

# Island Regional Transportation Planning Organization

## Title VI Plan and Assurances

**Beginning date of Plan October 31, 2023**



**Public Works Director**  
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## I. Title VI Non-Discrimination Assurances

It is the policy of the Island Regional Transportation Planning Organization (IRTPO) that no person shall on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the IRTPO as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the IRTPO including its contractors and anyone who acts on behalf of the IRTPO. This policy also applies to the operations of any department or agency to which the IRTPO extends federal financial assistance. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway infrastructure or facilities built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 USC § 2000d and related statutes, 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3 and 49 CFR part 21.

Signed: \_\_\_\_\_

Executive Director

10/31/23

Date

## II. Organization, Staffing, and Structure

Executive Director Connie Bowers is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all LPA employees, contractors, and agents pursuant to 49 CFR Part 21.

The IRTPO has created the position of IRTPO Transportation Planner to perform the duties of the Title VI Coordinator and ensure implementation of its Title VI program. The position of IRTPO Transportation Planner is located within the Island County Public Works Department ("the Agency").

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the Agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to WSDOT;
- 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; and
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.



### III. Primary Program Area Descriptions & Review Procedures

**Title VI Coordinator's Responsibilities and Program Administration** – As authorized by the Agency Administrator, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring the Island Regional Transportation Planning Organization's compliance with Title VI requirements as follows:

Program Area	General Description	Title VI Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
<b>Public Engagement</b>	Posting of documents including meeting notices, requests for proposals, requests for public comments, surveys, and both draft & adopted documents.	Providing document translation for any identified LEP populations. Currently, the IRTPO service area doesn't meet the threshold requiring vital records to be translated for LEP populations. However, the Tagalog population is close to the 1000 persons threshold.	Periodically monitor demographic data as available to track potential LEP populations. Note that anyone can request free interpretation/translation services on all public documents. Carefully review any complaints from non-English-speaking populations.
	Facilitating open public meetings.	The greatest challenge to non-discrimination is the potential lack of Internet or cell phone access among rural populations, particularly rural low-income populations.	Ensure that public review documents and public meeting information is distributed by newspaper, newsletter, postal notices, or other sources that do not limit information and participation to only those with access to technology.



Program Area	General Description	Title VI Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
<i>Transportation Planning</i>	Planning for the program areas related to the IRTPO and all its activities. These include coordination with other agencies and organizations; maintaining certain documents such as the Human Services Transportation Plan and the Regional Transportation Plan; as well as Grant funding for IRTPO projects and activities.	The Title VI personalities for the program area will be unique and some may require additional Public Participation or may require additional information or additional groups that may be affected about certain projects.	<p>The Collection of this data for LEP populations and minority populations will help address the needs of these Underserved Populations.</p> <p>The collected data will be processed and be reflected in documents produced by the IRTPO. These documents would include the Human Services Transportation Plan, the Regional Transportation Plan, and any document produced by the MPO.</p>

## IV. Review Procedures

Title VI Program reviews will be performed by the Title VI Coordinator to assess administrative procedures, staffing, and resources available to maintain Title VI compliance. All programs are reviewed annually to ensure effectiveness in their compliance with Title VI provisions. The Title VI Coordinator works to ensure equal participation in all programs and activities at all levels. All operational guidelines for contractors, sub-recipients, and program areas are reviewed annually to ensure inclusion of Title VI language, provisions, and related requirements, where applicable.

### A. Consultant Contracts

The IRTPO Title VI Coordinator is responsible for leading the process of consultant selection, negotiation, and the administration of consultant contracts.

### B. Authorities

- 48 CFR 31 – Contract Cost Principles and Procedures
- 23 CFR 172 – Procurement, Management, and Administration of Engineering and Design Related Services
- RCW 39.29 – Personal Service Contracts
- RCW 39.80 – Contracts for Architectural and Engineering Services

### C. Consultant Selection Process

The IRTPO operates under its adopted bylaws and all relevant federal and state laws. Selection of consultants is generally made by an ad hoc Consultant Selection Committee, which is established for each major project. The committee typically comprises IRTPO staff members, technical staff from affected local jurisdictions, and staff from affected agencies.



#### D. Title VI Responsibilities

- Ensure DBE opportunities exist.
- Ensure that all consultant contracts administered by IRTPO have the appropriate Title VI provisions included.
- Review directives and procedures to ensure Title VI compliance.
- Maintain necessary data and documentation required for completion of IRTPO's Title VI Update Annual Report.

