



Title VI Implementation Plan

2024



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Table of contents

Disclaimer	2
List of appendices	5
List of maps	6
Chapter 1: Introduction	7
Background	9
Nondiscrimination framework	10
Chapter 2: Demographic profile of the Denver region	12
People of color	14
People with low income.....	16
People with limited English proficiency.....	18
Older adults ages 60 and older	20
Youth ages 17 and younger.....	22
People with a disability	24
Households without a vehicle	26
People born outside the United States.....	28
Single-parent households.....	30
Housing-cost-burdened households.....	32
Disproportionately impacted communities.....	34
Chapter 3: Review procedures and data collection	36
Title VI responsibilities.....	37
Board and committee structure	41
Staff divisions and major plans and programs.....	51
Federal Transit Administration Section 5310 program	64
Data.....	67
Chapter 4: Meaningful public participation	69
DRCOG's commitment to engagement	70
Principles	71
Implementation.....	72
Language assistance	74

Summary of engagement.....	75
Public engagement annual reports.....	78
Chapter 5: Transportation investment analysis	79
Background	80
Analysis	85
Conclusion	93

List of appendices

Appendix A: Board resolution	94
Appendix B: Nondiscrimination policy statement	97
Appendix C: Notice of rights	99
Appendix D: Title VI assurance	101
Appendix E: Title VI local agency assurance	103
Appendix F: Complaint log	106
Appendix G: Contract provisions	108
Appendix H: Disadvantaged Business Enterprises and Small Business Enterprises	112

List of maps

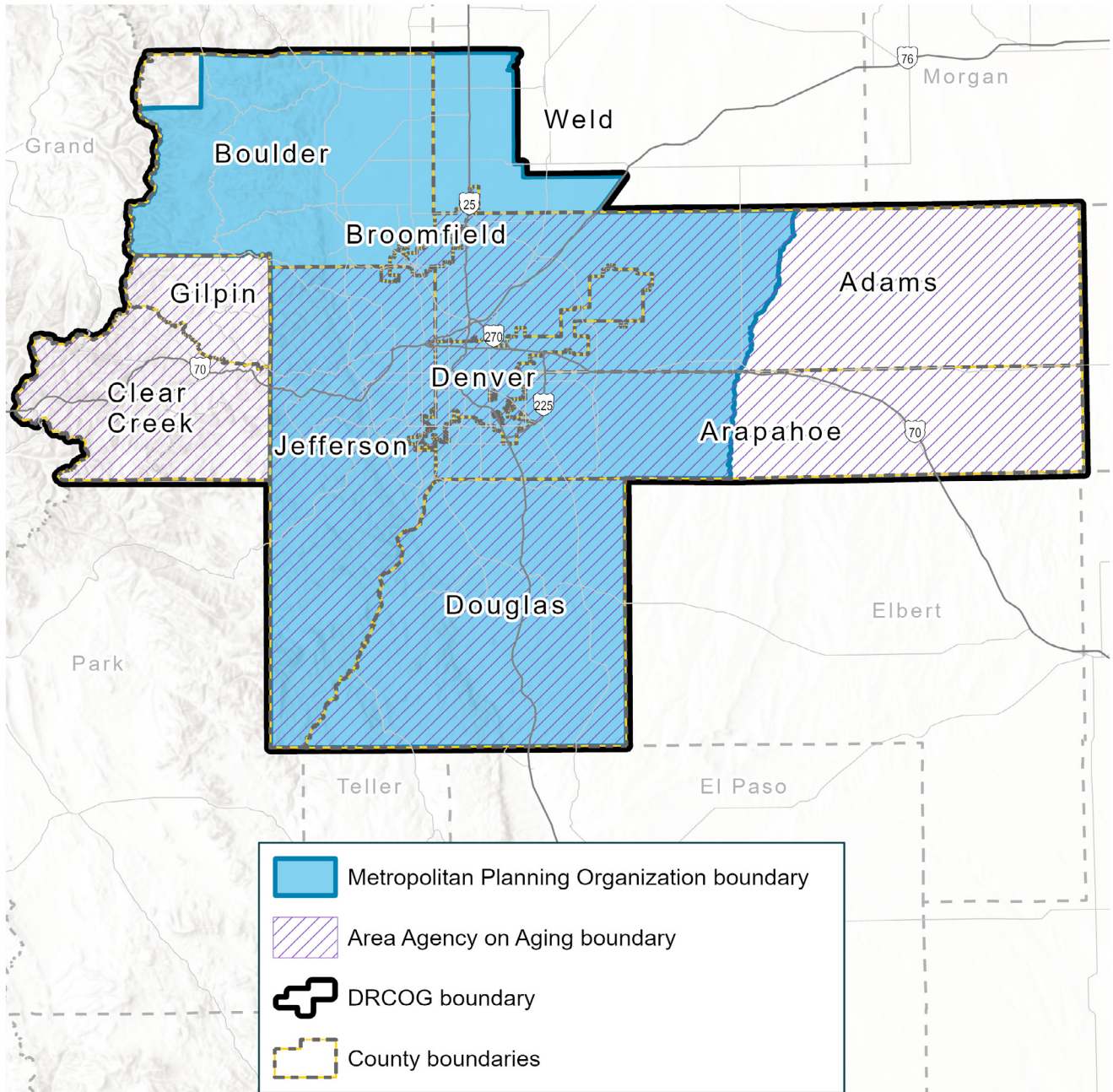
Map 1.1 The DRCOG planning area	8
Map 2.1 Distribution of people of color.....	15
Map 2.2 Distribution of people with low income.....	17
Map 2.3 Distribution of people with limited English proficiency.....	19
Map 2.4 Distribution of older adults ages 60 and older	21
Map 2.5 Distribution of youth ages 17 and younger.....	23
Map 2.6 Distribution of people with a disability	25
Map 2.7 Distribution of households without a vehicle	27
Map 2.8 Distribution of people born outside the United States	29
Map 2.9 Distribution of single-parent households.....	31
Map 2.10 Distribution of housing-cost-burdened households	33
Map 2.11 Distribution of disproportionately impacted communities.....	35
Map 5.1 Transportation investments compared to equity index scores.....	86
Map 5.2 Transportation investments compared to economic status domain scores.....	90
Map 5.3 Transportation investments compared to mobility barriers domain scores	91
Map 5.4 Transportation investments compared to race and ethnicity domain scores.....	92

1



Introduction

Map 1.1 The DRCOG planning area



Background

The Denver Regional Council of Governments is a planning organization through which local governments collaborate to establish guidelines set policy and allocate funding in the areas of transportation and personal mobility, growth and development, and aging and disability resources.

- DRCOG is a council of governments, serving as a planning organization, technical assistance provider and forum for local member governments.
- DRCOG functions as a regional planning commission per Colorado state statute and prepares the plan for the physical development of the region, known as Metro Vision.
- DRCOG is the federally designated Area Agency on Aging, planning and providing comprehensive services to address the needs of the region's population of older adults and people living with disabilities.
- DRCOG serves as the metropolitan planning organization for the region, carrying out the metropolitan transportation planning process for four urbanized areas, encompassing slightly more than 3,600 square miles.
- DRCOG is a designated recipient of Federal Transit Administration Section 5310 program funds for the Denver-Aurora Urbanized Area.

- DRCOG is the author of the region's Comprehensive Economic Development Strategy, which allows access to special funding programs at the federal Economic Development Administration to fund projects that address the foundational needs of successful economic development efforts in the region.

DRCOG's planning area covers Adams, Arapahoe, Boulder, Clear Creek, Douglas, Gilpin and Jefferson counties, the City and County of Broomfield and the City and County of Denver, and southwest Weld County.

Board and committee structure

Steering the activities of the Denver Regional Council of Governments is its Board of Directors. The Board's work is informed by its committees, which involve many individuals, groups and organizations in DRCOG's decision-making process.

- Board of Directors.
- Executive Committee.
- Finance and Budget Committee.
- Performance and Engagement Committee.
- Regional Transportation Committee.
- Transportation Advisory Committee.
- Advisory Committee on Aging.

Staff divisions

DRCOG staff are divided into the following seven divisions that fulfill DRCOG’s many roles and functions in the region.

- Administration and Finance.
- Area Agency on Aging.
- Communications and Marketing.
- Executive Office.
- Human Resources.
- Regional Planning and Development.
- Transportation Planning and Operations.

Major plans and programs

The following regional plans and programs are the primary focus of DRCOG’s policy work, with Metro Vision serving as the policy framework for most Board decisions.

- Metro Vision.
- Metro Vision Regional Transportation Plan.
- Transportation Improvement Program.
- Unified Planning Work Program.

- People-Centered Planning, Projects and Services (public engagement plan).
- Area Plan on Aging

Nondiscrimination framework

The Denver Regional Council of Governments is a recipient of federal financial assistance. All recipients are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964, which forbids discrimination against anyone in the U.S. because of race, color or national origin by any agency receiving federal funds. Further, DRCOG adheres to other federal nondiscrimination statutes that afford legal protection; specifically: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (gender); Age Discrimination Act of 1975 (age); and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability).

Regulations and statutes guiding Title VI compliance for DRCOG include, alphabetically:

- Age Discrimination Act of 1975 (42 USC 6101-6107): “Prohibits discrimination based on age in programs or activities that receive federal financial assistance.”
- Americans with Disabilities Act of 1990: “Prohibits discrimination against individuals with disabilities in all areas of public life,

including jobs, schools, transportation, and all public and private places that are open to the general public.”

- Civil Rights Restoration Act of 1987 (Pub. L. 100-159): “Clarifies the intent Title VI and other nondiscrimination requirements by restoring the broad coverage of nondiscrimination statutes and requirements to include all programs and activities that receive any portion of Federal funding.”
- Colorado Revised Statutes § 43-1-128, Environmental Impacts of Capacity Projects, which requires the Colorado Department of Transportation and metropolitan planning organizations to “fully evaluate the potential environmental and health impacts on disproportionately impacted communities” during the planning process.
- Executive Order No. 12898 of February 11, 1994: “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.”
- Executive Order No. 13166 of August 11, 2000: “Improving Access to Services for Persons with Limited English Proficiency.”
- Federal regulation 23 CFR 200: Provides guidelines for implementing the Federal Highway Administration’s Title VI compliance program conducting Title VI program compliance reviews relative to the Federal-aid highway program.
- Federal regulation 49 CFR 21: “Effectuates that 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 receiving Federal financial assistance from the U.S. Department of Transportation.”
- The Older Americans Act of 1965, which requires funding for people with the greatest economic or social need, particularly older adults of color, older adults with low income, older adults with limited English proficiency and older adults living in rural areas.
- Section 162(a), Federal-Aid Highway Act (23 USC 324): “Prohibits discrimination on the basis of sex in programs and activities receiving federal assistance.”
- Section 504, Rehabilitation Act of 1973 (29 USC 794): “Prohibits discrimination on the basis of disability.”
- The Uniform Act of 1970: “Establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms.”
- Title VI of the Civil Rights Act (42 USC 2000d-2003) of 1964: “Prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.”
- U.S. Department of Transportation Order 1050.2 Title VI Standard Assurances.



2

Demographic profile of the Denver region

Background

The Denver Regional Council of Governments maintains and analyzes statistical data on the demographic characteristics of the region. This information is used throughout DRCOG’s plans and programs to inform the recommendations made to its Board of Directors and the organization’s planning and programming decisions.

Every three years as part of its Title VI Implementation Plan update, DRCOG reviews its demographic data to determine whether there have been changes in the population that necessitate its staff to adjust strategies for providing meaningful access to agency programs and activities by newly identified or growing demographic groups. DRCOG’s strategies may include identifying local partners to ensure that these individuals are notified about public meetings and given the opportunity to be involved in the planning process.

The region

The Denver region is home to 3.4 million people and includes 58 communities anchoring Colorado’s Front Range. The region stretches from the mountain counties of Clear Creek and Gilpin in the west to the eastern plains of Adams and Arapahoe counties, and includes the varied communities that make up the urban corridor along I-25.

The maps and charts on the following pages display the census tracts in the region by the percent of marginalized communities. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. The spatial size of census

tracts varies depending on population density. The marginalized communities mapped include:

- People of color (includes racial and ethnic minorities).
- People with low income.
- People with limited English proficiency.
- Older adults ages 60 and older.
- Youth ages 17 and younger.
- People with a disability.
- Households without a motor vehicle.
- People born outside the United States.
- Single-parent households.
- Housing-cost burdened households.

The populations included in this plan are aligned with the marginalized communities defined in DRCOG’s Equity Index, developed in 2023. These 10 indicator characteristics were derived from federal and state mandates, reviews of national and peer regional equity analyses and relevant literature, and engagement with community-based organizations in the Denver region. Additionally, as part of state requirements, DRCOG must take into consideration the impacts on disproportionately impacted communities, as defined by the state. The analyses in this plan are intended to provide a baseline for the development and improvement of future Title VI Implementation Plans. For more information on other equity analyses, please visit the specific plan in question.

People of color

The U.S. Census Bureau defines racial categories generally as “a social definition of race recognized in this country and not an attempt to define race biologically, anthropologically or genetically.” An individual can report as white, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and other Pacific Islander,

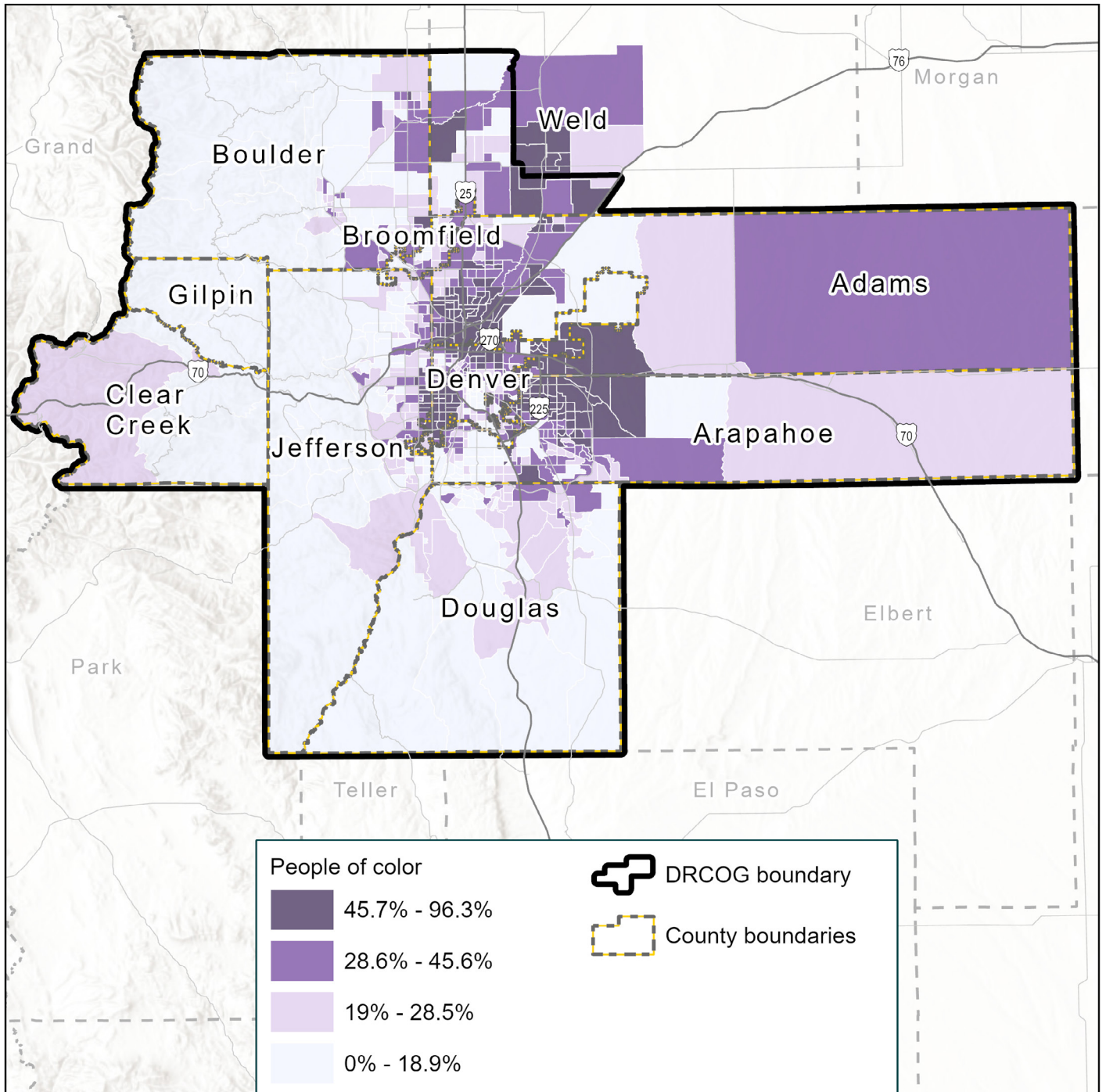
some other race, or multiple races. Ethnicity is used to determine whether an individual is of Hispanic origin or not, so an individual of Hispanic origin may report as any race. The number of people of color is calculated by subtracting the non-Hispanic or Latino white population from the total population, which yields all people of color and Hispanic or Latino people.

Table 2.1 People of color by county

County	Number	Percent
Adams County	273,104	22.36%
Arapahoe County	276,506	22.64%
Boulder County	78,078	6.39%
City and County of Broomfield	18,782	1.54%
Clear Creek County	1,311	0.11%
City and County of Denver	327,987	26.85%
Douglas County	74,263	6.08%
Gilpin County	914	0.07%
Jefferson County	136,435	11.17%
Southwest Weld County	34,184	2.80%
Total	1,221,564	100.00%

Map 2.1 illustrates information related to people of color (including racial and ethnic minorities) for the population within the Denver region. This information was collected at the census tract level. Individuals of color account for approximately 36% of the total population within the region.

Map 2.1 Distribution of people of color



People with low income

Following the Office of Management and Budget’s Statistical Policy Directive 14, the U.S. Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If

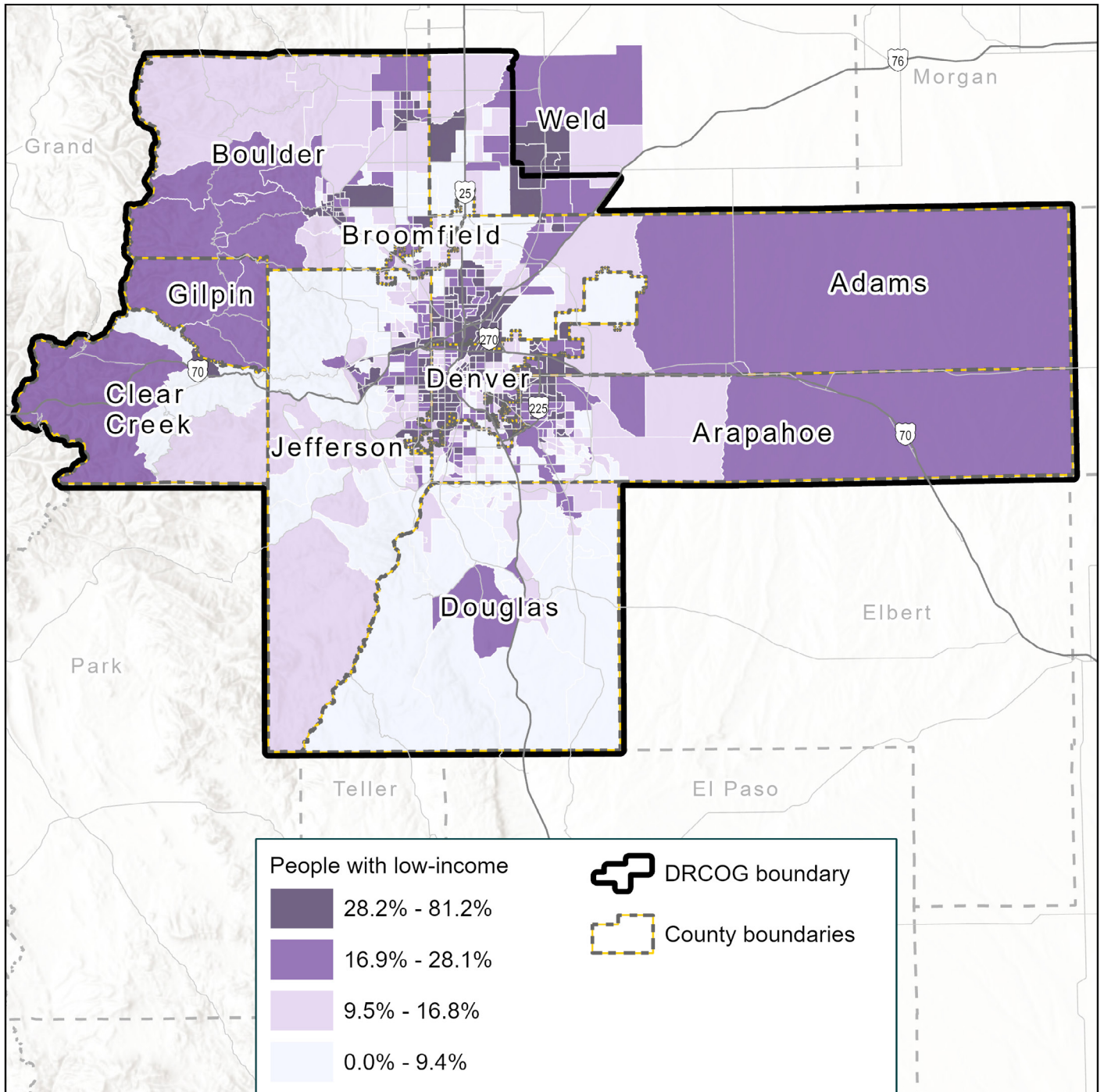
a family’s total income is less than the family’s threshold, then the family and every individual in it is considered in poverty. The number of people with low income is calculated by summing all people in households with income less than 200% of the poverty level for their respective family size.

Table 2.2 People with low income by county

County	Number	Percent
Adams County	132,317	19.91%
Arapahoe County	134,187	20.19%
Boulder County	69,031	10.39%
City and County of Broomfield	9,129	1.37%
Clear Creek County	1,737	0.26%
City and County of Denver	178,693	26.89%
Douglas County	29,301	4.41%
Gilpin County	1,251	0.19%
Jefferson County	93,504	14.07%
Southwest Weld County	15,433	2.32%
Total	664,583	100.00%

Map 2.2 illustrates information related to people with low income for the population within the Denver region. This information was collected at the census tract level. People with low income account for approximately 20% of the total population within the region.

Map 2.2 Distribution of people with low income



People with limited English proficiency

The Department of Justice and the Federal Interagency Working Group on Limited English Proficiency define people with limited English proficiency as “individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English.” The U.S. Census Bureau currently collects data on limited English-

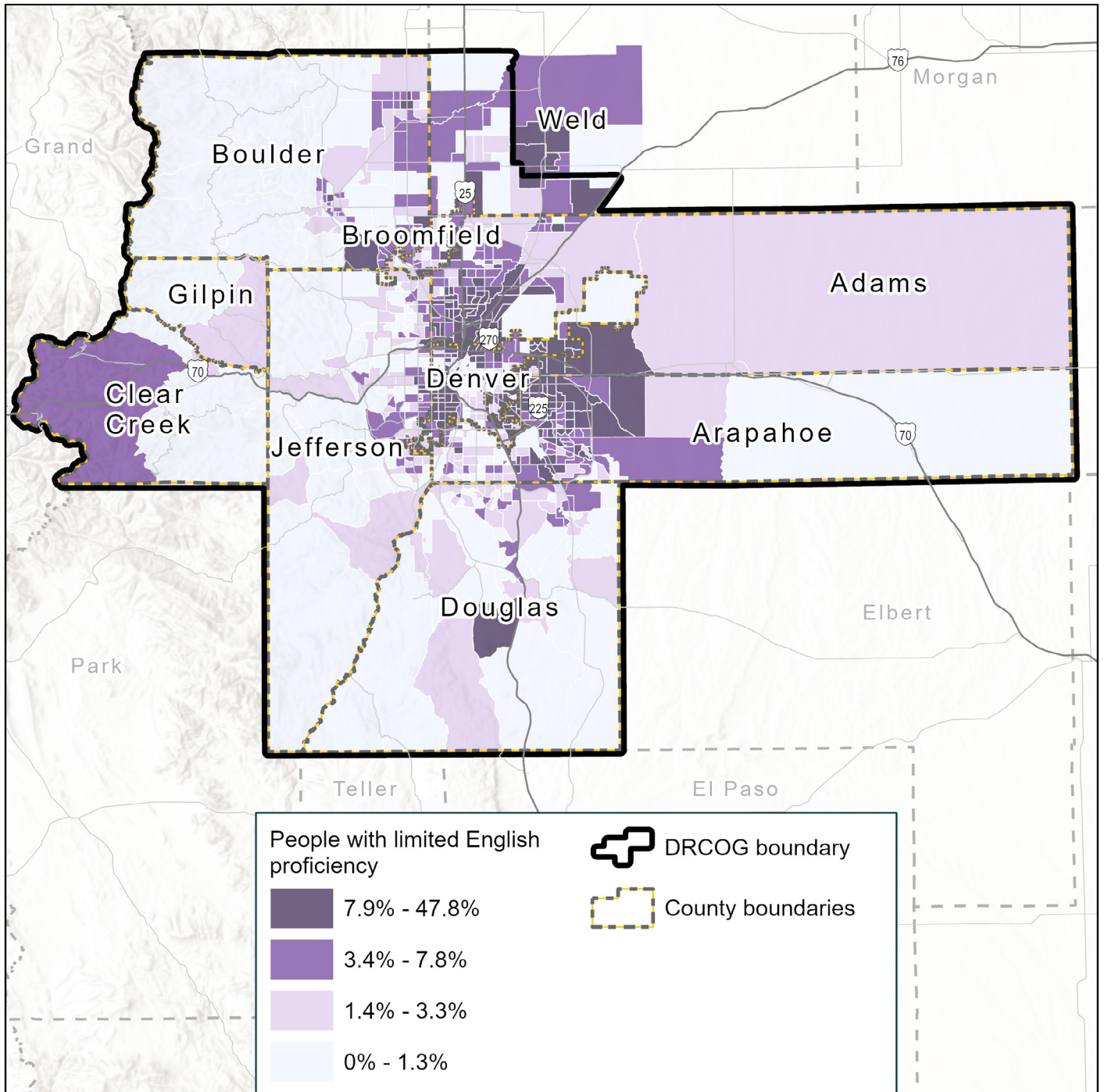
speaking households and individuals 5 years and older through the American Community Survey, and DRCOG used this data to identify the Limited English Proficiency population within the region. The number of people with limited English proficiency is calculated by summing all individuals 5 years and older who report speaking English “well,” “not well” or “not well at all.”

