARE POLICY AND COMPREHENSIVE FARE ORDINANCE**

#### Purpose:

To establish guidelines for setting a uniform, fair, and equitable areawide fare structure consistent with revenue-producing requirements and established budgets.

#### Background

With the approval of Senate Bill (SB) 1703, the planning and programming functions of the San Diego Metropolitan Transit Development Board (MTDB), which is now the Metropolitan Transit System (MTS), and the North San Diego County Transit Development Board, which is now North County Transit District (NCTD), were consolidated under the San Diego Association of Governments (SANDAG). Contained within these functions is the responsibility for developing a Regional Fare Policy, including setting fares for transit services in the region through a Comprehensive Fare Ordinance. The Initial Transition Plan for the regional consolidation specifies that SANDAG will develop the Regional Fare Policy, carried out in consultation with the transit agencies and operators.

#### **Regional Participation**

For this policy to be effective, it will be necessary for all transit agencies and operators in the region to implement the regional policy according to the following guidelines:

- 1. A single, unified, regionwide fare policy and transfer system shall be maintained for all publicly subsidized operators.
  - 1.1 All publicly supported transit operators shall participate in the system to be eligible for public subsidy.
  - 1.2 All publicly supported transit operators shall use and accept regional fare media.

#### Production

Fare revenues shall meet or exceed the level necessary to support the level of service provided given the current public subsidies available.

2. SANDAG shall adopt a specific farebox recovery ratio objective for each transit agency each fiscal year, consistent with the requirements of the Public Utilities Code regarding the disbursement of Transportation Development Act funds. SANDAG's farebox recovery ratio shall be higher than that set by the Public Utilities Code to encourage revenue growth and ridership.

- 2.1 The fare-pricing schedule shall be set to be consistent with meeting or exceeding the specified farebox recovery requirements.
- 2.2 The annual average fare (per passenger), over time, shall generally be consistent with annual increases in regionwide transit cost indicators and/or the rate of inflation.
- 2.3 SANDAG shall consider the financial and Title VI impacts of a fare change upon ridership, service provision, and operating budgets.
- 2.4 User-side subsidies and direct public/private funding shall be encouraged as sources of operating revenue, particularly for services with lower cost-effectiveness.

#### **Fairness**

The fare structure should be fair and equitable to all operators and passengers in the region.

- 3. Fare levels shall be consistent for similar types of service and similar service areas.
  - 3.1 Fare levels shall reflect a combination of the type of service, distance, speed of travel, and customer amenities provided to the customer, with higher fares set for premium services.
  - 3.2 There shall be a unified policy on transfers within the region and any supplementary charges or upgrades for transfers shall be related to differences between the types of service and respective fare levels.
  - 3.3 Regionwide fare discounts shall generally be limited to youth and senior patrons and patrons with disabilities, and prepaid fare programs, and any mandated federal, state, and local program.

#### Simplicity

The fare policy shall promote seamless travel throughout the region by developing one common and easily understood fare structure throughout the region.

- 4. The fare structure and transfer system shall be as simple and easy to understand for users as possible.
  - 4.1 The number of fare, transfer, and pass options shall be minimized to promote user friendliness and efficient fare validation.
  - 4.2 The pricing structure shall be based upon equal or easily identified coin increments.
  - 4.3 The fare collection process aboard a transit vehicle shall be designed to be as expeditious as possible.

- 4.4 Vehicle driver/operator involvement in the fare collection process onboard the transit vehicle should be minimized.
- 4.5 Use of prepaid fares including passes and stored value (e.g., daily and monthly passes) shall be encouraged to speed the patron boarding process.
- 4.6 The automated fare collection system shall be developed to simplify fare payment and collection, while providing the region with the opportunity to develop specialized fare structures that will be transparent to the user and driver/operator.

#### Responsibilities

SANDAG, the transit agencies, and transit operators all have roles and responsibilities to ensure successful implementation of the Regional Fare Policy.

- 5. SANDAG develops and adopts the Regional Fare Policy and Comprehensive Fare Ordinance which incorporates a uniform fare structure, a transfer policy, and agreement for revenue sharing of regional tickets, tokens, and passes, while also allowing for adoption of specialized fare procedures for travel within each operator's service area. SANDAG will regularly update the Regional Fare Policy and set the basic fare pricing for transit services in the region through updates to the Comprehensive Fare Ordinance.
  - 5.1 A Regional Fare Structure Working Group (comprised of staff from SANDAG, transit agencies, and operators) shall review the comprehensive fare ordinance each year during the annual budget process and propose changes to the ordinance, if appropriate.
  - 5.2 Transit agency boards shall review and provide input on proposed changes to the fare ordinance and solicit public input in accordance with transit agency policies prior to SANDAG Board action.
  - 5.3 SANDAG's Transportation Committee shall review the fare ordinance and develop fare recommendations as part of the annual budget process, unless needed at other times for special circumstances.
  - 5.4 SANDAG may adopt specialized fares and procedures for travel within each transit agency's service area.
  - Public notice of fare changes shall be provided as legally required, including written notice on all public transit vehicles, and legal notices to newspapers. The public will be provided with an opportunity(ies) to comment on proposed fare changes in accordance with SANDAG Policy No. 025, Public Participation/Involvement Policy.
  - 5.6 Transit operators shall implement and adhere to this Regional Fare Policy and Comprehensive Fare Ordinance. Transit operators shall take the necessary actions to authorize enforcement of the Comprehensive Fare Ordinance.

- 5.7 The two transit agencies shall have the ability to set special event fares. For special events the transit agencies are encouraged to achieve full recovery of their operational expenses. These fares because of their short-term/temporary nature would not need to be included in the Comprehensive Fare Ordinance and would not require a public hearing.
- 5.8 The two transit agencies shall have the ability to set temporary, promotional, and experimental fares. Temporary, promotional, and experimental fares are defined as fares implemented for no more than twelve months for seasonal events or for marketing purposes. These fares, because of their short-term/temporary nature, would not need to be included in the Comprehensive Fare Ordinance or require a public meeting as provided in SANDAG Policy No. 025, and the operators shall be responsible for any necessary Title VI or financial impacts analysis related to such fares.
- 5.9 The Regional Fare Policy should be reviewed every two years by SANDAG.

Adopted October 2004 Amended February 2006 Amended December 2008

### Appendix O: Equity Analyses for Fare Changes

# SANDAG Title VI Fare Equity Analysis for Fare Changes Proposed for 2022

March 25, 2022

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#### Purpose of Analysis

Pursuant to the San Diego Association of Government's (SANDAG) Board Policy No. 018, and in accordance with federal Title VI civil rights requirements (FTA Circular 4702.1B, October 1, 2012), SANDAG is responsible for evaluating whether any proposed change to the Fare Ordinance will have a disparate impact on minorities (based on race, color, or national origin) or result in a disproportionate burden on low-income persons. Pursuant to the FTA Circular and the FTA Title VI FAQ dated December 2012, the Fare Equity Analysis is conducted for fixed route transit, including both bus and rail services.

#### SANDAG Title VI Requirements

Pursuant to SANDAG's Board Policy No. 018, section 1.2, the process to be followed in determining whether a fare change has a disparate impact on minorities or a disproportionate burden on low-income individuals is as follows:

- 1.2.1.1 SANDAG will determine the existence of disparate impacts to minority populations for all Fare Ordinance changes. Pursuant to Title VI of the Civil Rights Act, disparate impacts are found when there is a difference in adverse effects between minority and non-minority areas of ten percent (10%) or more. Minority populations will be deemed adversely affected when the proportion of minority persons adversely affected by the change exceeds the average proportion of minority persons in the analysis service area. If SANDAG, in consultation with the transit operators, chooses to implement a proposed fare change in the Fare Ordinance despite a finding of disparate impact on minority populations, or if SANDAG finds, in consultation with the transit operators, even after the revisions, that minority populations will continue to bear a disproportionate share of the adverse effects of a proposed fare change, SANDAG may implement the fare change only if:
  - 1.2.1.1.1 There is a substantial legitimate justification for the proposed fare change, and
  - 1.2.1.1.2 A finding is made that there are no alternatives that would have a less disparate impact on minority populations and still accomplish the legitimate goals of the fare change.
- 1.2.1.2 SANDAG will determine the existence of disproportionate burdens on low-income populations for all Fare Ordinance changes. Pursuant to Executive Order 12898 (Clinton 1994), disproportionate burdens are found when there is a difference in adverse effects between low-income and

non-low-income populations of ten percent (10%) or more. Low-income populations will be deemed adversely affected when the proportion of low-income persons (using a threshold of at or below 200 percent of the U.S. Department of Health and Human Services poverty guidelines) adversely affected exceeds the average proportion of low-income persons in the analysis service area. If SANDAG chooses, in consultation with the transit operators, to implement a proposed fare change in the Fare Ordinance despite a finding of disproportionate burden on low-income ridership, or if SANDAG finds, in consultation with the transit operators, even after the revisions, that low-income riders will continue to bear a disproportionate burden due to the proposed fare change, SANDAG may implement the fare change only if the transit agency(ies) show that they will:

- 1.2.1.2.1 Take steps to avoid, minimize, or mitigate impacts where practicable, and
- 1.2.1.2.2 Provide a description of alternatives available to low-income populations affected by the fare changes.

This process is not intended by SANDAG, MTS, NCTD or the FTA to be an absolute determination of discrimination. Rather, the finding of a potential disparate impact or disproportionate burden according to this test is intended to *trigger additional steps* that are otherwise not required.

In accordance with FTA guidance, this analysis does not contemplate an assessment of the relative equity of the fare structure *as it exists today*, only of whether the proposed changes are themselves equitable.

## Description of Proposed Fare Changes

SANDAG and the North County Transit District (NCTD) are proposing to make permanent the SPRINTER/BREEZE pass, which is currently offered as a promotional fare product. This fare product was implemented on October 1, 2021, and provides riders unlimited monthly access to all SPRINTER rail service and BREEZE bus service in NCTD's service area. This provides a discounted option for North County riders who do not regularly utilize MTS service compared to the regional monthly pass. This fare product is proposed to be implemented as a permanent change upon the conclusion of its promotional period on October 1, 2022.

SANDAG, the Metropolitan Transit System (MTS), and NCTD are proposing a new fare product, the *Youth Opportunity Pass*, that will be made available as a limited-term pass for all youth riders aged 18 and under and provide no-cost transit to that group.

This fare product will replace the option to purchase a Youth day pass or monthly pass and will be made available exclusively through the PRONTO system (including PRONTO fare cards and the PRONTO mobile app) for eligible riders. This change is proposed to be implemented May 1, 2022, and will be available as an extended pilot program through June 30, 2023. One-way Youth cash fares will still be available for purchase for those not registered for the program.

