

BALTIMORE METROPOLITAN PLANNING ORGANIZATION

**BALTIMORE REGIONAL TRANSPORTATION BOARD
RESOLUTION #24-15**

**RESOLUTION FOR THE APPROVAL OF THE BALTIMORE REGION
TITLE VI PROGRAM UPDATE**

WHEREAS, the Baltimore Regional Transportation Board (BRTB) is the designated Metropolitan Planning Organization for the Baltimore region, encompassing the Baltimore Urban Area, and includes official representatives of the cities of Annapolis and Baltimore; the counties of Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne's; and representatives of the Maryland Department of Transportation, the Maryland Department of the Environment, the Maryland Department of Planning, the Maryland Transit Administration, and RTA of Central Maryland; and

WHEREAS, the Baltimore Regional Transportation Board as the Metropolitan Planning Organization for the Baltimore region, has responsibility under the provisions of the Moving Ahead for Progress in the 21st Century Act (MAP-21) to develop and execute a continuing, cooperative, comprehensive and performance-based transportation planning process for the metropolitan area; and

WHEREAS, 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, and Presidential Executive Order 13166 requires recipients of federal funds to assess, monitor, and address the needs of Limited English Proficiency (LEP) individuals seeking assistance; and

WHEREAS, the Baltimore Regional Transportation Board, in accordance with the Federal Transit Administration's (FTA) most recent circular on Title VI compliance, FTA C 4702.1B, has updated its Title VI Assurances and reaffirmed a Title VI Policy Statement. Both of which are included in the Title VI Program Update, (Attachment 1) and in planning activities to ensure non-discrimination in the metropolitan transportation planning process for the Baltimore region; and

WHEREAS, separate appendices to the Title VI Program include the 2022 Public Participation Plan and the 2023 Limited English Proficiency Plan. The Disadvantaged Business Program was adopted in 2010 with a DBE Goal adopted each year at the time of approval of the Unified Planning Work Program. Also included as appendices are BMC's current templates for Request for Proposals and Contracts.

WHEREAS, with this Title VI review, the Americans with Disabilities Act Assessment has been updated and incorporated as a separate appendix.

NOW, THEREFORE, BE IT RESOLVED that the Baltimore Regional Transportation Board as the Metropolitan Planning Organization for the Baltimore region approves the Title VI Assurances, Title VI Policy Statement and ADA Assessment.

I HEREBY CERTIFY that the Baltimore Regional Transportation Board, as the Metropolitan Planning Organization for the Baltimore region, approved the aforementioned resolution at its February 27, 2024 meeting.

2-27-24

Date



D'Andrea Walker, Chairman
Baltimore Regional Transportation Board

Title VI Program

To Ensure Nondiscrimination in all Programs and Activities

February 27, 2024

**PREPARED FOR THE
BALTIMORE REGIONAL TRANSPORTATION BOARD
The designated Metropolitan Planning Organization
for the Baltimore Region**



The BRTB is staffed by the:
BALTIMORE METROPOLITAN COUNCIL

1500 Whetstone Way, Suite 300
Baltimore, MD 21230-4767

The Baltimore Regional Transportation Board (BRTB) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, and other applicable laws.

BMC offers interpretation services, including language translation services and signage for the hearing impaired, at public meetings upon request with seven days advance notice. BMC will not exclude persons based on age, religion, or disability. For assistance, contact the Public Involvement Coordinator, comments@baltometro.org, or call 410-732-0500.

Dial 7-1-1 or 800-735-2258 to initiate a TTY call through Maryland Relay. Usuarios de Relay MD marquen 7-1-1.

Si se necesita información de Título VI en español, llame al 410-732-0500.

The U.S. Department of Transportation, (the Federal Highway Administration, and the Federal Transit Administration) and the Maryland Department of Transportation contributed funding towards the preparation of the FY 2024-2025 Unified Planning Work Program.

BALTIMORE REGION
Title VI Program
To Ensure Nondiscrimination in all Programs and Activities

The Honorable Johnny Olszewski Jr.
Chair
Baltimore Regional Transportation Board

Todd R. Lang
Director, Transportation Planning
Baltimore Metropolitan Council

February 27, 2024

**Produced under the auspices of the Baltimore Regional Transportation Board,
the Metropolitan Planning Organization for the Baltimore Region**

Baltimore Metropolitan Council
1500 Whetstone Way, Suite 300
Baltimore, Maryland 21230-4767

Purpose Of This Plan

The purpose of this document is to detail the Baltimore Regional Transportation Board's (BRTB) Title VI program, and demonstrate its compliance with all applicable Title VI regulations and requirements.

On behalf of the BRTB the Baltimore Metropolitan Council (BMC) hereby gives public notice that it is the policy of our agency to ensure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related authorities and regulations in all programs and activities.

Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which BMC receives federal financial assistance. Additional protections are provided in other federal and state authorities for discrimination based on income status, limited English proficiency, religion, sex, disability, age, gender identity (as defined in paragraph 249(c)(4) of title 18, United States Code) or sexual orientation.

Any person who believes they have experienced discrimination under Title VI has a right to file a formal complaint with the BRTB. Any such complaint must be filed with the Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence.

For more information on the BRTB's civil rights program, and the procedures to file a civil rights complaint, check the following resources:

Call: 410- 732-0500; (TTY 800-735-2258)

E-mail: titlevi@baltometro.org

Visit: Baltimore Metropolitan Council
1500 Whetstone Way, Suite 300
Baltimore Maryland 21230

Online: www.baltometro.org/non-discrimination.

If information is needed in another language, please contact 410-732-0500.

Si se necesita información de Título VI en español, llame al 410-732-0500.



Baltimore Regional Transportation Board Members

followed by Empowered Representatives

The Honorable Gavin Buckley, City of Annapolis

Mr. Christopher Jakubiak, Department of Planning & Zoning

The Honorable Steuart Pittman, Anne Arundel County

Mr. Sam Snead, Office of Transportation

The Honorable Brandon Scott, City of Baltimore

Ms. Corren Johnson, Department of Transportation

The Honorable Johnny Olszewski Jr., Baltimore County, BRTB Chair

Ms. D'Andrea Walker, Department of Public Works

The Honorable Ed Rothstein, Carroll County

Ms. Mary Lane, Department of Land Use, Planning & Development

The Honorable Bob Cassilly, Harford County

Mr. Alex Rawls, Department of Planning & Zoning

The Honorable Calvin Ball, Howard County, BRTB Vice Chair

Mr. Bruce Gartner, Office of Transportation

The Honorable James Moran, Queen Anne's County

Mr. Steve Cohoon, Department of Public Works

Ms. Holly Arnold, Maryland Transit Administration*

Ms. Elizabeth Gordon, Capital Programming

The Honorable Paul Wiedefeld, Maryland Department of Transportation

Ms. Heather Murphy, Office of Planning & Capital Programming

The Honorable Serena McIlwain, Maryland Department of the Environment*

Mr. Chris Hoagland, Air Quality Planning Program

The Honorable Rebecca Flora, Maryland Department of Planning*

Ms. Bihui Xu, Office of Smart Growth

Voting Representative from Eligible Public Transit Agency

Mr. Jason Quan, Central Maryland RTA

* Denotes non-voting members

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APPENDIX 4: AMERICAN WITH DISABILITIES ASSESSMENT

APPENDIX 5: SAMPLE BMC REQUEST FOR PROPOSALS

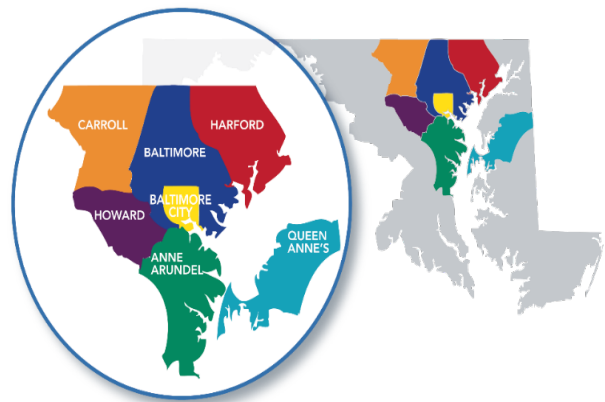
APPENDIX 6: SAMPLE BMC CONTRACT

Title VI Program To Ensure Nondiscrimination in all Programs and Activities

I. INTRODUCTION

Under the Title VI Civil Rights Act, programs or activities receiving federal financial assistance may not exclude persons from participating in, deny benefits to or subject anyone to discrimination based on a person's race, color, national origin or income status. This document outlines the roles, method of administration, and analysis that supports the Baltimore Regional Transportation Board's (BRTB) regional planning. This program document also represents the BRTB's commitment, obligations and compliance concerning Title VI. The following background is provided to give context to the BRTB's responsibilities in this area. The BRTB is a group of local governments and state agencies working together to address transportation issues that touch the lives of every resident in the region. Federal transportation law requires that the Governor of each state designate a Metropolitan Planning Organization (MPO) for each urbanized area with a population of 50,000 or more. The BRTB was designated as the MPO for transportation planning for the Baltimore region. Funding for BRTB activities come from a variety of sources, with federal and state funding comprising the principle revenue source. The BRTB's membership encompasses diverse social, economic and cultural communities. The BRTB actively seeks public participation in all of its meetings and solicits public input in every area of planning and policymaking. The thoughts, opinions and ideas of the community are valued and are necessary for the BRTB to build a community that serves the diverse interests and needs of all within the region.

The BRTB is a thirteen-member Board representing the cities of Annapolis and Baltimore, the counties of Anne Arundel, Baltimore, Carroll, Harford, Howard, and Queen Anne's as well as the Maryland Department of Transportation, the Maryland Department of the Environment, the Maryland Department of Planning, the Maryland Transit Administration and RTA of Central Maryland. The BRTB is the federally established Metropolitan Planning Organization (MPO) for the Baltimore region.





As an MPO, the BRTB is directly responsible for making sure that any federal funding approved for transportation projects and programs is based on a continuing, cooperative and comprehensive (3-C) planning process. Almost all transportation projects and programs that receive federal transportation funding in our region go through this planning process. Public involvement is a key part of this process.

A Commitment to Nondiscrimination - The Baltimore Regional Transportation Board (BRTB) welcomes public participation in the transportation planning process regardless of race, color, national origin, age, sex, religion, disability, sexual orientation, or family status.

The BRTB actively supports and follows nondiscrimination laws and regulations, including Title VI of the Civil Rights Act and other federal and state authorities. We promote equity and fairness in our transportation planning work because it is the right thing to do – not simply because the law prohibits discrimination.

To meet its mission, the BRTB develops a long-range and a short-range transportation plan, as well as a report that details the impact on the region's air quality. It also develops a work plan and budget called the Unified Planning Work Program (UPWP). The UPWP includes a variety of studies and projects in areas such as: 1) program management and coordination, 2) planning context, 3) promoting inclusiveness and cooperation, 4) gathering and analyzing data, 5) safety and security, 6) mobility, accessibility and connectivity, and 7) protecting current and future resources. In addition to those ongoing, core areas, the BRTB funds planning efforts to address specific needs in the region, such as examining microtransit, signal infrastructure assessments or a regional freight profile.

The BRTB is supported by a number of committees and advisory groups that focus on specific technical and policy areas. These currently include groups that focus on freight, bicycle and pedestrian, traffic incident management, air quality, and more. All meetings of the BRTB and its subcommittees are open to the public. A [calendar of events and meetings](#) is available on the BMC website.

Relationship between the BRTB and BMC

The BRTB receives staff support through its host agency, the BMC. The BMC is a nonprofit organization that works collaboratively with the chief elected officials in the region to create initiatives to improve our quality of life and economic vitality. BRTB meetings are usually held on the fourth Tuesday of each month at 9 a.m. All meetings are available remotely and on a quarterly basis the meetings are in person (with a remote option) at the BMC offices located at 1500 Whetstone Way, Suite 300, Baltimore, MD.

Title VI Policy Statement

The Baltimore Metropolitan Council (BMC) assures that no person shall, on the grounds of race, color, sex, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL100.259), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

BMC further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities whether those programs and activities are federally funded or not. In the event BMC distributes federal aid funds to another governmental entity, BMC will include Title VI language in all written agreements and will monitor for compliance. BMC's Title VI officer is responsible for initiating and monitoring Title VI activities, overseeing the preparation of required reports and overseeing other BMC responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200 and Title 49 CFR Part 21.