Table 2.3 People with limited English proficiency by county

County	Number	Percent
Adams County	54,940	26.49%
Arapahoe County	54,221	26.14%
Boulder County	11,095	5.35%
City and County of Broomfield	2,282	1.10%
Clear Creek County	179	0.09%
City and County of Denver	57,324	27.64%
Douglas County	7,325	3.53%
Gilpin County	115	0.06%
Jefferson County	14,394	6.94%
Southwest Weld County	5,552	2.68%
Total	207,427	100.00%

Map 2.3 contains information regarding people with limited English proficiency within the region. Approximately 6% of the total population within the region is considered limited English proficient.

Map 2.3 Distribution of people with limited English proficiency



Older adults ages 60 and older

DRCOG’s Area Agency on Aging provides services and programming that target older adults ages 60 and older due to funding streams and requirements. Older adults are more likely to have difficulty accessing

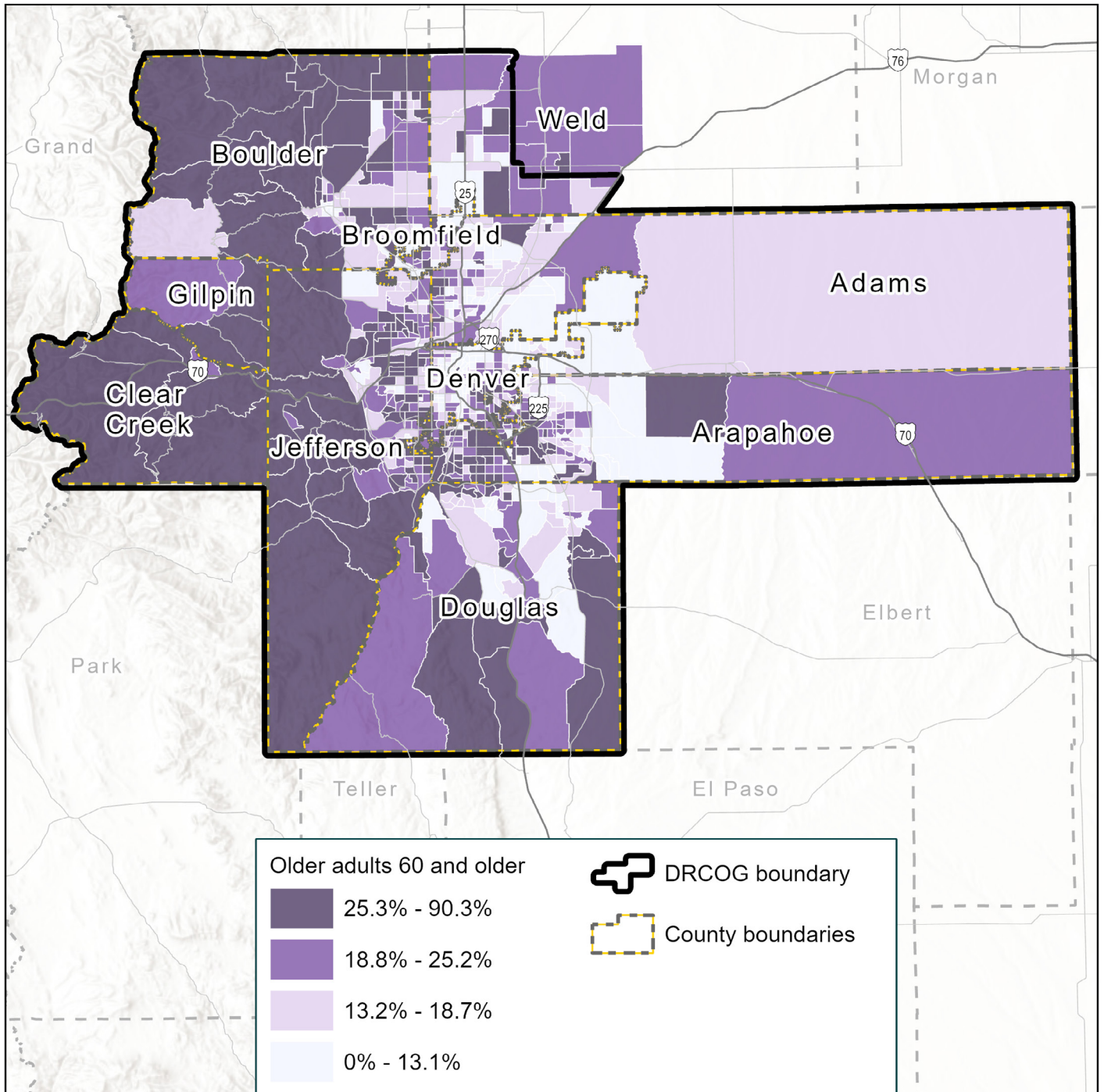
resources and services, represent a growing share of the population and “often face challenges traveling independently, relying on ride services to meet their daily needs.” The number of people ages 60 and older is calculated by summing males and females ages 60 and older.

Table 2.4 Older adults ages 60 and older by county

County	Number	Percent
Adams County	82,781	12.91%
Arapahoe County	128,680	20.06%
Boulder County	69,454	10.83%
City and County of Broomfield	14,927	2.33%
Clear Creek County	3,010	0.47%
City and County of Denver	117,992	18.40%
Douglas County	66,941	10.44%
Gilpin County	1,704	0.27%
Jefferson County	138,890	21.65%
Southwest Weld County	17,038	2.66%
Total	641,417	100.00%

Map 2.4 contains information regarding the older adult population in the region. According to the 2017-2022 American Community Survey estimates, approximately 19% of the population within the region is age 60 or older.

Map 2.4 Distribution of older adults ages 60 and older



Youth ages 17 and younger

Metropolitan planning organizations are encouraged by the Federal Highway Administration to consider youth as a traditionally underserved group in pursuing

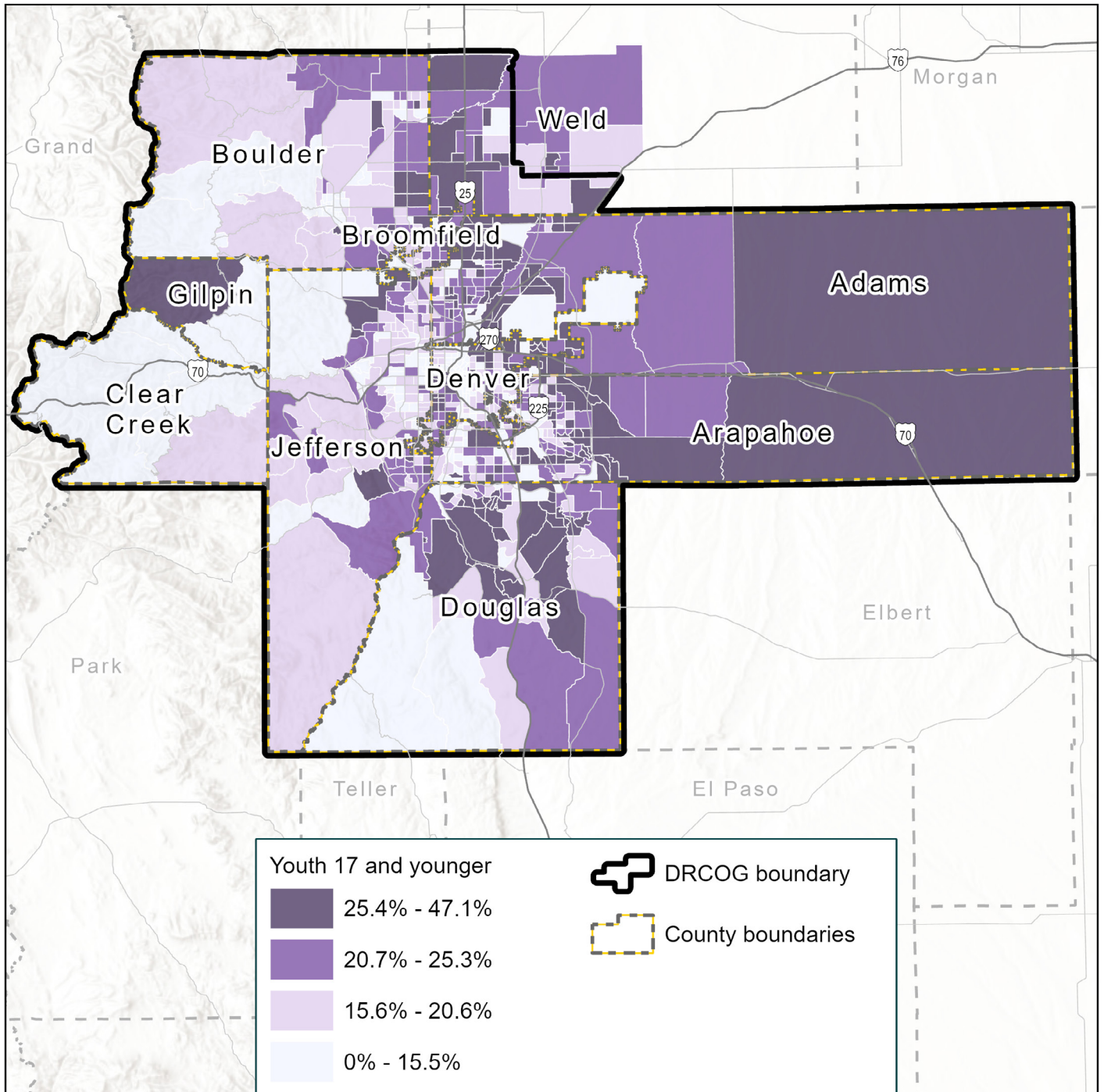
transportation equity. Youth are often limited in their ability to travel independently. The number of people ages 17 and younger is calculated by summing males and females ages 17 and younger.

Table 2.5 Youth ages 17 and younger by county

County	Number	Percent
Adams County	133,106	18.54%
Arapahoe County	149,726	20.85%
Boulder County	59,565	8.30%
City and County of Broomfield	15,908	2.22%
Clear Creek County	1,110	0.15%
City and County of Denver	132,983	18.52%
Douglas County	88,073	12.27%
Gilpin County	1,047	0.15%
Jefferson County	110,522	15.39%
Southwest Weld County	25,920	3.61%
Total	717,960	100.00%

Map 2.5 contains information related to children and youth in the region. According to the 2017-2022 American Community Survey estimates, approximately 21% of the population within the region is age 17 or younger.

Map 2.5 Distribution of youth ages 17 and younger



People with a disability

The U.S. Census Bureau uses the definition selected by the U.S. Department of Health and Human Services to define individuals with disabilities, and the definition is outlined in Section 4302 of the Affordable Care Act. The American Community Survey uses a six-item set of yes-or-no questions to identify the portion of the population with at least one disability.

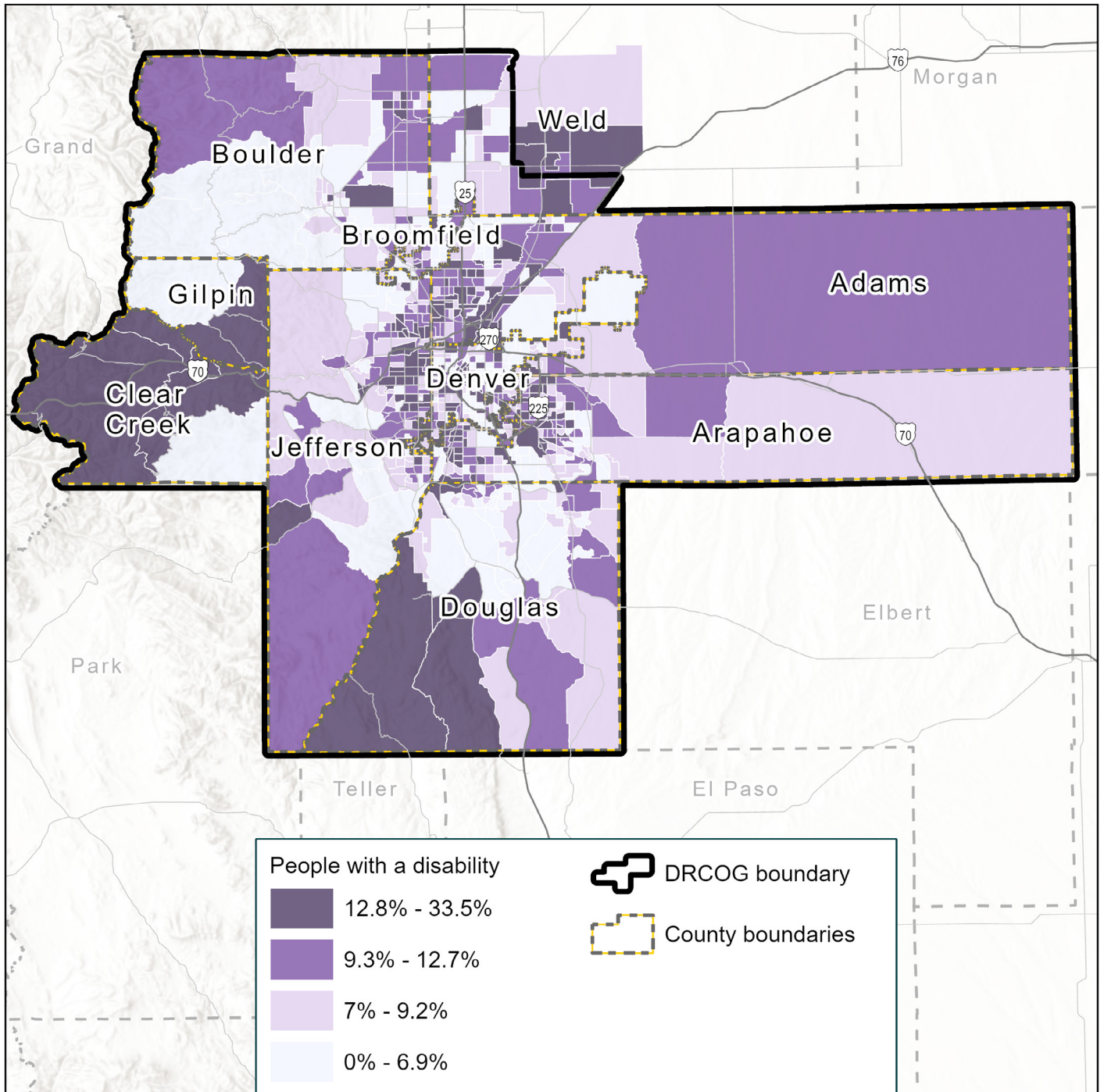
If a participant answers “yes” to any of the questions, that participant is recognized as a person with a disability. The number of people with a disability at the tract level is calculated by summing males and females of all ages with a disability.

Table 2.6 People with a disability by county

County	Number	Percent
Adams County	57,376	17.55%
Arapahoe County	67,778	20.73%
Boulder County	27,883	8.53%
City and County of Broomfield	5,817	1.78%
Clear Creek County	1,123	0.34%
City and County of Denver	69,637	21.30%
Douglas County	27,047	8.27%
Gilpin County	695	0.21%
Jefferson County	60,205	18.41%
Southwest Weld County	9,449	2.89%
Total	327,010	100.00%

Map 2.6 contains information regarding people with disabilities in the region. Approximately 10% of the population within the region has at least one of the disabilities defined by the U.S. Department of Health and Human Services.

Map 2.6 Distribution of people with a disability



Households without a vehicle

While DRCOG is not required to consider households with no motor vehicle in transportation planning, both DRCOG and other metropolitan planning organizations frequently include households with no motor vehicle in their equity analyses. The Southern California Association of Governments

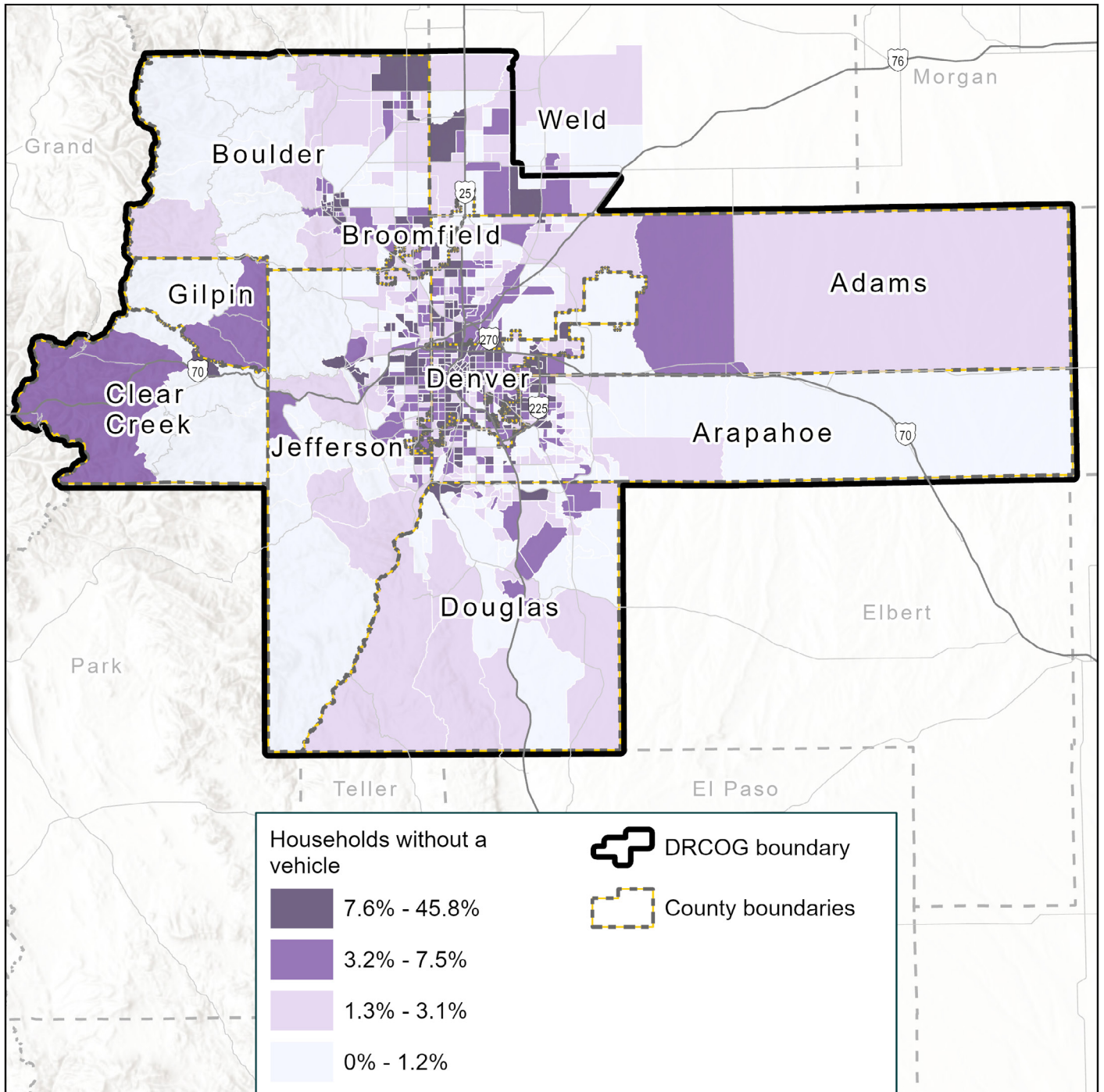
rationalizes the inclusion, saying, “a private vehicle should not be a requirement for full participation in social, civic and economic life, as it is unaffordable and burdensome for many people.” The number of households with no motor vehicle is calculated by summing renter-occupied households with no vehicle and owner-occupied households with no vehicle.

Table 2.7 Households without a vehicle by county

County	Number	Percent
Adams County	8,327	11.26%
Arapahoe County	12,544	16.96%
Boulder County	6,884	9.31%
City and County of Broomfield	1,095	1.48%
Clear Creek County	183	0.25%
City and County of Denver	32,094	43.39%
Douglas County	2,744	3.71%
Gilpin County	147	0.20%
Jefferson County	9,196	12.43%
Southwest Weld County	760	1.03%
Total	73,974	100.00%

Map 2.7 illustrates information related to households without a motor vehicle within the Denver region. The information was collected at the census tract level. The estimated population without access to a motor vehicle accounts for approximately 6% of the total households within the region.

Map 2.7 Distribution of households without a vehicle



People born outside the United States

Title VI of the Civil Rights Act prohibits discrimination based on national origin. Identifying the number of people born outside the U.S. can capture a vulnerable population not necessarily represented by people of color and/or people with limited English proficiency

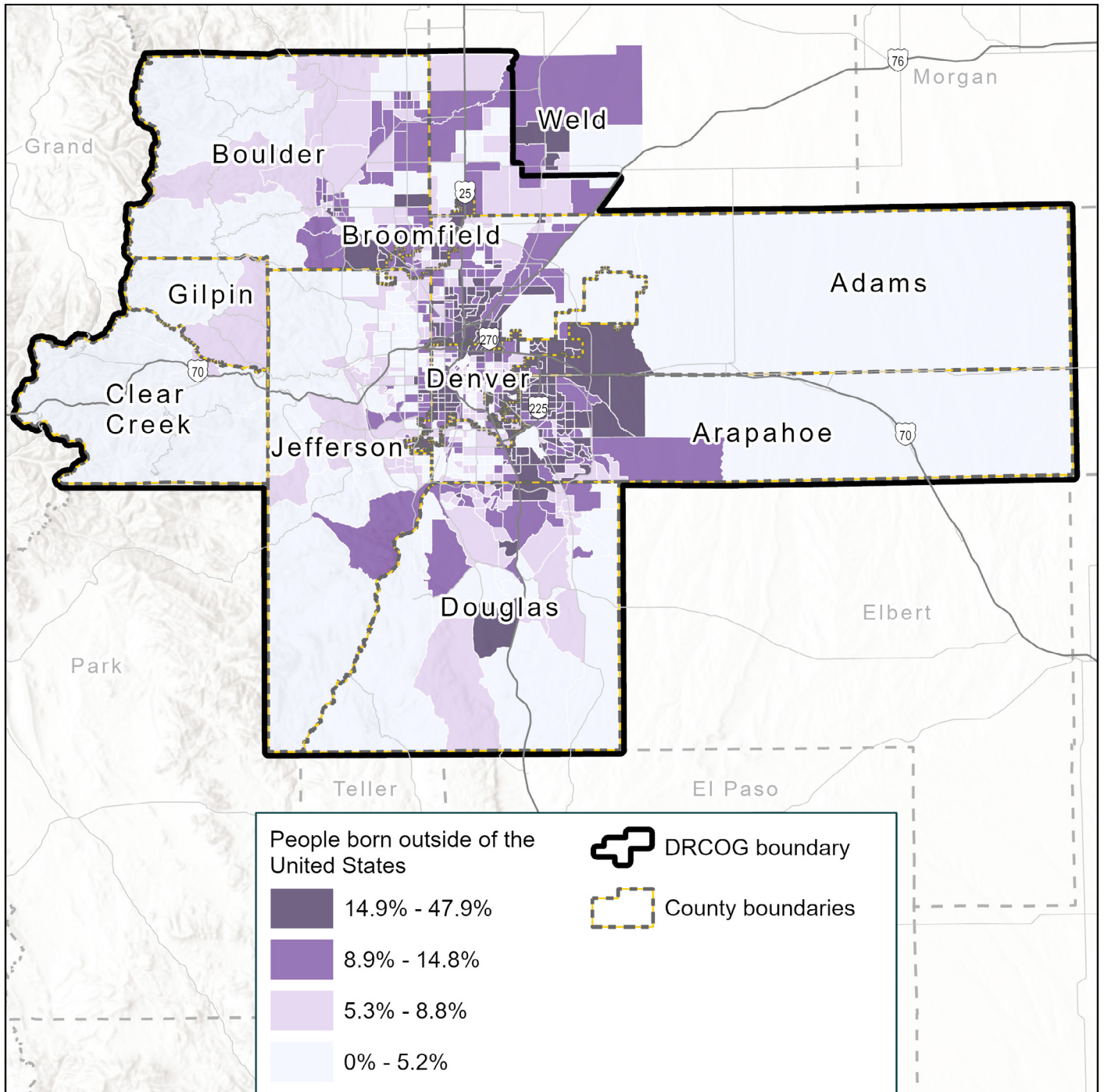
due to unspoken cultural literacy, social norm and other communication difficulties. People born outside the U.S. refers to people who were not U.S. citizens at birth, regardless of their later naturalization status. The number of people born outside the U.S. is calculated by retrieving the population born outside the U.S., excluding the population born at sea.