The SPRINTER/BREEZE pass is not likely to impose disparate impacts to minority riders or disproportionate burden to low-income riders, as it provides a lower-fare option for all riders that will be especially useful for low-income and minority riders.

The Youth Opportunity Pass program is not likely to impose disparate impacts to minority riders or disproportionate burden to low-income riders, as it eliminates fares for youth riders, the majority of whom are low-income persons, minority persons, or both. In fact, it is likely to provide the largest benefit to low-income and minority youth and their families who currently spend a large proportion of their income on transportation costs.

Additionally, collaboration between SANDAG, MTS, NCTD, and several community partners (as detailed in the Analysis of Community Outreach Program section) will ensure that proper fare media and informational materials are distributed to low-income and minority populations throughout the region about the Youth Opportunity Pass program. This will ensure that eligible youth are aware of and able to use the program.

The analysis finds that each of the fare changes proposed for 2022 imposes no disparate impact or disproportionate burden. Instead, each fare change decreases the financial burden of transit for all riders, increasing equity across San Diego's public transportation services.

**Table 1: Current Fare Structure and Proposed Changes** 

Table 1: Current Fare Structure and Proposed Changes											
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Fare Type	Proposed Change	_			Proposed		solute				
Regional Adult One-Way	No change	\$	2.50	\$	2.50	\$	-	0%			
Regional Youth One-Way	No change	\$	1.25	\$	1.25	\$	-	0%			
Regional SDM One-Way	No change	\$	1.25	\$	1.25	\$	-	0%			
Premium Regional Adult One-Way	No change	\$	5.00	\$	5.00	\$	-	0%			
Premium Regional Youth One-Way	No change	\$	2.50	\$	2.50	\$	-	0%			
Premium Regional SDM One-Way	No change	\$	2.50	\$	2.50	\$	-	0%			
MTS Rural Adult One-Way	No change	\$	8.00	\$	8.00	\$	-	0%			
MTS Rural Youth One-Way	No change	\$	4.00	\$	4.00	\$	-	0%			
MTS Rural SDM One-Way	No change	\$	4.00	\$	4.00	\$	-	0%			
Coaster Zone 1 Adult One-Way	No change	\$	5.00	\$	5.00	\$	-	0%			
Coaster Zone 1 Youth One-Way	No change	\$	2.50	\$	2.50	\$	-	0%			
Coaster Zone 1 SDM One-Way	No change	\$	2.50	\$	2.50	\$	-	0%			
Coaster Zone 2 Adult One-Way	No change	\$	5.75	\$	5.75	\$	-	0%			
Coaster Zone 2 Youth One-Way	No change	\$	2.75	\$	2.75	\$	-	0%			
Coaster Zone 2 SDM One-Way	No change	\$	2.75	\$	2.75	\$	-	0%			
Coaster Zone 3 Adult One-Way	No change	\$	6.50	\$	6.50	\$	-	0%			
Coaster Zone 3 Youth One-Way	No change	\$	3.25	\$	3.25	\$	-	0%			
Coaster Zone 3 SDM One-Way	No change	\$	3.25	\$	3.25	\$	-	0%			
MTS Access One-Way	No change	\$	5.00	\$	5.00	\$	-	0%			
NCTD Lift One-Way	No change	\$	5.00	\$	5.00	\$	-	0%			
Regional Adult Day Pass	No change	\$	6.00	\$	6.00	\$	-	0%			
Regional Youth Day Pass	Eliminate	\$	3.00	Eli	minate		N/A	N/A			
Regional SDM Day Pass	No change	\$	3.00	\$	3.00	\$	-	0%			
Premium Regional Adult Day Pass	No change	\$	12.00	\$	12.00	\$	-	0%			
Premium Regional Youth Day Pass	Eliminate	\$	6.00	Eli	minate		N/A	N/A			
Premium Regional SDM Day Pass	No change	\$	6.00	\$	6.00	\$	-	0%			
Coaster Adult Day Pass	No change	\$	15.00	\$	15.00	\$	-	0%			
Coaster Youth Day Pass	Eliminate	\$	7.50	Eli	minate		N/A	N/A			
Coaster SDM Day Pass	No change	\$	7.50	\$	7.50	\$	-	0%			
Regional Adult Monthly Pass	No change	\$	72.00	\$	72.00	\$	-	0%			
Regional Youth Monthly Pass	Decrease	\$	23.00	\$	-	\$	(23.00)	-100%			
Regional SDM Monthly Pass	No change	\$	23.00	\$	23.00	\$	-	0%			
Premium Regional Adult Monthly Pass	No change	\$	100.00	\$	100.00	\$	-	0%			
Premium Regional Youth Monthly Pass	Decrease	\$	32.00	\$	-	\$	(32.00)	-100%			
Premium Regional SDM Monthly Pass	No change	\$	32.00	\$	32.00	\$	-	0%			
Coaster Zone 1 Adult Monthly Pass	No change		140.00	\$	140.00	\$	-	0%			
Coaster Zone 2 Adult Monthly Pass	No change		161.00		161.00	\$	-	0%			
Coaster Zone 3 Adult Monthly Pass	No change	-	182.00		182.00	\$	-	0%			
Coaster Youth Monthly Pass	Decrease	\$	58.00	\$	-		(58.00)				
Coaster SDM Monthly Pass	No change	\$	58.00	\$	58.00	\$		0%			
Sprinter/Breeze Adult Monthly Pass	New fare		N/A	\$	59.00		N/A	N/A			
Sprinter/Breeze Youth Monthly Pass	New fare		N/A	\$	-		N/A	N/A			
Sprinter/Breeze SDM Monthly Pass	New fare		N/A	\$	19.00		N/A	N/A			

#### Dataset and Methodology

As required by this policy and FTA Circular 4702.1B, SANDAG has calculated the number of minority and low-income boardings taken with each fare product that is currently offered by MTS or NCTD. This data was obtained from the 2015 SANDAG On-Board Transit Survey and annual calculations of ridership by fare product. More recent data was scheduled to be collected in 2020, but that survey was postponed due to the COVID-19 pandemic and has not yet been completed.

This On-Board Survey effort involved two types of surveys with bus and rail riders in the San Diego Service area: on-to-off counts and an origin-destination survey. Surveys were conducted on the Metropolitan Transit System (MTS) Bus, MTS Rail (Trolley), NCTD BREEZE, NCTD COASTER, and NCTD SPRINTER. Overall, over 88,000 On-to-Off Counts Surveys and nearly 33,900 Origin-Destination Surveys were completed. Both surveys were carried out by ETC Institute on behalf of SANDAG between February 2015 and December 2015. The demographic and fare payment information in the survey provided SANDAG with the percentage of riders for each fare product who are considered to be a minority or a low-income rider.

The information from the On-Board Survey is combined with calculations on the boardings by fare product based on farebox data, APC data, and annual surveys of fare use. This provides information on the boardings by fare product and allows calculation of the number of boardings by fare product for minority and low-income individuals.

#### **Effects of Youth Opportunity Pass**

As the Youth Opportunity Pass will only be available to riders currently eligible for the MTS/NCTD Youth fare, its specific effects on the population of concern were assessed. The Comprehensive Fare Ordinance and the 2004 TransNet Extension Ordinance define a youth rider as any transit rider between the ages of 6 and 18 (inclusive). Riders under 6 years old already receive free rides with an accompanying adult, whereas riders aged 19 and older must pay the full Adult fare. This fare change does not include any increased fares, and the analysis finds that there is no disparate impact or disproportionate burden, as detailed below.

As defined by SANDAG's policy, the existence, or non-existence, of disparate impacts to the minority populations is determined by whether the proportion of minority persons adversely affected by the change exceeds the average proportion of minority persons in the analysis service area by more than 10%. To determine this,

individuals facing a fare increase were considered to be adversely affected by the fare change. The proportion of minority persons adversely affected by the change was calculated based on the number of minority persons who faced a fare increase and the total number of riders who faced a fare increase. The average proportion of minority persons in the analysis service area was calculated as the proportion that minority persons made up of all riders.

A second analysis estimates the proportion of the fare increase burden born by minority persons compared with the proportion that minority persons make up of all riders. A fare change which has a price reduction (such as the Youth Opportunity Pass) shows a negative number in these columns as it reduces the burden on riders, while a fare change which has a price increase shows a positive number as it increases the burden on riders. The calculations were performed separately for all riders and for minority persons, and these totals were then used to estimate the proportion of the fare increase burden born by minority persons. This was compared with the average proportion of minority persons in the analysis service area, as discussed above.

#### The key results are as follows:

- The Youth Opportunity Pass program is proposed to be free for eligible riders, so no fare increase is associated with the proposal.
- The proportion of minority persons adversely affected by the change is 0%, and the proportion of the fare increase burden born by minority persons is 0%
- The average proportion of minority persons in the analysis service area is: 84.39%
- As the proportion of minority persons adversely affected by the change does not exceed the average proportion of minority persons in the analysis service area by more than 10%, there is **no disparate impact**.
- As the proportion of the fare increase burden born by minority persons does not exceed the average proportion of minority persons in the analysis service area by more than 10%, this confirms that there is **no disparate impact**.

As defined by SANDAG's policy, the existence, or non-existence, of a disproportionate burden on low-income riders is determined by whether the proportion of low-income persons adversely affected by the change exceeds the average proportion of low-income persons in the analysis service area by more than 10%. To determine this, individuals facing a fare increase were considered to be adversely affected by the fare change. The proportion of low-income persons adversely affected by the change was calculated based on the number of low-income persons who faced a fare increase and the total number of riders who faced a fare increase. The average proportion of low-income persons in the analysis service area was calculated as the proportion that low-income persons made up of all riders.

A second analysis estimates the proportion of the fare increase burden born by low-income persons compared with the proportion that low-income persons make up of all riders. A fare change which has a price reduction (such as the Youth Opportunity Pass) shows a negative number in these columns as it reduces the burden on riders, while a fare change which has a price increase shows a positive number as it increases the burden on riders. The calculations were performed separately for all riders and for low-income persons, and these totals were then used to estimate the proportion of the fare increase burden born by low-income persons. This was compared with the average proportion of low-income persons in the analysis service area, as discussed above.

The key results are as follows:

- The Youth Opportunity Pass program is proposed to be free for eligible riders, so no fare increase is associated with the proposal.
- Therefore, the proportion of low-income persons adversely affected by the change is 0%, and the proportion of the fare increase burden born by low-income persons is 0%
- The average proportion of low-income persons in the analysis service area is: 76.36%
- As the proportion of low-income persons adversely affect by the change does not exceed the average proportion of low-income persons in the analysis service area by more than 10%, there is **no disproportionate burden**.
- As the proportion of the fare increase burden born by low-income persons
  does not exceed the average proportion of low-income persons in the
  analysis service area by more than 10%, this confirms that there is no
  disproportionate burden.