## V. Data Collection/Reporting/Analysis

Program Area	Type of Data Collected & Process for Collecting	Intended Outcome of Data Analysis (i.e. Title VI Purpose for Collecting the Data)
<b>Public Engagement</b>	Public meetings, maps showing split in demographics across the Island, as well as data from the Census Bureau.	To show public interest in projects and the effects certain projects would have over particular communities. This will help determine the barriers of certain communities and insure that there will be no discrimination in the processing of the projects.
<b>Transportation Planning</b>	Maps showing distribution of LEP and minority populations.  Comments from the community and entities inside of the IRTPO.	Identification of minority, low-income, or LEP population centers. This information is used to help identify needs and prevent discrimination in planning regional transportation options, public and private.  Special population centers are mapped, along with potential destinations such as job centers, schools, medical and other services, shopping, etc. (Elderly and disabled population centers are also mapped.)

## VI. Title VI Training

In keeping with the IRTPO's adopted policy of nondiscrimination, departmental procedures will be established or followed for Public Works employees to have equal access to applicable educational and training opportunities. IRTPO staff will maintain program administration documentation and data necessary for preparation of annual Title VI reports, and will routinely supply the necessary data to the Title VI Coordinator.

The IRTPO has no other staff or any subrecipients to offer additional Title VI training. If that changes, then WSDOT's Office of Equal Opportunity may be asked to provide applicable training.

The Title VI Coordinator is responsible for overall Title VI related training and staff development for Title VI Specialists and other employees. The Coordinator will organize or conduct a minimum of one internal Title VI training session annually. The Coordinator will organize and facilitate the provision of Title VI training sessions for consultants, contractors, and subcontractors periodically. WSDOT's Office of Equal Opportunity may be asked to provide applicable training.

## VII. Title VI Complaint Procedures

### Discrimination Complaint Procedure for IRTPO

Federal law prohibits discrimination on the basis of race, color, or national origin in any IRTPO program, service, or activity. This prohibition applies to all branches of IRTPO, its contractors, consultants, and anyone else who acts on behalf of IRTPO.

Complaints related to the Federal-aid programs may be filed with IRTPO and will be forwarded to Washington State Department of Transportation – Office of Equal Opportunity. If you need assistance to file your complaint or need interpretation services, please contact IRTPO's Transportation Planner.

#### Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any IRTPO program, service, or activity because of their race, color, or national origin may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

#### How do you file a complaint?

Complaints must be filed no later than 180 days from the last date of the alleged discrimination. Contact IRTPO's Transportation Planner if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact IRTPO's Transportation Planner.

Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. If a complainant phones IRTPO with allegations, the allegations of the complaint will be transcribed as provided by phone and then the written complaint will be sent to the complainant for correction and signature.

A complaint should contain the following information:

- The complainant's contact information, including, if available: full name, mailing address, phone number (and best time to call), and email address (if available);
- The basis of the complaint (e.g., race, color, national origin);
- The names of specific person(s) and/or agencies/organizations alleged to have discriminated.



- A description of the alleged discriminatory actions, meaning sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

All Title VI complaints are logged. The Complaint log must contain the following information for each complaint filed:

- The name and address of the person filing the complaint.
- The date of the complaint.
- The basis of the complaint.
- The disposition of the complaint.
- The status of the complaint.

The Complaint Log and documentation are destroyed six years after the end of the fiscal year in which the case is closed.

IRTPO then forwards complaints to WSDOT-Office of Equal Opportunity for processing by FHWA. [WSDOT investigates complaints only if delegated by FHWA after acceptance of a complaint.] FHWA is responsible for all determinations regarding whether to accept, dismiss, or transfer the complaint and finding no violation or failure to comply. A copy of the complaint form can be found at the Public Works admin desk or found on Island County's website at

<https://www.islandcountywa.gov/794/Title-VI-Discrimination-Complaints>

Complainants have the right to file a complaint directly with the federal funding agency. The following address is where Title VI complaints may be filed directly with FHWA:

Federal Highway Administration  
U.S. Department of Transportation Office of Civil Rights  
8th Floor E81-105  
1200 New Jersey Avenue, SE  
Washington, DC 20590

[CivilRights.FHWA@dot.gov](mailto:CivilRights.FHWA@dot.gov)

#### What happens after a complaint is filed?

If your complaint is forwarded to another agency, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

FHWA will render final decisions in all cases including those investigated by WSDOT. There are no administrative appeal forums in Title VI complaints. Once FHWA issues its final agency decision, a complaint is closed.

There is no prohibition against a complainant filing a Title VI complaint simultaneously with an LPA, WSDOT, and FHWA.