Table 2.8 People born outside the United States by county

County	Number	Percent
Adams County	78,784	20.04%
Arapahoe County	101,984	25.94%
Boulder County	31,990	8.14%
City and County of Broomfield	7,882	2.01%
Clear Creek County	419	0.11%
City and County of Denver	99,033	25.19%
Douglas County	28,616	7.28%
Gilpin County	352	0.09%
Jefferson County	35,741	9.09%
Southwest Weld County	8,313	2.11%
Total	393,114	100.00%

Map 2.8 illustrates information related to people born outside the United States. The information was collected at the census tract level. The estimated population born outside the United States is 12% of the total population in the region.

Map 2.8 Distribution of people born outside the United States



Single-parent households

While single-parent households are not a protected population, DRCOG gathered input from the Civic Advisory Group in 2022, presenting options for including female-headed

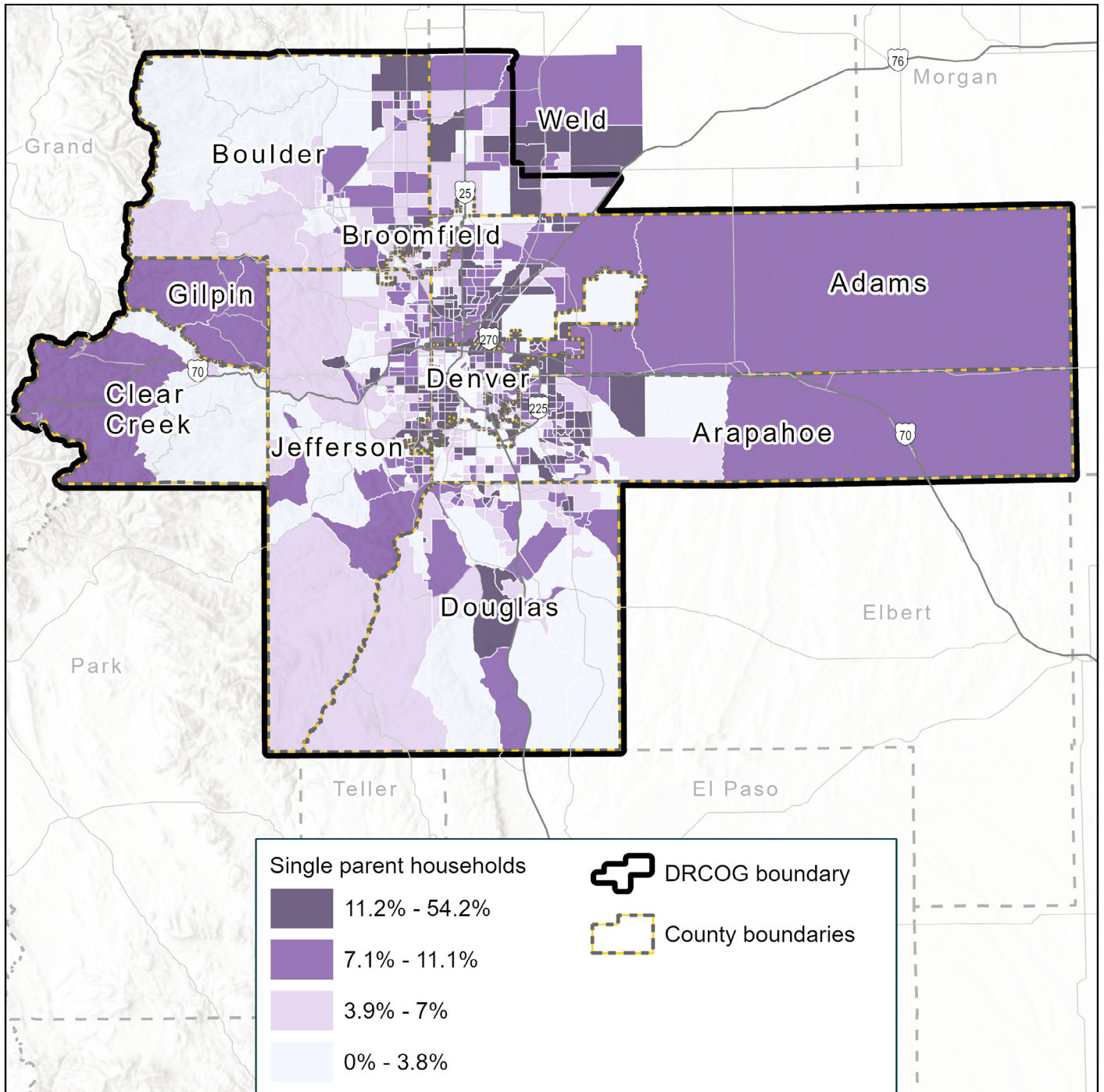
and/or single-parent households. The Civic Advisory Group voiced more support for the inclusion of single-parent households. This indicator is calculated by identifying households with one or more people younger than 18 and without a spouse present.

Table 2.9 Single-parent households by county

County	Number	Percent
Adams County	21,988	20.10%
Arapahoe County	23,504	21.49%
Boulder County	8,836	8.08%
City and County of Broomfield	1,823	1.67%
Clear Creek County	206	0.19%
City and County of Denver	24,656	22.54%
Douglas County	8,455	7.73%
Gilpin County	209	0.19%
Jefferson County	16,982	15.52%
Southwest Weld County	2,730	2.50%
Total	109,389	100.00%

Map 2.9 illustrates information related to single-parent households in the Denver region. The information was collected at the census tract level. The estimated population of single-parent households accounts for approximately 8% of the total households within the region.

Map 2.9 Distribution of single-parent households



Housing-cost-burdened households

Colorado ORS 43-1-128 defines “cost-burdened” as “a household that spends more than 30% of its income on housing.” For DRCOG purposes, the number of housing-

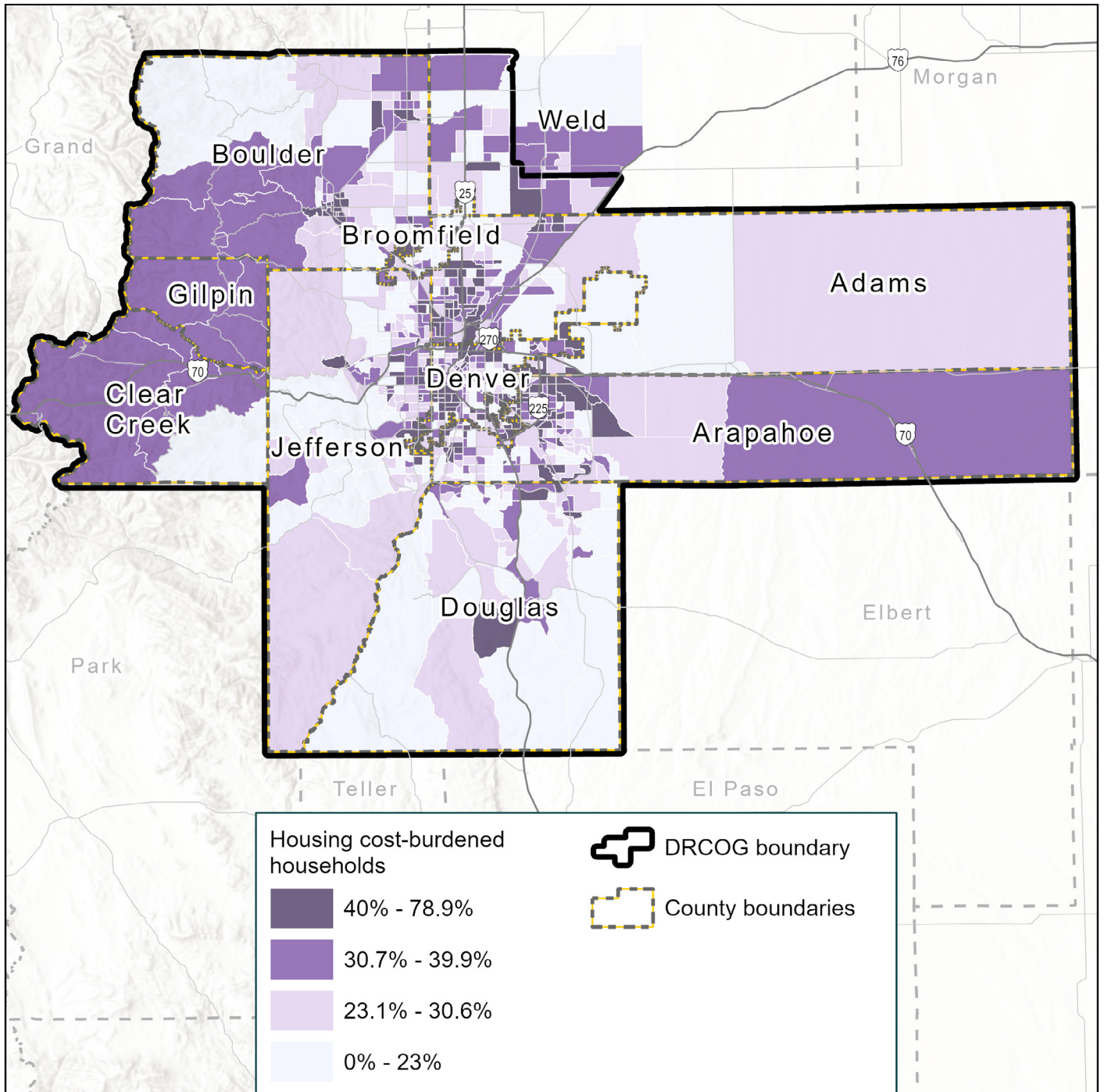
cost-burdened households is calculated by summing all renter-occupied housing units spending more than 30% (inclusive) of their income on rent and all owner-occupied housing units spending more than 30% (inclusive) of their income on owner costs.

Table 2.10 Housing-cost-burdened households by county

County	Number	Percent
Adams County	64,570	14.88%
Arapahoe County	86,213	19.87%
Boulder County	46,639	10.75%
City and County of Broomfield	7,950	1.83%
Clear Creek County	1,429	0.33%
City and County of Denver	113,322	26.12%
Douglas County	34,570	7.97%
Gilpin County	956	0.22%
Jefferson County	68,611	15.82%
Southwest Weld County	9,547	2.20%
Total	433,807	100.00%

Map 2.10 illustrates information related to households that are housing-cost-burdened within the Denver region. The information was collected at the census tract level. The estimated population of housing-cost-burdened households is approximately 33% of the total households within the region.

Map 2.10 Distribution of housing-cost-burdened households



Disproportionately impacted communities

Colorado ORS 43-1-128 requires the Colorado Department of Transportation and metropolitan planning organizations to “fully evaluate the

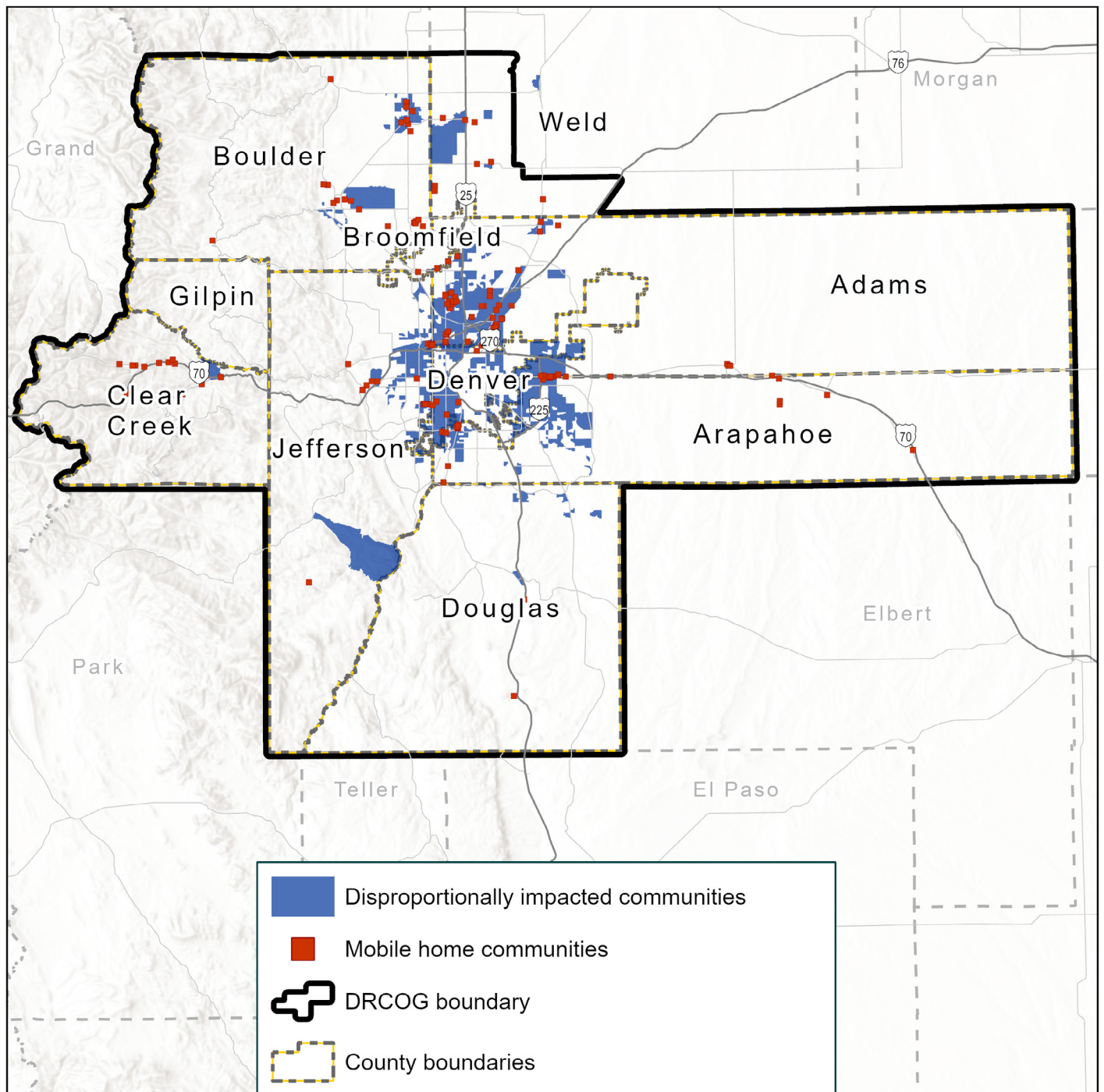
potential environmental and health impacts on disproportionately impacted communities” during the planning process. The definition of disproportionately impacted communities can be found on the [Colorado Department of Public Health and Environment website](#).

Table 2.11 Disproportionately impacted communities by county

County	Number	Percent
Adams County	304,009	27.28%
Arapahoe County	263,839	23.68%
Boulder County	63,551	5.70%
City and County of Broomfield	1,831	0.16%
Clear Creek County	1,685	0.15%
City and County of Denver	330,850	29.69%
Douglas County	15,934	1.43%
Gilpin County	0	0.00%
Jefferson County	120,674	10.83%
Southwest Weld County	12,043	1.08%
Total	1,114,416	100.00%

Map 2.11 illustrates information related to disproportionately impacted communities in the Denver region.

Map 2.11 Distribution of disproportionately impacted communities



3



**Review procedures and
data collection**

The executive director is ultimately responsible for ensuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that nondiscrimination is required of all agency employees, contractors and agents pursuant to applicable law, including but not limited to, 23 CFR Part 200, 49 CFR Part 21, and 28 CFR Part 42, Subpart C.

Title VI responsibilities

Title VI coordinator and liaisons organization chart



Title VI coordinator

The Denver Regional Council of Governments' contracts and budget program manager in the Administration and Finance division performs the duties of Title VI coordinator and ensures implementation of DRCOG's Title VI program.

The Title VI coordinator is responsible for:

- Developing and adopting a Title VI plan every three years and submitting annual reports on the agency's behalf as requested.
- Developing procedures for the prompt processing and disposition of complaints.
- Investigating complaints, compiling a complaint log and reporting to the Colorado Department of Transportation.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas.
- Conducting annual Title VI assessments of pertinent program areas.
- Developing Title VI information for dissemination to the general public and staff as needed.

- Attending relevant trainings and sharing information with staff as appropriate.
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

Title VI division liaisons

The Title VI liaisons within each of DRCOG's seven divisions are responsible for:

- Coordinating with the Title VI coordinator on agencywide Title VI implementation.
- Maintaining dialogue with the Title VI coordinator to inform them of their division's activities regarding Title VI implementation.

Policy statement

DRCOG pledges to adhere to Title VI of the Civil Rights Act of 1964 and other federal nondiscrimination statutes that afford legal protection. This policy statement is maintained on DRCOG's website, and a copy can also be found in [Appendix B](#).

Notice of rights

DRCOG provides a notice of rights against discrimination under Title VI of the Civil Rights Act of 1964. This notice is maintained on DRCOG's website and can also be found in [Appendix C](#).

Assurances

DRCOG hereby gives assurances that no person shall on the grounds of race, color, national origin, age, gender or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by DRCOG regardless of whether those particular programs and activities are federally funded. It is the responsibility of every person within DRCOG and all DRCOG's responsible agents, contractors and consultants to incorporate and implement actions consistent with nondiscrimination in programs.

Refer to [Appendix D](#) and [Appendix E](#) for the signed Title VI Assurance and Title VI Local Agency Assurance at the time of plan adoption. In between the regular three-year updates, DRCOG signs and uploads new assurances to the website and provides copies to the Colorado Department of Transportation.

Complaint procedures and forms

Any individual who believes that they have been subjected to discrimination or retaliation, by any of DRCOG's programs, services or activities, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. All written complaints received by DRCOG shall be reviewed immediately.

Visit the DRCOG website to access the latest versions of [complaint procedures and forms](#).

Complaint status

DRCOG does not have any active investigations, complaints or lawsuits. Refer to [Appendix F](#) for the complaint log at the time of plan adoption.

Public accommodation and accessibility

DRCOG promotes full accommodation and access to its meetings by publishing the following statement on its meeting agendas: "Persons in need of auxiliary aids or services, such as interpretation services, are asked to contact the Denver Regional Council of Governments at least 48 hours in advance of the meeting."

Additionally, the following document accommodation statements are included on documents as appropriate:

- "To receive these documents in accessible formats, such as in languages other than English, please call 303-455-1000 or email drcog@drcog.org so DRCOG can coordinate your request."
- "If you need digital accessibility assistance, submit a request at drcog.org/access or call 303-455-1000. Please expect a response within 72 hours (three business days)."

Contract provisions

DRCOG includes provisions in every contract addressing Title VI and civil rights. Refer to [Appendix G](#) for the full provisions.

Disadvantaged Business Enterprises and Small Business Enterprises program

DRCOG, as a condition of receiving federal financial assistance from the U.S. Department of Transportation, has signed an assurance that it will comply with Title VI of the Civil Rights Act of 1964, prohibiting discrimination based on race, color and national origin; and to adhere to 49 CFR Part 26.

It is a federal requirement, and also the policy of DRCOG, to ensure that Disadvantaged Business Enterprises, as defined in Part 26, have an equal opportunity to receive and participate in contracts. A Disadvantaged Business Enterprise Information Request Form is included in all bid solicitations to track the interest in DRCOG programs and participation by Disadvantaged Business Enterprise firms. Refer to [Appendix H](#) for the Disadvantaged Business Enterprises and Small Business Enterprises clauses.

Staff training

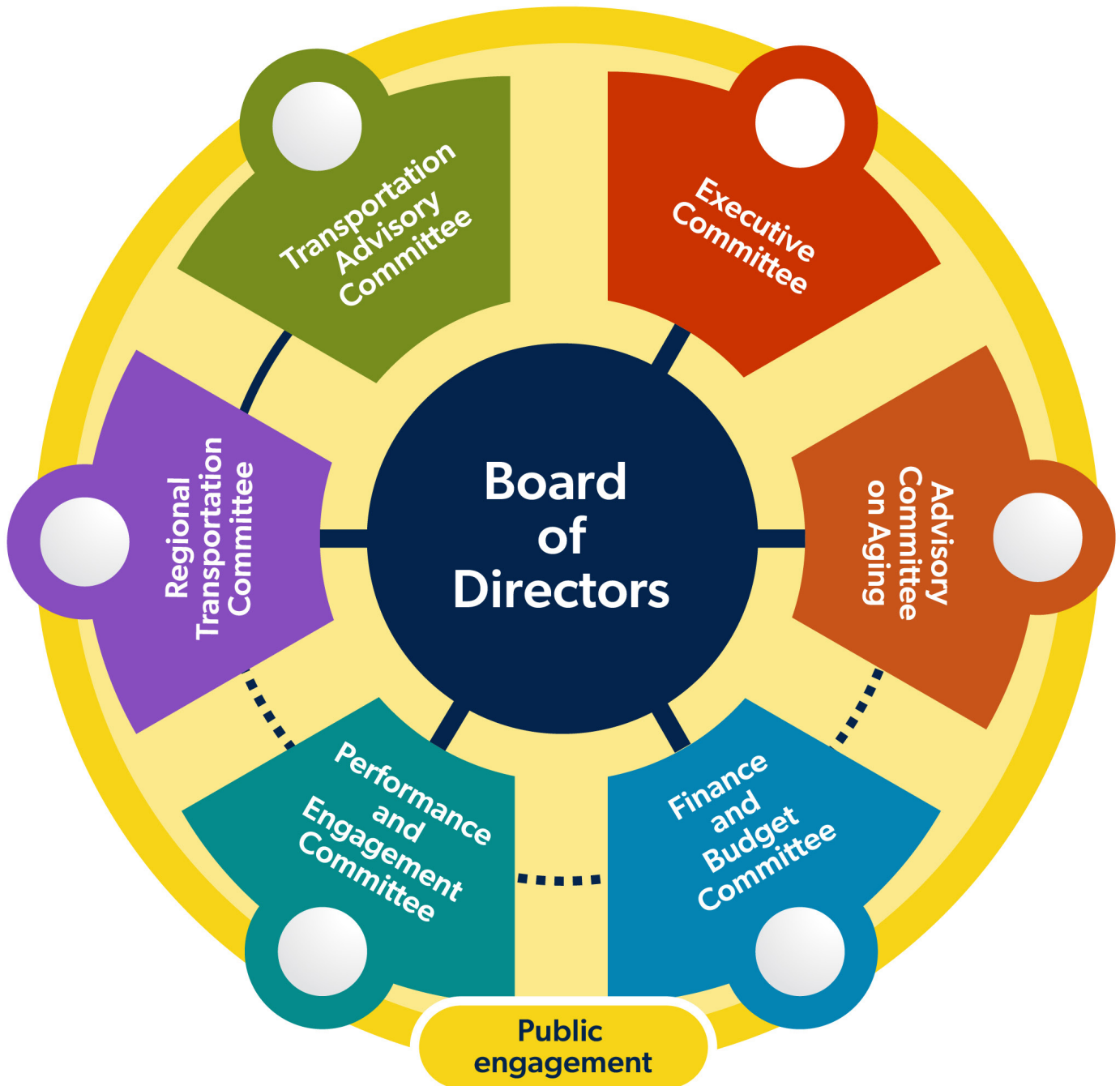
To ensure nondiscrimination in its programs and activities, DRCOG continues to offer training to its employees related to Title VI and other applicable statutes.

Annual reporting

In between the regular three-year updates, DRCOG completes an annual status report that documents activities completed the previous federal fiscal year that illustrate the agency's compliance with nondiscrimination requirements. This report is provided to the Colorado Department of Transportation.

Board and committee structure

DRCOG committee structure



.....

Can provide recommendations to peer committees

—————

Provides recommendations to the Board or associated committee

DRCOG staff provide information and administrative support to all committees and the Board. All Board and committee meetings are open to the public, and public comment is always included as an agenda item. Additionally, DRCOG accommodates and provides services for individuals with disabilities when provided notice before the hearing. DRCOG solicits attendees to provide such notice as part of every meeting agenda packet.

Authorities for these committees and their criteria for membership come from the DRCOG Articles of Association, memoranda of agreement, intergovernmental agreements, federal or state statutes, or Board authorization. For more information, see DRCOG's [Committees and Working Groups](#) section of the website.

Committee and Board meetings are conducted in a hybrid manner to allow members of the public to attend and participate virtually. DRCOG uses Zoom for committee and Board meetings, and the "live transcript" option is enabled for all meetings so attendees can turn on subtitles or a full transcript.

For the in-person portion of hybrid meetings, DRCOG staff bring "I speak ..." cards and Limited English Proficiency procedures in case members of the public attend who need interpretation.

DRCOG hosts public hearings in the evening, and participation of the public is welcome both in person and online through Zoom. Online attendees may view live subtitles of the meeting to improve accessibility.

Board of Directors

Membership

Steering the activities of DRCOG is its Board of Directors. DRCOG has 58 member governments, and each designates an elected official as its representative. In addition, the governor appoints three nonvoting representatives to the Board, and the Regional Transportation District has a nonvoting representative. The Board elects officers each February.

Responsibilities

The Board establishes policies and approves projects for staff to administer or implement. The Board's purpose is to define the results the organization is to produce and to define the acceptable boundaries within which it can delegate the achievement of those results to the Executive Director. The Board must create a vision and directives for staff that outline the desired benefits, the constituents served and the cost of delivering the desired outcomes.