### Effects of SPRINTER/BREEZE Pass

As the SPRINTER/BREEZE Pass will only be available to riders on NCTD's BREEZE bus service and SPRINTER hybrid rail service, its specific effects on the population of concern were assessed. The new fare is a discounted monthly pass for riders who do not utilize the MTS services included in the Regional Monthly Pass. This fare change does not include any increased fares, and the analysis finds that there is no disparate impact or disproportionate burden, as detailed below.

As defined by SANDAG's policy, the existence, or non-existence, of disparate impacts to the minority populations is determined by whether the proportion of minority persons adversely affected by the change exceeds the average proportion of minority persons in the analysis service area by more than 10%. To determine this, individuals facing a fare increase were considered to be adversely affected by the fare change. The proportion of minority persons adversely affected by the change

was calculated based on the number of minority persons who faced a fare increase and the total number of riders who faced a fare increase. The average proportion of minority persons in the analysis service area was calculated as the proportion that minority persons made up of all riders.

A second analysis estimates the proportion of the fare increase burden born by minority persons compared with the proportion that minority persons make up of all riders. A fare change which has a price reduction (such as the SPRINTER/BREEZE Pass) shows a negative number in these columns as it reduces the burden on riders, while a fare change which has a price increase shows a positive number as it increases the burden on riders. The calculations were performed separately for all riders and for minority persons, and these totals were then used to estimate the proportion of the fare increase burden born by minority persons. This was compared with the average proportion of minority persons in the analysis service area, as discussed above.

The key results are as follows:

- The SPRINTER/BREEZE pass reduces the fare for riders who purchase a monthly pass, so no fare increase is associated with the proposal, and the proportion of minority persons adversely affected by the change is 0%
- The proportion of the fare increase burden born by minority persons is 0%
- The average proportion of minority persons in the analysis service area is 66.89%
- As the proportion of minority persons adversely affected by the change does not exceed the average proportion of minority persons in the analysis service area by more than 10%, there is **no disparate impact**.
- As the proportion of the fare increase burden born by minority persons does not exceed the average proportion of minority persons in the analysis service area by more than 10%, this confirms that there is **no disparate impact**.

As defined by SANDAG's policy, the existence, or non-existence, of a disproportionate burden on low-income riders is determined by whether the proportion of low-income persons adversely affected by the change exceeds the average proportion of low-income persons in the analysis service area by more than 10%. To determine this, individuals facing a fare increase were considered to be adversely affected by the fare change. The proportion of low-income persons adversely affected by the change was calculated based on the number of low-income persons who faced a fare increase and the total number of riders who faced a fare increase. The average proportion of low-income persons in the analysis service area was calculated as the proportion that low-income persons made up of all riders.

A second analysis estimates the proportion of the fare increase burden born by low-income persons compared with the proportion that low-income persons make up of

all riders. A fare change which has a price reduction (such as the SPRINTER/BREEZE Pass) shows a negative number in these columns as it reduces the burden on riders, while a fare change which has a price increase shows a positive number as it increases the burden on riders. The calculations were performed separately for all riders and for low-income persons, and these totals were then used to estimate the proportion of the fare increase burden born by low-income persons. This was compared with the average proportion of low-income persons in the analysis service area, as discussed above.

The key results are as follows:

- The SPRINTER/BREEZE pass reduces the fare for riders who purchase a monthly pass, so no fare increase is associated with the proposal, and the proportion of low-income persons adversely affected by the change is 0%
- The proportion of the fare increase burden born by low-income persons is 0%
- The average proportion of low-income persons in the analysis service area is: 71.11%
- As the proportion of low-income persons adversely affect by the change does not exceed the average proportion of low-income persons in the analysis service area by more than 10%, there is **no disproportionate burden**.
- As the proportion of the fare increase burden born by low-income persons does not exceed the average proportion of low-income persons in the analysis service area by more than 10%, this confirms that there is no disproportionate burden.

# Analysis of Community Outreach Program

SANDAG, MTS, and NCTD are working proactively with community-based organizations from throughout the region to distribute fare media for and disseminate information about the *Youth Opportunity Pass* program to eligible riders who may have difficulty obtaining fare media otherwise.

Through the PRONTO system, riders can validate their fare by tapping a physical fare card on buses or on rail platforms, or by scanning a virtual fare card from the PRONTO mobile app. SANDAG and its partners are working collaboratively to teach eligible riders how to use the PRONTO mobile app and distribute physical fare cards to eligible riders who need them. Through partnerships with regional transit operators, schools, and community-based organizations, we can effectively reach eligible youth from across the county.

Participating outreach partners include, but are not limited to:

SANDAG

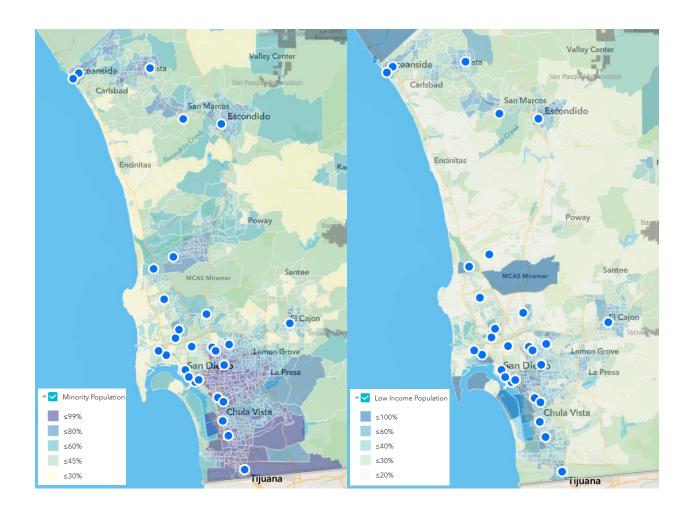
MTS

- NCTD
- San Diego County Office of Education
- San Diego County Department of Child and Welfare Services
- Office of County Supervisor Nora Vargas
- San Diego Unified School District
- Sweetwater Union High School District
- Environmental Health Coalition
- Mid-City CAN
- Alliance for Regional Solutions
- Bayside Community Center
- Casa Familiar
- Chula Vista Community
   Collaborative
- City Heights Community
  Development Corporation
- El Cajon Collaborative

- National Latino Research Center (California State University San Marcos)
- Nile Sisters Development Initiative
- Olivewood Gardens
- Samahan Health Centers
- Urban Collaborative Project
- Vista Community Clinic
- Kind Hearts
- Barrio Logan College Institute
- San Diego Youth Services
- Altus Schools
- The Preuss School, UCSD
- Bike Clairemont
- The Children's Initiative
- Doors of Change
- Marine Corps Community Services, MCRD San Diego

To determine whether a disparate impact or disproportionate burden is anticipated, the percentages of minority and low-income block groups with access to outreach partners were compared to the percentages of non-minority and non-low-income block groups with access to outreach partners.

The analysis found that there is no disparate impact or disproportionate burden found with the proposed outreach partners as non-minority or non-low-income block groups did not have greater access to the proposed outreach partners than minority and low-income block groups. In fact, higher percentages of minority and low-income block groups will have access to the proposed outreach partners once they are fully engaged. See maps attached below for more detail.



As is evident through the maps and analysis, almost all of SANDAG's outreach partners serve communities with high concentrations of minority residents and/or low-income residents. Additionally, many of these organizations operate within a wider sphere of influence than one location. Providing these additional options for minority and low-income communities ensures that there is no disparate impact or disproportionate burden. SANDAG's partnership with these groups will make it easier than ever for youth in low-income and minority neighborhoods to access transit.

# Title VI Equity Analysis for Fare Changes Proposed for 2023

SAN DIEGO ASSOCIATION OF GOVERNMENTS
OCTOBER 20, 2023

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# **Purpose of Analysis**

Pursuant to the San Diego Association of Government's (SANDAG) Board Policy No. 018, and in accordance with federal Title VI civil rights requirements (Federal Transit Administration Circular 4702.1B, October 1, 2012), SANDAG is responsible for evaluating whether any proposed change to the Fare Ordinance will have a disparate impact on minorities (based on race, color, or national origin) or result in a disproportionate burden on low-income persons. Pursuant to the FTA Circular and the FTA Title VI FAQ dated December 2012, the Fare Equity Analysis is conducted for fixed route transit, including both bus and rail services.

#### **SANDAG Title VI Requirements**

SANDAG's Board Policy No. 018 outlines the process for determining whether a fare change has a disparate impact on minorities or a disproportionate burden on low-income individuals. An adverse effect could include a fare increase, additional fee, or a fare discount that is not equitably available.

SANDAG will determine the existence of disparate impacts to minority populations for all Fare Ordinance changes. Pursuant to Title VI of the Civil Rights Act of 1964, a disparate impact exists when minority populations are adversely affected by a fare change at a higher rate than non-minority populations. A ten percent threshold between minority and non-minority populations is used to determine this disparity. SANDAG and the transit operators cannot implement a fare change found to have a disparate impact on minority populations unless there is substantial legitimate justification for the proposed change *and* there are no more equitable alternatives to accomplish said justification.

Additionally, SANDAG will determine the existence of disproportionate burdens on low-income populations for all Fare Ordinance changes. Pursuant to Executive Order 12898 a disproportionate burden exists when low-income populations are adversely affected by a fare change at a higher rate than non-low-income populations. A ten percent threshold between low-income and non-low-income populations is used to determine this disparity. SANDAG defines a low-income person as someone whose household income is below 200 percent of the federal poverty level. SANDAG and the transit operators cannot implement a fare change found to have a disproportionate burden on low-income populations unless we take steps to avoid, minimize, or mitigate impacts where practicable, and provide a description of alternatives available to low-income populations affected by the fare changes.

In accordance with FTA guidance, this analysis does not contemplate an assessment of the relative equity of the fare structure *as it exists today*, only of whether the proposed changes are themselves equitable.

### **Description of Proposed Fare Changes**

SANDAG and the North County Transit District (NCTD) are proposing to implement a new fare type for COASTER commuter rail service. Recently, NCTD launched the COASTER Multi-Day Packs ticketing options on a pilot basis. These options allow riders to purchase a package of regional day passes to use within an allotted time:

- The COASTER 5-Pack product provides unlimited COASTER travel on five individual days of travel and includes transfers to all other MTS and NCTD fixed route transit services. The pass must be used within 30 days of purchase. The pass costs \$45 for adult riders and \$22.50 for senior, disabled, and Medicare riders who qualify for a reduced fare.
- The COASTER 10-Pack product provides unlimited COASTER travel on ten individual days of travel and includes transfers to all other MTS and NCTD fixed route transit services. The pass must be used within 60 days of purchase. The pass costs \$75 for adult riders and \$37.50 for senior, disabled, or Medicare riders who qualify for a reduced fare.
- These prices are subject to change, although they would always maintain a
  discount compared to price of full-cost day passes. This analysis was
  conducted using the fare as currently priced.