## VIII. Limited English Proficiency

In order to provide meaningful communication for those with Limited English Proficiency (LEP), the IRTPO engages in the following actions:

1. Conduct a demographic profile of existing population then use the Four Factor Analysis recommended by the U.S. Department of Transportation (USDOT) to determine the need for language assistance measures. Information from the U.S. Census Bureau, Washington State Office of Financial Management (OFM), and local school districts should be included in the demographic profile. The Four Factor Analysis includes:
  - a. ***The number and proportion of people with LEP served or encountered in the eligible service population.*** USDOT has adopted a "safe harbor" provision for recipients of federal transportation funds that sets a threshold for the provision of written translation of documents for each eligible LEP language group of 1,000 or more people, or one that constitutes at least five percent of the Region's population, whichever is less.
  - b. ***The frequency with which people with LEP come into contact with IRTPO programs, activities, or services.*** Even though IRTPO fully complies with all applicable federal and state public notice requirements, active involvement in the transportation planning process on the part of the general public is minimal. The Transportation Planner's connections with public service agencies, schools, and transit provides the most opportunity for contact with potential LEP populations.
  - c. ***The importance to people with LEP regarding IRTPO's programs, activities, and services.*** Acting through its Executive Board, IRTPO works with Island County; the Cities of Oak Harbor, Langley, and Stanwood; the Town of Coupeville; the Ports of Coupeville and South Whidbey; Naval Air Station Whidbey; and WSDOT to develop policies and make decisions regarding investments in the regional transportation system. IRTPO develops the Regional Transportation Plan for the region and selects projects for funding through the federal Surface Transportation Block Grant program. IRTPO also maintains a list of proposed projects for the Island County Human Services Transportation Plan to ensure that mobility needs of various underserved populations are being met. All these planning initiatives may impact the LEP populations in the region, either directly or indirectly.
  - d. ***The resources available to IRTPO and the overall cost to provide assistance to people with LEP.*** The IRTPO is committed to providing translation services on request to any LEP populations identified in the region and providing assistance for speakers of other languages with Limited English Proficiency.
2. Apply the Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. Translate vital documents into languages other than English.
  - a. Notify LEP customers of the availability of language assistance services. Provide for oral language assistance.
    - i. All plans and public documents contain the following notice: "This material is available in other languages upon request."



- ii. All meeting announcements contain the following notice: "Translation and interpretation services are available upon request. Please make requests at least 48 hours prior to meeting time."
  - b. Train staff to utilize translators, interpreters, and other language services such as those provided by the Washington State Department of Enterprise Services. IRTPO staff can use these National Association of State Procurement Officer (NASPO) contracts. <https://des.wa.gov/services/contracting-purchasing/current-contracts>
3. Monitor and evaluate access to language assistance.

## IX. Environmental Justice

Executive Order #12898 requires federal agencies to develop strategies to prevent, mitigate, and correct the possible high and adverse disproportionate burdens or environmental effects of an agency's programs, policies, and activities on minority and/or low-income populations. USDOT and FHWA policy requires recipients/subrecipients to incorporate Environmental Justice (EJ) principles throughout all programs and activities and ensure that the public (inclusive of minority and/or low-income populations) has access to information concerning environmental impacts of proposed actions. Federal statutes and policies require state and local governments that receive federal assistance to establish EJ procedures.

Procedures for addressing environmental justice during project development (environmental review phase) are included in WSDOT Local Programs' NEPA Categorical Exclusion (CE) – A Guidebook for Local Agencies (for CE documents) and Chapter 458 of WSDOT's Environmental Manual (for Environmental Assessments (EAs) and Environmental Impact Statements (EISs)). EJ principles are expected to be incorporated in all phases of transportation decision-making, from planning to maintenance.

The summarized principles of Environmental Justice are to:

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

Minority and low-income communities have historically borne disproportionately high and adverse human health or environmental effect of transportation infrastructure projects. FHWA authorities define protected minority and low-income populations as Black, Hispanic, Asian, American Indian, Alaskan Native, Native Hawaiian or Pacific Islander, and people with a median household income at or below the poverty level as defined by the US Department of Health and Human Services. The objectives of EJ are to convey issues in ways that are meaningful to various cultural groups; bridge cultural and economic differences that affect participation; use communication techniques that enable people to interact; and increase participation by underrepresented groups.

One of IRTPO's primary planning requirements is a Human Services Transportation Plan. This plan uses US Census Bureau and other available demographic information to specifically identify special populations such as low-income, minority, elderly, disabled, veteran, and LEP. The plan,

itself, is an effort to locate service gaps and achieve equity in regional transportation planning for all people groups.

## **X. Notice of Title VI Rights**

IRTPO posts Notice to the Public as follows:

- On all IRTPO public meeting agendas
- In all IRTPO public notices
- At the IRTPO webpage hosted by Island County
  - <https://www.islandcountywa.gov/488/Island-Regional-Transportation-Planning->

### **Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964**

Island Regional Transportation Planning Organization (IRTPO) hereby gives public notice that it is the IRTPO's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, sex, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which IRTPO receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with IRTPO. Any such complaint must be filed with the IRTPO Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence. Title VI discrimination Complaint Forms may be obtained from the IRTPO office at no cost to the complainant.