The Board's governance function is distinct from the staff's management function. The Board's purpose is not to oversee staff, but rather to define the future and to ensure that this future is achieved in a legal, ethical and prudent manner.

DRCOG's Board of Directors is informed by its committees, which involve many individuals, groups and organizations in DRCOG's decision-making process.

Executive Committee

Membership

The incumbent Board officers constitute the Executive Committee.

Responsibilities

- The Executive Committee is the primary executive leadership of the Council, providing leadership to the Board and guidance to the Executive Director.
- The Executive Committee has no policy-making authority.
- The Executive Committee helps set Board meeting agendas, provides guidance on resolution of conflicts, provides process guidance, and receives updates from and assures the progress of committees of the Council.

Finance and Budget Committee

Membership

Members of the Finance and Budget Committee are appointed by the Board upon recommendation of the Nominating Committee, in accordance with procedures and requirements set forth in the Articles of Association.

Responsibilities

The administrative business of the Council concerning finances, contracts and related matters is managed by the Finance and Budget Committee. The following powers and duties are vested in the Finance and Budget Committee:

- To review contracts, grants and expenditures and authorize the expenditure of funds and entering into contracts, within the parameters of the Council budget.
- To execute official instruments of the Council.
- To review and recommend to the Board the budget as provided in Article XV of the Articles of Association.
- To review the Council's audited financial statements with the Council's auditor, and to undertake, oversee and/or review other organization audits.
- To receive and review other financial reports and provide regular updates to the Board.
- To compensate member representatives for expenses incurred in attending to the proper business of the Council.
- To exercise such other powers, duties and functions as may be authorized by the Board.

Performance and Engagement Committee

Membership

Members of the Performance and Engagement Committee are appointed by the Board upon recommendation of the Nominating Committee, in accordance with procedures and requirements set forth in the Articles of Association.

Responsibilities

The administrative business of the Council concerning the performance and evaluation of the Executive Director, the oversight of

onboarding of new Board members and related matters shall be managed by a Performance and Engagement Committee. The following powers and duties are vested in the Performance and Engagement Committee:

- To develop the process for recruitment of the Executive Director.
- To recommend appointment of the Executive Director to the Board.
- To execute an employment contract with the Executive Director, within the parameters of the Council budget.
- To develop the process for, and execute and document the annual performance evaluation for the Executive Director, including approval and execution of amendments to the Executive Director employment contract in connection therewith, within the parameters of the Council budget.
- To hold quarterly meetings with the Executive Director to provide performance feedback to the Executive Director.
- To recommend to the Board, as needed, policies and procedures for the effective administration of the Executive Director.
- To provide oversight of onboarding programs for new Board appointees.
- To implement and review Board structure and governance decisions.
- To plan the annual Board workshop.

- To review results of Board assessments and recommend improvements.
- To receive and review reports related to the business of the Committee and provide regular updates to the Board.
- To exercise such other powers, duties and functions as may be authorized by the Board.

Regional Transportation Committee

Membership

The Regional Transportation Committee brings together representatives of the region's transportation planning partners. Members include:

- From DRCOG, the Board chair and vice chair, two designees from the Board, and the Executive Director.
- Three metro area Transportation Commissioners and the Executive Director from CDOT.
- Three Board members and the General Manager from RTD.
- The Executive Director from the Regional Air Quality Council.
- Three members appointed by the Committee chair upon unanimous recommendation of the Executive Directors of DRCOG and CDOT, and the General Manager of RTD. DRCOG's Executive Director consults with the Committee chair prior to the three agency executives forming a recommendation.

Responsibilities

Through the Regional Transportation Committee, DRCOG, as the metropolitan planning organization, administers the urban transportation planning process for the region in accordance with Transportation Planning in the Denver Region and applicable federal regulations. The Regional Transportation Committee is a permanent committee that prepares and forwards policy recommendations to the DRCOG Board. Accordingly, the responsibilities of the Regional Transportation Committee include:

- Overall direction of current work activities established by the Unified Planning Work Program.
- Review and approval of items to be submitted to the DRCOG Board of Directors, as the metropolitan planning organization policy body, for adoption.
- Recommendation of plans, programs, documents and annual endorsements related to surface transportation as outlined in the Memorandum of Agreement between DRCOG, the Colorado Department of Transportation, and the Regional Transportation District. Should the DRCOG Board approve a policy action that differs from the Regional Transportation Committee's recommendation, the action shall be referred back to the committee for reconsideration.

Transportation Advisory Committee

Membership

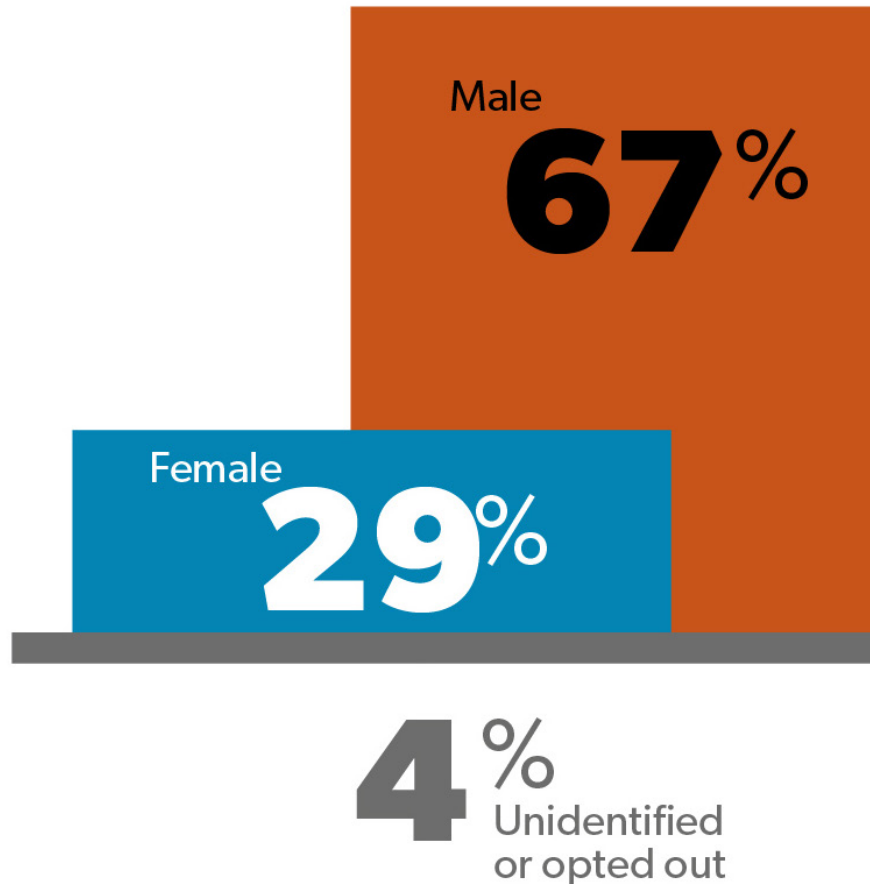
The Transportation Advisory Committee members include:

- 21 local government representatives.
- One representative each from the Colorado Department of Transportation's Region 1 and Region 4, the Division of Transportation Development, and Division of Transit and Rail.
- A representative of the Regional Transportation District.
- The Director of Transportation Planning and Operations of DRCOG.
- A representative of the Regional Air Quality Council.
- A representative of Via Mobility.
- One representative of each of the nine special interests — environment, freight and goods movement, transportation demand management, nonmotorized, aviation, business/economic development, equity populations/marginalized communities, housing and older adults.
- In an ex officio capacity, a representative from both the Federal Highway Administration and of the Federal Transit Administration. Ex-officio members are nonvoting.

The local government appointments for the metropolitan planning organization area are selected through the Subregional Transportation Forums, while the representative from outside the metropolitan planning organization is selected by recommendation and consensus from Clear Creek and Gilpin counties. The special

interest seats are nominated by the DRCOG Board Chair and approved by the Regional Transportation Committee. The DRCOG Board Chair and Regional Transportation Committee will review Transportation Advisory Committee membership annually.

Transportation Advisory Committee membership by sex



On the following pages are data detailing the results of a voluntary anonymous survey about how the Transportation Advisory Committee members identify. The Transportation Advisory Committee is the only DRCOG committee that both advises on transit issues and has membership selected by DRCOG. The survey was conducted in late April 2024 and received 24 responses.

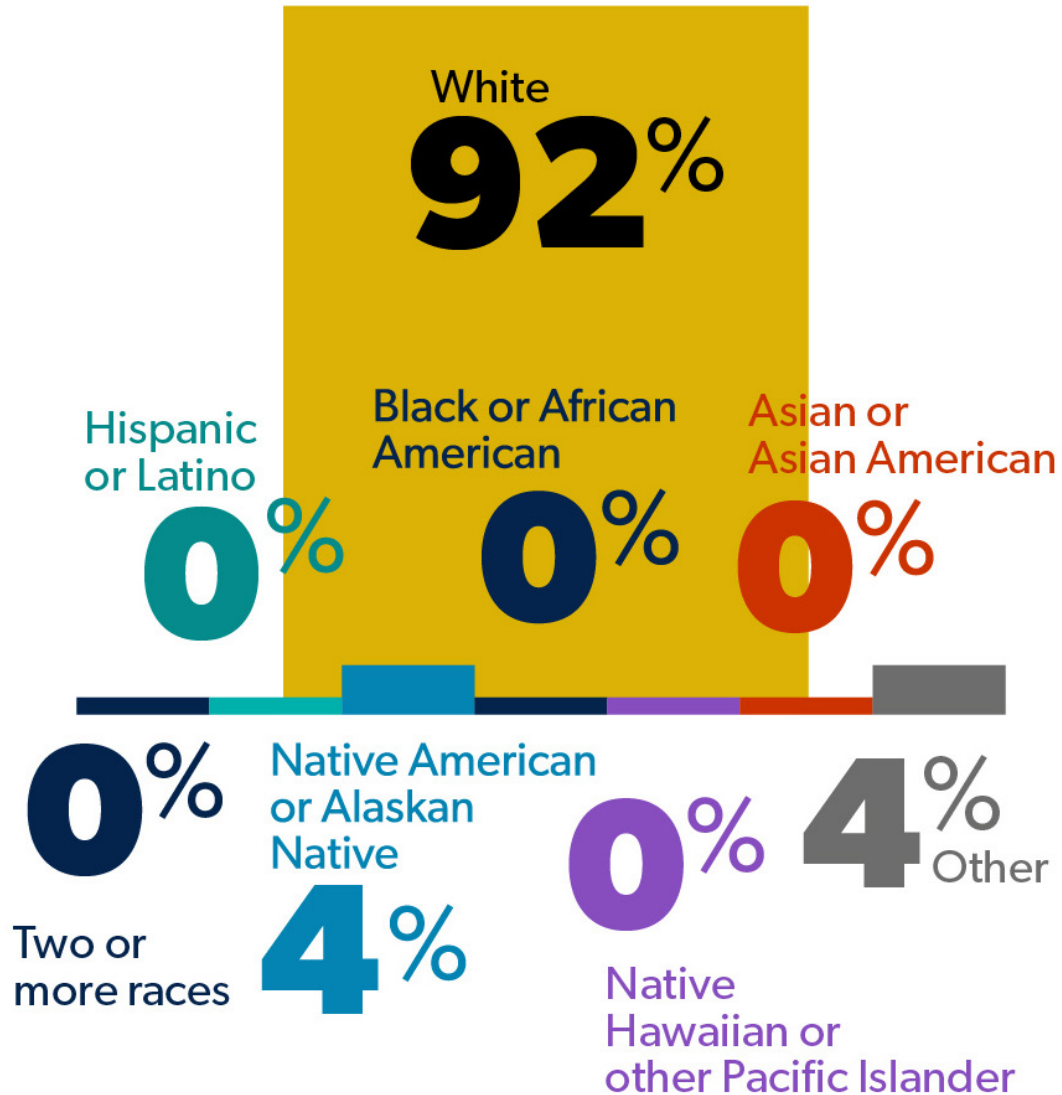
Responsibilities

The Transportation Advisory Committee assists the Board of Directors and the Regional Transportation Committee by reviewing the work of the transportation planning process, advising on methods of planning and implementation, and working with staff to develop policy options and

making recommendations to the Regional Transportation Committee. The Transportation Advisory Committee is a permanent committee. Specifically, the Transportation Advisory Committee:

- Establishes a dialogue on regional transportation issues among local governments, regional agencies, the state and other transportation stakeholders.
- Reviews the transportation planning process.
- Provides advice and guidance on methods of planning and implementation.

Transportation Advisory Committee membership by race and ethnicity



- Assists in coordinating and facilitating implementation of Metro Vision through the transportation planning process.
- Facilitates coordination of regional plans and programs among local government, regional agencies and the state.
- Provides advice and recommendations to the Regional Transportation Committee on transportation plans and improvement programs.

Advisory Committee on Aging

Membership

Advisory Committee on Aging membership includes individuals eligible to participate in the program, minority and low-income adults, older individuals, residents of geographically isolated areas, and at least three members of the DRCOG Board who are appointed by the DRCOG Board chair.

The DRCOG Board has established the goal that (1) at least one-half of the members should be age 60 and older, and (2) the Advisory Committee on Aging include at least one individual from each of the counties served by the Area Agency on Aging, and (3) include five community partner representatives from areas including, but not limited to, transportation; lifelong communities; foundations; financial institutions; aging; disability; lesbian, gay, bisexual, transgender, queer; elder rights; and developmental disability.

Members representing each of the counties served by the Area Agency on Aging shall be recommended for appointment by their respective county council or commission on aging through their respective governing body (board of county commissioners or mayor, as appropriate) and confirmed by the DRCOG Board chair. Representation shall proportionately reflect the 60-plus population within each county, and is determined using DRCOG's demographic estimates produced by the Colorado State Demography Office.

Responsibilities

- Represent the needs of individuals covered by all programs administered by the Area Agency on Aging.
- Advocate for the enhancement and well-being of the region's current and future older adult populations.
- Assist DRCOG staff in assessing the strengths and needs of older adults and their caregivers.
- Assist DRCOG staff in developing and updating the Area Agency on Aging's Area Plan on Aging; make recommendations concerning the same to the DRCOG Board.
- Assist DRCOG staff in developing policies, procedures and priorities for planning and funding activities; make recommendations concerning the same to the DRCOG Board.
- Assist DRCOG staff in assessing funding proposals to serve individuals covered by all programs administered by the Area Agency on Aging and subject to approval of the DRCOG Board or appropriate Board committee.
- Actively become and remain educated on the issues concerning the aging and their caregivers.
- Serve as an ambassador to the community and to the county councils on aging by communicating the purposes, responsibilities and functions of the Area Agency on Aging.

Additional and ad hoc committees

Transportation forums

The 2020-2023 Transportation Improvement Program process established eight transportation forums within the metropolitan planning organization boundary. Each forum is a geographic unit containing a county and all the incorporated areas within the county. Forum membership is not mandatory, but each member holds a vote, mostly established by intergovernmental agreements or memoranda of understanding. DRCOG, the Regional Transportation District, the Colorado Department of Transportation and other agencies or stakeholders are invited to participate in each forum as nonvoting members.

All standing meetings identified by a subregion are required to be open to the public, and their agendas are publicly posted in a timely fashion and contain time to receive public comment. The agendas and meeting information are also posted to DRCOG's website. The forums provide flexibility for member governments to apply local values to the planning process and remain up-to-date on other countywide transportation topics, in addition to regular updates from DRCOG, the Colorado Department of Transportation and the Regional Transportation District. Most forums have continued since the 2020-2023 Transportation Improvement Program was adopted and were also leveraged in the development of the 2050 Metro Vision Regional Transportation Plan.

Youth Advisory Panel

DRCOG sought out the input of youth in the region by creating a new Youth Advisory Panel to provide feedback throughout the planning process for the 2050 Metro Vision Regional Transportation Plan. Panel members consisted of representatives of member governments' youth boards and commissions. The panel met five times during plan development.

Civic Advisory Group

DRCOG convened a Civic Advisory Group to help guide development of the 2050 Metro Vision Regional Transportation Plan. The group represented the diversity of communities and experiences in the Denver region and provided perspectives from people who have not been previously involved in the transportation planning process. The panel met five times during plan development.

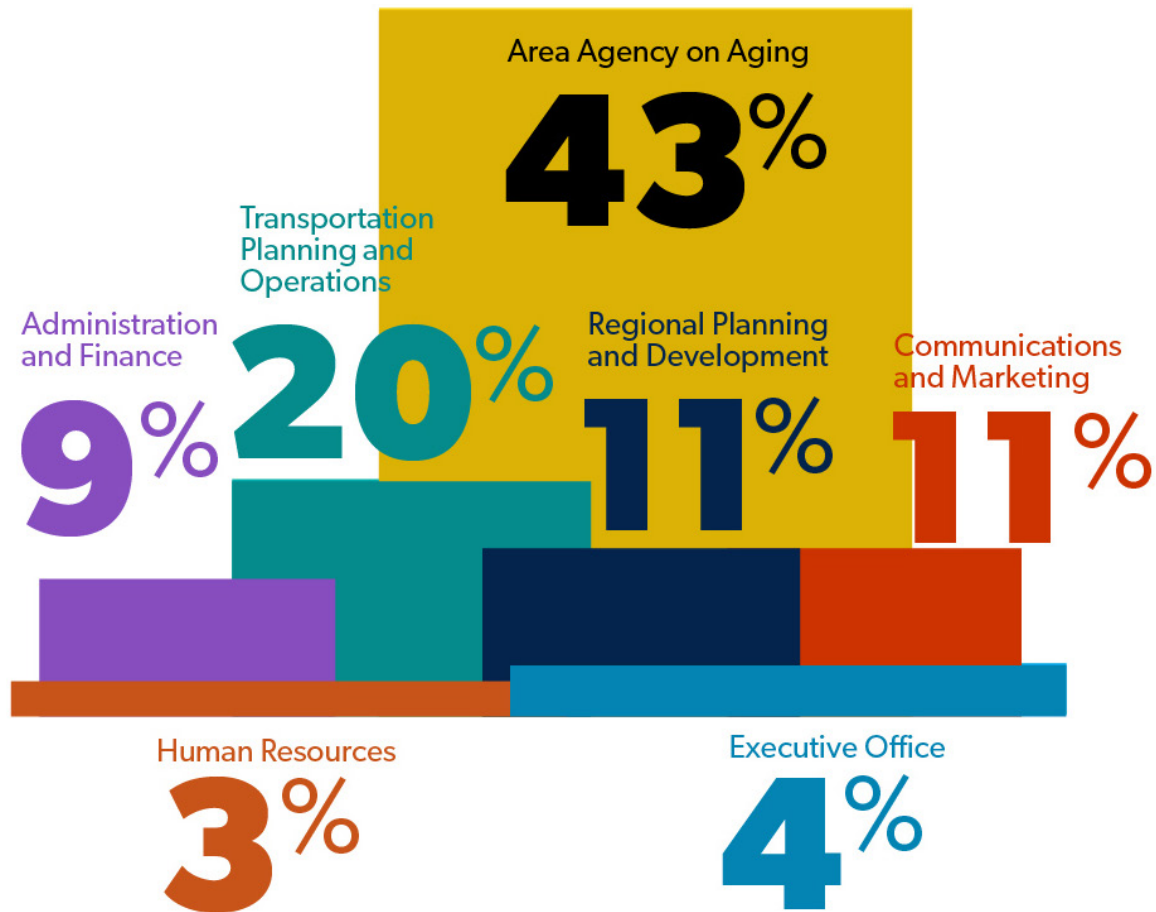
The Civic Advisory Group was reconvened for the update to the 2050 Metro Vision Regional Transportation Plan that was initiated to comply with the state's Greenhouse Gas Transportation Planning Standard. The group met four times.

Ad hoc committees

The Board of Directors may create ad hoc committees to review and study specific issues within a specified timeframe. Ad hoc committees have a written charge or scope of work set by the Board. The number of ad hoc committees must be aligned and within available DRCOG budgetary and staffing resources.

Staff divisions and major plans and programs

Employees by division



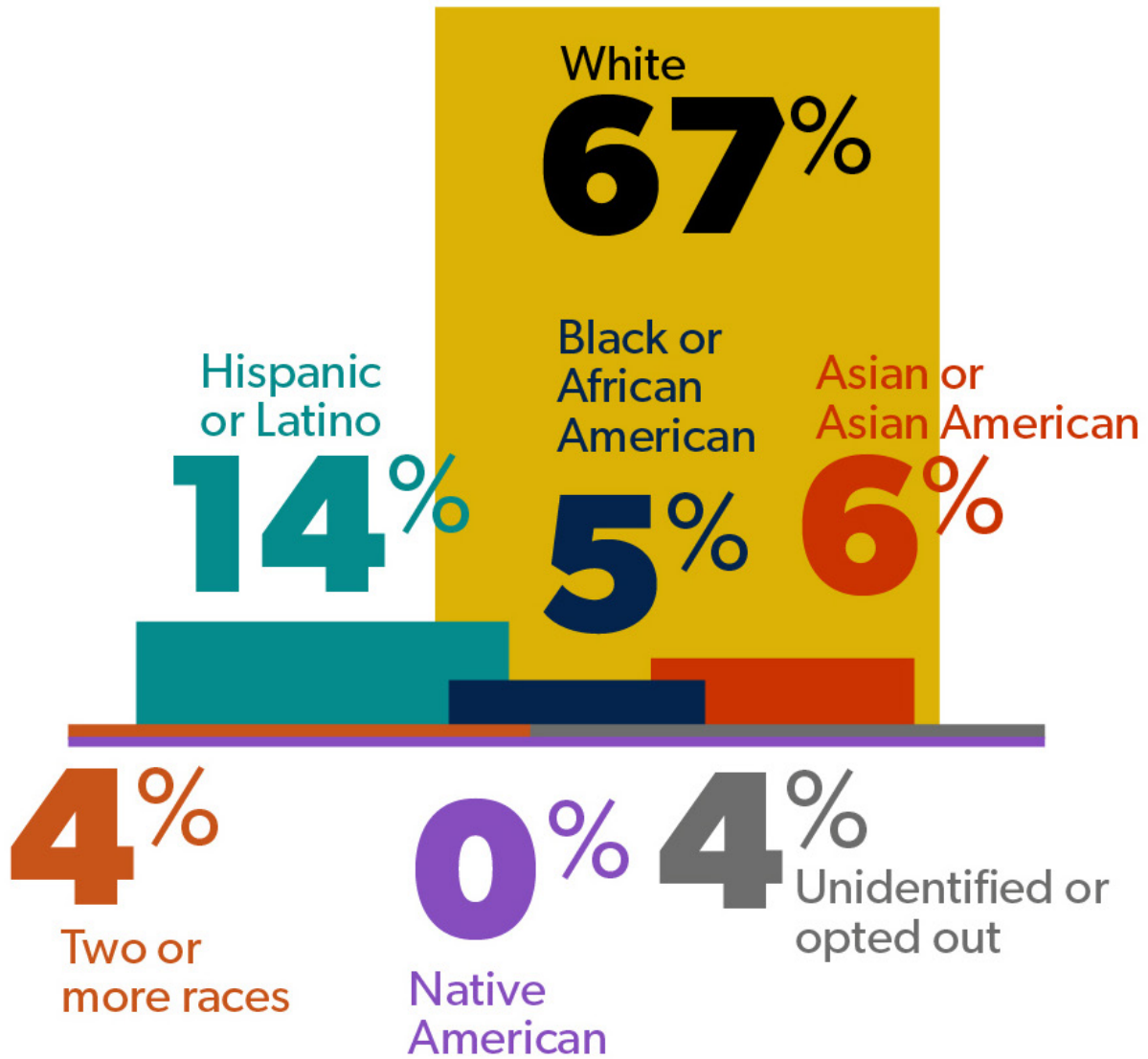
As of a March 26, 2024, Human Resources report, the Denver Regional Council of Governments employed 142 employees across seven divisions. The report only includes staff employed at the time and is not reflective of any potential vacancies at DRCOG or within divisions. The report does not include volunteers or interns working for DRCOG.

The largest division is the Area Agency on Aging with 61 employees, constituting almost half of all employees. The Transportation Planning and Operations division is the second-largest with 28 employees, 20% of all employees. The remaining third of employees are in Regional Planning and Development with

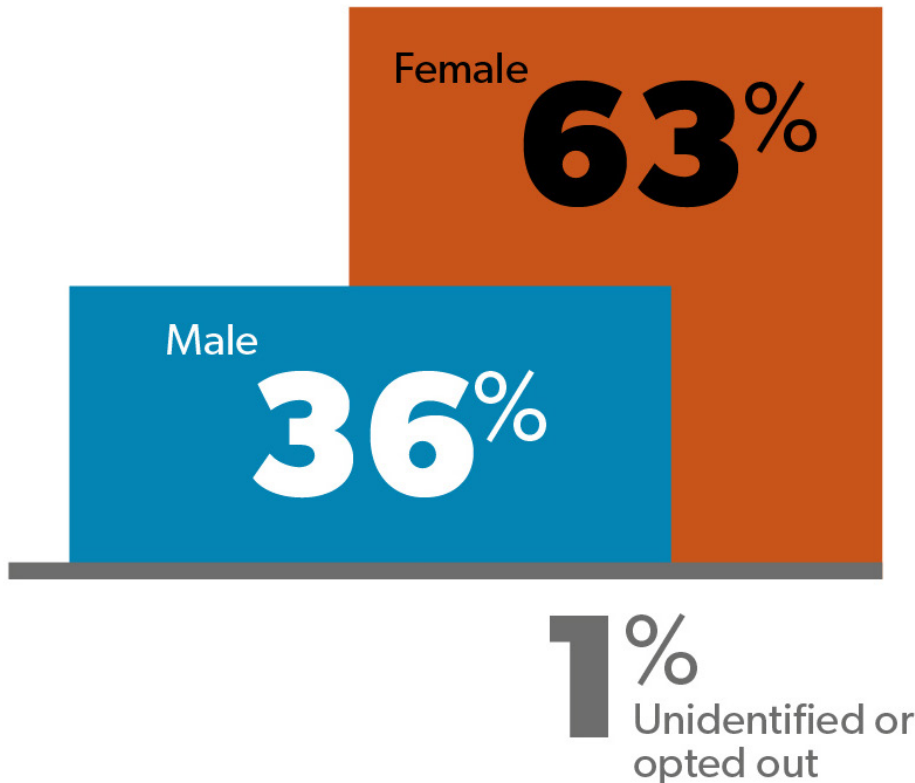
16 employees, Communications and Marketing with 15 employees, Administration and Finance with 13 employees, the Executive Office with 5 employees, and Human Resources with 4 employees.