These new fare products complement the fare change made by NCTD in 2022 that introduced a new fare type, the SPRINTER/BREEZE Monthly Pass, to address the needs of frequent riders on NCTD's other bus and hybrid rail services and provide a discount compared to the Regional Monthly Pass. Like these new COASTER fare products, it provides financial benefits to frequent riders of NCTD's other services. This year's new fare types extend that discount to semi-frequent COASTER riders as well.

These new fare products are not likely to impose disparate impacts to minority riders or disproportionate burden to low-income riders, as they are fare discounts that are accessible to all riders of COASTER service and do not increase fares for any group of riders or service. The analysis that follows finds that the fare changes proposed for 2023 impose no disparate impact or disproportionate burden.

**Table 1: Current Fare Structure and Proposed Changes** 

			Fa	are			Cha	nge
Fare Type	Proposed Change	Ex	isting	Pr	oposed	Abs	solute	Percent
Regional Adult One-Way	No change	\$	2.50	\$	2.50	\$	-	0%
Regional Youth One-Way*	No change	\$	1.25	\$	1.25	\$	-	0%
Regional SDM One-Way	No change	\$	1.25	\$	1.25	\$	-	0%
Premium Regional Adult One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
Premium Regional Youth One-Way*	No change	\$	2.50	\$	2.50	\$	-	0%
Premium Regional SDM One-Way	No change	\$	2.50	\$	2.50	\$	-	0%
MTS Rural Adult One-Way	No change	\$	8.00	\$	8.00	\$	-	0%
MTS Rural Youth One-Way*	No change	\$	4.00	\$	4.00	\$	-	0%
MTS Rural SDM One-Way	No change	\$	4.00	\$	4.00	\$	-	0%
Coaster Zone 1 Adult One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
Coaster Zone 1 Youth One-Way*	No change	\$	2.50	\$	2.50	\$	-	0%
Coaster Zone 1 SDM One-Way	No change	\$	2.50	\$	2.50	\$	-	0%
Coaster Zone 2 Adult One-Way	No change	\$	5.75	\$	5.75	\$	-	0%
Coaster Zone 2 Youth One-Way*	No change	\$	2.75	\$	2.75	\$	-	0%
Coaster Zone 2 SDM One-Way	No change	\$	2.75	\$	2.75	\$	-	0%
Coaster Zone 3 Adult One-Way	No change	\$	6.50	\$	6.50	\$	-	0%
Coaster Zone 3 Youth One-Way*	No change	\$	3.25	\$	3.25	\$	-	0%
Coaster Zone 3 SDM One-Way	No change	\$	3.25	\$	3.25	\$	-	0%
MTS Access One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
NCTD Lift One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
Regional Adult Day Pass	No change	\$	6.00	\$	6.00	\$	-	0%
Regional SDM Day Pass	No change	\$	3.00	\$	3.00	\$	-	0%
Premium Regional Adult Day Pass	No change	\$	12.00	\$	12.00	\$	-	0%
Premium Regional SDM Day Pass	No change	\$	6.00	\$	6.00	\$	-	0%
Coaster Adult Day Pass	No change	\$	15.00	\$	15.00	\$	-	0%
Coaster SDM Day Pass	No change	\$	7.50	\$	7.50	\$	-	0%
Coaster Adult 5-Pack	New fare		N/A	\$	45.00		N/A	N/A
Coaster SDM 5-Pack	New fare		N/A	\$	22.50		N/A	N/A
Coaster Adult 10-Pack	New fare		N/A	\$	75.00		N/A	N/A
Coaster SDM 10-Pack	New fare		N/A	\$	37.50		N/A	N/A
Regional Adult Monthly Pass	No change	\$	72.00	\$	72.00	\$	-	0%
Regional SDM Monthly Pass	No change	\$	23.00	\$	23.00	\$	-	0%
Premium Regional Adult Monthly Pass	No change	\$	100.00	\$	100.00	\$	-	0%
Premium Regional SDM Monthly Pass	No change	\$	32.00	\$	32.00	\$	-	0%
Coaster Zone 1 Adult Monthly Pass	No change	\$	140.00	\$	140.00	\$	-	0%
Coaster Zone 2 Adult Monthly Pass	No change	\$	161.00	\$	161.00	\$	-	0%
Coaster Zone 3 Adult Monthly Pass	No change		182.00		182.00	\$	-	0%
Coaster SDM Monthly Pass	No change	\$	58.00	\$	58.00	\$	-	0%
Sprinter/Breeze Adult Monthly Pass	No change	\$	59.00	\$	59.00	\$	-	0%
Sprinter/Breeze SDM Monthly Pass	No change	\$	19.00	\$	19.00	\$	-	0%
Youth Opportunity Pass	No change	\$	-	\$	-	\$	-	0%
*available as a cash fare only; PRONTO u		1	tunity <sup>r</sup>		free for			

# **Dataset and Methodology**

Consistent with existing policy, the number of minority and low-income boardings by fare type was calculated for this analysis. This data was obtained from the 2015 SANDAG On-Board Transit Survey and annual calculations of ridership by fare product. SANDAG is currently in the process of updating the On-Board Transit Survey as the schedule was affected by the COVID-19 pandemic. While some ridership patterns have changed due to the pandemic, ridership demographics are not expected to have considerably shifted, so this data is reasonably accurate for the purposes of this analysis

This On-Board Survey effort included on-off counts and an origin-destination survey for bus and rail riders in the San Diego region service area. Surveys were conducted on MTS Bus, MTS Rail (Trolley), NCTD BREEZE, NCTD COASTER, and NCTD SPRINTER. Overall, over 88,000 On-to-Off Counts Surveys and nearly 34,000 Origin-Destination Surveys were administered by ETC Institute on behalf of SANDAG between February 2015 and December 2015. The demographic and fare payment information in the survey provided SANDAG with the percentage of riders using each fare product who are a minority or a low-income rider.

The information from the On-Board Survey is combined with calculations on the boardings by fare product based on farebox data, automated passenger counter (APC) data, and annual surveys of fare use. This provides information on the boardings by fare product and allows calculation of the number of boardings by fare product for minority and low-income individuals.

## **Effects on Minority Populations**

The FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

As defined by SANDAG's policy the existence of disparate impacts to the minority populations is determined by whether the proportion of minority persons adversely affected by the change exceeds the proportion of non-minority persons adversely affected by the change by more than 10%. To determine this, individuals facing a fare increase are considered adversely affected by the fare change. The proportion of minority persons adversely affected by the change was calculated based on the number minority persons who faced a fare increase and the total number of transit system users who are minority persons. The proportion of non-minority persons adversely affected by the change was calculated based on the number of non-minority persons who faced a fare increase and the total number of transit system users who are non-minority persons. The key results are as follows:

**Table 2: Disparate Impact Evaluation** 

	Total riders in service	Riders facing fare	Percent facing fare
	area	increase	increase
Minority	1,086	0	0.0%
Non-minority	2,682	0	0.0%

As shown in Table 2, no riders will face a fare increase, so no population is adversely affected. Therefore, the proportion of minority persons affected by the fare change is 0.0%, and the proportion of non-minority persons affected by the fare change is also 0.0%. As the proportion of minority persons adversely affected by the change does not exceed the proportion of non-minority persons adversely affected by the change, **there is no disparate impact**.

A second calculation was conducted to estimate the proportion of the fare increase burden borne by minority persons compared with the proportion that minority persons make up of all riders. Since this change does not include any fare increases, no population bears the burden of increased fares, and **there is no disparate impact**.

**Table 3: Minority Fare Usage** 

	Minority	Non-minority	Benefit from change?
One-way	14.4%	19.1%	Yes, if taking at least 10 one-way
			trips per month
Regional Day	9.9%	10.4%	Yes, if purchasing at least 5 day
			passes per month
SPRINTER/BREEZE	1.4%	0.4%	Yes, if riding COASTER at least 5
			days per month
Regional Monthly	5.4%	6.0%	Yes, if riding COASTER at least 5
			days per month
COASTER Monthly	63.7%	60.9%	Yes, if riding COASTER between 5
			and 10 days per month
Other	5.2%	3.2%	Unknown based on fare
Total	100% of	100% of non-	
	minority riders	minority riders	

According to SANDAG's most recent onboard survey detailed in Table 3, minority COASTER riders were less likely than non-minority riders to use one-way fares and slightly more likely to use COASTER monthly passes when paying for their fare. Other categories of fare were similar in distribution among minority and non-minority riders. Depending on the frequency of each rider's COASTER trips, this pass can provide benefits for both types of commuters.

#### **Effects on Low-Income Populations**

The FTA defines a low-income person as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines but encourages local agencies to use a locally developed threshold that may be broader. SANDAG defines a low-income person as a person whose household income is below 200% of the federal poverty level according to HHS poverty guidelines.

As defined by SANDAG's policy, the existence of a disproportionate burden on low-income riders is determined by whether the proportion of low-income persons adversely affected by the change exceeds the proportion of non-low-income persons adversely affected by the change by more than 10%. To determine this, individuals facing a fare increase are considered adversely affected by the fare change. The proportion of low-income persons adversely affected by the change is calculated based on the number low-income persons who faced a fare increase and the total number of transit system users who are low-income. The proportion of non-low-income persons adversely affected by the change was calculated based on the number of non-low-income persons who faced a fare increase and the total number of transit system users who are non-low-income persons. The key results are as follows:

**Table 4: Disproportionate Burden Evaluation** 

	Total riders in service	Riders facing fare	Percent facing fare
	area	increase	increase
Low-income	389	0	0.0%
Non-low-income	3,028	0	0.0%

As shown in Table 4, no riders will face a fare increase, so no population is adversely affected. Therefore, the proportion of low-income persons affected by the fare change is 0.0%, and the proportion of non-low-income persons affected by the fare change is also 0.0%. As the proportion of low-income persons adversely affected by the change does not exceed the proportion of non-low-income persons adversely affected by the change, **there is no disproportionate burden**.

A second calculation was conducted to estimate the proportion of the fare increase burden borne by low-income persons compared with the proportion that low-income persons make up of all riders. Since this change does not include any fare increases, no population bears the burden of increased fares, and **there is no disproportionate burden**.