#### **To file a Title VI discrimination complaint, contact:**

IRTPO Transportation Planner  
1 NE 6th St.  
Coupeville, WA 98239  
360-679-7331

Washington Department of Transportation  
Office of Equal Opportunity – Title VI  
Box 47314  
Olympia, WA 98504-7314  
TitleVI@wsdot.wa.gov  
Phone: (800) 259-9143

#### **ATTACHMENT:**

APPENDIX A: USDOT 1050.2A, Standard Assurances with Appendices

APPENDIX B: Public Participation Plan

APPENDIX C: Complaint Form

APPENDIX D: Demographic Data



## Appendix A – USDOT 1050.2A Standard Assurances with Appendices

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### The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination Assurances DOT Order No. 1050.2A

The **Island Regional Transportation Planning Organization (IRTPO)** (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through **Washington State Department of Transportation (WSDOT)**, is subject to and will comply with the following:

#### Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

#### General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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, for which the Recipient receives Federal financial assistance from DOT, including the **WSDOT**."*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

#### Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted **Unified Planning Work Program**:



1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all **Unified Planning Work Program** and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The **Island Regional Transportation Planning Organization**, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
  - a. the period during which the property 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; or
  - b. the period during which the Recipient retains ownership or possession of the property.



9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, **IRTPO** also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the **IRTPO** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the **IRTPO**. You must keep records, reports, and submit the material for review upon request to **IRTPO**, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

**IRTPO** gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the **Unified Planning Work Program**. This ASSURANCE is binding on **Washington State**, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the **Unified Planning Work Program**. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

## Appendix B – Public Participation Plan

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### Introduction

Island Regional Transportation Planning Organization is conducting a periodic update to its Title VI, due by November 1, 2026. Throughout the process of updating required documents for the IRTPO, the public will be encouraged to participate and help shape growth in the county over the next few years. This Public Participation Plan ensures early, continuous, and inclusive public participation, as required by Washington State Law (RCW 36.70A).

### Goals of the Public Participation Plan

- Ensure broad participation, solicit input from diverse stakeholders, and ensure that no single group or interest dominates the process.
- Maintain and establish meaningful relationships with partner municipalities, organizations, and groups through continuous direct outreach and coordination.
- Provide equitable opportunities for public participation in each of the four Island County planning areas (North Whidbey, Central Whidbey, South Whidbey, and Camano Island).
- Focus resources on soliciting input on elements of the update process likely to be of greatest interest/impact to the public.
- Make use of in-person and online communication technologies to efficiently distribute information and create multiple opportunities for engagement.
- Transparently and proactively share information with the public about all opportunities to provide input including meetings, hearings, surveys, workshops, legislative actions, etc.

### Communications Principles and Tactics

The following principles will guide the County's public outreach efforts:

- Public outreach should be intentional and specific, making it easy for individuals to engage.
- Public outreach should be equitable to meet the differing needs of different audiences.
- Public outreach should be iterative, clearly stating how input will be used in decision making.

The following tactics will be utilized in assessing which communications tools and outreach methods to implement:

- Identify communities most impacted by planned growth and any development changes and establish best practices for communicating with these communities.
- Engage with affected communities early and often to establish, build, and maintain meaningful relationships.



- Clearly communicate the public participation goal when conducting engagement, be specific with requests for input, and define a feedback loop to share how the input was used.
- Remove barriers for participation, consider location and time of day of meetings/events, consider providing food and childcare as resources allow, provide materials in multiple languages, and offer multiple ways to participate.

### **Emphasis on Vulnerable and Historically Underserved Communities**

Historically, members of the public who choose to participate in planning processes tend to be individuals who have flexibility in their work to attend meetings during the day, individuals with a technical background, or community members who are retired. Planning processes that do not try to engage more diverse audiences can perpetuate inequity by reflecting the values and desires of people who hold power and privilege in a community.

To encourage diverse participation and build trust during this comprehensive planning process, Island County intends to focus public engagement efforts on including communities who are vulnerable and/or have historically been underserved. Examples of vulnerable and underserved communities may include veterans, seniors, youth, immigrants and refugees, people of low income, people with disabilities, and people of color.