About Title VI Assurances

As a recipient of federal funds, and in accordance with Title VI, BMC must submit a signed assurance to the United States Department of Transportation that it will not discriminate in the administration of its programs and activities. The assurance informs sub-recipients of their nondiscrimination obligations and provides a basis for the federal government to enforce compliance with the nondiscrimination laws.

On October 1, 2012, the Federal Transit Administration (FTA) published *Circular C4702.1B: Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, which placed a renewed emphasis on Title VI in the transportation planning process. The document below details how the Board meets the requirements of the aforementioned authorities – in particular the requirements set forth in *FTA Circular C4702.1* – in the MPO planning process for the Baltimore region.

Baltimore Metropolitan Council Title VI Assurances

The Baltimore Metropolitan Council ("Recipient"), HEREBY AGREES THAT as a condition to receiving any federal financial assistance, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d, et seq. ("Act"), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, 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, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances regarding its federal aid assisted programs:

1. That the Recipient agrees that each “program” and each “facility”, as defined in the Regulations, will be (with regard to a “program”) conducted or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with federal aid assisted programs, and in adapted form in all proposals for negotiated agreements:

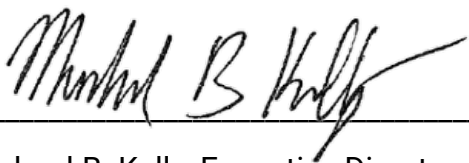
The Baltimore Metropolitan Council, in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d,et seq., and Title 49, Code of Federal Regulations hereby notifies all bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, sex or national origin in consideration for an award.

3. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.
4. That where the Recipient received federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over, or under such property.
5. That the Recipient shall include the appropriate clauses regarding a covenant running with the land, in any future deeds, leases, permits, licenses and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under federal aid-assisted programs; and (b) for the construction or use of, or access to space on, over, or under real property acquired or improved under federal aid-assisted programs.
6. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, 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.

7. The Recipient shall provide for such methods of administration for the program, as are found by the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other recipients, sub-recipients, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.
8. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

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 Recipient and is binding on it, other recipients, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Recipient.



Michael B. Kelly, Executive Director

March 12, 2024

Date

II. TITLE VI PROGRAM ADMINISTRATION

On April 22, 2020, the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), and the Environmental Protection Agency (EPA) staff conducted the most recent review of metropolitan transportation planning in the Baltimore region. The [2020 certification review](#) was carried out in accordance with 23 U.S.C. 134(i)(5) and 49 U.S.C. 5303(k)(5), which requires FHWA and FTA to certify that all metropolitan areas with population of more than 200,000 meet requirements of 23 CFR 450 Subpart C at least every four years. The certification review considers all aspects of the planning process, including Title VI compliance.

The review team identified strengths as well as recommendations for improvement in the Baltimore MPO planning process. The team identified no corrective actions. Based on the review, FHWA and FTA certified the metropolitan planning process in the Baltimore region through July 2024.

In this area, the review team stated: “BRTB has designated a Title VI Coordinator, developed an effective mechanism to collect demographic and economic data on vulnerable populations including LEP populations. Furthermore, BRTB has effectively integrated Title VI requirements in their public participation and planning plans.

BRTB should continue to work in coordination with MDOT in the implementation of its Title VI requirements in the planning and public participation processes for their region. 49 CFR Part 21.7, 23 CFR § 450.334, FTA Circular 4702.1B.”

The BMC, on behalf of the BRTB, intends to continue to pursue Title VI activities as identified by the federal review team.

FTA Circular C4702.1B requires that the BRTB, as a sub-recipient of federal funds from the Maryland Department of Transportation (MDOT), document compliance by submitting a Title VI Program to MDOT as the primary recipient.

Staff Roles and Responsibilities

The Executive Director of the BMC is responsible for the Title VI program, and leads a team with expertise in the policies and methods required to meet the requirements of FTA Circular C4702.1.

The Executive Director has designated a Title VI Officer, and has delegated the authorities needed to manage development and implementation of the Title VI program to that Title VI Officer. Since Title VI program elements are often interrelated, liaisons have been

designated to coordinate Title VI program development and implementation with the Baltimore Regional Transportation Board and its committees, the Transportation Division staff and the public. An organizational structure is in place to insure the overall mission of BMC and Title VI is compliant.

General responsibilities of the core Title VI team include:

Title VI Officer

General Responsibilities

- Implement, refine and monitor Title VI program.
- Manage compliance process with state and federal partners.
- Receive, investigate and respond to all Title VI complaints.
- Maintain a database to document the Title VI complaint process.
- Identify and coordinate Title VI-related professional development for staff as needed and oversee all Title VI-related professional development.

Liaison to the Board (BMC and BRTB)

- Inform the Board of Title VI related planning activities.
- Identify and coordinate Title VI related professional development opportunities.
- Coordinate Board response to any Title VI complaints.

Liaison to the Transportation Division

- Inform Division staff of and coordinate its response, both programmatic and analytic, to Board recommended Title VI related planning activities.
- Coordinate Title VI related professional development for staff as needed.
- Support Title VI Officer in complaint process.

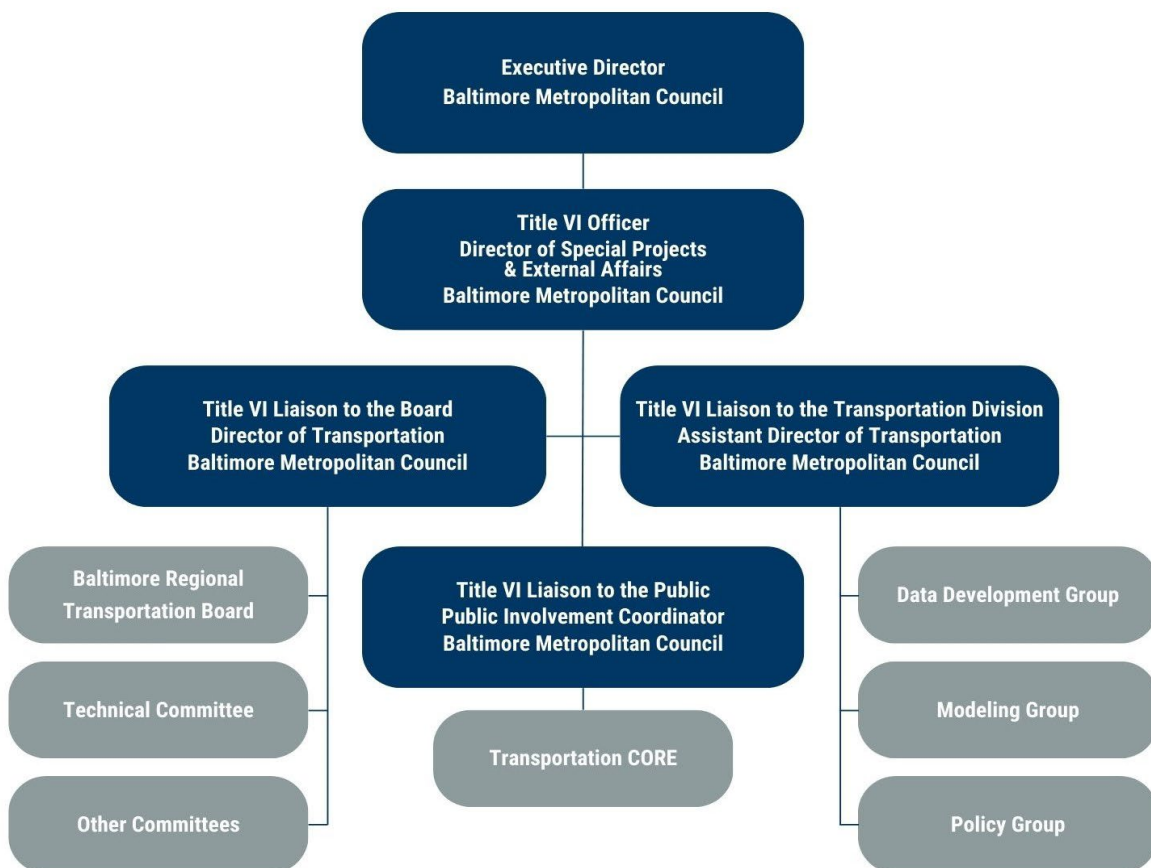
Liaison to the Public

- Inform the Transportation CORE of and coordinate its involvement with Title VI related planning activities.
- Coordinate Title VI related professional development activities available to the Transportation CORE, stakeholder organizations and individuals, and the Public as needed.
- Deliver Title VI specific information/training and Title VI compliant information to the Transportation CORE, stakeholder organizations and individuals, and the public

in the most appropriate fashion.

- Implement, refine and maintain a contact relationship management (CRM) solution to maximize liaison contact with all interested parties.
- Maintain a database to chronicle all Title VI-related outreach activities.
- Support Title VI Officer in complaint process.

Baltimore Metropolitan Council Title VI Program Organizational Chart





Should the BRTB need the assistance or review of state or federal partners the following agencies are available:

Maryland Department of Transportation:

Director, Office of Diversity & Equity
7201 Corporate Center Drive P.O. Box 548
Hanover, MD 21076-1415
Phone: 888-713-1414

MDOT Maryland Transit Administration:

Office of Equal Opportunity Compliance
Programs
6 Saint Paul Street, 20th Floor
Baltimore, Maryland 21202
866-RIDE-MTA

Federal Highway Administration:

U.S. Department of Transportation
Federal Highway Administration
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
1-202-366-4000

Federal Transit Administration:

FTA Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
888-446-4511

Staff Development

All BMC employees are encouraged to participate in professional development and training within and outside of BMC. Internally, BMC offers a variety of training for staff development and in support of various programmatic goals. BMC-wide training involves a variety of topics, such as performance management, supervisory training, diversity, technical/computer related training and other subjects in response to departmental or BMC-wide training needs.

In an effort to continue improving the BMC's overall compliance posture, nondiscrimination training has been and will continue to be coordinated with the Federal Highway Administration (FHWA), the Federal Transit Administration, the Maryland Department of Transportation (MDOT) and made available to BMC staff, BRTB members and to the public as appropriate. This occurs on an ongoing basis to ensure up-to-date knowledge of Title VI and other nondiscrimination statutes. The Title VI Officer oversees all Title VI-related professional development, with support from all appropriate liaisons and staff. There are webinars on a range of topics offered by the Maryland Commission on Civil Rights that support staff training as well.

Staff Administration

The Executive Director of BMC is tasked with administration of the policy set forth in the *BMC Personnel and Procedure Manual*. Policy 101 in the section on Equal Employment Opportunity (EEO) is as follows:

In order to provide equal employment opportunity to all individuals, employment decisions at BMC will be based on qualifications, abilities and performance. BMC does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, or any other characteristic protected by law. BMC will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Contractor Administration

BMC is responsible for the selection, negotiation and administration of its consultant contracts and manages these functions under internal contract procedures as well as all relevant federal and state laws. The BMC Executive Director is responsible for ensuring nondiscrimination language is included in requests for qualification/proposals and contracts, and reviewing consultant compliance.