Human Resources is also capable of providing reports of employees broken down by race and ethnicity and sex. Human Resources collects staff demographic information through voluntary self-identification by new hires through the recruitment process. The following two charts illustrate the current demographic breakdowns of DRCOG staff.

Employees by race and ethnicity



Employees by sex



Administration and Finance

The role of the Administration and Finance division is to support staff in carrying out the goals of the DRCOG Board. This includes protecting the agency from risk, ensuring grant and contractual compliance standards are met, strengthening the fiscal integrity of the organization, and ensuring efficiency in all business operations.

Administration and Finance staff serve the agency through the information technology team, which equips staff with the technological tools they need to be successful, in addition to keeping the network operational and secure. The accounting and contracts team assists staff with daily business operations,

collaborates on business development opportunities and helps direct the financial future of the organization.

Area Agency on Aging

Established in 1974, the DRCOG Area Agency on Aging serves as the regional planning and coordinating agency for programs and services for older adults and their caregivers. The DRCOG Area Agency on Aging is the largest in Colorado and covers the eight-county Denver metropolitan area (excluding Boulder County, which has its own area agency on aging) as mandated through both the Older Americans Act of 1965, as amended, and the Older Coloradans Act of 1985.

The Area Agency on Aging helps adults 60 and older remain independent in the community. Through direct services and a network of funded providers, it offers older adults, their families and caregivers information and referral services, case management, transportation, home-delivered meals, access to senior centers, and legal services. The Area Agency on Aging also serves people living in the region's 490 nursing homes and assisted living residences. As the regional planning entity on aging, the Area Agency on Aging is responsible for identifying the needs of older adults, identifying gaps in services and working with community partners to address the service gaps in the region.

A key role of the Area Agency on Aging is also advocacy, as it helps ensure that lawmakers are aware of the needs of older adults and their caregivers, the benefits of community-based services and the taxpayer cost of failing to address the needs of the region's older adult population.

The Area Agency on Aging is largely funded through the Older Americans Act, a half-century-old federal program that allocates funds to states based on their 60-plus populations. Without the act, many of the programs DRCOG and its partners offer would have to secure private funding.

In addition to strengthening essential community partnerships, DRCOG works with clinical medical providers to identify social concerns that may contribute to hospital readmissions, high medical bills and poor health. With DRCOG as a bridge, nonprofits, community partners and clinical medical

sites work together to reduce health care costs and improve the quality of life for the region's older adults.

DRCOG has recently started allocating available grant money to organizations that prove they're providing solutions for previously underserved communities.



Area Plan on Aging

The Area Plan on Aging guides the work of the DRCOG Area Agency on Aging during a four-year period. It reflects the needs of the region, highlights service goals, and demonstrates outcomes, strategies and measures that will be used to evaluate progress and the success of the work. The plan is carried out through programs provided directly by the Area Agency on Aging and through contracts with community-based agencies to provide a continuum of services.

Public input is essential for DRCOG to understand how Area Agency on Aging services are being used, how effective they are and what services are needed in the region to

help people age better. To obtain public input, in 2022 DRCOG conducted a Community Assessment Survey of Older Adults, held 14 community conversations and seven key informant sessions. DRCOG uses the information from the Community Assessment Survey of Older Adults to identify strengths, needs and trends in its planning and service area, and to prioritize funding and service priorities during the plan's four years. It also helps local governments, service providers and other partners better understand the older adults living in the region, including what is going well and the areas that still need work.

For more information, visit the [Area Agency on Aging section](#) of the DRCOG website.

Communications and Marketing

The Communications and Marketing division works to improve all aspects of internal and external communications, building awareness and perception of the organization and its mission. Its staff support the success of divisions, programs, projects and initiatives by developing and designing promotional and informational communications materials for various and diverse audiences.

Communications and Marketing addresses accessibility by making the DRCOG website accessible, demonstrated by a place to click to enlarge the font, magnify text, adjust line spacing or increase contrast if needed. Website users can also choose to display the site in modes specific to the needs of people who have seizures, cognitive disabilities, attention deficit/hyperactivity disorder or who prefer to use keyboard navigation of the site.

The Communications and Marketing division also optimizes PDF documents for accessibility, for example, by using capitalization standards best suited for text-to-speech readers, increasing contrast for people with color perception deficiencies and indicating segment reading order.

The division also translates the Board's policy into a clear and concise message that can be easily shared with the public, policymakers, legislators, media and other stakeholders. The division works closely with other DRCOG divisions; local, state and federal agencies; and other partner organizations to develop strategies to implement the Board's priorities.

Communications and Marketing also houses the Way to Go program, a joint venture among DRCOG and seven partner agencies to offer options to driving alone. Way to Go promotes the use of transit, biking, walking, carpooling, vanpooling and telework, working with employers to reduce commute trips throughout the region. The Way to Go program is well known throughout the region for hosting its annual Bike to Work Day event, the second-largest of its kind in the country.

Public Engagement Plan

People-Centered Planning, Projects and Services, DRCOG's public engagement plan, helps DRCOG employees plan, implement and evaluate effective engagement activities that invite greater public participation in the organization's projects. DRCOG is committed to going well beyond just meeting the minimum requirements, and its employees not only inform the public of what DRCOG

is doing, but also encourage and enable meaningful engagement.



The plan emphasizes engaging individuals and segments of the public who are directly affected by a project. DRCOG staff are encouraged to both reach out to groups of people traditionally underrepresented and significantly affected by the decisions a project entails. DRCOG invites participation by members of populations traditionally underrepresented in regional decision-making processes due to demographic, geographic or economic circumstances, to allow DRCOG to appropriately consider their needs. DRCOG uses demographic and stakeholder analysis to identify communities for projects for which it seeks public engagement.

For more information, visit the [Get Involved](#) section of the DRCOG website.

Limited English Proficiency Plan

DRCOG is committed to engaging and involving all residents of the Denver region, including those with limited English proficiency, in its activities. Therefore, in accordance with the best practice standards for public

involvement identified by state and federal partners, together with assistance from the Colorado Department of Transportation, the Federal Highway Administration and the Federal Transit Administration, DRCOG has developed a Limited English Proficiency Plan. The goal of the Limited English Proficiency Plan is to ensure all residents of the Denver region can, to the fullest extent practicable, participate in DRCOG activities. DRCOG's Communications and Marketing staff maintains a record of language assistance requests so future needs may be accurately assessed.

For more information, visit the [Nondiscrimination](#) section of the DRCOG website.

Way to Go

Way to Go advocates for access to mobility options for all residents of the Denver region. In accordance with DRCOG's Limited English Proficiency Plan, Way to Go leverages several strategies to communicate well with people who speak a primary language other than English. Its websites use Google Translate, and phone, email or in-person inquiries include translation support if needed. Many of Way to Go's educational and marketing materials, as well as its trip-planning platform (MyWayToGo.org), are translated into Spanish.

Way to Go may be best known for organizing the region's Bike to Work Day event, the second-largest of its kind in the country. Materials, including posters and other communications, are translated into Spanish, and future events will continue the emphasis on encouraging use of various types of bikes, including adaptive models. Way to Go staff have been intentional about partnering with groups that advocate for underserved

communities, with examples including the Denver Regional Mobility and Access Council, Black Girls Do Bike, Outspokin (an LGBTQ organization) and Wish for Wheels.

Way to Go also administers and funds projects through Transportation Demand Management Set-Aside grants. Among other factors for evaluating and scoring grant project applications, it focuses on environmental justice areas, and more broadly considers access for people of all ages, incomes and abilities.

Civic Academy

Civic Academy, formerly known as Citizens' Academy, is a program, run by staff from both the Communications and Marketing division and Regional Planning and Development division, that helps build the civic capacity of the Denver region's residents. Through a seven-week course, the academy exposes participants to regional issues like transportation, economic vitality, housing and civic engagement.

Each academy includes weekly two-hour sessions consisting of presentations from local subject matter experts, small-group interactions and networking. In addition, participants develop individual action plans to complete after the academy. Around 1,000 residents are alumni of Civic Academy.

Executive Office

The Executive Office oversees the day-to-day functions of DRCOG, as well as providing support and acting as a liaison to the Board of Directors.

Comprehensive Economic Development Strategy

The Comprehensive Economic Development Strategy is a tool to promote regional cooperation on economic issues extending beyond jurisdictional boundaries. The strategy relies upon contributions from individual and regional economic development organizations; nonprofits; educational institutions; and local, state and federal partners to create objectives and fulfill outcomes through different pathways and at different speeds for shared positive results.

Creating the region's first Comprehensive Economic Development Strategy presents an opportunity for local governments to build broader, deeper, stronger, more inclusive coalitions across the region and to capture new funding opportunities at the same time.

The strategy will ensure current and future economic development efforts at the community and regional levels will continue to succeed by addressing the specific challenges and unrealized opportunities that have been identified through the process employed to develop it.

Human Resources

The Human Resources division supports staff in carrying out the goals of the DRCOG Board by providing services such as facilities management and maintaining employment records. Human Resources also provides services related to employee recruitment, onboarding and retention, such as staff training, coordinating and designing employee benefits, ensuring compliance with all employment laws,

investigating and resolving employee concerns, and managing an employee safety program.

Regional Planning and Development

The Regional Planning and Development division supports DRCOG's vision and mission by enabling and facilitating regional collaboration. It provides the information, services and tools to advance a sustainable and vibrant region for all stakeholders. A major focus area for Regional Planning and Development is the Metro Vision plan, the long-range vision for the region that guides growth and development. Regional Planning and Development also is responsible for using sophisticated modeling tools to anticipate the locations of household and job growth forecast by the Colorado State Demography Office at a county level. The division is composed of service-oriented teams, providing high-quality information, tools and resources to both internal and external partners.

Metro Vision

The DRCOG Board of Directors adopted the first Metro Vision plan in 1997 and, since then, has continued the dialogue about how best to achieve the plan's evolving vision. For more than 20 years, the DRCOG Board of Directors has committed to addressing regional challenges through shared aspirations that outline its communities' desired future and integrated plans that collectively serve as a comprehensive guide for how the region as a whole can achieve the future reflected in Metro Vision. Metro Vision outlines outcomes, objectives and initiatives established by the DRCOG Board of Directors to ensure the coordinated efforts of DRCOG's many partners



meet the evolving needs of the region's existing and future residents.

Although Metro Vision's core values have been carried forward through various updates and remain valid, today's Metro Vision is markedly different than its predecessors. Metro Vision's focus has expanded from three topic-based plan elements (growth and development, transportation, and environment) to a theme- and outcomes-based approach. The shift in focus reflects:

- Consideration of the region's social and economic health alongside its physical development.
- The addition of new or expanded topic areas such as housing, economy, community health and wellness, and community resilience.
- The desire for an emphasis on measuring shared achievement of regionwide goals.

The current version of Metro Vision emerged from a collaborative process that spanned more than four years. DRCOG's policy committees, member governments, partner agencies, regional stakeholders and the community at

large collaborated to create a shared vision for action for shaping the future of the Denver metro area. DRCOG used a variety of outreach opportunities to engage participants and inform the process, including Metro Vision Idea Exchanges, local government surveys, listening sessions, stakeholder interviews with public- and private-sector interest groups, online forums, neighborhood meetings and numerous engagement activities associated with DRCOG's Sustainable Communities Initiative. Residents throughout the region informed the collaborative process, identifying areas of regional success worth continuing and expanding, as well as emerging challenges for Metro Vision to address.

CRS 30-28-106(2) requires, at minimum, a well-noticed public hearing (notice has been published in a newspaper of general circulation in the region in a manner sufficient to notify the public of the time, place and nature of the public hearing) prior to the adoption or amendment of a regional plan, though DRCOG has made a stronger commitment to nondiscriminatory engagement and involvement in Metro Vision updates and amendments through People-Centered Planning, Projects and Services (DRCOG's public engagement plan). This includes regular and routine amendment cycles so Metro Vision can remain dynamic and flexible, and respond to a wide range of issues and concerns.

For more information, visit the [Metro Vision](#) section of the website.

Boomer Bond

DRCOG and communities across Colorado are nationally recognized leaders for their efforts to create age-friendly communities. For more than

a decade, DRCOG has been working directly with its member governments to help them prepare for the expected dramatic growth in the older adult population.

DRCOG's Boomer Bond assessment helps local governments conduct an evaluation of how their community serves older adults in the areas of housing, mobility and access, community living, and support services. The assessment tool helps local governments document existing conditions, strengths and deficiencies, but also guides them in identifying short- and long-term priorities and implementation strategies to ensure they support health and successful aging.

Transportation Planning and Operations

The Transportation Planning and Operations division assists the Board and local officials in planning and implementing the Regional Transportation Plan. The division also improves the operation of the region's infrastructure through traffic operations and signalization projects, a key function of which is coordinating efforts to improve traffic congestion and mobility in the region.

The primary products of the regional transportation planning process that address mobility needs are the Metro Vision Regional Transportation Plan and the Transportation Improvement Program. In addition, Transportation Planning and Operations undertakes other programs and projects that address the mobility needs of all residents in the region, including vulnerable populations. Specific programs and projects are described in DRCOG's Unified Planning Work Program, which is updated every two years.



Metro Vision Regional Transportation Plan

The Metro Vision Regional Transportation Plan outlines the region's multimodal transportation vision with a horizon of at least 20 years. The Regional Transportation Plan helps DRCOG and its numerous partners implement the shared aspirational vision of Metro Vision by identifying specific improvements to the transportation system and its operations. The multimodal plan includes roadway, transit, freight, active transportation, safety, and operational facilities and services.

During the original plan development process in 2019-2021, DRCOG launched the Civic Advisory Group and Youth Advisory Panel as part of the 2050 Regional Transportation Plan to increase inclusive outreach and engagement during the planning process. DRCOG committed to the 2050 Regional Transportation Plan respecting equity issues in its project and program investment priorities. Transportation helps address social equity issues, and transportation equity is one of the foundational themes of the 2050 planning process and the 2050 Regional Transportation Plan. The plan's vision for transportation connects people of all ages, incomes and abilities to housing, jobs, health care, recreation and education.

DRCOG considered the plan's potential benefits to, and effects on, minority and low-income populations within the Denver region, especially as compared to the broader population. DRCOG staff used population and travel demand forecasting tools to determine whether the plan would result in vulnerable populations experiencing more hardship than the general population, especially whether they would spend more time traveling to jobs, essential services, and entertainment and educational opportunities.

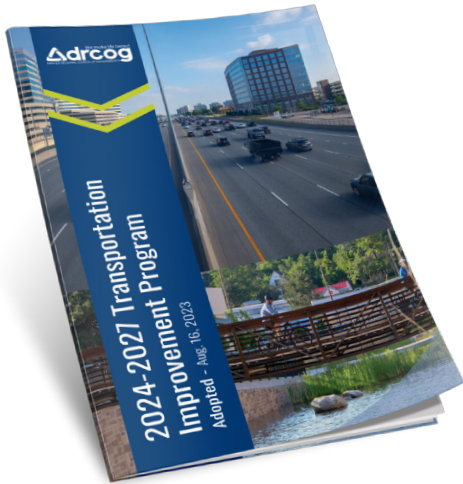
During the update in 2022 to meet the state's greenhouse gas planning standard, DRCOG staff conducted a Disproportionately Impacted Community analysis on the greenhouse gas mitigations selected.

For more information, visit the [Metro Vision Regional Transportation Plan](#) section of the DRCOG website.

Transportation Improvement Program

The Transportation Improvement Program is a staged multiyear plan of projects to implement the Regional Transportation Plan. The program identifies the federally funded surface transportation strategies and projects (or phases of projects) to be implemented in the DRCOG transportation management area over a four-year period. This multimodal program includes roadway, high-occupancy vehicle, transit, travel demand management, and active transportation facilities and services.

Federal law designates metropolitan planning organizations as responsible for developing and approving the Transportation Improvement Program. DRCOG directly selects projects with federal and state funding, and reviews CDOT- and RTD-submitted projects for



consistency with regional plans. Each of the three regional transportation planning partners — DRCOG, CDOT and RTD — select projects for the funds over which it has authority. DRCOG is allocated Transportation Alternatives, Surface Transportation Block Grant, Congestion Mitigation and Air Quality, and Carbon Reduction Program federal funding in addition to the state Multimodal Transportation and Mitigation Options Fund.

DRCOG also includes in the Transportation Improvement Program air quality regionally significant, local government-funded projects that require federal approval. CDOT selects projects for inclusion into the program using a variety of federal and state revenues to fund regional multimodal system construction, operations and maintenance. RTD selects projects using a variety of federal funds and RTD revenues to fund regional transit system construction, operations and maintenance.

DRCOG evaluates and selects projects through two calls for projects — one for the Regional Share and another for the Subregional Share. This dual-model approach provides the flexibility for member governments to apply local values to the Transportation Improvement

Program process and still maintain DRCOG's commitment to implementing a process consistent with Metro Vision and the Regional Transportation Plan.

At the initiation of the Regional Share call for projects, DRCOG, CDOT and RTD staff jointly conduct two mandatory training workshops across the region to describe and explain the submittal process, eligibility and evaluation, development requirements for construction projects, sponsor responsibilities, and basic requirements for implementing federal projects for the regional and subregional processes.

During the training, CDOT, RTD and DRCOG staff are available to assist jurisdictions in preparing funding request applications, as needed. As an outcome of the required training, those who attend are certified to submit applications for either call. Only applications prepared by certified sponsors who attended a mandatory training are considered eligible submittals.

The project selection process considers the input of residents at the local, subregional and regional levels. Resident involvement is most significant at the local level, as projects were submitted to DRCOG for regional funding through the Regional Share process and to each county subregional forum through the Subregional Share process during the most recent call for projects. Local governments and agencies, such as CDOT and RTD, work directly with residents in the development of transportation projects.

DRCOG and each county subregional forum provided public notice of each subregional technical committee and forum meeting throughout the development process. In

addition, each agenda contained dedicated time for public comment. Notice of public involvement activities and the time established for public review and comment on the Transportation Improvement Program satisfy the Program of Projects requirements of the Federal Transit Administration Section 5307 Program for RTD's Program of Projects (also referred to as RTD's Mid-Term Financial Plan).

During the process, applicants are asked to use the DRCOG Data Tool to identify the number (and proportion of the total population) of members of particular groups. Applicants are then asked how their project would improve access and mobility for each population group. Responses were scored and included as one element of the final technical score of the project, one of the main drivers of project selection.

Finally, the full portfolio of selected projects is put through an equity analysis, which is included in the published Transportation Improvement Program document. This analysis compares funded project locations to the residential locations of marginalized communities throughout the region, and evaluates generalized benefits and burdens distributed throughout the region as a result of project implementation. This analysis is included in the document as one element for the DRCOG committees and Board to consider prior to adoption.

All projects selected for funding must go through National Environmental Policy Act environmental analysis and public involvement prior to construction. Projects in the Transportation Improvement Program contain the best information at the time of submittal. Final details of alignment; design; multimodal

treatments; and environmental mitigation, minimization, or abatement strategies are determined by project sponsors and state and federal partners before construction takes place through a project-level National Environmental Policy Act process.

The Board-adopted Policy on Transportation Improvement Program Preparation covering the projects selected in the program, provides more details. For more information, visit the [Transportation Improvement Program](#) section of DRCOG's website.



Unified Planning Work Program

DRCOG addresses the region's planning priorities through its Unified Planning Work Program, which describes all transportation-related planning activities occurring in the region on a two-year cycle. It primarily identifies tasks that will be accomplished using federal transportation planning funds.

The regional partners participate in the activities of the Unified Planning Work Program, with each contributing information, effort and resources. The work program defines

the nature, extent and duration of partners' participation. As a recipient of federal funding, compliance with Title VI is required. DRCOG has integrated Title VI into its planning activities as part of its transportation planning process.

For more information, visit the [Unified Planning Work Program](#) section of the DRCOG website.

Additional plans and programs

Transportation Planning and Operations is also responsible for the development of other multimodal plans and programs that outline the region's vision and needs. For more information on each of the plans mentioned below, and how each addresses the needs of vulnerable populations, visit the DRCOG website.

Active Transportation Plan

The plan envisions a safe, comfortable and connected network, and highlights opportunities and implementation strategies to improve active transportation across the Denver region.

Regional Multimodal Freight Plan

The plan covers local freight issues, including challenges and opportunities for improvement, and offers a strategic framework for the region to engage in planning for the future of freight infrastructure.

Taking Action on Regional Vision Zero

Taking Action on Regional Vision Zero is a safety action plan establishing a target of zero fatalities and serious injuries on the Denver region's transportation system.

Coordinated Transit Plan

The Coordinated Transit Plan addresses federal requirements, identifies strategies to address the transportation needs of our region's older adults and individuals with disabilities, and emphasizes the region's integrated approach to coordinating an array of fixed route and human service transit services.

Transportation Demand Management Strategic Plan

The plan provides the Denver region with a framework to improve efficiency and mobility for travelers of all ages, incomes and abilities by identifying actions to enhance and expand sustainable, multimodal travel choices; reduce traffic congestion; and provide air quality benefits.

Regional Transportation Operations and Technology Strategic Plan

The purpose of the plan is to guide the Denver Regional Council of Governments' efforts to deploy technology, tools and coordinated system procedures to manage the multimodal transportation system. Regional Transportation Operations and Technology is a set of tools and processes used by public and private operating agencies' staff to meet the day-to-day demands of the traveling public.

Regional Complete Streets Toolkit

The toolkit provides decision-makers, planners and designers guidance for planning, designing and implementing Complete Streets. The Complete Streets approach gives people walking, rolling, bicycling and taking transit the same access to safe and comfortable streets as those driving a motor vehicle. The toolkit can help DRCOG, local governments and project sponsors achieve Vision Zero and better define multimodal projects for funding.

Priority Climate Action Plan

DRCOG was awarded the U.S. Environmental Protection Agency’s Climate Pollution Reduction Grant for the Denver-Aurora-Lakewood Metropolitan Statistical Area and prepared the Priority Climate Action Plan consistent with grant requirements. The plan sets a vision for the greater Denver region’s climate goals, describing eight near-term, high-priority, implementation-ready measures to reduce greenhouse gas emissions, improve air quality and drive equity in the Front Range.

Community-Based Transportation Planning Program

The program funds studies or planning efforts to identify specific mobility needs of historically marginalized communities, develop community-informed solutions, and map out a path to fund and implement recommendations. Collaboration is central in this planning effort, and DRCOG seeks to work with municipal and county governments, community-based organizations, and community members throughout the development of the community-based plans.

Corridor Planning Program

DRCOG formed the Corridor Planning Program to advance planning for projects and priorities outlined in the 2050 Regional Transportation Plan with the goal of project implementation. As part of the program, DRCOG will fund and lead planning studies to advance infrastructure investment priorities along regional arterial corridors identified in the plan.

Federal Transit Administration Section 5310 program

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Unlike other federal funding that the Denver Regional Council of Governments receives

as a subrecipient, DRCOG is a designated recipient of Federal Transit Administration Section 5310 program funds for the Denver-Aurora Urbanized Area. The Program Management Plan details how DRCOG plans to administer the 5310 program to facilitate both DRCOG’s management and Federal Transit Administration oversight by documenting the procedures and policies for administering the programs. The Program Management Plan details how a project is selected, incorporated into the appropriate documents for federal funding, contracted and managed.

The Fixing America’s Surface Transportation Act requires projects selected for funding under Section 5310 to be “derived from a locally developed, coordinated public transit-human services transportation plan” and that the plan be “developed through a process that includes representation of public, private, and nonprofit transportation and human services providers.” DRCOG produces and maintains the Coordinated Transit Plan, which covers the entire Denver region; however, local entities are encouraged to develop local coordinated transit plans.

Section 5310 program management is provided by the Area Agency on Aging with support from multiple divisions within DRCOG, including the Transportation Planning and Operations division, and the Administration and Finance division. The Area Agency on Aging provides program management and general review of projects with support from Transportation Planning and Operations. Administration and Finance provides overall program financial compliance and contract management.

The following sections are based on information in DRCOG’s Section 5310 Program

Management Plan and outline how Section 5310 subrecipients meet their requirements to implement and submit Title VI programs to DRCOG. Please refer to the documents, available on the DRCOG website, for further details.

Monitoring

DRCOG continually monitors 5310 subrecipients. DRCOG staff review invoices from 5310 grantees to ensure they comply with applicable regulations and are submitted for eligible expenses. If invoices do not match regulations, they are rejected and further investigated. If DRCOG determines a project is no longer compliant with the 5310 program, funds are taken from the subrecipient.