Table 5: Low-Income Fare Usage

One-way	32.4%	16.7%	Yes, if taking at least 10 one-way
			trips per month
Regional Day	15.7%	9.5%	Yes, if purchasing at least 5 day
			passes per month
SPRINTER/BREEZE	0.5%	0.7%	Yes, if riding COASTER at least 5
			days per month
Regional Monthly	1.0%	6.2%	Yes, if riding COASTER at least 5
			days per month
COASTER Monthly	44.5%	63.5%	Yes, if riding COASTER between
			5 and 10 days per month
Other	5.9%	3.5%	Unknown based on fare
Total	100% of	100% of non-	
	minority riders	minority riders	

According to SANDAG's most recent onboard survey and detailed in Table 5, low-income COASTER riders were less likely than non-low-income riders to use regional monthly passes or COASTER monthly passes and more likely to use one-way fares and regional day passes when paying for their fare. Other categories of fare were similar in distribution among low-income and non-low-income riders. This suggests that low-income riders are more sensitive to a larger upfront cost than non-low-income riders. Depending on the frequency of each rider's COASTER trips and the ability for low-income riders to afford the upfront cost of a pass, this pass can provide benefits for both types of commuters.

#### **Other Considerations**

While these fare changes do not pose a disparate impact or disproportionate burden for minority or low-income riders, NCTD, MTS, and SANDAG must continue to ensure that the region's transit system and fare structure remain equitable for those riders.

One of the most reliable ways to increase equity for transit riders is to provide frequent and reliable service on popular transit routes. While these fare changes reduce financial burden for COASTER riders, they do not address the frequency or schedule of COASTER service. The COASTER still maintains a relatively commuter-focused schedule, running fifteen round-trips per weekday with frequencies as short as 20 minutes during the morning and evening rush hours but up to 140 minutes midday. However, the current schedule is a major improvement over prior schedules when fewer COASTER trains ran throughout the day, almost exclusively at commuting hours. SANDAG and NCTD have made investments in the coastal rail line, upgrading infrastructure and purchasing new trainsets to expand service and offer transportation options to a variety of travel markets at more hours of the day and night. Further improvements to COASTER service are identified in the 2021

Regional Plan that will transform the rail line into a true regional rail service, offering all-day service every 20 minutes for riders to access jobs, education, and recreation without being confined to a typical commuting schedule.

Table 6: Expected discounts for COASTER riders using new fares

5-times per month Coaster rider							
1 mo	Day	passes	М	onthly	5-pac	k	Discount
Adult	\$	75.00	\$	182.00	\$ 45	.00	40%
SDM	\$	37.50	\$	58.00	\$ 22	.50	40%
2 mo	Day	passes	М	onthly	10-pa	ick	Discount
Adult	\$	150.00	\$:	364.00	\$ 75	.00	50%
SDM	\$	75.00	\$	116.00	\$ 37	.50	50%
10-time	es pe	er month	Coa	aster rid	er		
Ea mo	Day	passes	М	onthly	10-pa	ick	Discount
Adult	\$	150.00	\$	182.00	\$ 75	.00	50%
SDM	\$	75.00	\$	58.00	\$ 37	.50	35%

While the equity of the current fare system is specifically excluded from this analysis per FTA regulations and SANDAG board policy, it is important to note the relative equity of COASTER service changes compared to changes to other transit services offered by NCTD. On average, COASTER riders are more likely to be white and less likely to be low-income than riders of other NCTD's other fixed-route transit services, BREEZE and SPRINTER. While a decrease in fare does not pose a disparate impact or disproportionate burden, it should be taken into consideration that discounts to fares for services used predominantly by riders who are disproportionately white and affluent while maintaining the existing fare structure for services predominantly used by riders who are more likely to be minority and low-income could, over time, pose an equity issue. Of the services operated by NCTD, the COASTER is the most expensive both to ride and to operate. This new fare is designed to reduce cost barriers and make COASTER service more affordable to occasional passengers, especially low-income and minority populations protected by Title VI, as shown in Table 6. While not a direct analog, these new fares complement the SPRINTER/ BREEZE monthly pass that provides a discount of 18 percent for most riders when compared to the Regional monthly pass.

COASTER service is also not subject to regional fare capping programs, while other NCTD services SPRINTER and BREEZE, as well as all MTS services, do participate. Additional intermediate fare products may help reduce the disparities between infrequent, occasional, and regular COASTER riders. As many low-income riders are unable to purchase full-fare monthly passes, they rely more on the new regional fare capping system. However, there is still a large difference in price between one-way fares or day passes and the new COASTER Packs. Depending on the overall cost burden for each rider, this may provide an opportunity to purchase fares in bulk

while not having to purchase a full monthly pass. Many low-income riders, however, may still be unable to afford the upfront cost of a 5-Pack or 10-Pack, and will continue to rely on one-way fares or single day passes. Future inclusion of COASTER in the regional fare capping program could be considered as a strategy to promote fare equity in a way that is simple and understandable for riders.

SANDAG, MTS, and NCTD will continue to collaborate to ensure equity in every aspect of the regional transit system, including fares, routes, frequencies, and amenities. The agencies have recently taken steps to promote equity within the transit system, including the Social Equity Early Action Transit Pilot, which includes the Youth Opportunity Pass, expanding service on the COASTER, and providing new rail service to UC San Diego and UTC with a direct connection to the U.S.-Mexico border via the Mid-Coast Extension of the Blue Line trolley. SANDAG is currently evaluating the system's fare structure to determine the feasibility and potential benefits and concerns of targeted fare subsidies as another way to promote equity for those who struggle to pay for transit while maintaining the crucial operating funding that fares provide.

# Appendix A: Transit Ridership and Fare Data

The following data that was used for this Title VI Equity Analysis was collected as part of SANDAG's 2015 Onboard Transit Survey, the most recent data available at the time of the analysis.

# **COASTER Riders**

#### Fare Type Including Discounts \* Those in Poverty - 200% Crosstabulation

			Thos	se in / - 200%	Total
			No	Yes	TOtal
		Count	446	96	542
	0	% within Fare Type Including Discounts	82.3%	17.7%	100.0%
	One-way	% within Those in Poverty - 200%	14.7%	24.7%	15.9%
		% of Total	13.1%	2.8%	15.9%
		Count	60	30	90
	One way CDM	% within Fare Type Including Discounts	66.7%	33.3%	100.0%
	One-way-SDM	% within Those in Poverty - 200%	2.0%	7.7%	2.6%
		% of Total	1.8%	0.9%	2.6%
	Regional Day	Count	146	37	183
		% within Fare Type Including Discounts	79.8%	20.2%	100.0%
		% within Those in Poverty - 200%	4.8%	9.5%	5.4%
		% of Total	4.3%	1.1%	5.4%
Fare Type Including Discounts	Regional Plus Day	Count	141	24	165
		% within Fare Type Including Discounts	85.5%	14.5%	100.0%
		% within Those in Poverty - 200%	4.7%	6.2%	4.8%
		% of Total	4.1%	0.7%	4.8%
		Count	3	0	3
	SPRINTER/BREEZE Day-	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
	SDM	% within Those in Poverty - 200%	0.1%	0.0%	0.1%
		% of Total	0.1%	0.0%	0.1%
		Count	149	4	153
	Dogianal Marthly	% within Fare Type Including Discounts	97.4%	2.6%	100.0%
	Regional Monthly	% within Those in Poverty - 200%	4.9%	1.0%	4.5%
		% of Total	4.4%	0.1%	4.5%
	Regional Monthly-SDM	Count	34	0	34

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	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
	% within Those in Poverty - 200%	1.1%	0.0%	1.0%
,	% of Total	1.0%	0.0%	1.0%
	Count	4	0	4
Rapid Express Regional	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
Monthly-SDM	% within Those in Poverty - 200%	0.1%	0.0%	0.1%
	% of Total	0.1%	0.0%	0.1%
	Count	17	2	19
SPRINTER/BREEZE	% within Fare Type Including Discounts	89.5%	10.5%	100.0%
Monthly	% within Those in Poverty - 200%	0.6%	0.5%	0.6%
	% of Total	0.5%	0.1%	0.6%
	Count	78	20	98
COACTED Marriell	% within Fare Type Including Discounts	79.6%	20.4%	100.0%
COASTER Monthly - 1 Zone	% within Those in Poverty - 200%	2.6%	5.1%	2.9%
	% of Total	2.3%	0.6%	2.9%
	Count	414	37	451
	% within Fare Type Including Discounts	91.8%	8.2%	100.0%
COASTER Monthly - 2 Zone	% within Those in Poverty - 200%	13.7%	9.5%	13.2%
	% of Total	12.1%	1.1%	13.2%
	Count	1112	72	1184
COACTED Mary 11 7.7	% within Fare Type Including Discounts	93.9%	6.1%	100.0%
COASTER Monthly - 3 Zone	% within Those in Poverty - 200%	36.7%	18.5%	34.7%
	% of Total	32.5%	2.1%	34.7%
	Count	11	7	18
COASTER Youth Monthly	% within Fare Type Including Discounts	61.1%	38.9%	100.0%
	% within Those in Poverty - 200%	0.4%	1.8%	0.5%

		% of Total	0.3%	0.2%	0.5%
	COASTER S/D/M Monthly  College	Count	307	37	344
		% within Fare Type Including Discounts	89.2%	10.8%	100.0%
		% within Those in Poverty - 200%	10.1%	9.5%	10.1%
		% of Total	9.0%	1.1%	10.1%
		Count	7	0	7
		% within Fare Type Including Discounts	100.0%	0.0%	100.0%
		% within Those in Poverty - 200%	0.2%	0.0%	0.2%
		% of Total	0.2%	0.0%	0.2%
		Count	28	14	42
	Employee	% within Fare Type Including Discounts	66.7%	33.3%	100.0%
		% within Those in Poverty - 200%	0.9%	3.6%	1.2%
		% of Total	0.8%	0.4%	1.2%
		Count	71	9	80
		% within Fare Type Including Discounts	88.8%	11.3%	100.0%
		% within Those in Poverty - 200%	2.3%	2.3%	2.3%
		% of Total	2.1%	0.3%	2.3%
		Count	3028	389	3417
Total		% within Fare Type Including Discounts	88.6%	11.4%	100.0%
		% within Those in Poverty - 200%	100.0%	100.0%	100.0%
		% of Total	88.6%	11.4%	100.0%

#### Fare Type Including Discounts \* Minority Crosstabulation

			Minority		Total
			No	Yes	Total
Fare Type Including Discounts	One-way	Count	446	125	571
		% within Fare Type Including Discounts	78.1%	21.9%	100.0%
		% within Minority	16.6%	11.5%	15.2%
		% of Total	11.8%	3.3%	15.2%