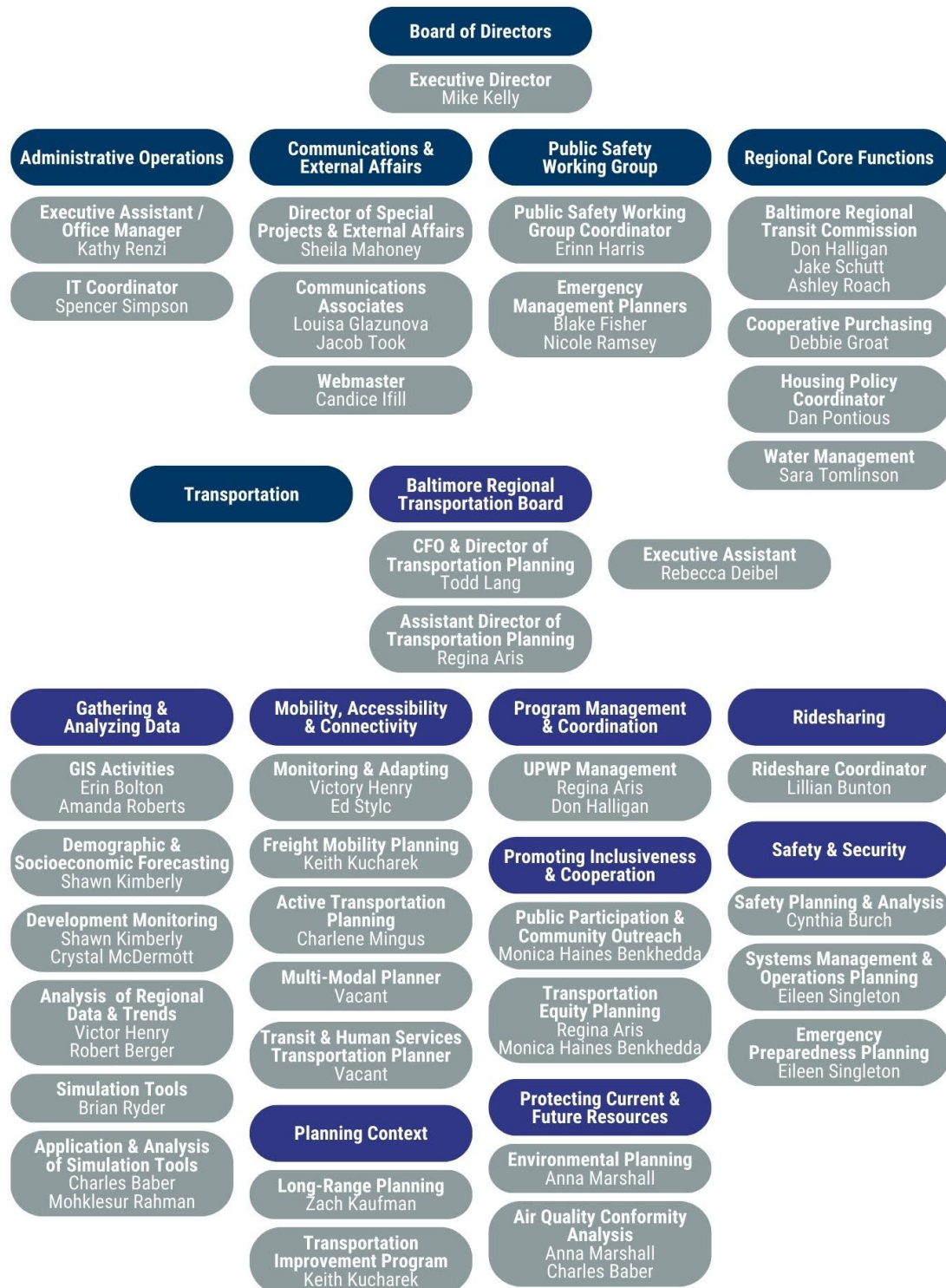
BMC ensures that consultants are monitoring and verifying compliance with nondiscrimination authorities, procedures and requirements within the workplace and in the conduct of grant-funded activities.

If a recipient or sub-recipient is found to not be in compliance with the non-discrimination authorities, the Title VI Officer and appropriate staff will work with the recipient or sub-recipient to resolve the deficiency and prepare re-medial actions as necessary.

In support of contracting responsibilities, the BRTB established a Disadvantaged Business Enterprise (DBE) Program and adopts a DBE goal annually for contracts at the time the UPWP is adopted for the coming fiscal year. The DBE program and goal is found in Appendix 4.

Further, there is an Assessment of our compliance with provisions of the Americans with Disabilities Act (ADA). The current assessment was updated for the Title VI update in 2024, it is located in Appendix 5.

Baltimore Metropolitan Council Organizational Chart



III. GENERAL REQUIREMENTS

Title VI Notice to the Public

The Baltimore Regional Transportation Board (BRTB) operates without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. Anyone who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the BRTB.

To learn about the BRTB's civil rights program, and our procedures to file a complaint, contact us by telephone at: 410-732-0500, TTY at 800-735-2258, email at: titlevi@baltometro.org; or visit us at: 1500 Whetstone Way, Suite 300, Baltimore, MD 21230. For more information go to: www.baltometro.org/non-discrimination.

A complaint may also be filed directly with:

- Federal Transit Administration Office of Civil Rights, Attention: Complaint Team, 1200 New Jersey Avenue, SE, 8th Floor E81-105, Washington, DC 20590
- Federal Highway Administration Office of Civil Rights, 1200 New Jersey Avenue, SE, 8th Floor E81-105, Washington, DC 20590
- Maryland Department of Transportation, Director, Office of Diversity and Equity, 7201 Corporate Center Drive, P.O. Box 548, Hanover, MD 21076-1415
- MDOT Maryland Transit Administration, Office of Equal Opportunity Compliance Programs, 6 St. Paul Street, 20th Floor, Baltimore MD, 21202

If information is needed in another language, contact us at 410-732-0500.

Si requiere información en otro idioma, contáctenos al 410-732-0500.

This Title VI Notice to the Public was reaffirmed by BRTB on February 27, 2024 via Resolution #24-14. The Title VI Notice to the Public is located on the BMC website, at the front desk of the BMC offices and in the two main public conference rooms. The full notice is also available in (Latin American) Spanish.

In addition, the BRTB includes the following Notice on all print publications and in announcements to both the press and public:

The Baltimore Regional Transportation Board (BRTB) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, and other applicable laws.

BMC offers interpretation services, including language translation services and signage for the hearing impaired, at public meetings upon request with seven days advance notice. BMC will not exclude persons based on age, religion, or disability.

For assistance, contact the Public Involvement Coordinator, comments@baltometro.org, or call 410-732-0500.

Dial 7-1-1 or 800-735-2258 to initiate a TTY call through Maryland Relay. Usuarios de Relay MD marquen 7-1-1.

Si se necesita información de Título VI en español, llame al 410-732-0500.

Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color, national origin or other applicable laws, by the Baltimore Regional Transportation Board may file a Title VI complaint with the Title VI Officer. The BRTB Board investigates Title VI complaints received no more than 180 days after the alleged discrimination; and will process all complete complaints with the Complaint Procedure adopted with BRTB Resolution #12-24.

1. Once the complaint is received, the BRTB will review it to determine if the BRTB has jurisdiction. The Complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the BRTB. The BRTB has 30 days to investigate the complaint.
2. If more information is needed to resolve the case, the BRTB may contact the Complainant. The Complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the Complainant or does not receive the additional information within 30 business days, the BRTB can administratively close the case. A case can also be administratively closed if the Complainant no longer wishes to pursue their case.
3. After the investigator reviews the complaint, she/he will issue one of two letters to the Complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and details plans for remedial actions to provide redress. The written response shall be issued no later than 90 calendar days after the date the complaint is received.
4. If the Complainant wishes to appeal the decision, she/he has 30 days after the date of the letter of finding to do so.

If the Complainant is dissatisfied with the BRTB's resolution of the complaint, she/he may

also submit a complaint to the appropriate state or federal agency. Addresses are provided below.

Maryland Department of Transportation:

Director, Office of Diversity & Equity
7201 Corporate Center Drive P.O. Box 548
Hanover, MD 21076-1415
Phone: 888-713-1414

MDOT Maryland Transit Administration:

Office of Equal Opportunity Compliance
Programs
6 Saint Paul Street, 20th Floor
Baltimore, Maryland 21202
866-RIDE-MTA

Federal Highway Administration:

U.S. Department of Transportation
Federal Highway Administration
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
1-202-366-4000

Federal Transit Administration:

FTA Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
888-446-4511

Title VI Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
<input type="checkbox"/> Other Protected Class _____				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses.				

Section IV:		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V:		
<p>Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, check all that apply:</p> <p><input type="checkbox"/> Federal Agency: _____</p> <p><input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____</p> <p><input type="checkbox"/> State Court _____ <input type="checkbox"/> Local Agency _____</p>		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		
Section VI:		

Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

Please submit this form to the Baltimore Metropolitan Council Title VI Officer at:

Mail: 1500 Whetstone Way, Suite 300
Baltimore, MD 21230-4767

E-mail: titlevi@baltometro.org

Fax: 410-732-8248

Title VI Complaints, Investigations and Lawsuits

There are no Title VI complaints, investigations and/or lawsuits to report. If in the future there are, this matrix will be used to provide an overview of each. (For each, complete details will also be compiled.)

	Description	Date Filed	Status	Action Taken
Complaints				
None				
Investigations				
None				
Lawsuits				
None				

Public Participation Plan and Summary of Outreach Efforts

The current Public Participation Plan (Appendix 1) was adopted by the BRTB via Resolution #23-9 in December of 2022. The PPP included the following updates:

- Review Executive Order 13985 and Infrastructure Investment and Jobs Act to identify new requirements.
- Update section on Social Media to clarify how comments are accepted via social media and when they're considered part of the public record.
- Modify reference to PAC.
- Update policies based on advanced consultation with BRTB committee members, new virtual panel, survey of key interested parties, staff review, etc.

Information about outreach methods to engage minority and limited English proficiency populations (LEP) (Appendix 2), as well as a summary of outreach efforts made since the last Title VI Program submission.

To better involve the public, especially in low-income and minority communities, we've taken the following steps:

- BMC staff created an interactive mapping tool called the Vulnerable Population Index (VPI). The VPI uses census data to identify seven vulnerable groups in the region: Low-income population, Hispanic/Latino, Non-Hispanic and Non-White Minorities, People with limited English proficiency (LEP), People with disabilities, the elderly, and Carless households. This tool guides outreach activities by helping us identify where there are vulnerable populations in a project area. Staff explore the mapping tool to identify the targeted populations. Then, staff does research and works with local jurisdictions, project partners and consultants to identify community partners in each location. This includes neighborhood and main street associations, community-based organizations, faith-based institutions, housing associations, nonprofits, and more. This information helps us reach out and invite these groups to participate and make their opinions are considered in the regional planning process.

In addition, an online platform BMC has a contract with, publicinput.com, offers an Equity Mapping tool. This tool is meant to: 1) identify underrepresented or disadvantaged groups early in the engagement process, 2) use data to screen for potential risks and plan engagement strategies, 3) tailor engagement approaches to target affected communities, 4) use native ESRI ArcGis integration to map how local resources affect engagement, and 5) demonstrate representative engagement to defend your decisions.

- BMC has also partnered with publicinput.com to create engaging outreach materials and interactive surveys. Project pages are section 508 accessible. Members of the public are encouraged to share comments by text message or voicemail. This helps reach those that may not have broadband access or may not wish to share comments formally in writing.
- In addition, with publicinput.com, we have been able to generate project pages and surveys in other languages. Using VPI data, we have identified concentrations of LEP populations and generated project pages in Spanish.
- Staff have placed advertisements in area print and online publications that serve minority populations such as the Baltimore Afro-American, as well as Spanish speaking communities through Latin Opinion Baltimore.
- BMC launched an innovative virtual panel of community members, local organizations and representatives from various interested parties. This group of 50+ members is called the Transportation CORE (Community Outreach and Regional Engagement) and includes minorities and representatives of groups that work with vulnerable

populations. Staff connect with CORE members on a regular basis to get their ideas and input. Some CORE members also serve on stakeholder groups for various projects.

- BMC created a list of local civil rights organizations and invited them to be a part of the planning process. Staff are periodically contacting these organizations to offer new ways to be involved and to share information with their constituents.
- BMC is partnering with NextDoor to reach a wider audience of residents. We've conducted targeted outreach on NextDoor and will be sharing information to local neighborhoods via a public agency page. Staff will focus on building relationships with area residents, particularly those in low-income and minority communities.
- During the COVID-19 pandemic, we had fewer in-person meetings and events like pop-ups. Now, in-person activities have started up again since last summer and will keep growing.

Language Assistance Plan for Persons with Limited English Proficiency

The current Language Assistance Program and Limited English Proficiency Plan (Appendix 2) was adopted by the BRTB via Resolution #23-23 in June of 2023. The LEP included the following updates:

- American Community Survey data was updated to 2017 – 2021 (5-year) Estimates using Table B16001, "Languages Spoken at Home by Ability to Speak English for the Population 5 Years and Over.
- Data in this format is now only available at the PUMA level. All of the Baltimore region jurisdictions had one or more PUMAs except Queen Anne's County, due to the lower population level. Queen Anne's County was grouped with four other Eastern Shore counties.
- Our interpreter services changed from Language Link to lingualinx.