### **Communication Tools**

The communications tools that will be used by Island County during the comprehensive plan update process may include, but are not limited to:

- **Website** – Planning and Community Development (planning staff) will regularly update its website with comprehensive plan information. Relevant documents and schedules will be posted on the website along with announcements and notices concerning upcoming meetings, hearings, and public involvement opportunities.
- **Email List** – Planning staff will maintain a list of individuals or groups who have expressed an interest in the comprehensive plan update process. The email list will be used to disseminate announcements and notices. Current list has over 8,000 subscribers.
- **Direct Mail** – Postcards or other informational materials may be directly mailed to residents during the comprehensive plan update process to notify the public about opportunities to participate, key dates or deadlines, and/or public meetings and hearings.
- **News Releases** – For major topics and decisions, Island County will prepare press releases and distribute to local papers.
- **Social Media** – Planning staff will use already established social media platforms to promote public meetings and opportunities to provide formal public comment (those social media channels already owned by Island County or by partner organizations and community groups) in the comprehensive plan update process.
- **Posters** – Hang posters about public events or opportunities to comment at common gathering places in affected communities such as community centers, libraries, food banks, etc.
- **Commissioners Town Hall and/or Newsletters** – During key milestones in the comprehensive plan process, planning staff will work with the Board of Island County



Commissioners (BOCC) to provide information via regularly scheduled Town Halls and in regular newsletters, as deemed appropriate by the Commissioners.

- **Issue Papers** – Issue papers will provide focused guidance to decision makers and document the evolution of the update process. Prior to the final adoption stage, planning staff will compile all of the issue papers into a single background report. Planning staff will post issue papers on the department's website as they are prepared.

### **Outreach Methods**

The outreach methods that will be used by Island County during the comprehensive plan update process may include, but are not limited to:

- **Focus Groups / Technical Advisory Groups** – In order to solicit guidance on specific issues or complex technical issues, planning staff may utilize BOCC approved Focus Groups or Technical Advisory Groups. These groups will include members who have specific knowledge or interest in certain topics or can effectively represent a subset of the community. Focus Groups or Technical Advisory Groups may have members from business groups, trade organizations, interest groups, Government agencies, County departments, community or environmental groups, and/or members of the public.
- **Paid Focus Groups** – One method that could be used for engaging historically underserved members of the public who may not otherwise be able to participate in a Focus Group or Technical Advisory Group, is to provide payment for their service. Members would have to demonstrate that their employer would not otherwise compensate them for their time on the Focus Group or Technical Advisory Group and would be paid an hourly rate commensurate with a living wage in Island County. [See [PSRC Compensation Policy](#) for an example model of how this could work.]
- **Surveys** – For specific topics where planning staff feel they could benefit from specific feedback on the comprehensive plan updates, surveys may be utilized to better understand the community's point of view. Surveys could be administered online or in-person at outreach events.
- **Community Events / Fairs and Festivals** – Planning staff will utilize already established community events to share information about the comprehensive plan process. During the summer 2024, the County will host booths at events like farmers markets, local parades, and annual community events.
- **Public Meetings / Workshops** – Public meetings and workshops are informal public gatherings to solicit public feedback on Island County's planning efforts. Public meetings or workshops may involve presentations by planning staff, question and answer sessions, and interactive activities.
- **Public Hearings** – Public Hearings are a formal public process conducted and held before the BOCC or the Island Regional Transportation Planning organization.
- **Council of Governments** – Issues requiring a high level of intergovernmental coordination or decision making may be forwarded to the Island County Council of Governments for discussion. In particular, the Council of Governments will take a leading role in updating the County Wide Planning Policies.
- **Board of Commissioners Work Sessions** – Planning staff will frequently attend works sessions in order to brief Board members on the update process.



- **Planning Commission Work Sessions** – Planning staff will frequently attend work sessions in order to brief Planning Commission members on the update process.

### Key Audiences

The audiences below include groups who will be engaged by Island County during the comprehensive planning process. This list represents a draft list of groups who are required to be involved or have expressed interest in being involved during the drafting of this public participation plan; this will remain a living document and will be added to as the comprehensive plan update process continues.