	One-way-SDM	Count	67	31	98
		% within Fare Type Including Discounts	68.4%	31.6%	100.0%
		% within Minority	2.5%	2.9%	2.6%
		% of Total	1.8%	0.8%	2.6%
	Regional Day _	Count	145	56	201
		% within Fare Type Including Discounts	72.1%	27.9%	100.0%
		% within Minority	5.4%	5.2%	5.3%
		% of Total	3.8%	1.5%	5.3%
	Regional Plus Day	Count	133	52	185
		% within Fare Type Including Discounts	71.9%	28.1%	100.0%
		% within Minority	5.0%	4.8%	4.9%
		% of Total	3.5%	1.4%	4.9%
	SPRINTER/BREEZE Day	Count	0	4	4
		% within Fare Type Including Discounts	0.0%	100.0%	100.0%
		% within Minority	0.0%	0.4%	0.1%
		% of Total	0.0%	0.1%	0.1%
	SPRINTER/BREEZE Day- SDM -	Count	0	3	3
		% within Fare Type Including Discounts	0.0%	100.0%	100.0%
		% within Minority	0.0%	0.3%	0.1%
		% of Total	0.0%	0.1%	0.1%
		Count	131	39	170
	Regional Monthly	% within Fare Type Including Discounts	77.1%	22.9%	100.0%
		% within Minority	4.9%	3.6%	4.5%
-		% of Total	3.5%	1.0%	4.5%
		Count	27	20	47
	Regional Monthly-SDM _	% within Fare Type Including Discounts	57.4%	42.6%	100.0%
		% within Minority	1.0%	1.8%	1.2%
		% of Total	0.7%	0.5%	1.2%
		Count	4	0	4
	Rapid Express Regional Monthly-SDM	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
		% within Minority	0.1%	0.0%	0.1%

		% of Total	0.1%	0.0%	0.1%
		Count	11	8	19
	SPRINTER/BREEZE	% within Fare Type Including Discounts	57.9%	42.1%	100.0%
-	Monthly –	% within Minority	0.4%	0.7%	0.5%
		% of Total	0.3%	0.2%	0.5%
		Count	57	42	99
	COASTER Monthly - 1 Zone _	% within Fare Type Including Discounts	57.6%	42.4%	100.0%
		% within Minority	2.1%	3.9%	2.6%
		% of Total	1.5%	1.1%	2.6%
		Count	309	176	485
	COASTER Monthly - 2 Zone _	% within Fare Type Including Discounts	63.7%	36.3%	100.0%
		% within Minority	11.5%	16.2%	12.9%
		% of Total	8.2%	4.7%	12.9%
		Count	912	386	1298
	COASTER Monthly - 3 Zone	% within Fare Type Including Discounts	70.3%	29.7%	100.0%
	_	% within Minority	34.0%	35.5%	34.4%
		% of Total	24.2%	10.2%	34.4%
		Count	18	6	24
	COASTER Youth Monthly	% within Fare Type Including Discounts	75.0%	25.0%	100.0%
		% within Minority	0.7%	0.6%	0.6%
	-	% of Total	0.5%	0.2%	0.6%
		Count	336	82	418
	COASTER S/D/M Monthly	% within Fare Type Including Discounts	80.4%	19.6%	100.0%
	-	% within Minority	12.5%	7.6%	11.1%
	-	% of Total	8.9%	2.2%	11.1%
		Count	1	9	10
	— College	% within Fare Type Including Discounts	10.0%	90.0%	100.0%
		% within Minority	0.0%	0.8%	0.3%
		% of Total	0.0%	0.2%	0.3%
		Count	19	23	42
	Employee	% within Fare Type Including Discounts	45.2%	54.8%	100.0%

		% within Minority	0.7%	2.1%	1.1%
		% of Total	0.5%	0.6%	1.1%
		Count	66	24	90
	Other	% within Fare Type Including Discounts	73.3%	26.7%	100.0%
		% within Minority	2.5%	2.2%	2.4%
		% of Total	1.8%	0.6%	2.4%
		Count	2682	1086	3768
Total	% within Fare Type Including Discounts	71.2%	28.8%	100.0%	
		% within Minority	100.0%	100.0%	100.0%
		% of Total	71.2%	28.8%	100.0%

# Title VI Equity Analysis for Fare Changes Proposed for 2023

SAN DIEGO ASSOCIATION OF GOVERNMENTS
OCTOBER 20, 2023

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### **Purpose of Analysis**

Pursuant to the San Diego Association of Government's (SANDAG) Board Policy No. 018, and in accordance with federal Title VI civil rights requirements (Federal Transit Administration Circular 4702.1B, October 1, 2012), an evaluation is required to determine whether any proposed change to the Fare Ordinance will have a disparate impact on minorities (based on race, color, or national origin) or result in a disproportionate burden on low-income persons. Pursuant to the FTA Circular and the FTA Title VI FAQ dated December 2012, the Fare Equity Analysis is conducted for fixed route transit, including both bus and rail services.

#### **SANDAG Title VI Requirements**

SANDAG's Board Policy No. 018 outlines the process for determining whether a fare change has a disparate impact on minorities or a disproportionate burden on low-income individuals. An adverse effect could include a fare increase, additional fee, or a fare discount that is not equitably available.

SANDAG will determine the existence of disparate impacts to minority populations for all Fare Ordinance changes. Pursuant to Title VI of the Civil Rights Act of 1964, a disparate impact exists when minority populations are adversely affected by a fare change at a higher rate than non-minority populations. A ten percent threshold between minority and non-minority populations is used to determine this disparity. SANDAG and the transit operators cannot implement a fare change found to have a disparate impact on minority populations unless there is substantial legitimate justification for the proposed change *and* there are no more equitable alternatives to accomplish said justification.

Additionally, SANDAG will determine the existence of disproportionate burdens on low-income populations for all Fare Ordinance changes. Pursuant to Executive Order 12898 a disproportionate burden exists when low-income populations are adversely affected by a fare change at a higher rate than non-low-income populations. A ten percent threshold between low-income and non-low-income populations is used to determine this disparity. SANDAG defines a low-income person as someone whose household income is below 200 percent of the federal poverty level. SANDAG and the transit operators cannot implement a fare change found to have a disproportionate burden on low-income populations unless we take steps to avoid, minimize, or mitigate impacts where practicable, and provide a description of alternatives available to low-income populations affected by the fare changes.

In accordance with FTA guidance, this analysis does not contemplate an assessment of the relative equity of the fare structure *as it exists today*, only of whether the proposed changes are themselves equitable.

### **Description of Proposed Fare Changes**

SANDAG and the North County Transit District (NCTD) are proposing to implement a new fare type for COASTER commuter rail service. Recently, NCTD launched the COASTER Multi-Day Packs ticketing options on a pilot basis. These options allow riders to purchase a package of regional day passes to use within an allotted time:

- The COASTER 5-Pack product provides unlimited COASTER travel on five individual days of travel and includes transfers to all other MTS and NCTD fixed route transit services. The pass must be used within 30 days of purchase. The pass costs \$45 for adult riders and \$22.50 for senior, disabled, and Medicare riders who qualify for a reduced fare.
- The COASTER 10-Pack product provides unlimited COASTER travel on ten individual days of travel and includes transfers to all other MTS and NCTD fixed route transit services. The pass must be used within 60 days of purchase. The pass costs \$75 for adult riders and \$37.50 for senior, disabled, or Medicare riders who qualify for a reduced fare.
- These prices are subject to change, although they would always maintain a
  discount compared to price of full-cost day passes. This analysis was
  conducted using the fare as currently priced.

These new fare products complement the fare change made by NCTD in 2022 that introduced a new fare type, the SPRINTER/BREEZE Monthly Pass, to address the needs of frequent riders on NCTD's other bus and hybrid rail services and provide a discount compared to the Regional Monthly Pass. Like these new COASTER fare products, it provides financial benefits to frequent riders of NCTD's other services. This year's new fare types extend that discount to semi-frequent COASTER riders as well.

These new fare products are not likely to impose disparate impacts to minority riders or disproportionate burden to low-income riders, as they are fare discounts that are accessible to all riders of COASTER service and do not increase fares for any group of riders or service. The analysis that follows finds that the fare changes proposed for 2023 impose no disparate impact or disproportionate burden.

**Table 1: Current Fare Structure and Proposed Changes** 

			Fa	are			Cha	nge
Fare Type	Proposed Change	Ex	isting	Pr	oposed	Abs	solute	Percent
Regional Adult One-Way	No change	\$	2.50	\$	2.50	\$	-	0%
Regional Youth One-Way*	No change	\$	1.25	\$	1.25	\$	-	0%
Regional SDM One-Way	No change	\$	1.25	\$	1.25	\$	-	0%
Premium Regional Adult One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
Premium Regional Youth One-Way*	No change	\$	2.50	\$	2.50	\$	-	0%
Premium Regional SDM One-Way	No change	\$	2.50	\$	2.50	\$	-	0%
MTS Rural Adult One-Way	No change	\$	8.00	\$	8.00	\$	-	0%
MTS Rural Youth One-Way*	No change	\$	4.00	\$	4.00	\$	-	0%
MTS Rural SDM One-Way	No change	\$	4.00	\$	4.00	\$	-	0%
Coaster Zone 1 Adult One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
Coaster Zone 1 Youth One-Way*	No change	\$	2.50	\$	2.50	\$	-	0%
Coaster Zone 1 SDM One-Way	No change	\$	2.50	\$	2.50	\$	-	0%
Coaster Zone 2 Adult One-Way	No change	\$	5.75	\$	5.75	\$	-	0%
Coaster Zone 2 Youth One-Way*	No change	\$	2.75	\$	2.75	\$	-	0%
Coaster Zone 2 SDM One-Way	No change	\$	2.75	\$	2.75	\$	-	0%
Coaster Zone 3 Adult One-Way	No change	\$	6.50	\$	6.50	\$	-	0%
Coaster Zone 3 Youth One-Way*	No change	\$	3.25	\$	3.25	\$	-	0%
Coaster Zone 3 SDM One-Way	No change	\$	3.25	\$	3.25	\$	-	0%
MTS Access One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
NCTD Lift One-Way	No change	\$	5.00	\$	5.00	\$	-	0%
Regional Adult Day Pass	No change	\$	6.00	\$	6.00	\$	-	0%
Regional SDM Day Pass	No change	\$	3.00	\$	3.00	\$	-	0%
Premium Regional Adult Day Pass	No change	\$	12.00	\$	12.00	\$	-	0%
Premium Regional SDM Day Pass	No change	\$	6.00	\$	6.00	\$	-	0%
Coaster Adult Day Pass	No change	\$	15.00	\$	15.00	\$	-	0%
Coaster SDM Day Pass	No change	\$	7.50	\$	7.50	\$	-	0%
Coaster Adult 5-Pack	New fare		N/A	\$	45.00		N/A	N/A
Coaster SDM 5-Pack	New fare		N/A	\$	22.50		N/A	N/A
Coaster Adult 10-Pack	New fare		N/A	\$	75.00		N/A	N/A
Coaster SDM 10-Pack	New fare		N/A	\$	37.50		N/A	N/A
Regional Adult Monthly Pass	No change	\$	72.00	\$	72.00	\$	-	0%
Regional SDM Monthly Pass	No change	\$	23.00	\$	23.00	\$	-	0%
Premium Regional Adult Monthly Pass	No change	\$	100.00	\$	100.00	\$	-	0%
Premium Regional SDM Monthly Pass	No change	\$	32.00	\$	32.00	\$	-	0%
Coaster Zone 1 Adult Monthly Pass	No change	\$	140.00	\$	140.00	\$	-	0%
Coaster Zone 2 Adult Monthly Pass	No change	\$	161.00	\$	161.00	\$	-	0%
Coaster Zone 3 Adult Monthly Pass	No change		182.00		182.00	\$	-	0%
Coaster SDM Monthly Pass	No change	\$	58.00	\$	58.00	\$	-	0%
Sprinter/Breeze Adult Monthly Pass	No change	\$	59.00	\$	59.00	\$	-	0%
Sprinter/Breeze SDM Monthly Pass	No change	\$	19.00	\$	19.00	\$	-	0%
Youth Opportunity Pass	No change	\$	-	\$	-	\$	-	0%
*available as a cash fare only; PRONTO u		1	tunity <sup>r</sup>		s free for			