DRCOG performs an annual evaluation, providing program measures and other applicable information, including tracking funding and the remaining apportionment balances. DRCOG uses the 5310 program checklist found in Appendix A of the Program Management Plan to ensure it is taking all appropriate measures in administering and managing the 5310 program. The results from the checklist are included in the annual evaluation document.

Progress reporting

Subrecipients are required to prepare progress reports on a quarterly basis. The reports begin based on the date when agreements or contracts are signed with subrecipients and continue until the project is closed out. In addition to applicable items from 2 CFR 200.328(b), progress reports also include the following Section 5310 specific program measures (C 9070.1G, p.II-2.), as applicable.

Certifications and assurances

All applicants must comply with various federal requirements. These certifications and assurances, including the applicant's Title VI Plan, which are required to be signed by an authorized agency official, are part of the solicitation documents or application package and are to be submitted with the completed application of applicants. If an application is approved, these certifications and assurances become part of the subrecipient's contract with DRCOG.

DRCOG, when submitting a grant application to the Federal Transit Administration, is also required to execute certifications and assurances both on behalf of DRCOG and covering its subrecipients. DRCOG agrees to comply with all requirements of the Annual List of Certifications and Assurances for Federal Transit Administration Grants and Cooperative Agreements and pass those requirements to subrecipients as appropriate.

Site visits

DRCOG or authorized representatives perform on-site project monitoring visits with subrecipients receiving grant assistance. Site visits are conducted using checklists that outline account and record-keeping requirements in compliance with Office of Management and Budget circulars A-122 and A-87 if the subrecipient received operating assistance, Office of Management and Budget 49 CFR Part 18 and Part 19 for administrative requirements, the regulatory requirements for receipt of federal funds, vehicle inventory and maintenance records if the subrecipient received capital assistance, and compliance with the Federal Transit Administration Drug and Alcohol Program testing regulations.

DRCOG complies with all applicable standards set forth in 2 CFR 200 and guidance in Federal Transit Administration circular 5010.1 – Grant Management Guidelines about financial management systems for financial reporting, accounting records, cost standards, internal controls, budget controls and audit requirements.

Additional subrecipient requirements

DRCOG requires a signed certification of compliance pertaining to applicable Certifications and Assurances from 5310 subrecipients. DRCOG, in turn, includes the documentation in the project's permanent file. DRCOG also randomly completes audits of subrecipients to ensure compliance with applicable provisions.

Civil rights

DRCOG assures the Federal Transit Administration that each third-party contractor at any tier and each subrecipient at any tier under the project is compliant with these requirements. Each subrecipient is required to attend an annual workshop on civil rights requirements.

DRCOG will seek, from all approved applicants, a written certification of compliance pertaining to Civil Rights, Title VI, Equal Employment Opportunity and Disadvantaged Business Enterprise regarding the grantee's facility and services. DRCOG also insists on being informed, in writing, of any lawsuit, litigation or civil rights complaints made against the grantee organization. Additionally, DRCOG accepts, in writing, any updates on the status or outcome of active or pending lawsuits throughout the period of the approved grant. Furthermore, when selecting projects DRCOG prioritizes

projects that that serve environmental justice (minority and low-income) and other vulnerable populations and areas where transit-dependent populations reside but aren't currently well-served served by the transit system.

DRCOG, in turn, makes all documents related to Civil Rights reporting part of the project's permanent file.

Section 504 and Americans with Disabilities Act reporting

DRCOG seeks, from all approved applicants, a written certification of compliance pertaining to Americans with Disabilities Act directives. DRCOG, in turn, makes all documents related to Americans with Disabilities Act reporting part of the project's permanent file. The documentation includes information regarding the Americans with Disabilities Act accessibility of vehicles purchased through the 5310 program and executed, contracted assurances for subrecipients. DRCOG incorporates the relevant elements Section 5310 program administration into this Title VI Plan.

Environmental protection

When determining if a particular program, policy or activity will have disproportionately high and adverse effects on minority and low-income populations, DRCOG will take into account mitigation and enhancement measures and potential offsetting benefits to the affected minority or low-income populations. Other factors DRCOG will also take into account are comparative impacts, design and the number of similar existing system elements in nonminority and non-low-income areas. The evaluation by DRCOG staff will determine if alternatives studied will be disadvantageous to the population considered.

However, any program, policy or activity that has the potential for disproportionately high and adverse effects on the affected populations will only be carried out by the applicant if there is a substantial need for the program, policy or activity based on overall public interest, or alternatives that would have fewer adverse effects have either adverse social, economic, environmental or human health impacts that are more severe or would involve increased costs of an extraordinary magnitude.

In addition, any federal funded projects must comply with the National Environmental Policy Act. DRCOG will work with subrecipients proposing to use Section 5310 funds for any construction-related projects to ensure that the National Environmental Policy Act requirements are met in advance of approving the project for funding.

Disadvantaged Business Enterprise Plan

DRCOG receives direct funding from the Federal Transit Administration Section 5310 program, and its staff anticipate issuing contracts to recipients and subrecipients greater (in total) than \$250,000. Therefore, DRCOG is required to create, maintain and implement a Disadvantaged Business Enterprise plan.

Section 5310 program management is provided by staff from the Administration and Finance division with input from agency staff in the Area Agency on Aging and Transportation and Planning Operations divisions. Administration and Finance staff also provide financial oversight and contract management.

DRCOG staff will never exclude any person from participating in, deny any person the

benefits of, or otherwise discriminate against any person in connection with the award and performance of any contract based on race, color, sex or national origin. Using the framework and requirements in this Disadvantaged Business Enterprise Program Plan document, DRCOG staff will ensure that Disadvantaged Business Enterprises have equal opportunity for all contracting and subcontracting opportunities.

For more information on DRCOG's Disadvantaged Business Enterprise Plan covering the agency's FTA Section 5310 program, please visit the [Nondiscrimination](#) section of the DRCOG website.

Data

Data collection

The Denver Regional Council of Governments produces a wide array of data, information, maps and models in support of regional planning. Data and maps, addressing topics from transportation and land use to demographics and employment, are available for download from the Regional Data Catalog to inform regional and local infrastructure investment decisions. The data collected is used for data briefs, small-area forecast analysis and other performance measurement where data can be used in conjunction with demographic data to allow regional stakeholders to better understand access to opportunity. DRCOG also engages local governments in collaborative data initiatives through the Denver Regional Data Consortium and the Denver Regional Aerial Photography Project.

Interactive maps

DRCOG creates numerous web maps each year to help with stakeholder engagement. DRCOG recently deployed a new platform that makes creating and updating maps easier and more consistent, resulting in more opportunities to create web map products to assist in the public's review of DRCOG's plans.

The new web maps have an updated user interface, additional functionality and a streamlined update process for internal management and future development. Web maps have been produced to help with Census 2020 outreach to hard-to-reach populations, public review and comment on the 2050 Metro Vision Regional Transportation Plan, and exploration of all-day volume at traffic count locations around the region.

Regional Data Catalog

The Regional Data Catalog is a repository of open data managed by the Denver Regional Council of Governments. The datasets in the catalog support communities in making informed, data-driven decisions in areas including mobility, land use and changing demographics. Annually, DRCOG develops and compiles data sourced from local governments, data companies, the land use and travel models, and DRCOG-facilitated data acquisition projects. DRCOG focuses on regional forecasts, transportation projects and planimetric data. The data in the catalog is regional in scale and may be updated less frequently than authoritative local sources.

Denver Regional Data Consortium

The Denver Regional Data Consortium is an open and voluntary committee made up of geographic information system professionals interested in collaborative data initiatives. The

regionwide group meets two to three times a year and issues a quarterly newsletter to encourage the exchange of data, information and ideas. Past issues of the Denver Regional Data Consortium newsletter are available on the DRCOG website.

Regional Aerial Photography Project

DRCOG facilitates the Denver Regional Aerial Photography Project for the benefit of local and regional partners. Since 2020 its goal has been to acquire high-resolution aerial imagery of the Denver region every two years. Project partners consistently describe the project as valuable because it shares cost savings among partners, increases collaboration in the region and reduces duplication of effort.

Data Privacy Policy

To make informed decisions, DRCOG has determined it is necessary to collect, store, analyze, visualize and report data — some of which may be of a sensitive nature. DRCOG staff recognize the organization must balance the need for information with the needs of the public, vendors and partners to maintain the privacy of their personal or proprietary data.

The Data Privacy Policy notifies the public of DRCOG's intentions to use data responsibly. It also provides a framework for DRCOG staff to handle protected data by outlining guiding principles and strategies.

Visit DRCOG's website to see the full Data Privacy Policy.



4

Meaningful public participation

The following are excerpts from People-Centered Planning, Projects and Services (DRCOG’s public engagement plan) and its Limited English Proficiency Plan. Please refer to the documents, available on the DRCOG website, for further details.

DRCOG’s commitment to engagement

The public engagement plan provides the vision, the framework and the process for meaningfully engaging the public in regional decision-making. DRCOG is committed to transparency and access to services, information and the decision-making process for people throughout the region. Because planning is about people and the communities they call home, it is about where and how the region’s residents live, work and play, making life better for people of all ages, incomes and abilities. Community participation improves the relevance of plans, policies, services and projects, and helps DRCOG meet people’s needs today and into the future.

Throughout the plan, there is an emphasis on engaging individuals and segments of the public who are directly affected by a project. DRCOG staff are encouraged to both reach out to groups of people traditionally

underrepresented and significantly affected by the decisions a project entails. However, leveraging DRCOG’s existing, robust relationships with the jurisdictions where members of the public reside will also be useful. Many DRCOG employees (especially within the Regional Planning and Development and Transportation Planning and Operations divisions) are in regular conversation with jurisdiction staff. Colleagues should approach one another for their insights and for help reaching out to their established connections at member governments. In addition, employees in the Executive Office can help discern the best ways to reach out to elected officials from our member governments.

DRCOG is committed to an engagement model that fosters shared problem-solving, supportive partnerships and reciprocal relationships. DRCOG believes that the region’s decision-makers need to hear its residents’ full range of perspectives to better understand issues, explore alternatives and create a shared action plan. Through the principles outlined in the public engagement plan, DRCOG intends to demonstrate that it provides clear and concise information, is responsive to the people of the region, and addresses ideas and concerns raised.

Principles

To support the commitment described above, DRCOG uses the following principles to guide engagement:

Early engagement

DRCOG staff engage the public toward the beginning of each project, or when members of the public can have the greatest effect on shaping the direction of DRCOG's efforts.

Ongoing engagement

DRCOG staff engage the public throughout development of a project, or at specific phases identified early in the process. DRCOG staff provide members of the public with clear and specific timelines and methods for providing their perspectives.

Timely and adequate notice

DRCOG staff ensure that the public receives timely and adequate notice of opportunities for public engagement.

Consistent access to information

DRCOG staff follow state, federal and funding partner requirements, as well as organization policies, regarding making supporting material available for topics on which it has invited members of the public to provide their perspectives.

Invitation for public review and comment

DRCOG staff invite public review of, and comment on, essential plans and programs. Invitations are made no later than is required

by federal and state requirements or funding partners (typically 30 to 45 days). For projects lacking specific partner requirements for public engagement, DRCOG staff determine the appropriate length of the review period. Copies of public review drafts are made available at DRCOG's office and website. Comments are accepted by mail, email and via the DRCOG website (drcog.org). Although DRCOG maintains a robust social media presence and promotes opportunities for public involvement through social media, comments are not directly accepted through social media (such as Facebook, Twitter or Instagram).

Invitation and consideration of perspectives from those traditionally underrepresented

DRCOG staff invite participation by members of populations traditionally underrepresented in regional decision-making processes due to demographic, geographic or economic circumstances, to allow DRCOG to appropriately consider their needs. Such populations include, but are not limited to, individuals who speak languages other than English, individuals representing diverse cultural backgrounds, low-income individuals, people with disabilities, older adults and young adults. DRCOG staff use demographic and stakeholder analysis to identify communities for projects for which it seeks public engagement. Specific engagement strategies for seeking out and considering the needs of those traditionally underserved groups are detailed in appendices D, E and F of People-Centered Planning, Projects and Services. DRCOG's Limited English Proficiency plan guides staff in providing customer service to, and facilitating participation by, members of the public whose proficiency in English is limited.

Regular review of public engagement processes

DRCOG staff regularly review the implementation of the plan and the ability of the principles, steps, techniques and tools in the public engagement plan to advance meaningful public engagement. DRCOG staff use a variety of means to determine the effectiveness of engagement strategies, including data collection, feedback from participants at public events, review of attendance at public events and evaluation of the implementation of a variety of techniques and tools. The outcomes of such evaluations will inform future engagement, and successful activities will be continued, while those that underperform will be eliminated. DRCOG staff compile a routine evaluation summary of engagement activities to share results of the organization’s recent engagement efforts and review areas of success and potential improvement.

In addition to DRCOG’s commitment to continuous improvement and evaluation of its public engagement activities, the organization’s efforts are periodically reviewed by funding partners and agencies such as the Federal Highway Administration and Federal

Transit Administration during every four-year metropolitan planning organization planning process certification review.

Implementation

Whether a project includes a formal process or engagement is related to a DRCOG project without federal, state or partner requirements, implementation can take many forms. To start, staff must determine the appropriate level of public engagement and carefully consider the goals for the project as well as the purpose of public engagement.

DRCOG staff should consider the techniques and tools that might best encourage the appropriate level of public engagement for the project. The selected techniques and tools that are chosen can facilitate the level of engagement to be achieved. For example, an eblast announcing a new report is informational. A poster announcing a public hearing is not consultative on its own, but facilitates consultation at the hearing it promotes. An email announcing that the public is invited to submit their community’s five most serious challenges represents the “involve”

Levels of public engagement



level. A focus group at which members of the public suggest alternatives for how to spend limited funds on transportation projects represents the “collaborate” level. Very few techniques or tools, in and of themselves, result in participation that is collaborative. Collaborative opportunities for organizations structured like DRCOG, which operates under priorities established by a board of directors, are rare. However, in some circumstances it’s appropriate to consider greater decision-making involvement by the public.

Techniques

Techniques represent tactics for approaching public involvement. They always involve interaction among people — usually representatives of DRCOG (employees, committee members, Board directors) and members of the public. Discern the techniques that will be used for public engagement before thinking about the tools that will be used to support it.

Tools

Tools are what can be used as part of the public engagement techniques. A tool’s success depends on a) how well it is designed to support its corresponding technique and b) how effectively it is deployed. Not every tool will be relevant for every technique. However, every tool requires an employee to take responsibility for using it and measuring how its use contributes to the success of its corresponding technique.

The medium is not the message

Simply using a technique or tool won’t guarantee meaningful results. Consider how the techniques will be refined and tools will be developed to ensure meaningful public engagement. For tools that are static materials, such as posters, postcards and other printed matter, create a clear call to action that will allow staff to measure how many people saw the collateral and how they responded. Staff are encouraged to consult DRCOG’s public engagement planner for help developing techniques and tools at any stage of a project process.

Potential participants

Although staff may have a well-defined idea about the types of people to engage in a project, staff should consider other types of organizations, professionals and members of the public with whom DRCOG has not previously interacted — or who may have provided input in the past but who have not recently been actively engaged.

Demonstrating results and evaluation

During development of a project, the purpose, goals and results of the project were considered. The elements that would contribute to its success — or the success of its public engagement component — were also considered. The groups of people who have been historically underrepresented in similar efforts were specifically considered. And the ideal level of public engagement for the project was determined.

Evaluating the success of engagement strategies is critical to improving the overall effectiveness of engagement in the future. Criteria includes three major objectives:

- Provide meaningful opportunities to participate.
- Involve under-represented communities.
- Communicate complete, accurate, understandable and timely information.

Some criteria, but perhaps not all, will be relevant to the project. Before data is collected, determine which criteria are relevant to the project.

The project team should designate a member to coordinate how the team will gather, compile and report on criteria and measurements throughout all project stages. By measuring progress toward goals throughout the project, corrections may be made while the efforts are still underway.

Because collecting and evaluating data may require collaboration across DRCOG divisions, be sure to allow adequate time for employees in other divisions to help. The results of these evaluations are vital for the continual improvement of engagement efforts.

Language assistance

The Denver Regional Council of Governments is committed to engaging and involving all residents of the Denver region, including those with limited English proficiency, in its activities. Therefore, in accordance with the best practice

standards for public involvement identified by state and federal partners, together with assistance from the Colorado Department of Transportation, Federal Highway Administration and Federal Transit Administration, DRCOG has developed a Limited English Proficiency Plan. The goal of the Limited English Proficiency Plan is to ensure all residents of the DRCOG region can, to the fullest extent practicable, participate in DRCOG activities.

Department of Transportation and limited English proficiency policy guidance

In accordance with Executive Order No. 13166, the U.S. Department of Transportation, on December 14, 2005, issued its Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons. Adopting the framework established by the Department of Justice in its August 11, 2000, guidance, the U.S. Department of Transportation identifies four factors that should be considered by a recipient of federal funds in assessing the needs of individuals with limited English proficiency and implementing a plan to address those needs.

The four factors include:

- 1) The number or proportion of LEP persons served or encountered in the eligible service population.
- 2) The frequency with which LEP individuals come in contact with the programs, activities or services.
- 3) The nature and importance to LEP persons of the programs, activities and services.
- 4) The resources available to the recipient and costs.

The greater the number or proportion of eligible people with limited English proficiency, the greater the frequency with which they will have contact with a program, activity or service and the more likely enhanced language services will be needed. The intent is to strike a balance ensuring people with limited English proficiency have meaningful access to critical services without unduly burdening the local agency.

Older Americans Act guidance on “targeting” services

In accordance with the Older Americans Act and the Colorado Department of Health and Human Services, State Unit on Aging Rule Manual Volume 10, area agencies on aging are required to target older adults who are in some way socially or economically disadvantaged. This includes, but is not limited to, giving “preference and priority in the delivery of services ... to older adults with limited English proficiency.” It is expected that each contracted service provider has a policy in place detailing how to do so.

Summary of engagement

Over the past three years, Denver Regional Council of Governments staff have been engaged in the development, update and implementation of major plans and programs. Following are highlights summarizing the engagement completed for DRCOG’s major plans and programs.

2024 amendments to Metro Vision and the Regional Transportation Plan

DRCOG held a public hearing at the April 17, 2024, Board of Directors meeting on proposed amendments to the Metro Vision plan, the Metro Vision Regional Transportation Plan and associated air quality conformity and greenhouse gas transportation documents. The hearing was noticed in The Denver Post and posted on the DRCOG website 30 days before the hearing to allow for public comment on the proposed changes.

An eblast was sent to over 560 recipients when the 30-day comment period opened; approximately 42% of recipients opened the email.

DRCOG staff used social media posts with visual content to promote the public comment period on Facebook and Twitter, but received minimal interaction.

DRCOG staff also developed a virtual open house site. The open house provided a range of ways to explore the plan and had the capability to be translated into any language a visitor might require. It included user-friendly access to all draft plan documents, including the full plan and appendices. In addition,

the site provided executive summaries and overview documents in both Spanish and English. DRCOG staff advertised the public hearing on the open house site with links to register to attend. The open house site also included the introductory video created during Phase 1 as well as a plan schedule. The site had an easy-to-use comment box where users could submit comments directly. In addition, there was an option to view a Google Drive version of the main plan document.

2022 updated 2050 Metro Vision Regional Transportation Plan

DRCOG originally adopted the 2050 Metro Vision Regional Transportation Plan in 2021 after a two-year planning process. The DRCOG Board of Directors in September 2022 adopted the updated 2050 Metro Vision Regional Transportation Plan to address the Colorado Greenhouse Gas Transportation Planning Standard.

DRCOG held a 31-day public comment review period from August 7 through September 6, 2022, to solicit review, engagement and input on the draft 2050 Regional Transportation Plan documents. To do so, DRCOG staff updated the plan's Social Pinpoint project website to house the draft plan documents, announce public meetings and provide opportunities for feedback and discussion. DRCOG gave the public the option of sharing general comments and engaging in discussion through the site's idea wall and providing more specific comments on markable PDFs of the plan documents. Several eblasts and social media posts were made during the public review

period to publicize the Social Pinpoint site and the virtual public meetings.

DRCOG staff published a legal notice in the Sunday, August 7, 2022, edition of The Denver Post officially announcing the public review period.

During the public review period, DRCOG staff held five virtual public meetings to present the draft 2050 Regional Transportation Plan, with a focus on the proposed updates to comply with the state Greenhouse Gas Planning Standard. Simultaneous Spanish interpretation was provided for two of the meetings. Each meeting included an introduction to DRCOG, an introduction to the Greenhouse Gas Planning Standard, an overview of DRCOG's proposed greenhouse gas compliance strategy, an explanation of overall changes to the 2050 RTP and information on how to participate in the process further. Over the five public meetings, there were 11 attendees.

DRCOG held a virtual public hearing on September 7, 2022, as part of a special DRCOG Board meeting. For the first time, the public hearing and Board meeting included both simultaneous Spanish interpretation and American Sign Language interpretation using the Zoom platform. Eleven people testified during the public hearing, with comments generally in support of the proposed 2050 Regional Transportation Plan updates and urging the DRCOG Board to adopt the updated plan. Commenters generally urged even greater investment in multimodal travel options and less in roadways and highways.

DRCOG received almost 350 comments from the general public and stakeholders during the public comment period. The majority of comments were received through the Social Pinpoint idea wall. Although previous invitations for public comment provided the capacity for participants to interact with each other's posts, the 2050 Regional Transportation Plan represented the first time they took advantage of the opportunity. Comments were also received through marked-up PDF documents and via email.

2024-2027 Transportation Improvement Program

The Fiscal Year 2024-2027 Transportation Improvement Program was adopted by the Board of Directors on August 16, 2023, following a public hearing held on July 19. The hearing was preceded by a 30-day public comment period, with public notice posted in The Denver Post, DRCOG's social media platforms, through an eblast to DRCOG's contact lists and on the DRCOG website. The public was invited to submit comments through the website or by email, phone or mail.

DRCOG continued its practice of using an interactive map commenting application using ArcGIS Online, which allowed the public to see the locations of proposed projects and leave comments directly on the map. DRCOG received 193 comments on 73 projects through the map.

Additionally, for the first time, DRCOG staff solicited comments during the calls for projects. These public comment periods gathered public

input on applications received prior to project selection and were provided to evaluators to take into account in the development of their funding recommendations. Between the two calls associated with the development of the 2024-2027 Transportation Improvement Program, 1,345 comments were received on project applications.

Staff used several social media posts to promote the public comment period, the interactive map and the public hearing on Instagram, Twitter, LinkedIn and Facebook. It is estimated that the majority of comments were spurred by social media engagement.

2024-2025 Unified Planning Work Program

The Fiscal Year 2024-2025 Unified Planning Work Program was adopted by the Board of Directors on August 16, 2023. Adoption was preceded by an approximately two-week public comment period, with comments solicited through DRCOG's social media platforms, an eblast to DRCOG's contact lists and a news post on the DRCOG website. The public was invited to submit comments by email, phone or mail. No comments were received during the comment period.

Additional engagement work

In addition to these major plans and programs, DRCOG participated in other engagement activities. For more information on the following plans and programs, visit the DRCOG website.

- Taking Action on Regional Vision Zero.

- Regional Complete Streets Prioritization Analysis.
- Coordinated Transit Plan.
- Priority Climate Action Plan
- Transportation Demand Management Strategic Plan
- Regional Transportation Operations and Technology Strategic Plan
- Environmental Justice and Equity Project
- Edgewater Community-Based Transportation Plan
- Regional Housing Needs Assessment
- Civic Academy.

Public engagement annual reports

Since the adoption of the public engagement plan, People-Centered Planning, Projects and Services, in 2019, staff has produced annual public engagement reports. The annual reports document the major engagement efforts by DRCOG staff during the development and implementation of various plans and programs.

For more information, visit the DRCOG website to see the most recent annual reports.



5

Transportation investment analysis

Background

As part of the transportation programming and planning process, the Denver Regional Council of Governments examines the distribution of transportation funding throughout the region to identify any disparate or disproportionate effect on marginalized communities.