- **Members of the public**, with an emphasis on vulnerable and historically underserved communities
- **Island County Departments:** Public Health, Public Works, Human Services, Facilities, Dept. of Emergency Management, Environmental Health, Marine Resources Committee, Diversity Equity and Inclusion, County Administrator, Prosecuting Attorney, Conservation Futures Program, Comprehensive Economic Development Strategy Team
- **Cities/Towns:** City of Oak Harbor, Town of Coupeville, City of Langley
- **Tribal Governments:** Samish, Stillaguamish, Swinomish, Tulalip, Sauk-Suiattle, other tribes as applicable
- **Federal Government:** Naval Air Station Whidbey Island, U.S. Coast Guard, Army Corps of Engineers, National Parks Service, Federal Aviation Administration
- **State Agencies:** Dept. of Ecology, Dept. of Commerce, Office of Financial Management, WSDOT, WSDOT Aviation Dept., Dept. of Fish and Wildlife, Dept. of Natural Resources, Dept. of Archaeology and Historic Preservation, Puget Sound Partnership
- **Local Organizations:** Ebey's Landing National Historical Reserve, North Whidbey Parks and Recreation, South Whidbey Parks and Recreation, Island County Historical Society, Friends of Camano Island Parks, Sound Defense Alliance, COER, Camano Preparedness Group, libraries, community councils, churches, groceries/farmers markets, bookstores, other local businesses that serve as gathering places
- **Environmental Groups:** Whidbey Camano Land Trust, Whidbey Island Conservation District, Snohomish Conservation District, Whidbey Environmental Action Network, Conservation Futures, Whidbey Audubon Society, Sound Water Stewards
- **Agriculture / Farm Groups:** Whidbey Island Grown, Whidbey Island Conservation District, Agricultural Resource Committee of Island County, Island County Farm Bureau, Growing Veterans, South Whidbey Tilth, NW Ag Council, school gardens/community gardens, Goosefoot, farmers markets, farmstands
- **Economic Groups:** Island County Economic Development Council, Chambers of Commerce, Port of South Whidbey, Port of Coupeville, Northwest Workforce Development Council, aviation organizations and owners
- **Housing Groups:** Island County Housing Advisory Board, Housing Authority of Island County, Camano Island Housing Task Group, Ituha Crisis Stabilization Center, SPIN Café, Low Income Housing Institute, Thinc Whidbey, Goosefoot, Shelter Resources, Habitat for Humanity, Whidbey Homelessness Coalition, builders and developers

- **Transportation Groups:** IRTPO, Island Transit, Public Works, Whidbey SeaTac Shuttle, Sno-Goose Transit
- **Utility Providers:** PSE, SNOPUD, Freeland Water and Sewer District, Camano Fire, Oak Harbor Fire, NW Fire, South Whidbey Fire & EMS, Central Whidbey Fire, Island County Broadband Action Team, Whidbey Island Water Systems Association, Langley Public Works, Coupeville Utilities
- **Veteran Groups:** Veterans Advisory Board, Whidbey Island Veteran Resource Center, VFW, American Legions, Opportunity Council, Disabled American Veterans
- **Senior Service Groups:** Island Senior Resources, Northwest Senior Services Board, Camano Center, Camano Island Senior Center, Oak Harbor Senior Center
- **Social Service Groups:** Community Health Advisory Board, North Sound Behavioral Health Organization Advisory Board, DSHS, Whidbey Health, Compass Health, Skagit Regional Clinic, Camano Island Health System, Sunrise Services, Whidbey Island Nourishes, Goosefoot, Good Cheer, South Whidbey CARES Coalition, ZCADA, Opportunity Council, Stanwood Camano Community Resource Center, Stanwood Camano Area Foundation, Whidbey Community Foundation, food banks, homeless shelters, churches, community service clubs (e.g.; rotary and elks clubs)
- **Youth Service Groups:** Oak Harbor School District, Coupeville School District, South Whidbey School District, Stanwood-Camano School District, Boys & Girls Clubs, Big Brothers Big Sisters of Island County, Stanwood Camano YMCA, Stanwood Camano Community Resource Center, Skagit Valley College, Pediatric Associations of Whidbey Island, Ryan's House for Youth, childcare centers and early childhood education providers, church youth groups, sports clubs
- **News Outlets:** South Whidbey Record, Whidbey News-Times, Stanwood-Camano News, Everett Herald, Drews List, Crab Cracker, Whidbey Weekly

### Contacts

#### **Island County, Public Works Department**

Phone: 360-679-7331

Email: [Malcolm.roberts@islandcountywa.gov](mailto:Malcolm.roberts@islandcountywa.gov)

In Person: 1 NE 6<sup>th</sup> Street, Coupeville, WA 98239

Mailing Address: 1 NE 7<sup>th</sup> Street, Coupeville, WA 98239

Camano Office: 121 N East Camano Drive, Camano Island, WA 98282



Appendix C – Title VI Complaint Form

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*What remedy are you seeking for the alleged discrimination? Please note that this process will not result in the payment of punitive damages or financial compensation.*

\_\_\_\_\_

*List any other persons that we should contact for additional information in support of your complaint. Please list their names, phone numbers, address, email address below.*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Have you filed your complaint, grievance, or lawsuit with any other agency or court?*