### **Dataset and Methodology**

Consistent with existing policy, the number of minority and low-income boardings by fare type was calculated for this analysis. This data was obtained from the 2015 SANDAG On-Board Transit Survey and annual calculations of ridership by fare product. SANDAG is currently in the process of updating the On-Board Transit Survey as the schedule was affected by the COVID-19 pandemic. While some ridership patterns have changed due to the pandemic, ridership demographics are not expected to have considerably shifted, so this data is reasonably accurate for the purposes of this analysis

This On-Board Survey effort included on-off counts and an origin-destination survey for bus and rail riders in the San Diego region service area. Surveys were conducted on MTS Bus, MTS Rail (Trolley), NCTD BREEZE, NCTD COASTER, and NCTD SPRINTER. Overall, over 88,000 On-to-Off Counts Surveys and nearly 34,000 Origin-Destination Surveys were administered by ETC Institute on behalf of SANDAG between February 2015 and December 2015. The demographic and fare payment information in the survey provided SANDAG with the percentage of riders using each fare product who are a minority or a low-income rider.

The information from the On-Board Survey is combined with calculations on the boardings by fare product based on farebox data, automated passenger counter (APC) data, and annual surveys of fare use. This provides information on the boardings by fare product and allows calculation of the number of boardings by fare product for minority and low-income individuals.

### **Effects on Minority Populations**

The FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

As defined by SANDAG's policy the existence of disparate impacts to the minority populations is determined by whether the proportion of minority persons adversely affected by the change exceeds the proportion of non-minority persons adversely affected by the change by more than 10%. To determine this, individuals facing a fare increase are considered adversely affected by the fare change. The proportion of minority persons adversely affected by the change was calculated based on the number minority persons who faced a fare increase and the total number of transit system users who are minority persons. The proportion of non-minority persons adversely affected by the change was calculated based on the number of non-minority persons who faced a fare increase and the total number of transit system users who are non-minority persons. The key results are as follows:

**Table 2: Disparate Impact Evaluation** 

	Total riders in service	Riders facing fare	Percent facing fare
	area	increase	increase
Minority	1,086	0	0.0%
Non-minority	2,682	0	0.0%

As shown in Table 2, no riders will face a fare increase, so no population is adversely affected. Therefore, the proportion of minority persons affected by the fare change is 0.0%, and the proportion of non-minority persons affected by the fare change is also 0.0%. As the proportion of minority persons adversely affected by the change does not exceed the proportion of non-minority persons adversely affected by the change, **there is no disparate impact**.

A second calculation was conducted to estimate the proportion of the fare increase burden borne by minority persons compared with the proportion that minority persons make up of all riders. Since this change does not include any fare increases, no population bears the burden of increased fares, and **there is no disparate impact**.

**Table 3: Minority Fare Usage** 

	Minority	Non-minority	Benefit from change?
One-way	14.4%	19.1%	Yes, if taking at least 10 one-way
			trips per month
Regional Day	9.9%	10.4%	Yes, if purchasing at least 5 day
			passes per month
SPRINTER/BREEZE	1.4%	0.4%	Yes, if riding COASTER at least 5
			days per month
Regional Monthly	5.4%	6.0%	Yes, if riding COASTER at least 5
			days per month
COASTER Monthly	63.7%	60.9%	Yes, if riding COASTER between 5
			and 10 days per month
Other	5.2%	3.2%	Unknown based on fare
Total	100% of	100% of non-	
	minority riders	minority riders	

According to SANDAG's most recent onboard survey detailed in Table 3, minority COASTER riders were less likely than non-minority riders to use one-way fares and slightly more likely to use COASTER monthly passes when paying for their fare. Other categories of fare were similar in distribution among minority and non-minority riders. Depending on the frequency of each rider's COASTER trips, this pass can provide benefits for both types of commuters.

### **Effects on Low-Income Populations**

The FTA defines a low-income person as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines but encourages local agencies to use a locally developed threshold that may be broader. SANDAG defines a low-income person as a person whose household income is below 200% of the federal poverty level according to HHS poverty guidelines.

As defined by SANDAG's policy, the existence of a disproportionate burden on low-income riders is determined by whether the proportion of low-income persons adversely affected by the change exceeds the proportion of non-low-income persons adversely affected by the change by more than 10%. To determine this, individuals facing a fare increase are considered adversely affected by the fare change. The proportion of low-income persons adversely affected by the change is calculated based on the number low-income persons who faced a fare increase and the total number of transit system users who are low-income. The proportion of non-low-income persons adversely affected by the change was calculated based on the number of non-low-income persons who faced a fare increase and the total number of transit system users who are non-low-income persons. The key results are as follows:

**Table 4: Disproportionate Burden Evaluation** 

	Total riders in service	Riders facing fare	Percent facing fare
	area	increase	increase
Low-income	389	0	0.0%
Non-low-income	3,028	0	0.0%

As shown in Table 4, no riders will face a fare increase, so no population is adversely affected. Therefore, the proportion of low-income persons affected by the fare change is 0.0%, and the proportion of non-low-income persons affected by the fare change is also 0.0%. As the proportion of low-income persons adversely affected by the change does not exceed the proportion of non-low-income persons adversely affected by the change, **there is no disproportionate burden**.

A second calculation was conducted to estimate the proportion of the fare increase burden borne by low-income persons compared with the proportion that low-income persons make up of all riders. Since this change does not include any fare increases, no population bears the burden of increased fares, and **there is no disproportionate burden**.

**Table 5: Low-Income Fare Usage** 

	Low-income	Non-low-income	Benefit from change?
One-way	32.4%	16.7%	Yes, if taking at least 10 one-way
			trips per month
Regional Day	15.7%	9.5%	Yes, if purchasing at least 5 day
			passes per month
SPRINTER/BREEZE	0.5%	0.7%	Yes, if riding COASTER at least 5
			days per month
Regional Monthly	1.0%	6.2%	Yes, if riding COASTER at least 5
			days per month
COASTER Monthly	44.5%	63.5%	Yes, if riding COASTER between
			5 and 10 days per month
Other	5.9%	3.5%	Unknown based on fare
Total	100% of	100% of non-	
	minority riders	minority riders	

According to SANDAG's most recent onboard survey and detailed in Table 5, low-income COASTER riders were less likely than non-low-income riders to use regional monthly passes or COASTER monthly passes and more likely to use one-way fares and regional day passes when paying for their fare. Other categories of fare were similar in distribution among low-income and non-low-income riders. This suggests that low-income riders are more sensitive to a larger upfront cost than non-low-income riders. Depending on the frequency of each rider's COASTER trips and the ability for low-income riders to afford the upfront cost of a pass, this pass can provide benefits for both types of commuters.

#### **Other Considerations**

While these fare changes do not pose a disparate impact or disproportionate burden for minority or low-income riders, NCTD, MTS, and SANDAG must continue to ensure that the region's transit system and fare structure remain equitable for those riders.

One of the most reliable ways to increase equity for transit riders is to provide frequent and reliable service on popular transit routes. While these fare changes reduce financial burden for COASTER riders, they do not address the frequency or schedule of COASTER service. The COASTER still maintains a relatively commuter-focused schedule, running fifteen round-trips per weekday with frequencies as short as 20 minutes during the morning and evening rush hours but up to 140 minutes midday. However, the current schedule is a major improvement over prior schedules when fewer COASTER trains ran throughout the day, almost exclusively at commuting hours. SANDAG and NCTD have made investments in the coastal rail line, upgrading infrastructure and purchasing new trainsets to expand service and

offer transportation options to a variety of travel markets at more hours of the day and night. Further improvements to COASTER service are identified in the 2021 Regional Plan that will transform the rail line into a true regional rail service, offering all-day service every 20 minutes for riders to access jobs, education, and recreation without being confined to a typical commuting schedule.

Table 6: Expected discounts for COASTER riders using new fares

5-times per month Coaster rider							
1 mo	Day	passes	Mo	onthly	5-pa	ck	Discount
Adult	\$	75.00	\$	182.00	\$ 45	5.00	40%
SDM	\$	37.50	\$	58.00	\$ 22	2.50	40%
2 mo	Day	passes	Мс	onthly	10-pa	ack	Discount
Adult	\$	150.00	\$:	364.00	\$ 75	5.00	50%
SDM	\$	75.00	\$	116.00	\$ 37	7.50	50%
10-time	10-times per month Coaster rider						
Ea mo	Day	passes	М	onthly	10-pa	ack	Discount
Adult	\$	150.00	\$	182.00	\$ 75	5.00	50%
SDM	\$	75.00	\$	58.00	\$ 37	7.50	35%

While the equity of the current fare system is specifically excluded from this analysis per FTA regulations and SANDAG board policy, it is important to note the relative equity of COASTER service changes compared to changes to other transit services offered by NCTD. On average, COASTER riders are more likely to be white and less likely to be low-income than riders of other NCTD's other fixed-route transit services, BREEZE and SPRINTER. While a decrease in fare does not pose a disparate impact or disproportionate burden, it should be taken into consideration that discounts to fares for services used predominantly by riders who are disproportionately white and affluent while maintaining the existing fare structure for services predominantly used by riders who are more likely to be minority and low-income could, over time, pose an equity issue. Of the services operated by NCTD, the COASTER is the most expensive both to ride and to operate. This new fare is designed to reduce cost barriers and make COASTER service more affordable to occasional passengers, especially low-income and minority populations protected by Title VI, as shown in Table 6. While not a direct analog, these new fares complement the SPRINTER/ BREEZE monthly pass that provides a discount of 18 percent for most riders when compared to the Regional monthly pass.