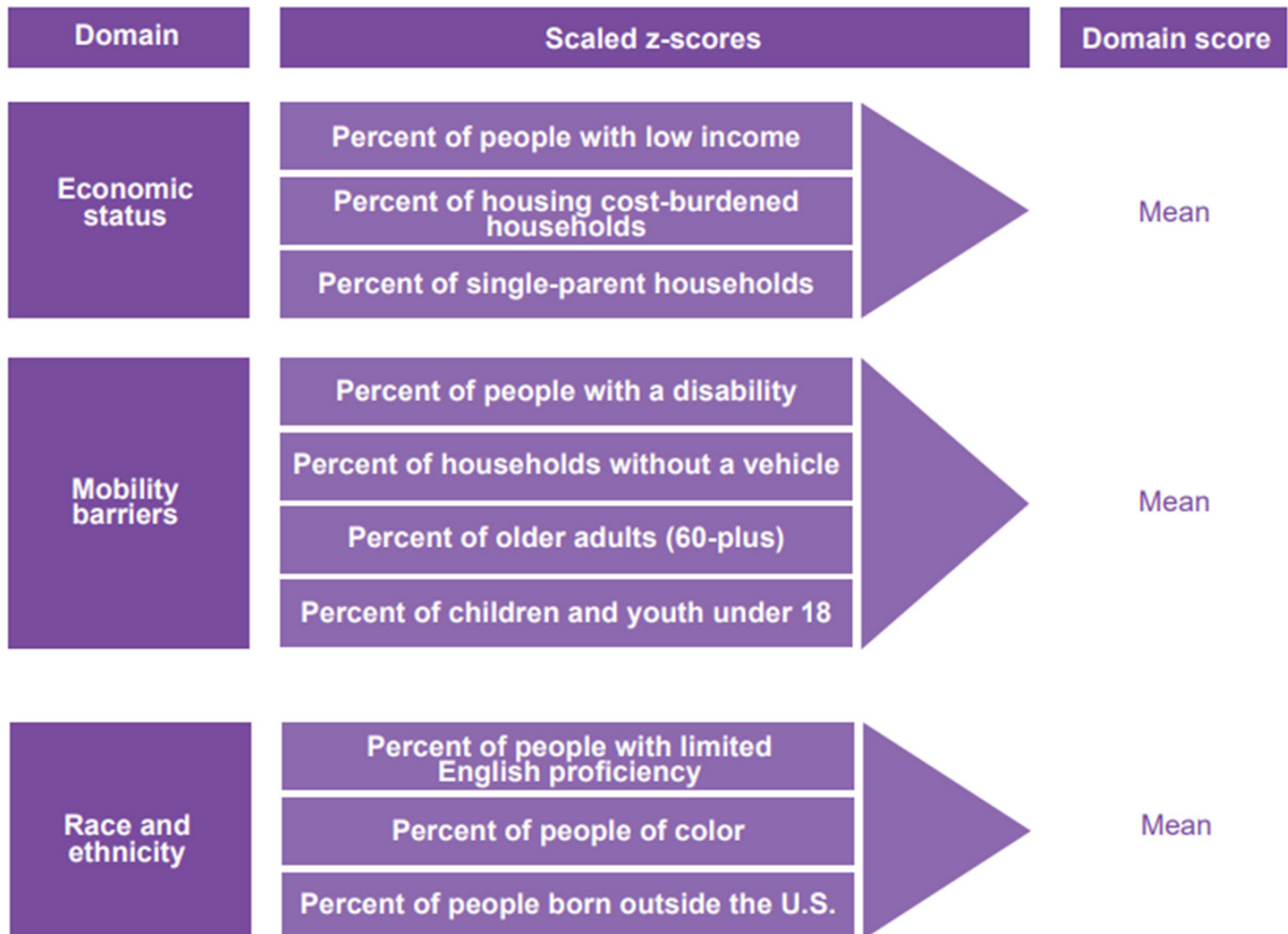
Equity Index

DRCOG recently developed the agency's first equity index. The Equity Index Dataset was developed by staff to better understand the geography of marginalized communities in the Denver region and make use of each of the 10 populations, characteristics or

indicators included in the DRCOG definition of marginalized communities. It was developed over a year of research, best practice interviews and public engagement.

The equity index uses U.S. Census tract geography. Each tract is given a final index score based on the presence of marginalized communities in its population. The benefit of the equity index is that it allows for the consideration of multiple indicators at the same time and for a measure of magnitude, rather than a binary approach as used in previous environmental justice zones analyses.

A key component in creating the final equity index scores is to group the indicators into



domains based on common themes. The 10 indicators were grouped into Economic Status, Mobility Barriers, and Race and Ethnicity domains.

The use of domains helps keep the index balanced and ensures final scores are not overly influenced by a particular factor of marginalization simply because more indicators relate to that factor. In this case, the use of domains ensures economic status, race and ethnicity, and mobility barriers are considered equally in the calculation process.

Benefits and burdens

Recognizing that “scores” derived from equity indices don’t provide qualitative understanding of projects’ potential positive and negative impacts on surrounding communities, DRCOG worked with community-based organizations to identify a comprehensive list of potential benefits and burdens that could potentially impact surrounding communities because of a project’s implementation, as detailed in the following table. DRCOG staff further evaluated project types to determine magnitude of benefits and burdens and key potential benefits and burdens by project type. These are reviewed in more depth on the following pages.

Table 5.1 Potential benefits and burdens

Category	Benefit	Burden
Access	Increases access to opportunities and services for the communities that allow the community to thrive, often through improved connectivity or the lowering of barriers or expanding service areas; improves education.	Reduces access to opportunities and services through reductions in accessibility, including through the construction of facilities that may divide or disconnect a community.
Mobility	Increases access to high-quality mobility choices through the expansion or improved reliability of transit service, active transportation facilities or travel options; reduces costs; improves education; improves ease/comfort of use.	Creates physical, technological or financial barriers that limit or remove access to mobility choices.

Category	Benefit	Burden
Congestion	Mitigates congestion (often through increased reliability and optimized capacity).	Increases traffic congestion.
Environment and health	Reduces exposure to environmental risk factors or negative health outcomes in communities benefiting from the investment.	Increases the probability of exposure to environmental risk factors and negative health impacts (often as a result of increased greenhouse gases, noise, air toxins, particulate matter or other harmful pollutants).
Safety	Reduces injuries, fatalities and crashes in communities benefiting from the investment.	Increases the risk or frequency of injuries, fatalities and crashes due to the project (often the result of higher speeds or traffic volumes).
Resilience	Reduces the risks and effects of natural and human-created hazards on lives, property, equipment and infrastructure.	Increases the risk or frequency of loss of life, trauma or damage to property, equipment or infrastructure by building in a way that does not account for natural and human-created hazards.
Development	Encourages development that meets the needs of current residents and people of all ages, incomes and abilities.	Increases the risk of displacement of residents or businesses, prioritizes the needs of future or new residents, and may result in further concentration of poverty.

Roadway projects

Roadway projects are defined as those where the primary activity involves one or more of the improvements listed below. Most, if not all, roadway projects in the Denver region include other project elements, including bike and pedestrian accommodations, transit facilities, and safety improvements.

- New roads.
- Road widenings.
- Road reconstructions.
- New interchanges.
- Interchange reconstructions.
- New bridges.
- Bridge reconstruction.

Roadway projects have been identified by DRCOG and community-based organization feedback as likely to provide proportional benefits and burdens to nearby communities. A key potential benefit of roadway projects is increasing access to essential opportunities and services for the communities that allow the community to thrive, often through improved connectivity or the lowering of barriers. Notable potential burdens are increasing the exposure to environmental risk factors or negative health outcomes (often as a result of increased greenhouse gases, noise, air toxins, particulate matter or other harmful pollutants).

Transit projects

Transit projects are defined as those where the primary activity involves one or more of the improvements listed below. Many transit projects may also include operational improvements or active transportation connections to transportation facilities.

- Rapid transit (rail or bus rapid transit).
- Bus service.
- Transit facilities (passenger, maintenance).
- Transit vehicles.

Transit projects have been identified by DRCOG and community-based organization feedback as likely to provide more benefits than burdens to nearby communities. Key potential benefits provided by transit projects are increasing access to essential opportunities and services for the communities that allow the community to thrive, often through improved connectivity or expanding service areas and increasing access to mobility choices through the expansion or improved reliability of transit service, reduced costs, or improved ease/comfort of use.

While likely providing more benefits than burdens, a notable potential negative impact that might affect surrounding communities is increasing the risk of displacement of current residents or businesses or prioritizing the needs of future or new residents, which may result in further concentration of poverty.

Active transportation projects

Active transportation projects are defined as those where the primary activity involves one or more of the improvements listed below. Many active transportation projects, particularly Complete Streets improvements, may include aspects such as transit bus stops or otherwise improve access to transit facilities.

- Bicycle facilities (new or upgraded).
- Pedestrian facilities (new or upgraded).
- Complete Streets improvements.

Active transportation projects have been identified by DRCOG and community-based organization feedback as likely to provide more benefits than burdens to nearby communities. Key potential benefits include increasing access to essential opportunities and services for the communities that allow the community to thrive, often through improved connectivity or the lowering of barriers, and increasing access to mobility choices through the expansion of active transportation facilities or travel options, reduced costs, or improved ease/comfort of use.

While likely providing more benefits than burdens, a notable potential burden that might impact surrounding communities is increasing

the risk of displacement of current residents or businesses or prioritizing the needs of future or new residents, which may result in further concentration of poverty.

Safety and operational projects

Safety and operational projects are defined as those where the primary activity involves one or more of the improvements listed below. Many safety and operational projects include improvements that are related to roadway operations and safety, transit operations and safety, or bike and pedestrian safety.

- Vision Zero improvements.
- Operational improvements.

Safety and operational projects have been identified by DRCOG and community-based organization feedback as likely to provide more benefits than burdens to nearby communities. A key potential benefit includes reducing injuries, fatalities and crashes.

While likely providing more benefits than burdens, notable potential burdens that might impact surrounding communities are increasing traffic congestion and increasing the risk of displacement of current residents or businesses or prioritizing the needs of future or new residents, which may result in further concentration of poverty.

Analysis

The analysis for the Title VI Implementation Plan uses projects identified in the most recent Transportation Improvement Program, the Fiscal Year 2024-2027 Transportation Improvement Program.

The program contains a total of 98 projects selected by DRCOG for funding. This number excludes those projects unable to be mapped, greater than 20 square miles in area or regional in nature, including transportation demand management marketing programs, air quality outreach programs, Way to Go (vanpool and carpool, etc.), areawide transit programs (including those for older adults and people with disabilities), and some studies. Many of these may provide significant benefits to marginalized communities, although it is difficult to localize their impacts as part of this analysis.

As illustrated in the following table by comparing scores, the 98 projects included in

this analysis tend to be located in census tracts with a higher degree of marginalization than the region as a whole.

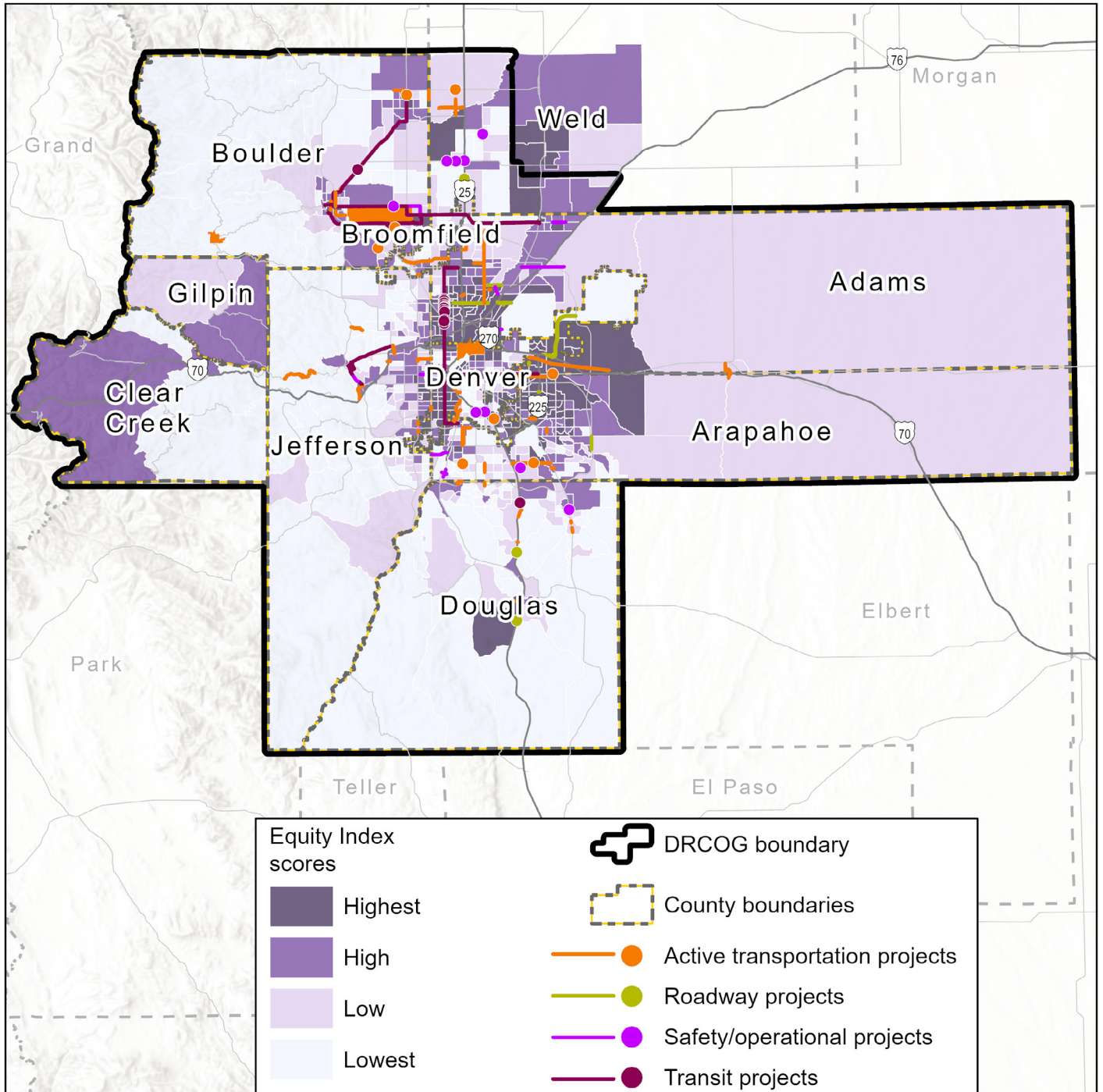
In total, the 98 DRCOG-selected projects included in the Transportation Improvement Program are likely to increase access to essential opportunities and services; increase access to mobility choices; and reduce injuries, fatalities and crashes, especially for marginalized communities.

This also holds true when evaluated further by using quartiles to group census tracts. Quartiles divide the census tracts in the region into four groups of equal size based on their index scores, such that the first quartile includes tracts with the lowest 25% of index scores and the fourth quartile includes tracts with the highest 25% of index scores. There are roughly 200 tracts in each quartile throughout the region.

Table 5.2 Equity index scores

Project type	Mean equity index score	Median equity index score
All projects	28.2	24.7
Region	25.7	23.0

Map 5.1 Transportation investments compared to equity index scores



Project types

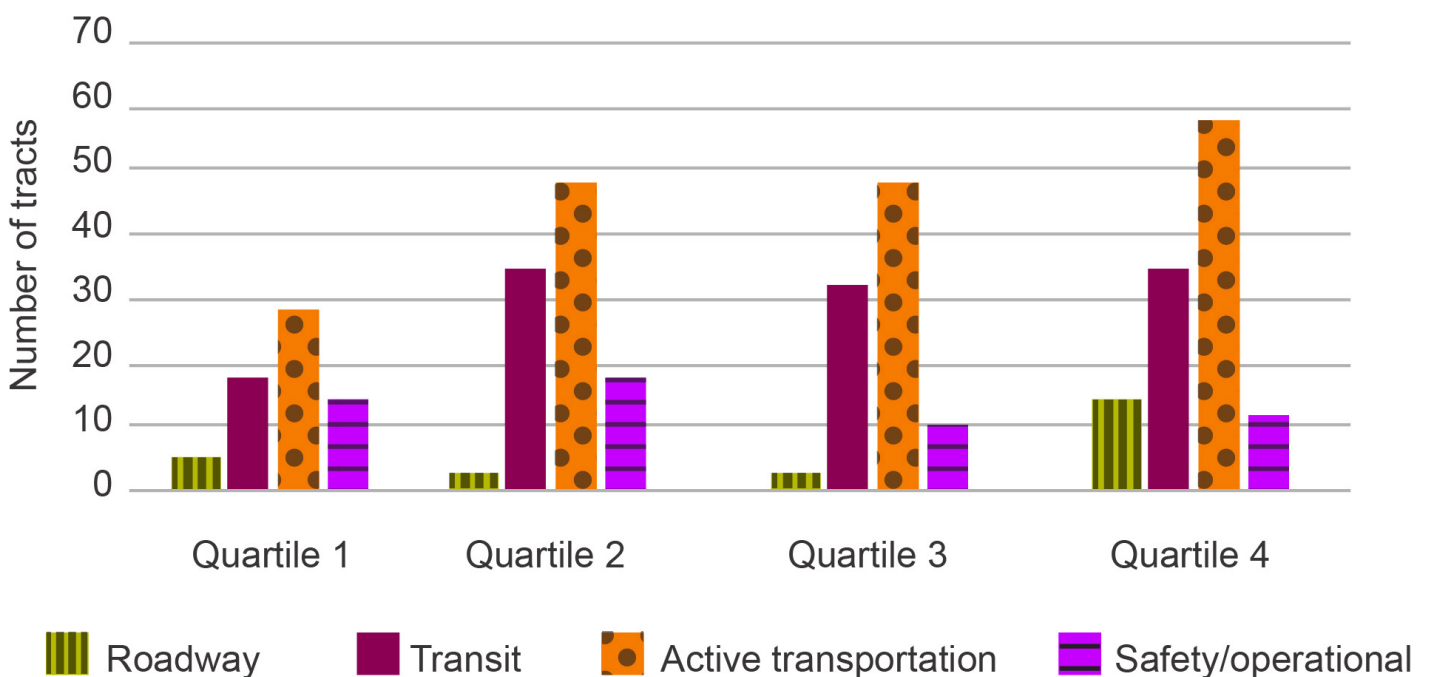
Adjacent to project locations, there are 120 tracts in the fourth quartile, while only 66 tracts fall in the first quartile, indicating that

projects are generally distributed in more marginalized communities, as shown in the following chart, with the exception of safety/operational projects.

Table 5.3 Equity index scores by project type

Project type	Mean equity index score	Median equity index score
Roadway	33.0	38.0
Transit	27.7	23.9
Active transportation	28.7	24.9
Safety/operational	24.9	22.1
All projects	28.2	24.7
Region	25.7	23.0

Project proximity to marginalized communities by project type



The Transportation Improvement Program includes 10 roadway projects. While 23 census tracts are located immediately adjacent to these 10 projects, 15 are identified as being in the most marginalized quartile. While the investment associated with these projects is primarily geared toward roadway improvements, project sponsors are strongly encouraged through the project evaluation and selection process to include multimodal improvements that would benefit transit users, people walking and rolling, and people biking. These projects are also important since the majority of residents in the Denver region travel along the region's roadways on a regular basis by car, carpool or bus.

The Transportation Improvement Program includes 10 transit projects less than 20 square miles in area. Most of these tracts fall into the third and fourth quartiles, indicating transit projects are located in tracts that are more marginalized. Transit projects are likely to provide benefits across a range of communities, especially for people taking transit, older adults, children, people with a disability and people without access to a car. People of color and people with low income are also likely to experience benefits from transit projects based on their travel characteristics.

The Transportation Improvement Program includes 62 active transportation projects

less than 20 square miles in area. Due to the high number of projects, the number of tracts immediately adjacent to these projects is 183. As with transit projects, the majority of tracts adjacent to active transportation projects are more marginalized. Active transportation projects are likely to provide benefits across a range of communities, including for people walking or rolling, biking, taking transit, older adults, children, people with a disability and people without access to a car. People of color and people with low income are also likely to experience benefits from active transportation projects based on their travel characteristics.

The Transportation Improvement Program includes 16 safety and operational projects less than 20 square miles in area. Fifty-four tracts are impacted by safety and operational projects, with a slight majority in less marginalized tracts. Safety and operational projects are likely to provide benefits across a range of communities, including for people walking or rolling, taking transit, driving, older adults, children, people with a disability and people without access to a car. People of color and people with low income are also likely to experience benefits based on their travel characteristics.

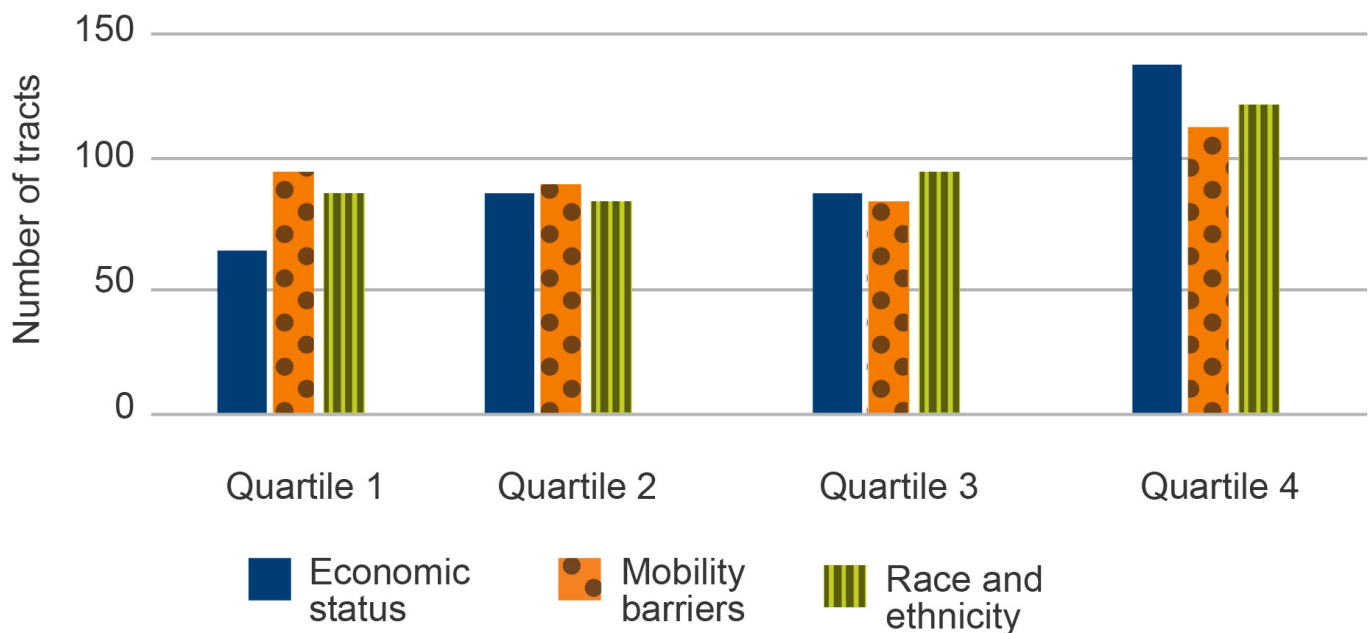
Equity index domains

Using the domains developed for the equity index also provides another lens to analyze transportation investments in the region.