Who \_\_\_\_\_ When \_\_\_\_\_

Status (pending, resolved, etc.) \_\_\_\_\_ Result, if known \_\_\_\_\_

Complaint number, if known \_\_\_\_\_

*Do you have an attorney in this matter?* \_\_\_\_\_

Name \_\_\_\_\_ (print) \_\_\_\_\_

Phone \_\_\_\_\_ Address \_\_\_\_\_

City \_\_\_\_\_ Zip \_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

## Appendix D – Demographics Breakdown

### Island County, Washington

Label	Estimate	Margin of Error	Percent	Percent Margin of Error
<b>SEX AND AGE</b>				
Total population	84,187	± *****	84,187	(X)
Male	41,989	± 205	49.90%	±0.2
Female	42,198	± 205	50.10%	±0.2
Sex ratio (males per 100 females)	99.5	± 1	(X)	(X)
Under 5 years	4,657	± 73	5.50%	±0.1
5 to 9 years	4,007	± 335	4.80%	±0.4
10 to 14 years	4,421	± 315	5.30%	±0.4
15 to 19 years	3,728	± 209	4.40%	±0.2
20 to 24 years	5,822	± 190	6.90%	±0.2
25 to 34 years	11,576	± 215	13.80%	±0.3
35 to 44 years	8,788	± 251	10.40%	±0.3
45 to 54 years	8,510	± 234	10.10%	±0.3
55 to 59 years	5,256	± 403	6.20%	±0.5
60 to 64 years	6,747	± 376	8.00%	±0.4
65 to 74 years	12,725	± 147	15.10%	±0.2
75 to 84 years	5,995	± 255	7.10%	±0.3
85 years and over	1,955	± 240	2.30%	±0.3
Median age (years)	44.1	± 0.4	(X)	(X)
Under 18 years	15,275	± *****	18.10%	*****
16 years and over	70,613	± 196	83.90%	±0.2
18 years and over	68,912	± *****	81.90%	*****
21 years and over	66,801	± 198	79.30%	±0.2
62 years and over	24,833	± 436	29.50%	±0.5
65 years and over	20,675	± 124	24.60%	±0.1
18 years and over	68,912	± *****	68,912	(X)
Male	34,330	± 35	49.80%	±0.1
Female	34,582	± 35	50.20%	±0.1
Sex ratio (males per 100 females)	99.3	± 0.2	(X)	(X)
65 years and over	20,675	± 124	20,675	(X)
Male	9,714	± 98	47.00%	±0.3
Female	10,961	± 60	53.00%	±0.3
Sex ratio (males per 100 females)	88.6	± 0.9	(X)	(X)



Island County IRTPO  
Title VI Plan - 2023

RACE				
Total population	84,187	± *****	84,187	(X)
One race	79,075	± 615	93.90%	±0.7
Two or more races	5,112	± 615	6.10%	±0.7
One race	79,075	± 615	93.90%	±0.7
White	70,240	± 455	83.40%	±0.5
Black or African American	2,278	± 308	2.70%	±0.4
American Indian and Alaska Native	982	± 200	1.20%	±0.2
Cherokee tribal grouping	69	± 96	0.10%	±0.1
Chippewa tribal grouping	64	± 56	0.10%	±0.1
Navajo tribal grouping	68	± 90	0.10%	±0.1
Sioux tribal grouping	39	± 43	0.00%	±0.1
Asian	3,917	± 381	4.70%	±0.5
Asian Indian	178	± 132	0.20%	±0.2
Chinese	319	± 139	0.40%	±0.2
Filipino	2,327	± 395	2.80%	±0.5
Japanese	296	± 111	0.40%	±0.1
Korean	208	± 94	0.20%	±0.1
Vietnamese	153	± 101	0.20%	±0.1
Other Asian	436	± 177	0.50%	±0.2
Native Hawaiian and Other Pacific Islander	327	± 75	0.40%	±0.1
Native Hawaiian	17	± 26	0.00%	±0.1
Chamorro	81	± 75	0.10%	±0.1
Samoan	49	± 52	0.10%	±0.1
Other Pacific Islander	180	± 114	0.20%	±0.1
Some other race	1,331	± 411	1.60%	±0.5
Two or more races	5,112	± 615	6.10%	±0.7
White and Black or African American	727	± 263	0.90%	±0.3
White and American Indian and Alaska Native	945	± 204	1.10%	±0.2
White and Asian	1,024	± 270	1.20%	±0.3
Black or African American and American Indian and Alaska Native	21	± 26	0.00%	±0.1