COASTER service is also not subject to regional fare capping programs, while other NCTD services SPRINTER and BREEZE, as well as all MTS services, do participate. Additional intermediate fare products may help reduce the disparities between infrequent, occasional, and regular COASTER riders. As many low-income riders are unable to purchase full-fare monthly passes, they rely more on the new regional fare capping system. However, there is still a large difference in price between one-way

fares or day passes and the new COASTER Packs. Depending on the overall cost burden for each rider, this may provide an opportunity to purchase fares in bulk while not having to purchase a full monthly pass. Many low-income riders, however, may still be unable to afford the upfront cost of a 5-Pack or 10-Pack, and will continue to rely on one-way fares or single day passes. Future inclusion of COASTER in the regional fare capping program could be considered as a strategy to promote fare equity in a way that is simple and understandable for riders.

SANDAG, MTS, and NCTD will continue to collaborate to ensure equity in every aspect of the regional transit system, including fares, routes, frequencies, and amenities. The agencies have recently taken steps to promote equity within the transit system, including the Social Equity Early Action Transit Pilot, which includes the Youth Opportunity Pass, expanding service on the COASTER, and providing new rail service to UC San Diego and UTC with a direct connection to the U.S.-Mexico border via the Mid-Coast Extension of the Blue Line trolley. SANDAG is currently evaluating the system's fare structure to determine the feasibility and potential benefits and concerns of targeted fare subsidies as another way to promote equity for those who struggle to pay for transit while maintaining the crucial operating funding that fares provide.

# Appendix A: Transit Ridership and Fare Data

The following data that was used for this Title VI Equity Analysis was collected as part of SANDAG's 2015 Onboard Transit Survey, the most recent data available at the time of the analysis.

## **COASTER Riders**

#### Fare Type Including Discounts \* Those in Poverty - 200% Crosstabulation

			Those in Poverty - 200%		Total
			No	Yes	TOtal
		Count	446	96	542
	0	% within Fare Type Including Discounts	82.3%	17.7%	100.0%
	One-way	% within Those in Poverty - 200%	14.7%	24.7%	15.9%
		% of Total	13.1%	2.8%	15.9%
		Count	60	30	90
	One way CDM	% within Fare Type Including Discounts	66.7%	33.3%	100.0%
	One-way-SDM	% within Those in Poverty - 200%	2.0%	7.7%	2.6%
		% of Total	1.8%	0.9%	2.6%
	Regional Day	Count	146	37	183
		% within Fare Type Including Discounts	79.8%	20.2%	100.0%
		% within Those in Poverty - 200%	4.8%	9.5%	5.4%
		% of Total	4.3%	1.1%	5.4%
Fare Type Including Discounts	Regional Plus Day	Count	141	24	165
		% within Fare Type Including Discounts	85.5%	14.5%	100.0%
		% within Those in Poverty - 200%	4.7%	6.2%	4.8%
		% of Total	4.1%	0.7%	4.8%
		Count	3	0	3
	SPRINTER/BREEZE Day-	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
	SDM	% within Those in Poverty - 200%	0.1%	0.0%	0.1%
		% of Total	0.1%	0.0%	0.1%
		Count	149	4	153
	Dogianal Marthly	% within Fare Type Including Discounts	97.4%	2.6%	100.0%
	Regional Monthly	% within Those in Poverty - 200%	4.9%	1.0%	4.5%
		% of Total	4.4%	0.1%	4.5%
	Regional Monthly-SDM	Count	34	0	34

	0/ ::: = =			
	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
	% within Those in Poverty - 200%	1.1%	0.0%	1.0%
,	% of Total	1.0%	0.0%	1.0%
	Count	4	0	4
Rapid Express Regional	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
Monthly-SDM	% within Those in Poverty - 200%	0.1%	0.0%	0.1%
	% of Total	0.1%	0.0%	0.1%
	Count	17	2	19
SPRINTER/BREEZE	% within Fare Type Including Discounts	89.5%	10.5%	100.0%
Monthly	% within Those in Poverty - 200%	0.6%	0.5%	0.6%
	% of Total	0.5%	0.1%	0.6%
	Count	78	20	98
COACTED Marriell	% within Fare Type Including Discounts	79.6%	20.4%	100.0%
COASTER Monthly - 1 Zone	% within Those in Poverty - 200%	2.6%	5.1%	2.9%
	% of Total	2.3%	0.6%	2.9%
	Count	414	37	451
	% within Fare Type Including Discounts	91.8%	8.2%	100.0%
COASTER Monthly - 2 Zone	% within Those in Poverty - 200%	13.7%	9.5%	13.2%
	% of Total	12.1%	1.1%	13.2%
	Count	1112	72	1184
COACTED Mary 11 7.7	% within Fare Type Including Discounts	93.9%	6.1%	100.0%
COASTER Monthly - 3 Zone -	% within Those in Poverty - 200%	36.7%	18.5%	34.7%
	% of Total	32.5%	2.1%	34.7%
	Count	11	7	18
COASTER Youth Monthly	% within Fare Type Including Discounts	61.1%	38.9%	100.0%
	% within Those in Poverty - 200%	0.4%	1.8%	0.5%

		% of Total	0.3%	0.2%	0.5%
		Count	307	37	344
	COASTER SIR MANA	% within Fare Type Including Discounts	89.2%	10.8%	100.0%
	COASTER S/D/M Monthly	% within Those in Poverty - 200%	10.1%	9.5%	10.1%
		% of Total	9.0%	1.1%	10.1%
		Count	7	0	7
		% within Fare Type Including Discounts	100.0%	0.0%	100.0%
		% within Those in Poverty - 200%	0.2%	0.0%	0.2%
		% of Total	0.2%	0.0%	0.2%
		Count	28	14	42
		% within Fare Type Including Discounts	66.7%	33.3%	100.0%
	Employee	% within Those in Poverty - 200%	0.9%	3.6%	1.2%
		% of Total	0.8%	0.4%	1.2%
		Count	71	9	80
	O.I.	% within Fare Type Including Discounts	88.8%	11.3%	100.0%
	Other -	% within Those in Poverty - 200%	2.3%	2.3%	2.3%
		% of Total	2.1%	0.3%	2.3%
		Count	3028	389	3417
-			88.6%	11.4%	100.0%
Total		% within Those in Poverty - 200%	100.0%	100.0%	100.0%
		% of Total	88.6%	11.4%	100.0%

#### Fare Type Including Discounts \* Minority Crosstabulation

		Minority			Total
			Yes	Total	
		Count	446	125	571
Fare Type Including Discounts	One-way	% within Fare Type Including Discounts	78.1%	21.9%	100.0%
Discounts		% within Minority	16.6%	11.5%	15.2%
		% of Total	11.8%	3.3%	15.2%

_	One-way-SDM	Count	67	31	98
		% within Fare Type Including Discounts	68.4%	31.6%	100.0%
		% within Minority	2.5%	2.9%	2.6%
		% of Total	1.8%	0.8%	2.6%
		Count	145	56	201
	Regional Day	% within Fare Type Including Discounts	72.1%	27.9%	100.0%
		% within Minority	5.4%	5.2%	5.3%
		% of Total	3.8%	1.5%	5.3%
	Regional Plus Day	Count	133	52	185
		% within Fare Type Including Discounts	71.9%	28.1%	100.0%
		% within Minority	5.0%	4.8%	4.9%
		% of Total	3.5%	1.4%	4.9%
	SPRINTER/BREEZE Day	Count	0	4	4
		% within Fare Type Including Discounts	0.0%	100.0%	100.0%
		% within Minority	0.0%	0.4%	0.1%
		% of Total	0.0%	0.1%	0.1%
		Count	0	3	3
	SPRINTER/BREEZE Day- SDM	% within Fare Type Including Discounts	0.0%	100.0%	100.0%
	SDM -	% within Minority	0.0%	0.3%	0.1%
		% of Total	0.0%	0.1%	0.1%
		Count	131	39	170
	Regional Monthly	% within Fare Type Including Discounts	77.1%	22.9%	100.0%
		% within Minority	4.9%	3.6%	4.5%
		% of Total	3.5%	1.0%	4.5%
		Count	27	20	47
	Regional Monthly-SDM _	% within Fare Type Including Discounts	57.4%	42.6%	100.0%
		% within Minority	1.0%	1.8%	1.2%
		% of Total	0.7%	0.5%	1.2%
		Count	4	0	4
	Rapid Express Regional Monthly-SDM	% within Fare Type Including Discounts	100.0%	0.0%	100.0%
		% within Minority	0.1%	0.0%	0.1%

	% of Total	0.1%	0.0%	0.1%
SPRINTER/BREEZE Monthly –	Count	11	8	19
	% within Fare Type Including Discounts	57.9%	42.1%	100.0%
	% within Minority	0.4%	0.7%	0.5%
	% of Total	0.3%	0.2%	0.5%
	Count	57	42	99
COASTER Monthly - 1 Zone	% within Fare Type Including Discounts	57.6%	42.4%	100.0%
	% within Minority	2.1%	3.9%	2.6%
	% of Total	1.5%	1.1%	2.6%
	Count	309	176	485
COASTER Monthly - 2 Zone	% within Fare Type Including Discounts	63.7%	36.3%	100.0%
_	% within Minority	11.5%	16.2%	12.9%
_	% of Total	8.2%	4.7%	12.9%
COASTER Monthly - 3 Zone	Count	912	386	1298
	% within Fare Type Including Discounts	70.3%	29.7%	100.0%
	% within Minority	34.0%	35.5%	34.4%
	% of Total	24.2%	10.2%	34.4%
	Count	18	6	24
COASTER Youth Monthly	% within Fare Type Including Discounts	75.0%	25.0%	100.0%
_	% within Minority	0.7%	0.6%	0.6%
	% of Total	0.5%	0.2%	0.6%
	Count	336	82	418
COASTER S/D/M Monthly	% within Fare Type Including Discounts	80.4%	19.6%	100.0%
	% within Minority	12.5%	7.6%	11.1%
	% of Total	8.9%	2.2%	11.1%
College	Count	1	9	10
	% within Fare Type Including Discounts	10.0%	90.0%	100.0%
	% within Minority	0.0%	0.8%	0.3%
	% of Total	0.0%	0.2%	0.3%
	Count	19	23	42
Employee	% within Fare Type Including Discounts	45.2%	54.8%	100.0%

			0.70/	2.10/	1.10/
		% within Minority	0.7%	2.1%	1.1%
		% of Total	0.5%	0.6%	1.1%
Other		Count	66	24	90
	% within Fare Type Including Discounts	73.3%	26.7%	100.0%	
	% within Minority	2.5%	2.2%	2.4%	
		% of Total	1.8%	0.6%	2.4%
Total		Count	2682	1086	3768
	tal	% within Fare Type Including Discounts	71.2%	28.8%	100.0%
		% within Minority	100.0%	100.0%	100.0%
		% of Total	71.2%	28.8%	100.0%