Table - Non-Elected Committee Related to Transit

BRTB Empowered Voting Representatives	Caucasian	African American	Asian American
10 members	6	3	1



Board Minutes and Resolution approving the 2024 Title VI Program

Inserted after 2/27 meeting

IV. MPO SPECIFIC REQUIREMENTS

Demographic Profile of Metropolitan Area

The development of a demographic profile for the past, present and future is a requirement of regional transportation planning in general, as well as a requirement of MPO Title VI compliance. With historic and current data from sources such as the U.S. Census Bureau's Decennial Census and American Community Survey, the BRTB is able to characterize the region's demographics.

One of the BRTB's standing committees, the Cooperative Forecast Group, develops forecasts that are used to characterize the region's future demographics – for each jurisdiction in five-year increments through the Long-Range Transportation Plan (LRTP) horizon year (2050). The approved CFG forecast serves as an input for the long-range transportation planning process and is utilized by state and local project planners.

The current LRTP for the BRTB region, *Resilience 2050*, considers a number of important trends in order to provide the most effective transportation network for a diverse region.

While overall population growth is expected to be slow, the region will see significant and sustained growth in the older population. From within and via immigration, the minorities' population will continue to grow. Growth will continue to occur at a higher rate in the suburban areas, relative to the urban core; while household size will decrease region-wide. These trends and others, whether they are new technologies or distracted driving, must be considered in order to provide the most effective transportation network for all those in the Baltimore region.

The BRTB includes a demographic profile of the metropolitan area as a part of the Environmental Justice (EJ) analysis for the Transportation Improvement Program (TIP) and LRTP. This demographic profile includes identification of the locations of minority populations as well as the locations of low-income persons in the Baltimore region. The BRTB adopted the *2024-2027 TIP* and the LRTP, *Resilience 2050*, in July 2023.

A summary of the EJ analysis in the *2024-2027 TIP* and *Resilience 2050* follows, including a demographic profile, the methods used to consider the mobility needs of EJ populations, maps and charts, and a discussion of the analysis.

EJ seeks to ensure that the benefits and burdens of transportation investments are shared as equitably as possible among all affected communities. Specifically, EJ

considers whether low-income and minority populations bear disproportionate impacts resulting from governmental decisions.

Historically, EJ was borne out of civil rights and environmental complaints from low-income and minority communities. Concerns were raised, showing that these communities have suffered disproportionately from exposure to toxic chemicals and the siting of industrial plants and waste facilities.

In February 1994, President Clinton signed Executive Order 12898 entitled *Federal Action to Address Environmental Justice in Minority and Low-Income Populations*. In 1997, the U.S. Department of Transportation (DOT) issued an “Order to Address Environmental Justice in Minority Populations and Low-income Populations.”

The DOT Order directs consideration of two groups: low-income persons and minorities.

The BRTB previously used the poverty level as its definition of low-income. However, the former Public Advisory Committee criticized this definition as too low and recommended increasing it due to the region’s cost of living. For example, the 2023 HHS poverty guideline for a family of four is just \$30,000.

In response to this critique, BMC staff reviewed alternative definitions of low-income for use in EJ mapping and analysis, the Vulnerable Populations Index and project scoring for *Resilience 2050*. Staff conducted a review of low-income definitions used by other MPOs as well as an analysis of ACS data. In addition to the population living below the national poverty level, the ACS also identifies the population that lives at or below higher percentages of the poverty level to account for the higher costs of living in some areas of the country. Many of the MPOs reviewed used a higher percentage of the poverty level as their definition of low-income.

After reviewing alternatives and practices used by other MPOs, we recommended 200% of the poverty level as the new definition for low-income populations. This increases the definition of low-income to approximately \$29,000 for a one-person family and to about \$60,000 for a four-person family. This definition has several advantages. It captures a larger portion of economically insecure persons in the Baltimore region, as the poverty level is not a living wage for the Baltimore region. It is also a close approximation to 50% of Baltimore region Area Median Income, an income level that is utilized for some U.S. Department of Housing and Urban Development programs. Another advantage is that it is readily available from the ACS for incorporation into BMC products. Finally, it is also a good approximation of a family-supporting wage. This wage is derived from the

Massachusetts Institute of Technology living wage calculator and has been utilized in a number of BMC workforce development reports and analyses.

In December 2021, the BRTB Technical Committee agreed to move forward with 200% of the poverty level as the definition of low-income populations for use in future analyses.

Minorities are defined as a person belonging to any of the following groups:

- Person of origin in any of the black racial groups of Africa;
- Person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin;
- Person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent;
- Person having origins in any of the original peoples of North America (American Indian, Alaskan Native) and who maintains cultural identification through tribal affiliation or community recognition; or
- Person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands

The US DOT order applies to all policies, programs and other activities undertaken, funded or approved by the US DOT, including metropolitan planning. There are three fundamental US DOT EJ principles:

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

MPOs are responsible for assessing the benefits and burdens of transportation system investments for different socio-economic groups. This includes both a data collection effort and the engagement of minority and low-income populations in public involvement activities.

EJ Populations in the Baltimore Region

Low-income

As stated previously, the BRTB defines low-income populations as the population below 200% of the poverty level. The primary source of data on low-income persons is the Census Bureau's American Community Survey (ACS). The Census Bureau uses a set of income thresholds that vary by size of family and number of children to determine poverty (and 200% of the poverty level). If a family's total income is less than the threshold for 200% of the poverty level, then that family and every individual in it is considered to have an income less than 200% of the poverty level. For example, the 2022 poverty threshold for a four-person family with two children is \$29,678. This means that the 200% poverty threshold for a four-person family with two children is \$59,356.

Table 1 summarizes low-income population by jurisdiction. The population at or below 200% of the poverty level is not evenly distributed throughout the region, ranging from 12.7% of the population in Carroll and Howard Counties to 38.6% of the population in Baltimore City. In total, 21.4% of the population in the Baltimore region have incomes at or below 200% of the poverty level.

Table 1 - Low-Income Population by Jurisdiction

Jurisdiction	Total Population*	Population Below 200% of Poverty Level	
		Low-Income Population	Share
Anne Arundel	568,438	79,308	14.0%
Baltimore City	569,935	220,113	38.6%
Baltimore County	830,134	181,141	21.8%
Carroll	168,464	21,461	12.7%
Harford	257,375	41,009	15.9%
Howard	326,248	41,356	12.7%
Queen Anne's	49,150	7,224	14.7%
BRTB Region Total	2,769,744	591,612	21.4%

Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates (Table C17002)

*Total Population for which poverty level is counted

Minority

The ACS also serves as the primary data source for identifying minority populations. Minorities include persons who are members of several population groups including Hispanic persons and non-Hispanic persons who are Black, American Indian or Alaskan Native, and Asian or Pacific Islander. Non-minorities are defined as those that are both white and non-Hispanic.

Table 2 summarizes minority persons by Hispanic or Latino origin and race while Table 3 summarizes minority persons by jurisdiction. As with low-income populations, minorities are not evenly distributed throughout the region. According to the latest 5-year estimates from the ACS, the share of minorities in BRTB jurisdictions ranges from 12.3% in Carroll County to 72.7% in Baltimore City. In total, minorities make up 44.7% of the Baltimore region population while white, non-Hispanics make up the remaining 55.3%.

Table 2 - Total Population in the BRTB region by Hispanic or Latino Origin and Race

Categories		BRTB Population		Share	
White, non-Hispanic		1,568,682	1,568,682	55.3%	55.3%
Minorities	Black, non-Hispanic	1,268,543	812,664	44.7%	28.6%
	American Indian and Alaska Native, non-Hispanic		4,412		0.2%
	Asian, non-Hispanic		162,578		5.7%
	Native Hawaiian and Pacific Islander, non-Hispanic		1,068		0.0%
	Some other race, non-Hispanic		11,492		0.4%
	Two or more races, non-Hispanic		100,187		3.5%
	Hispanic - all races		176,142		6.2%
Total		2,837,225	2,837,225	100.0%	100.0%

Source: U.S. Census Bureau, 2017-2021 ACS 5-Year Estimates (Table B03002)

Table 3 - Minority Population by Jurisdiction

Jurisdiction	Minority Population	White, non-Hispanic Population	Minority Share	White, non-Hispanic Share
Anne Arundel	198,278	385,758	33.9%	66.1%
Baltimore City	430,256	161,967	72.7%	27.3%
Baltimore County	379,804	470,898	44.6%	55.4%
Carroll	21,206	150,942	12.3%	87.7%
Harford	65,686	193,476	25.3%	74.7%
Howard	165,763	163,490	50.3%	49.7%
Queen Anne's	7,551	42,151	15.2%	84.8%
BRTB Region Total	1,268,543	1,568,682	44.7%	55.3%

Source: U.S. Census Bureau, 2017-2021 ACS 5-Year Estimates (Table B03002)

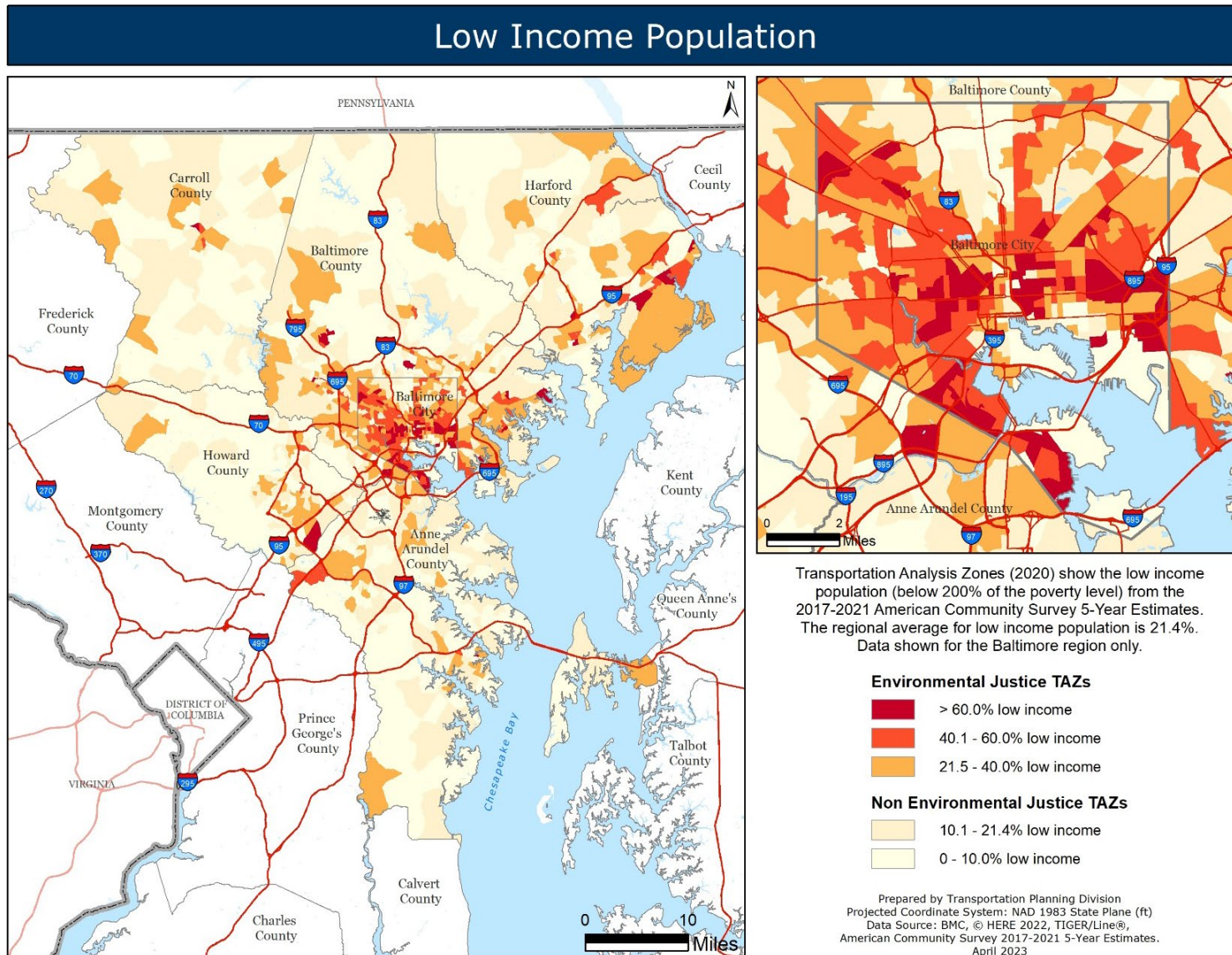
Identifying EJ Populations

The first step in analyzing the effects of plans and programs on EJ populations is to identify where minority and low-income populations live. We use Transportation Analysis Zones (TAZ) as a basis for identifying EJ areas. TAZs are a basic unit of geography used to predict travel behavior in our travel demand model, known as InSITE. They are constructed using census block geographies and in many cases are smaller than census tracts.