Table 5.4 Domain scores by project type

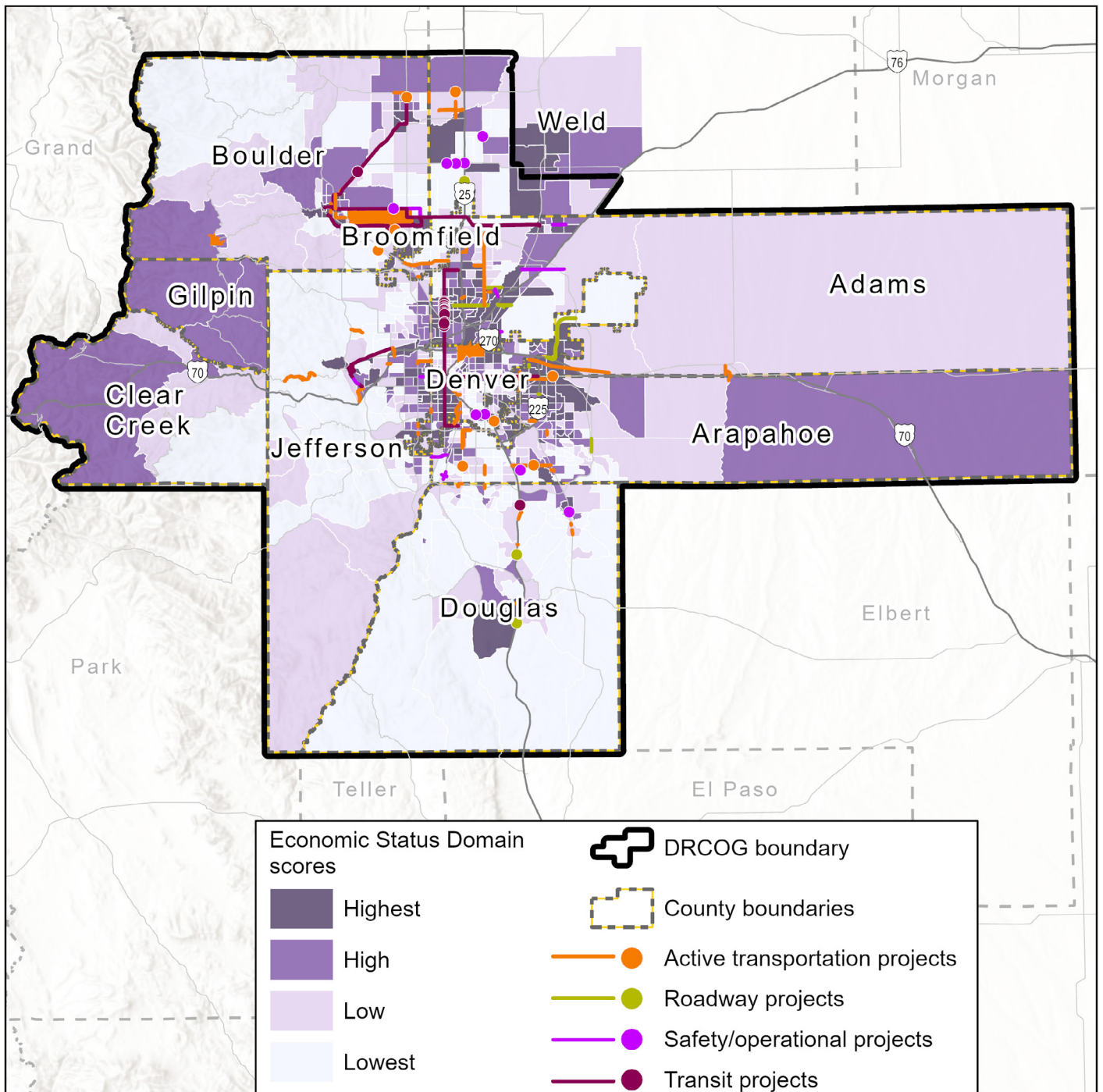
Project type	Economic status score	Mobility barriers score	Race and ethnicity score
Roadway	31.4	26.7	36.1
Transit	30.1	26.2	24.2
Active transportation	29.5	25.9	28.1
Safety/operational	26.2	26.2	21.8
All projects	29.3	26.0	26.5
Region	25.7	25.8	23.7

Project proximity to marginalized communities by equity index domains



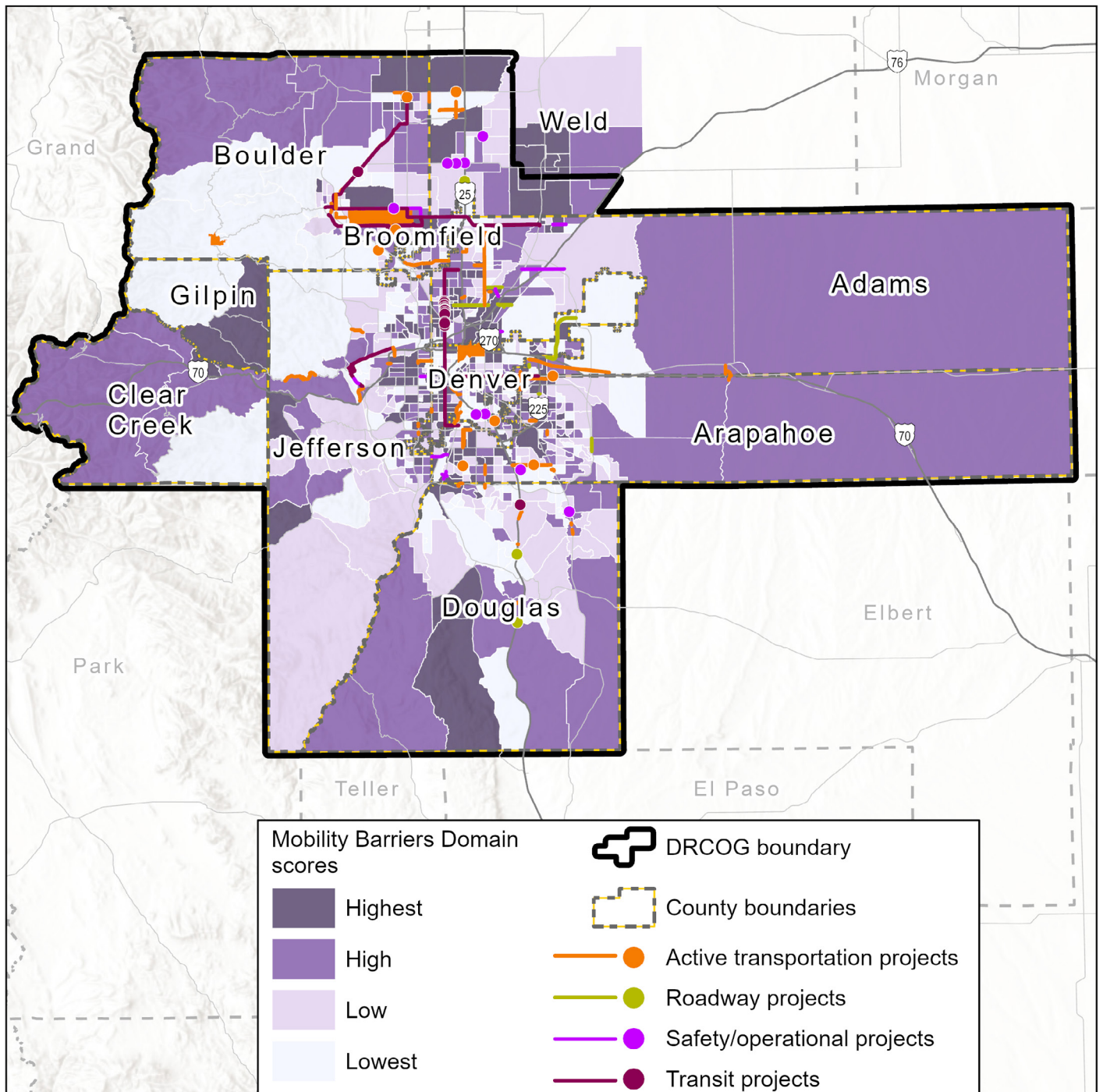
When evaluating by the economic status domain, there are 137 tracts in the fourth quartile adjacent to project locations, while only 67 tracts fall in the first quartile, indicating that projects are generally distributed in more marginalized communities.

Map 5.2 Transportation investments compared to economic status domain scores



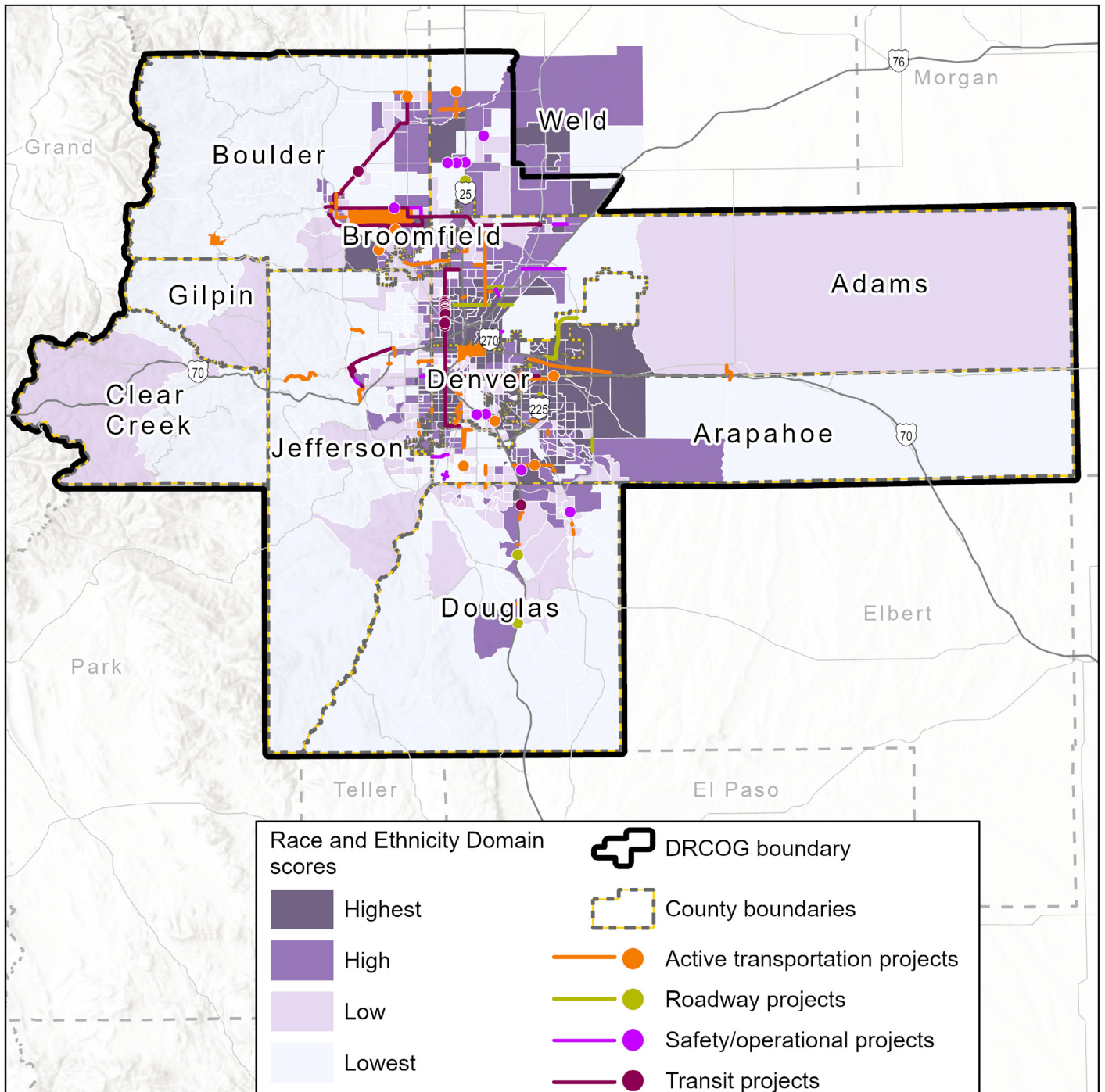
When evaluating by the mobility barriers domain, there are 108 tracts in the fourth quartile adjacent to project locations, compared to 94 in the first quartile, 90 in the second and 91 in the third, indicating that projects are generally distributed equally across the region.

Map 5.3 Transportation investments compared to mobility barriers domain scores



When evaluating by the race and ethnicity domain, there are 119 tracts in the fourth quartile adjacent to project locations, while only 85 tracts fall in the first quartile, indicating that projects are slightly more distributed in more marginalized communities.

Map 5.4 Transportation investments compared to race and ethnicity domain scores



Conclusion

Regional-level analysis indicates DRCOG-funded projects are generally located in more marginalized tracts versus in tracts of less marginalization. The majority of census tracts immediately adjacent to projects of each project type are also in the top two quartiles of census tracts within the equity index. This shows that projects are located in areas where they can impact the lives of marginalized communities in our region. As projects can have both benefits and burdens, each of the following conclusions can be drawn for by project type:

- For roadway projects, the majority of adjacent census tracts are in the most marginalized quartile of the equity index. Roadway projects are important to increase access but may increase the risk of exposure to environmental risk factors.
- For transit projects, the majority of adjacent census tracts are in the top half of tracts for marginalization. Transit projects are expected to be beneficial to surrounding communities by increasing access and mobility choices but may increase the risk of displacement for surrounding communities.
- For active transportation projects, the majority of adjacent census tracts are in the top half of tracts for marginalization. Active transportation projects are expected to be

beneficial to surrounding communities by increasing access and mobility choices but may increase the risk of displacement for surrounding communities.

- For safety and operational projects, a slight majority of adjacent census tracts are in the top half of tracts for marginalization. Safety and operational projects are expected to be beneficial to surrounding communities by reducing injuries and fatalities but may increase traffic congestion and increase the risk of displacement for surrounding communities.

All projects selected for funding in the Transportation Improvement Program must go through further National Environmental Policy Act environmental analysis and public involvement prior to construction. Final alignments, design attributes, multimodal treatments, and state and federal approvals for projects are finalized at that time. The analyses must define mitigation, minimization or abatement strategies that address environmental justice topics.

While the analysis presented here is inherently limited in scope due to its regional scale, the identification of key areas of benefit and burden can help to inform further analysis by local project sponsors.



Appendix A: Board resolution

Denver Regional Council of Governments
State of Colorado

Board of Directors

Resolution No. 9, 2024

A resolution adopting the Title VI Implementation Plan, Limited English Proficiency Plan, Americans with Disabilities Act Program Access Plan, and Disadvantaged Business Enterprise Program Plan.

Whereas, the Denver Regional Council of Governments, as the Metropolitan Planning Organization, is responsible for carrying out and maintaining the continuing, cooperative, and comprehensive transportation planning process designed to prepare and adopt regional transportation plans and programs; and

Whereas, the transportation planning process within the Denver region is carried out by the Denver Regional Council of Governments through a cooperative agreement with the Regional Transportation District (RTD) and the Colorado Department of Transportation (CDOT); and

Whereas; the U.S. Department of Transportation (DOT) requires that all recipients of federal funding develop and implement a program that ensures that the federal-aid recipient is implementing programs and activities in a nondiscriminatory manner and in compliance with the Civil Rights Act of 1964 and other statutes, regulations, executive orders, and guidance that mandate nondiscrimination; and

Whereas; the Federal Transit Administration (FTA) has issued guidance that describes the requirements and content of these nondiscrimination programs known as Title VI Programs; and

Whereas; the Denver Regional Council of Governments is a recipient of federal financial assistance, including U.S. Department of Transportation (DOT) funding, and is committed to ensuring that no person or persons shall, on any statutorily prescribed basis, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by DRCOG; and

Whereas; the Title VI Implementation Plan, Limited English Proficiency Plan, Americans with Disabilities Act Program Access Plan, and Disadvantaged Business Enterprise Program Plan were prepared by the Denver Regional Council of Governments in cooperation with the Regional Transportation District (RTD), the Colorado Department of Transportation (CDOT), the Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA); and

Whereas; the Title VI Implementation Plan, Limited English Proficiency Plan, Americans with Disabilities Act Program Access Plan, and Disadvantaged Business Enterprise Program Plan describe the policies and procedures for implementing programs and activities in a nondiscriminatory manner and responds to state and federal statutes, regulations, executive orders, and guidance pertaining to nondiscrimination; and

A resolution adopting the Title VI Implementation Plan, Limited English Proficiency Plan, Americans with Disabilities Act Program Access Plan, and Disadvantaged Business Enterprise Program Plan.

Resolution No. 9, 2024

Page 2 of 2

Whereas; a 30-day public review and comment period was held, and comments received on the Title VI Implementation Plan, Limited English Proficiency Plan, Americans with Disabilities Act Program Access Plan, and Disadvantaged Business Enterprise Program Plan were addressed; and

Whereas; the Transportation Advisory Committee and the Regional Transportation Committee have recommended that the Board of Directors adopt the Title VI Implementation Plan, Limited English Proficiency Plan, Americans with Disabilities Act Program Access Plan, and Disadvantaged Business Enterprise Program Plan.

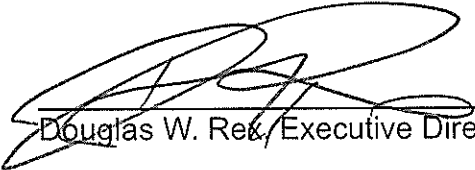
Now, therefore, be it resolved that the Board of Directors of the Denver Regional Council of Governments hereby adopts the Title VI Implementation Plan, Limited English Proficiency Plan, Americans with Disabilities Act Program Access Plan, and Disadvantaged Business Enterprise Program Plan.

Resolved, passed, and adopted this 18th day of September, 2024 at Denver Colorado.



Jeff Baker, Chair
Board of Directors
Denver Regional Council of Governments

ATTEST:



Douglas W. Rea, Executive Director



Appendix B: Nondiscrimination policy statement

The Denver Regional Council of Governments (“DRCOG”) adheres to Title VI of the Civil Rights Act of 1964, a nondiscrimination law which provides that no person 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. Further, DRCOG adheres to other federal nondiscrimination statutes that afford legal protection; specifically: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (gender); Age Discrimination Act of 1975 (age); and Section 504 of the

Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability). DRCOG is committed to ensuring that no person or persons shall, on any statutorily prescribed basis, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by DRCOG.

DRCOG has established a discrimination complaint procedure and form for handling complaints of discrimination (located on the DRCOG website).



Appendix C: Notice of rights

Your rights against discrimination under Title VI of the Civil Rights Act of 1964

The Denver Regional Council of Governments (“DRCOG”) operates its programs and services without regard to race, color, national origin, sex, age and disability. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any DRCOG program or activity because of their race, color, national origin, age, sex or disability may file a discrimination complaint with DRCOG or the Colorado Department of Transportation.

To file a Title VI discrimination complaint, contact:

Denver Regional Council of Governments
Title VI Coordinator
1001 17th St., Suite 700
Denver, CO 80202
Phone: 303-455-1000

CDOT Civil Rights and Business
Resource Center
Title VI Coordinator
2829 W. Howard Pl., 1st Floor
Denver, CO 80204
Email: dot_civilrights@state.co.us
Phone: 800-925-3427
Fax: 303-952-7088



Appendix D: Title VI assurance

Denver Regional Council of Governments


Title VI Assurance

Fiscal Year 2023 (October 1, 2022 – September 30, 2023)


1. There have been no lawsuits or complaints alleging discrimination on the basis of race, color, or national origin filed against the Denver Regional Council of Governments during the period of October 1, 2022 through September 30, 2023.
2. In addition to funding from the Federal Transit Administration, the Denver Regional Council of Governments routinely receives federal funds from the Federal Highway Administration and has also received funds from the Department of Health and Human Services.
3. There were no civil rights compliance reviews performed on the Denver Regional Council of Governments by any local, state, or federal agency during the period of October 1, 2022 through September 30, 2023.
4. Title VI will be enforced by the Denver Regional Council of Governments for all of its contractors. All contracts with Denver Regional Council of Governments include compliance measures which, in effect, state that failure to comply with Title VI requirements will result in termination of the contract.

This certification is a material representation of fact upon which reliance is placed when this transaction was made or entered into.

Executed this 7 day of May, 2024.

By: 

Douglas W. Rex
Executive Director

ATTEST: 

Jenny Dock
Director, Administration and Finance



Appendix E: Title VI local agency assurance

Denver Regional Council of Governments

Title VI Local Agency Assurance

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Related statutes and Presidential Executive Orders under the umbrella of Title VI address Environmental Justice in minority and low-income populations, services to those individuals with Limited English Proficiency, and the protected bases of gender, age, and disability. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of federal air recipients and sub-recipients whether those programs and activities are federally funded or not. Title VI refers to the umbrella of related authorities that require recipients (and sub-recipients) of federal financial assistance to assure nondiscrimination on the basis of race, color, national origin, age, gender, or disability.

The Denver Regional Council of Governments is a recipient of federal financial assistance and as such it, as well as all of its responsible agents, contractors, and consultants, is required to assure nondiscrimination. This assurance is required by the United States Department of Transportation Title VI Regulations at 49 CFR Part 21 (hereinafter referred to as the Regulations).

The Denver Regional Council of Governments hereby gives assurance that no person shall on the grounds of race, color, national origin, age, gender, or disability be excluded from participation in, be denied the benefits or, or be otherwise subjected to discrimination under any program or activity conducted by the Denver Regional Council of Governments regardless of whether those particular programs and activities are federally funded. It is the responsibility of every person within the Denver Regional Council of Governments and all Denver Regional Council of Governments' external agents to incorporate and implement actions consistent with nondiscrimination in programs.

More specifically, and without limiting the above general assurance, the Denver Regional Council of Governments hereby gives the following specific assurances:

1. That it will promptly take any measures necessary to effectuate this agreement.
2. That each of the Denver Regional Council of Governments' programs, activities, and facility will be conducted and or operated in compliance with nondiscrimination requirements under all federal laws and regulations.
3. That these assurances are given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts, or other federal

financial assistance extended by the United States Department of Transportation. These assurances are binding on the Denver Regional Council of Governments, its recipients, sub-recipients, contractors, transferees, successors in interest, and other participants.

4. That the Denver Regional Council of Governments will insert a notification in all solicitations for bids for work or material subject to the Regulations that notifies all bidders that it will affirmatively ensure that disadvantaged business enterprises will be afforded full opportunity to submit bids in response to all invitations and will not be discrimination against on the ground of race, color, national origin, age, gender, or disability in consideration for an award. The Denver Regional Council of Governments will also adapt this notification for all proposals for negotiated agreements.
5. That the Denver Regional Council of Governments will insert appropriate nondiscrimination clauses in every contract subject to Title VI and the Regulations.
6. The Denver Regional Council of Governments will display Title VI information for employees and the public. This information shall include the Denver Regional Council of Governments' Nondiscrimination Policy, obligations, and protections under Title VI, procedures on how to file a Title VI complaint, and contact information for the Denver Regional Council of Governments' Title VI Coordinator. This information shall be translated into languages other than English as needed and consistent with the limited English proficiency requirements of Title VI.
7. The Denver Regional Council of Governments shall seek out and consider the input of minority, low-income, and limited English proficiency populations in the course of conducting public outreach and involvement activities. Public participation shall be encouraged early and often in consideration of social, economic, and environmental impacts on all populations.



Signature of authority

DRCOG

Name of authority (please print)

5/7/24

Date

Executive Director

Title of authority (please print)



Appendix F: Complaint log



Appendix G: Contract provisions

The following provisions are attached to every applicable contract:

Civil Rights Act

During the performance of this contract, the Contractor, for itself, its assignees, and successors in interest, agrees as follows:

a. Nondiscrimination. In accordance with Title VI of the Civil Rights Act, as amended, 42 USC § 2000d, section 303 of the Age Discrimination Act of 1975, as amended, 42 USC § 6102, section 202 of the Americans with Disabilities Act of 1990, 42 USC § 12132, and Federal transit law at 49 USC § 5332, Contractor agrees that it will not discriminate against any employee or applicant for employment because of race, color, creed, national origin, sex, age, or disability. In addition, Contractor agrees to comply with applicable Federal implementing regulations and other implementing requirements FTA may issue.

b. Equal Employment Opportunity. The following equal employment opportunity requirements apply to the Contract:

1) Race, Color, Creed, National Origin, Sex. In accordance with Title VII of the Civil Rights Act, as amended, 42 USC § 2000e, and Federal transit laws at 49 USC § 5332, Contractor agrees to comply with all applicable equal employment opportunity requirements of U.S. Department of Labor (U.S. DOL) regulations, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of

Labor," 41 CFR Parts 60 et seq., (which implement Executive Order No. 11246, "Equal Employment Opportunity," as amended by Executive Order No. 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," 42 USC § 2000e note), and with any applicable Federal statutes, executive orders, regulations, and Federal policies that may in the future affect activities undertaken in the course of this Contract. Contractor agrees to take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, creed, national origin, sex, or age. Such action shall include, but not be limited to, the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. In addition, Contractor agrees to comply with any implementing requirements FTA may issue.

2) Age. In accordance with section 4 of the Age Discrimination in Employment Act of 1967, as amended, 29 USC § 623 and Federal transit law at 49 USC § 5332, Contractor agrees to refrain from discrimination against present and prospective employees for reason of age. In addition, Contractor agrees

- 1) to comply with any implementing requirements FTA may issue.
- 2) Disabilities. In accordance with section 102 of the Americans with Disabilities Act, as amended, 42 USC § 12112, Contractor agrees that it will comply with the requirements of U.S. Equal Employment Opportunity Commission, "Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act," 29 CFR Part 1630, pertaining to employment of persons with disabilities. In addition, Contractor agrees to comply with any implementing requirements FTA may issue.
- 3) Contractor shall comply with the appropriate areas of the Americans with Disabilities Act of 1990 as enacted and from time to time amended and any other applicable federal, state, or local laws and regulations.

The parties hereby incorporate the requirements of 41 CFR § 60-1.4(a) and 29 CFR § 471, Appendix A to Subpart A, if applicable.

This contractor and subcontractor shall abide by the requirements of 41 CFR 60-300.5(a) and 41 CFR 60 741.5(a), if applicable. These regulations prohibit discrimination against qualified protected veterans and qualified individuals with disabilities, and require affirmative action by covered prime contractors and subcontractors to employ and advance in

employment qualified protected veterans and qualified individuals with disabilities.

The following provisions are attached to every applicable Area Agency on Aging contract:

Assurance of compliance with the Department of Health and Human Services regulation under Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973

The Contractor HEREBY AGREES to comply with Title VI of the Civil Rights Act of 1964 (P.L. 88 352) and all requirements imposed by or pursuant to Regulations of the Department of Health and Human Services (HHS) (45 CFR Part 80) issued pursuant to that title, and to comply with Section 504 of the Rehabilitation Act of 1973 (P.L. 93 112) and all requirements imposed by or pursuant to the Regulations of the HHS (45 CFR Part 84) issued pursuant to the Act, all as from time to time amended, to the end that, in accordance with Title VI, the Act and Regulations, no person in the United States shall, on the grounds of race, color, national origin, or nonqualified handicap, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Contractor receives Federal financial assistance from DRCOG, a recipient of Federal financial assistance from HHS; and HEREBY GIVES ASSURANCE THAT it will immediately take any measures necessary to effectuate this agreement.

If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the Contractor by DRCOG, this assurance shall obligate the Contractor, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits. If any personal property is so provided, this assurance shall obligate the Contractor for the period during which it retains ownership or possession of the property. In all other cases, this assurance shall obligate the Contractor for the period during which the Federal financial assistance is extended to it by DRCOG.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Contractor by DRCOG, including installment payments after such date on account of applications for Federal financial assistance which were approved before such date. The Contractor recognizes and agrees that such Federal financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that DRCOG or the United States or both shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Contractor, its successors, transferees, and assignees.



Appendix H: Disadvantaged Business Enterprises and Small Business Enterprises

It is the policy of the Denver Regional Council of Governments (“DRCOG”) that equal opportunity to participate in its procurements is provided to disadvantaged business enterprises as provided by applicable law. The selected respondent(s) shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of contracts.

DRCOG includes Disadvantaged Business Enterprise clauses in all applicable contracts and requests for proposal (RFPs). These clauses are provided for reference:

- Procedures to ensure that DBEs are afforded opportunity to participate in federal-aid highway programs and activities

- “It is declared to be in the national interest to encourage and develop the actual and potential capacity of small businesses and to utilize this important segment of our economy to the fullest practicable extent in construction of Federal-aid highway systems, including the Interstate System. In order to carry out that intent and encourage full and free competition, the Secretary should assist, insofar as feasible, small business enterprises in obtaining contracts in connection with the prosecution of the highway program.” (23 USC § 304) and (49 CFR 26, effective February 2011)

All applicable respondents must complete and return with their response the Disadvantaged Business Enterprise Program Information Request Form.



**Title VI
Implementation Plan**

**Denver Regional Council of Governments
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