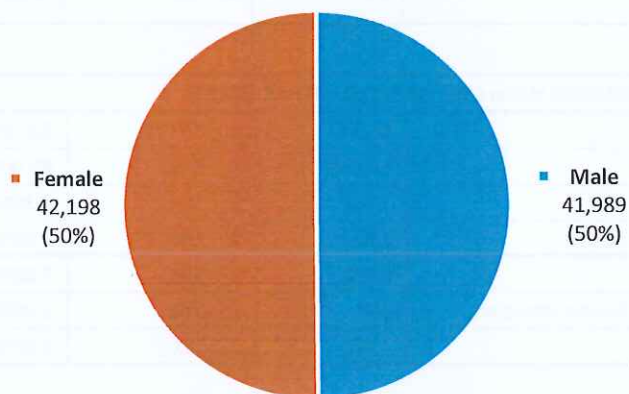
RACE ALONE OR IN COMBINATION WITH ONE OR MORE OTHER RACES				
Total population	84,187	± *****	84,187	(X)
White	74,908	± 693	89.00%	±0.8
Black or African American	3,580	± 214	4.30%	±0.3
American Indian and Alaska Native	2,585	± 500	3.10%	±0.6
Asian	5,932	± 196	7.00%	±0.2
Native Hawaiian and Other Pacific Islander	849	± 208	1.00%	±0.2
Some other race	2,483	± 500	2.90%	±0.6

HISPANIC OR LATINO AND RACE				
Total population	84,187	± *****	84,187	(X)
Hispanic or Latino (of any race)	6,846	± *****	8.10%	*****
Mexican	4,991	± 396	5.90%	±0.5
Puerto Rican	660	± 257	0.80%	±0.3
Cuban	160	± 136	0.20%	±0.2
Other Hispanic or Latino	1,035	± 301	1.20%	±0.4
Not Hispanic or Latino	77,341	± *****	91.90%	*****
White alone	66,189	± 97	78.60%	±0.1
Black or African American alone	2,179	± 279	2.60%	±0.3
American Indian and Alaska Native alone	790	± 144	0.90%	±0.2
Asian alone	3,914	± 381	4.60%	±0.5
Native Hawaiian and Other Pacific Islander alone	327	± 75	0.40%	±0.1
Some other race alone	226	± 148	0.30%	±0.2
Two or more races	3,716	± 529	4.40%	±0.6
Two races including Some other race	260	± 146	0.30%	±0.2
Two races excluding Some other race, and Three or more races	3,456	± 487	4.10%	±0.6
Total housing units	42,270	± 243	(X)	(X)

CITIZEN, VOTING AGE POPULATION				
Citizen, 18 and over population	66,907	± 333	66,907	(X)
Male	33,692	± 154	50.40%	±0.2
Female	33,215	± 263	49.60%	±0.2

## Demographics: Sex and Age

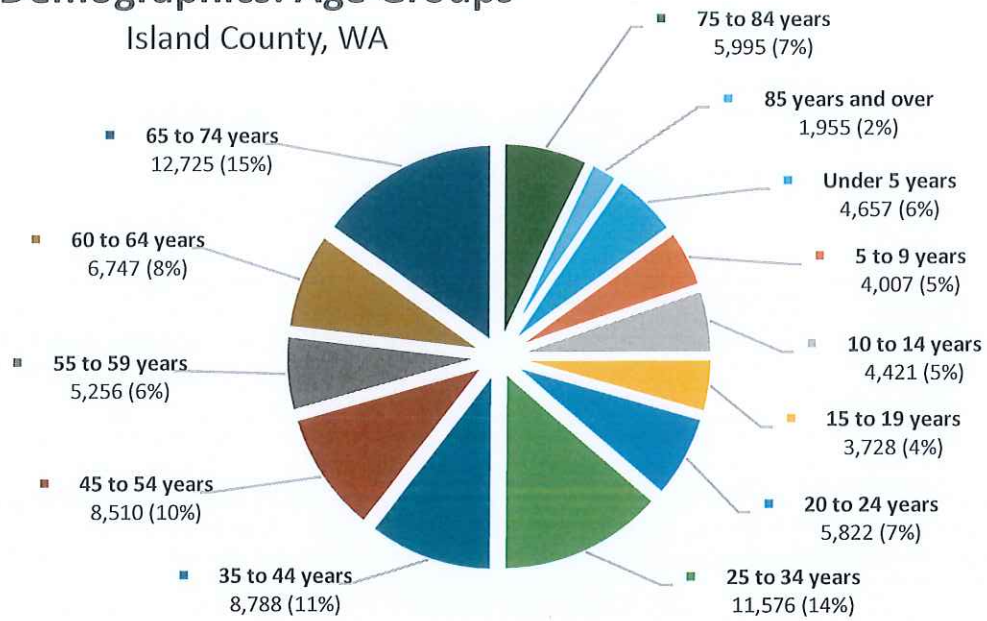
### Island County, WA





## Demographics: Age Groups

Island County, WA



## Demographics: Race

Island County, WA