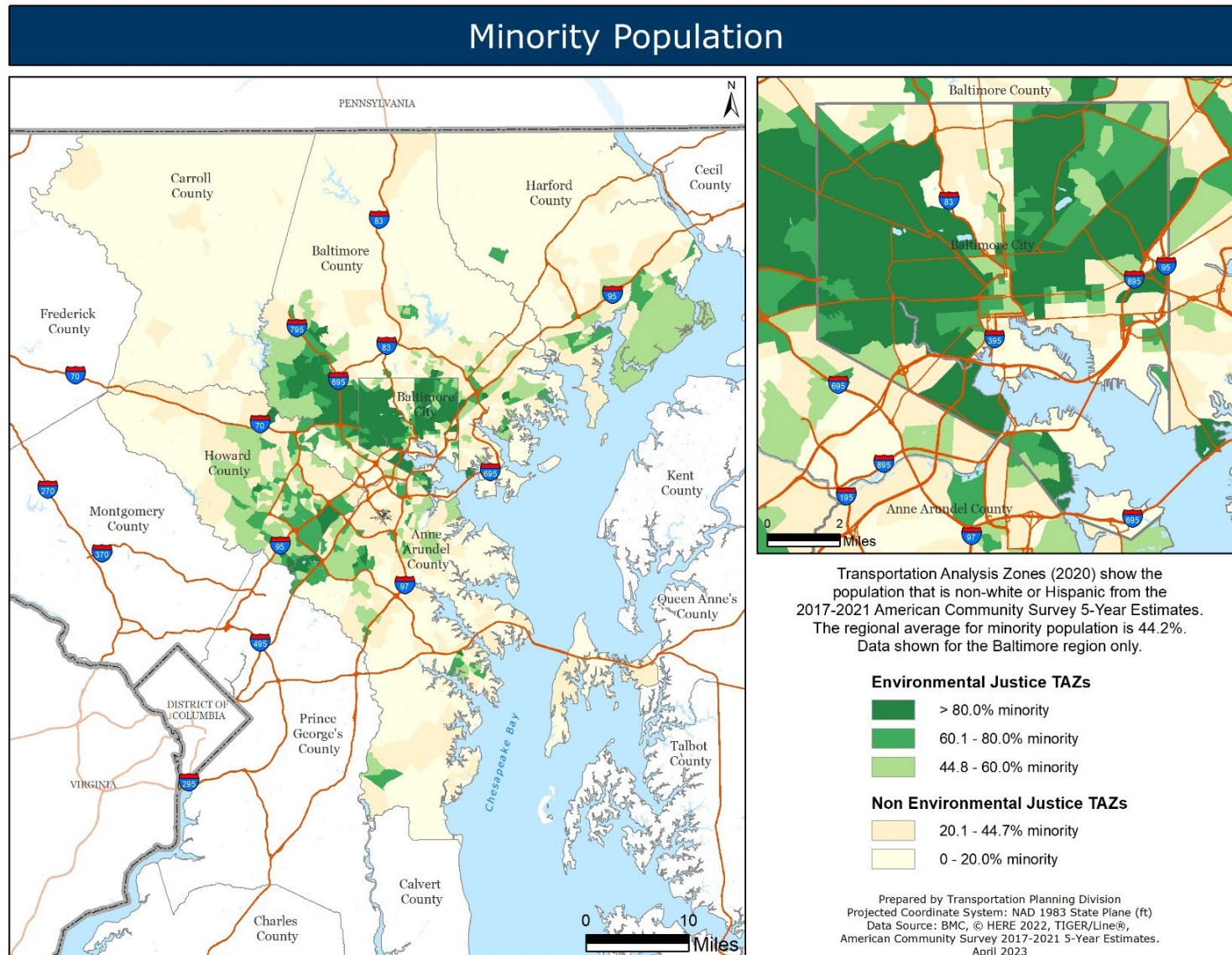
Having established that TAZs will be the geographic unit of analysis, we need a way to identify EJ and non-EJ TAZs. A TAZ is identified as an EJ area if it has a concentration of low-income persons or minorities greater than their respective regional averages. The percentage of the low-income population below 200% of the poverty level is 21.4%. Thus, TAZs with a concentration of the population living below 200% of the poverty level greater than 21.4% are considered low-income TAZs for EJ purposes. Similarly, TAZs with a concentration of minority persons greater than the regional average of 44.7% are considered minority TAZs for EJ purposes.

Maps 1 and 2 show the low-income population and minority population, respectively, in the Baltimore region by TAZ. Map 3 shows all EJ TAZs, breaking EJ TAZs into those exceeding the regional average for low-income population, those exceeding the regional average for minority concentration, and those exceeding both regional averages.

Map 1 - Low Income Population by TAZ



Map 2 - Minority Population by TAZ



Map 3 - Environmental Justice TAZs by Type

Low Income & Minority Concentrations

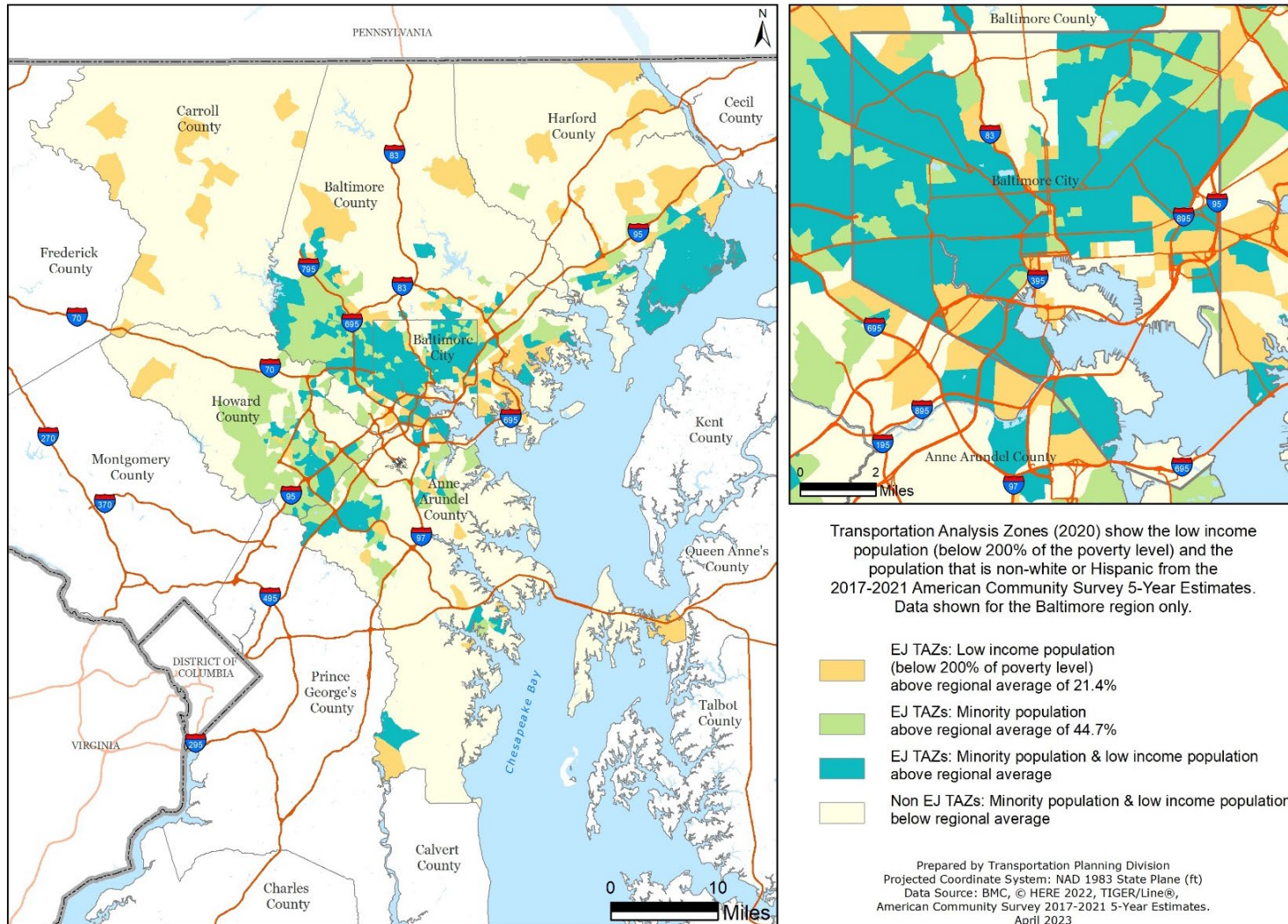


Table 4 provides further details on EJ TAZs. Of the 1,412 TAZs in the BRTB region, 766 qualify as EJ TAZs and 646 are non-EJ TAZs. Of the 766 EJ TAZs, 225 exceed the regional average for minority population, 159 exceed the regional average for population below 200% of the poverty level, and 382 exceed both the minority and low-income regional averages. The population living in EJ TAZs (1.59 million) exceeds the population living in non-EJ TAZs (1.25 million).

MPOs frequently utilize the regional average for low-income and minority populations to identify EJ areas for analysis. It is important to point out that this method has the shortcoming of excluding small pockets of EJ populations from the analysis. This is because some low-income and minority persons will necessarily live in TAZs identified as non-EJ. However, Table 4 shows that EJ TAZs account for most of the EJ population. EJ TAZs account for 80.6% of the region's minority population. This means that the other 19.4% of minorities live in non-EJ TAZs. Similarly, 79.3% of the region's low-income population are located in TAZs identified as EJ, with the remaining 20.7% of the low-income population located in non-EJ TAZs.

Table 4 - Summary of EJ and Non-EJ TAZs by Type

TAZs by Type	Number of TAZs	Population	EJ Populations			
			Minority Population	Minority Share	Low-Income Population	Low-Income Share
EJ TAZs	766	1,588,831	1,022,312	80.6%	469,218	79.3%
• Minority > 44.7%	225	473,543	306,407	24.2%	53,311	9.0%
• Low-income Population > 21.4%	159	294,279	79,447	6.3%	87,918	14.9%
• Both Minority and Low-income	382	821,009	636,458	50.2%	327,989	55.4%
Non-EJ TAZs	646	1,248,394	246,231	19.4%	122,394	20.7%
Total	1,412	2,837,225	1,268,543	100.0%	591,612	100.0%

Considering the Mobility Needs of Minority Populations via the TIP

Methodology, Maps and Analysis for EJ Populations in the 2024-2027 TIP

Maps 4 through 10 show the locations of specific TIP projects in relation to EJ TAZs. Each map shows where the population that is non-white or Hispanic is higher than the regional average of 44.7% and where the low-income population (below 200% of the poverty level) is higher than the regional average of 21.4% from the 2017-2021 American Community Survey 5-Year Estimates.

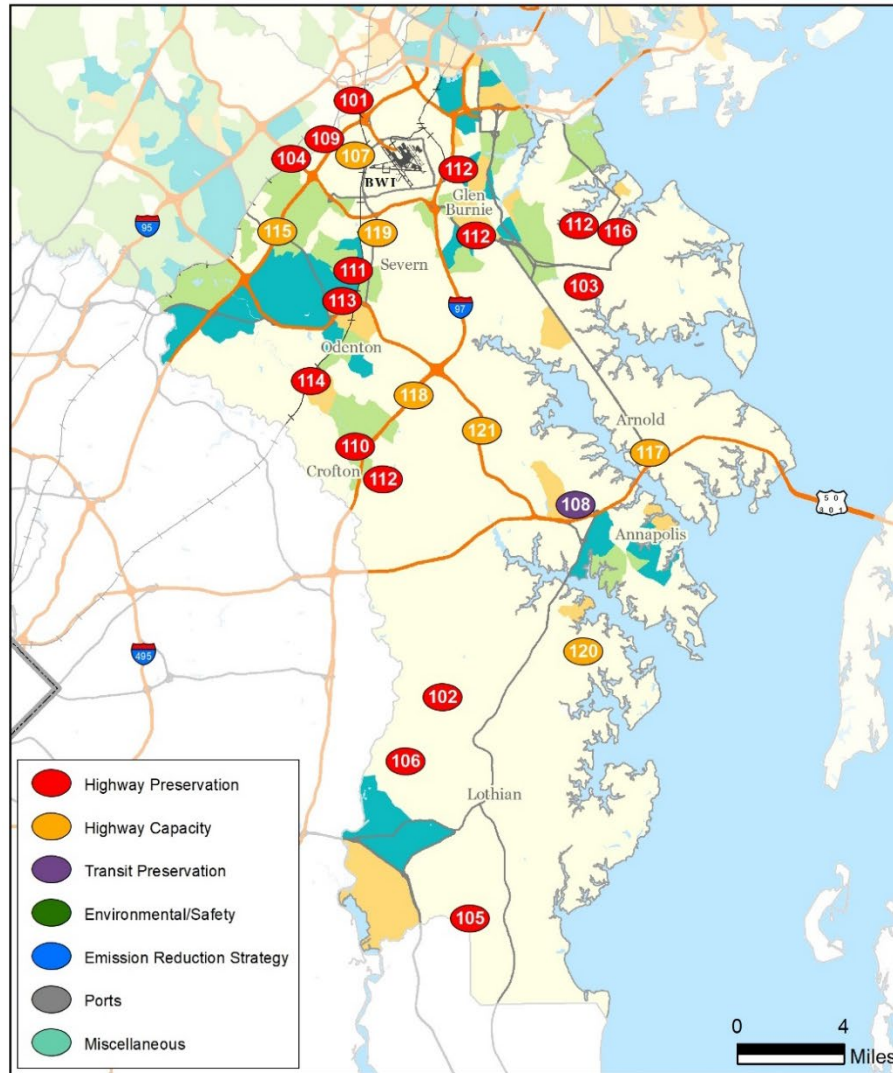
The project listings accompanying each map represent the TIP projects that can be shown through mapping techniques. There are numerous projects that cannot be mapped such as bus purchases and operating assistance. For further project details, see section VI.B of the [2024-2027 TIP](#).

In addition to these maps, the BRTB created a variety of public involvement materials for the 2024-2027 TIP, including an [interactive project map](#) and posters showing the locations of projects in relation to EJ TAZs. In addition, the BRTB completed an equity scan in FY 2023 in an effort to further integrate equity into transportation policies, plans and programs. One recommendation related to the TIP involves developing a framework for incorporating equity considerations into the TIP decision-making process. BMC staff are working on integrating additional equity analyses into the TIP process in response to this recommendation.

Demographic Maps for the TIP Analysis

Map 4 - Anne Arundel County Projects in Relation to Low Income and Minority Concentrations

Anne Arundel County Projects in Relation to Low Income & Minority Concentrations



Project Sponsor: Anne Arundel County

101	Furnace Avenue Bridge over Deep Run	11-1103-13
102	Harwood Road Bridge over Stocketts Run	11-1208-13
103	Magothy Bridge Road Bridge over Magothy River	11-1402-13
104	O'Connor Road Bridge over Deep Run	11-1403-13
105	McKendree Road Culvert over Lyons Creek	11-1601-19
106	Polling House Road Bridge over Rock Branch	11-1602-13
107	Hanover Road Corridor Improvement	11-1801-42
108	Parole Transportation Center	11-2101-66
109	Hanover Road Bridge over Deep Run	11-2105-13
110	Conway Road Bridge over Little Patuxent River	11-2106-13
111	Jacobs Road Bridge over Severn Run	11-2107-13
112	Culvert Invert Paving	11-2401-13
113	Town Center Boulevard over tributary of Severn Run	11-2402-13
114	Patuxent Rd over Little Patuxent River	11-2403-13

Project Sponsor: MDOT State Highway Administration

115	MD 175: Sellner Road/Race Road to McCarron Court	61-1701-41
116	MD 173: Bridge Replacement over Rock Creek	61-2101-13
117	MD 2: US 50 to Arnold Road	61-2301-41
118	MD 3: Waugh Chapel Road/Riedel Road to MD32/I-97	61-2302-41
119	MD 170: Norcross Lane to Wicker Road	61-2303-41
120	MD 214: MD 468 to Camp Letts Road	61-2304-41
121	I-97: US 50 to MD 32 TSMO	61-2305-41

EJ TAZs: Low income population (below 200% of poverty level) above regional average of 21.4%

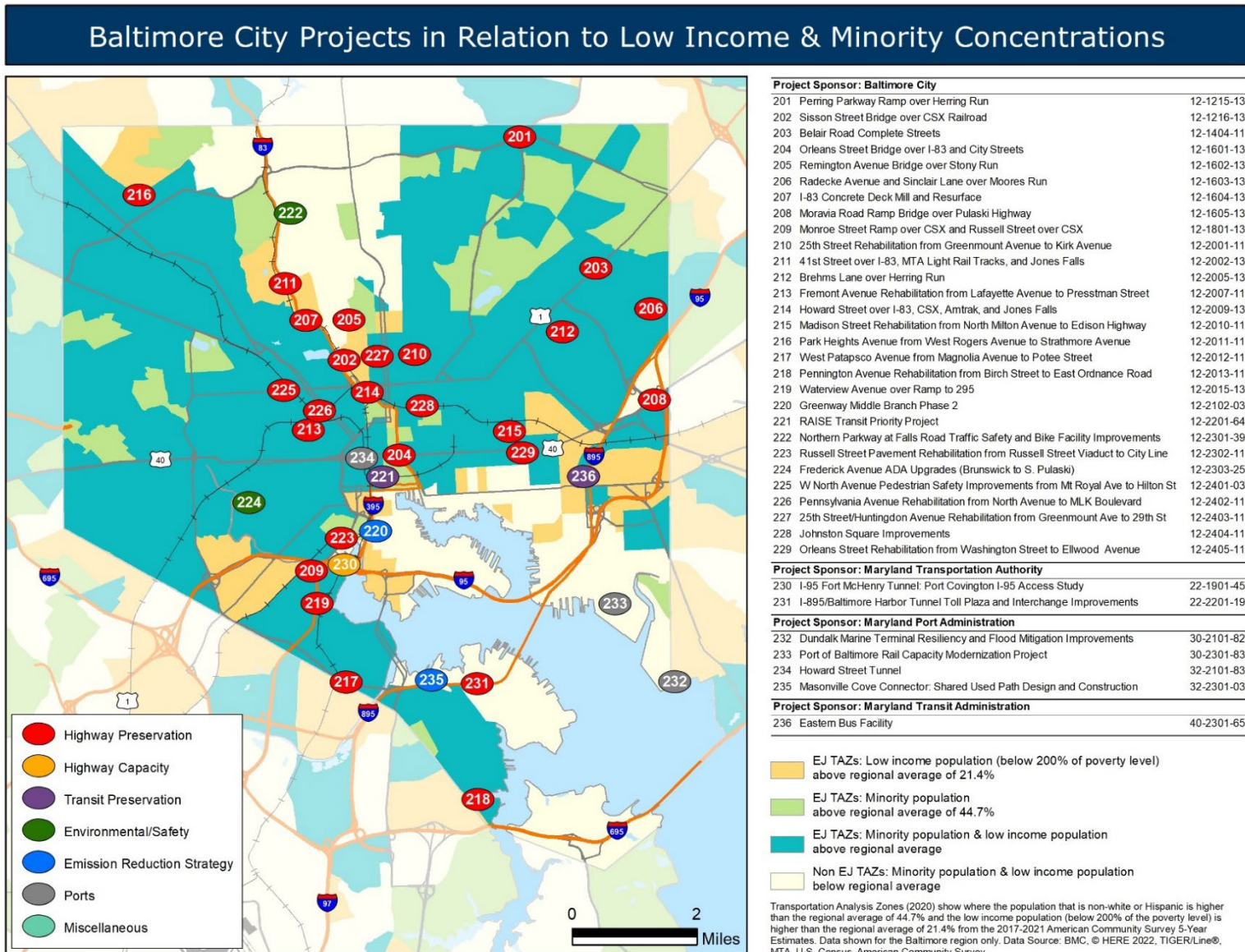
EJ TAZs: Minority population above regional average of 44.7%

EJ TAZs: Minority population & low income population above regional average

Non EJ TAZs: Minority population & low income population below regional average

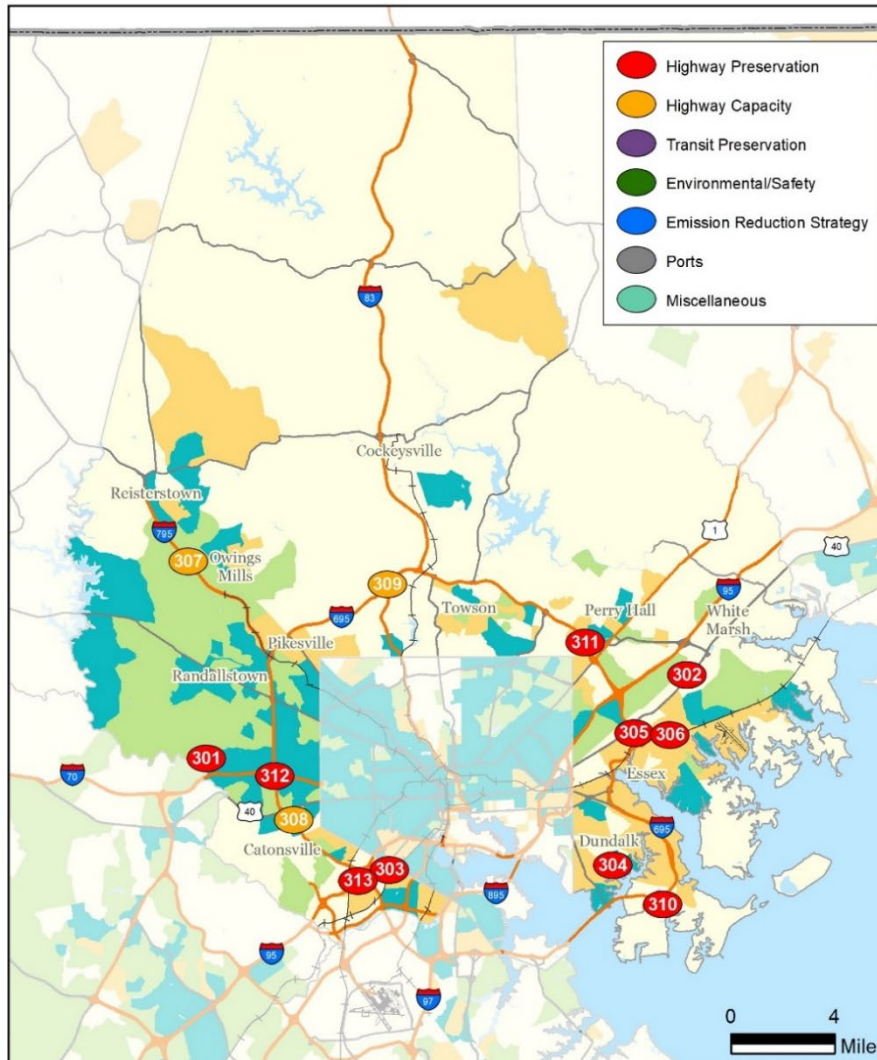
Transportation Analysis Zones (2020) show where the population that is non-white or Hispanic is higher than the regional average of 44.7% and the low income population (below 200% of the poverty level) is higher than the regional average of 21.4% from the 2017-2021 American Community Survey 5-Year Estimates. Data shown for the Baltimore region only. Data Source: BMC, © HERE 2022, TIGER/Line®, MTA, U.S. Census, American Community Survey.

Map 5 - Baltimore City Projects in Relation to Low Income and Minority Concentrations



Map 6 - Baltimore County Projects in Relation to Low Income and Minority Concentrations

Baltimore County Projects in Relation to Low Income & Minority Concentrations



Project Sponsor: Baltimore County

301	Dogwood Road Bridge No. B-0072 Over Dogwood Run	13-0001-13
302	Mohrs Lane Bridge No. B-0143 over CSX Railroad	13-0803-13
303	Hammonds Ferry Road Bridge No. B-0100 over CSX Railroad	13-1012-13
304	Peninsula Expressway Bridge No. B-0119 over CSX Railroad	13-1108-13
305	Golden Ring Road Bridge No. B-0110 over Stemmers Run	13-1208-13
306	Rossville Boulevard Bridge No. B-0132 over Amtrak & Orem's Road	13-1701-13

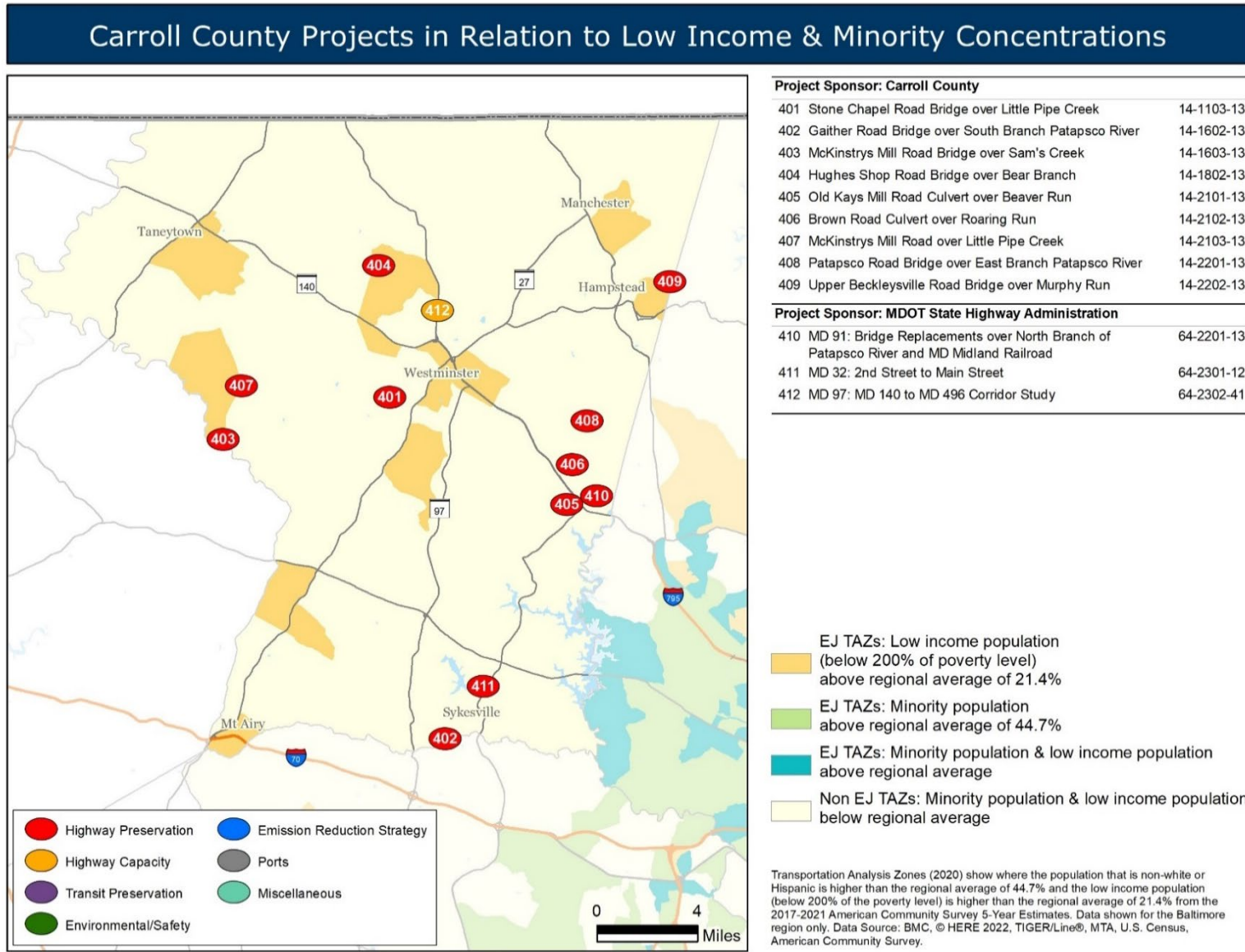
Project Sponsor: MDOT State Highway Administration

307	I-795: Dolfeld Boulevard Interchange	63-0803-46
308	I-695: US 40 to MD 144	63-1601-41
309	I-695: I-70 to MD 43	63-1802-41
310	MD 151/MD 151B: Bridge Replacements	63-2001-13
311	I-695: Bridge Replacement on Putty Hill Avenue	63-2002-13
312	I-695: Reconstruction of Interchange at I-70	63-2201-12
313	I-95/I-695 Interchange Bridge Deck Replacement	63-2202-13

- EJ TAZs: Low income population (below 200% of poverty level) above regional average of 21.4%
- EJ TAZs: Minority population above regional average of 44.7%
- EJ TAZs: Minority population & low income population above regional average
- Non EJ TAZs: Minority population & low income population below regional average

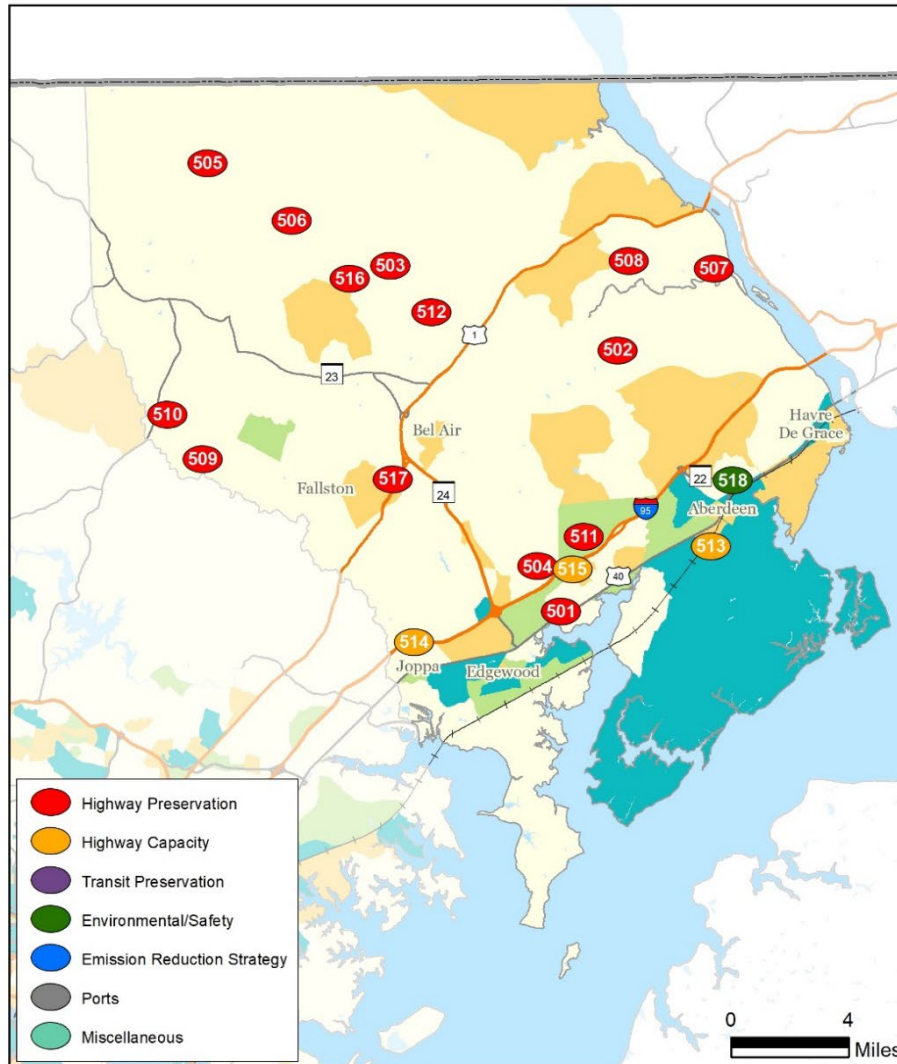
Transportation Analysis Zones (2020) show where the population that is non-white or Hispanic is higher than the regional average of 44.7% and the low income population (below 200% of the poverty level) is higher than the regional average of 21.4% from the 2017-2021 American Community Survey 5-Year Estimates. Data shown for the Baltimore region only. Data Source: BMC, © HERE 2022, TIGER/Line®, MTA, U.S. Census, American Community Survey.

Map 7 - Carroll County Projects in Relation to Low Income and Minority Concentrations



Map 8 - Harford County Projects in Relation to Low Income and Minority Concentrations

Harford County Projects in Relation to Low Income & Minority Concentrations



Project Sponsor: Harford County

501	Abingdon Road Bridge #169 over CSX Railroad	15-1001-13
502	Glenville Road Bridge #30 over Mill Brook	15-1601-13
503	Grier Nursery Road Bridge #43 over Deer Creek	15-2001-13
504	Hookers Mill Road Bridge #13 over Bynum Run	15-2002-13
505	Madonna Road Bridge #113 over Deer Creek	15-2101-13
506	St. Clair Bridge Road Bridge #100 over Deer Creek	15-2102-13
507	Stafford Road Bridge #162 over Buck Branch	15-2103-13
508	Trappe Church Road Bridge #161 over Hollands Branch	15-2104-13
509	Moore's Road Bridge #78 over a tributary to Gunpowder Falls	15-2201-13
510	Hess Road Bridge #81 over Yellow Branch	15-2202-13
511	Cullum Road Bridge #12 over Tributary of James Run	15-2401-13
512	Chesnut Hill Road Bridge #41	15-2402-13
513	Woodley Road Extension to MD 715	15-2403-14

Project Sponsor: Maryland Transportation Authority

514	I-95 Express Toll Lanes Northbound Extension	25-1801-41
515	I-95 Southbound Part-Time Shoulder Usage	25-2101-41

Project Sponsor: MDOT State Highway Administration

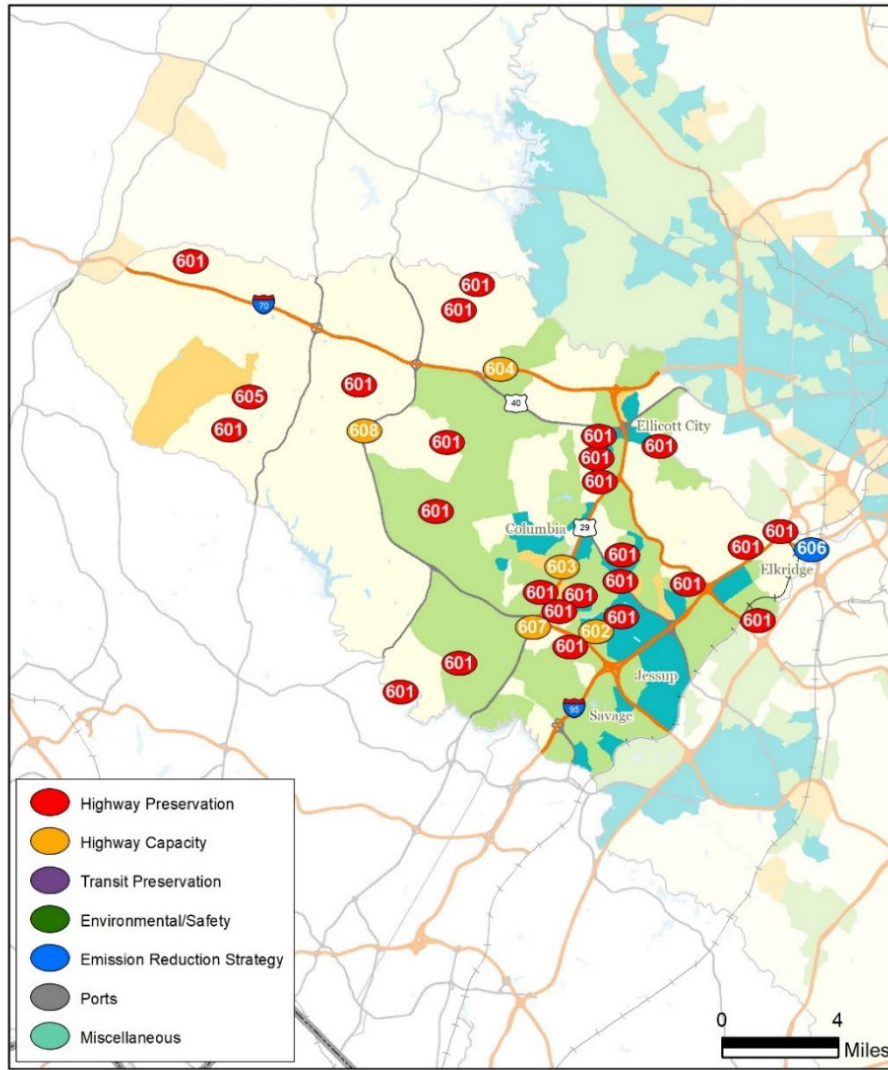
516	MD 24: South of Stirrup Run Culvert to Deer Creek Bridge, Section G	65-1601-12
517	US 1: Bridge Replacements at Tollgate Road and Winters Run	65-2101-13
518	MD 22: MD 462 to Mount Royal Avenue Noise Abatement	65-2301-31

- EJ TAZs: Low income population (below 200% of poverty level) above regional average of 21.4%
- EJ TAZs: Minority population above regional average of 44.7%
- EJ TAZs: Minority population & low income population above regional average
- Non EJ TAZs: Minority population & low income population below regional average

Transportation Analysis Zones (2020) show where the population that is non-white or Hispanic is higher than the regional average of 44.7% and the low income population (below 200% of the poverty level) is higher than the regional average of 21.4% from the 2017-2021 American Community Survey 5-Year Estimates. Data shown for the Baltimore region only. Data Source: BMC, © HERE 2022, TIGER/Line®, MTA, U.S. Census, American Community Survey.

Map 9 - Howard County Projects in Relation to Low Income and Minority Concentrations

Howard County Projects in Relation to Low Income & Minority Concentrations



Project Sponsor: Howard County

601 Bridge Repair and Deck Replacement	16-0436-13
602 Snowden River Parkway: Broken Land Parkway to Oakland Mills Road	16-1410-41
603 US 29/Broken Land Parkway Interchange and North South Connector Road	16-1901-42
604 Marriottsville Road and I-70 Bridge Improvements	16-2101-41
605 Replacement of Bridge No. HO-040 on Union Chapel Road over Cattail Creek	16-2201-13
606 Patapsco Regional Greenway: Elkridge to Guinness Open Gate Brewery	16-2301-03

Project Sponsor: MDOT State Highway Administration

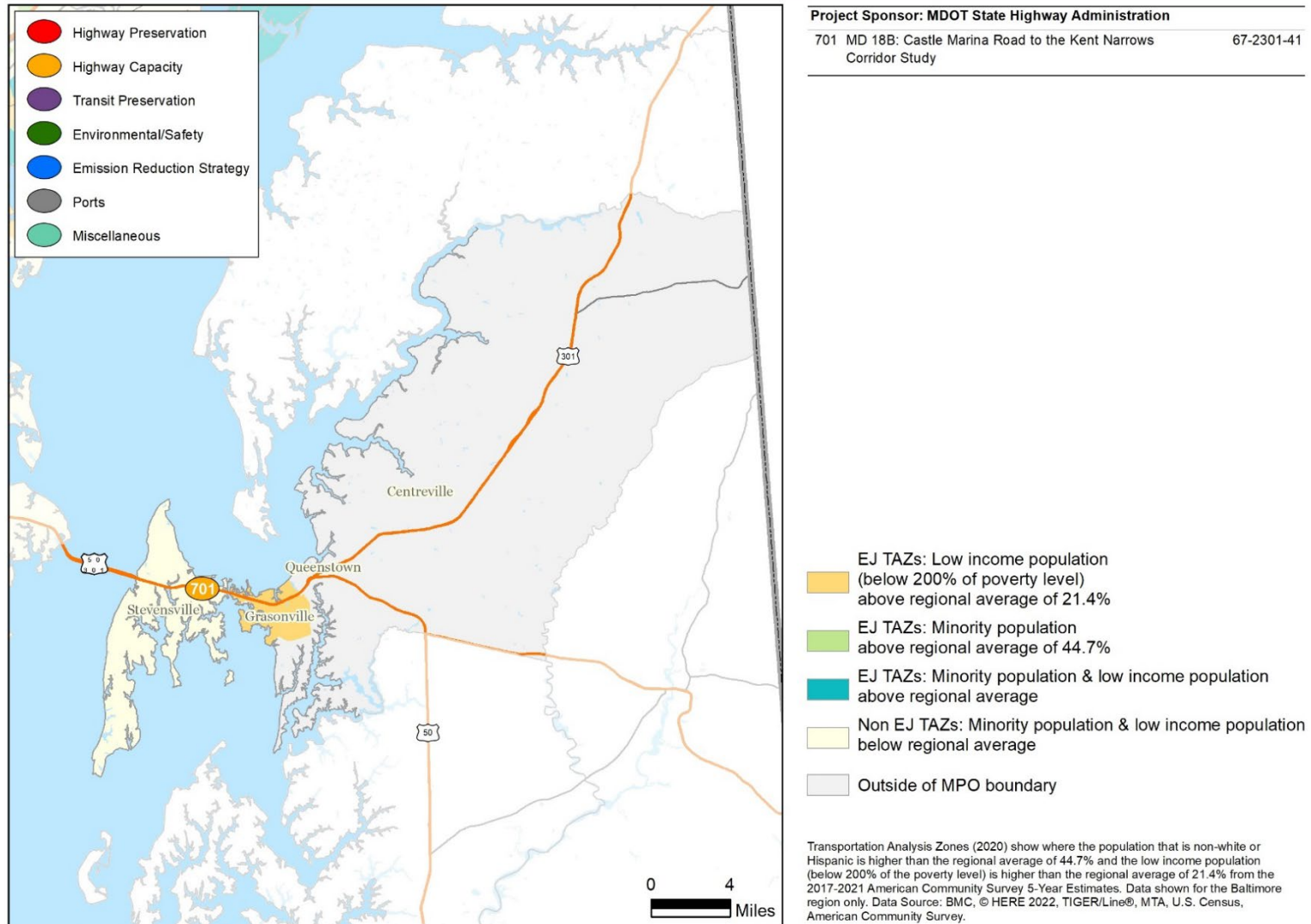
607 US 29: Middle Patuxent River to Seneca Drive - Phase 2	66-1406-41
608 MD 32: Linden Church Road to I-70, Capacity & Safety Improvements	66-1703-41

- EJ TAZs: Low income population (below 200% of poverty level) above regional average of 21.4%
- EJ TAZs: Minority population above regional average of 44.7%
- EJ TAZs: Minority population & low income population above regional average
- Non EJ TAZs: Minority population & low income population below regional average

Transportation Analysis Zones (2020) show where the population that is non-white or Hispanic is higher than the regional average of 44.7% and the low income population (below 200% of the poverty level) is higher than the regional average of 21.4% from the 2017-2021 American Community Survey 5-Year Estimates. Data shown for the Baltimore region only. Data Source: BMC, © HERE 2022, TIGER/Line®, MTA, U.S. Census, American Community Survey.

Map 10 – Queen Anne’s County Projects in Relation to Low Income and Minority Concentrations

Queen Anne's County Projects in Relation to Low Income & Minority Concentrations



Considering the Mobility Needs of Minority Populations in *Resilience 2050*

Scenarios and Measures

The EJ analysis for the LRTP, *Resilience 2050*, considers the needs of minority and low-income populations by comparing the potential effects on EJ and non-EJ TAZs for several measures and scenarios. A description of this analysis follows.

As noted previously, TAZs are the base geographic unit for BMC's travel demand model, known as InSITE. In addition to TAZs, the InSITE model requires a number of inputs to estimate travel patterns. These inputs include the existing road and transit network, the future road and transit network, and the Round 10 demographic forecasts for population, households and employment (see [Chapter 2](#) of *Resilience 2050* for a discussion of the Round 10 forecasts). For the purposes of this section, the future road network includes all surface transportation improvements identified in the preferred alternative of *Resilience 2050* (see [Chapter 7](#) of *Resilience 2050* for a full list of projects in the preferred alternative). The model takes these inputs and estimates travel times and distances from each TAZ to all other TAZs. The InSITE geographic coverage area includes the Baltimore region along with four jurisdiction from the Washington region (District of Columbia, Montgomery, Prince George's and Frederick Counties) and Adams and York Counties in Pennsylvania.

The InSITE model enables us to compare how travel patterns differ for EJ and non-EJ TAZs. To facilitate this analysis, we identified a number of specific measures related to accessibility, mobility and proximity. We calculated results for each of these measures across two scenarios:

- **2050 Existing and Committed (2050 E+C):** The 2050 E+C scenario includes all projects that are either already in place or are committed. "Committed" means that a schedule is in place and sponsors have identified fund sources and have committed funds to build these projects by 2027. The scenario assumes that there will be no new capacity adding infrastructure projects beyond 2027 through 2050.
- **2050 Preferred Alternative Scenario (2050 PA):** The 2050 Preferred Alternative scenario includes all projects in the 2050 E+C scenario as well as implementation of all surface transportation projects in the preferred alternative of *Resilience 2050*.

Both of these scenarios incorporate 2050 demographic forecasts for population, households and employment. This enables us to isolate the impact of implementing the projects contained in the preferred alternative of *Resilience 2050* while holding demographic variables constant. A complete EJ analysis should include a discussion of analysis both within and between these scenarios. First, the analysis can compare how conditions differ in the 2050 E+C scenario between EJ and non-EJ areas. Second, the analysis can compare how conditions differ in the 2050 PA scenario between EJ and non-

EJ areas. Finally, the analysis can look at the relative change in benefits that each group is expected to experience with the implementation of the plan.

The chosen measures used for the EJ analysis are listed and summarized below. These measures quantify how *Resilience 2050* might change access to jobs and shopping opportunities, travel times to common destinations, and the percentage of the population close to certain important destinations such as supermarkets and hospitals. In all, there are eight different measures, with each applied to both auto and transit. Auto and transit travel times are TAZ to TAZ. For auto, travel times include time estimates for parking and walking to the destination.

For transit, travel times include time estimates for walking to a transit stop, wait times, transfer times (walking and waiting), and walking from the final transit stop to the destination. The transit measures are limited to walk access only, meaning that they exclude transit trips involving driving to access transit.

- **Average number of jobs accessible:** This measures the average number of jobs accessible from EJ and non-EJ TAZs within a specified travel time by both auto and transit (walk access). The travel times selected for auto and transit were 30 and 60 minutes, respectively, during the peak travel period. A weighted average of the number of jobs accessible from EJ and non-EJ TAZs was calculated based on TAZ worker population. For example, assume TAZ A contains 40 workers and 80 jobs are accessible within a 30 minute drive and TAZ B contains 60 workers and 200 jobs are accessible within a 30 minute drive. The weighted average is calculated as follows: $(40/100) \times 80 + (60/100) \times 200 = 152$.
- **Average number of shopping opportunities accessible:** This measures the average number of shopping opportunities accessible from EJ and non-EJ TAZs within a specified travel time by both auto and transit (walk access). The travel times selected for auto and transit were 30 and 60 minutes, respectively, during the peak travel period. Shopping opportunities do not measure the number of stores within these travel times because data for every retail store is not available in the InSITE model. Rather, shopping opportunities represent the number of person shopping trips retail employment attracts on an average weekday. Attractions are influenced by both the location and concentration of retail employment throughout the region. A weighted average of the number of shopping opportunities accessible from EJ and non-EJ TAZs was calculated based on TAZ population.
- **Average commute time:** This measures the average number of minutes it takes workers to commute to their usual place of work during the peak travel period from EJ and non-EJ TAZs by both auto and transit (walk access).
- **Average travel time for shopping purposes:** This measures the average number of minutes it takes to travel for shopping purposes from EJ and non-EJ TAZs by both auto and transit (walk access).

- **Average travel time to closest hospital:** This measures the average number of minutes it takes to travel to the closest TAZ containing a hospital from EJ and non-EJ TAZs by both auto and transit (walk access). The travel time is to the closest TAZ containing a hospital because the InSITE model calculates all travel times from zone to zone rather than from a particular origin to a particular destination. [Hospital location data](#) are available from U.S. Department of Homeland Security (DHS).
- **Percent of population close to a supermarket:** This measures the percent of the population living in EJ and non-EJ TAZs that lives close to a supermarket by both auto and transit (walk access). Rather than defining what “close” means, we present the data as the percent of the population within 15, 30, 45 and 60 minutes of the closest supermarket for auto and the percent of the population within 30, 45 and 60 minutes of the closest supermarket for transit. [Supermarket location data](#) are sourced from the United States Department of Agriculture.
- **Percent of population close to a hospital:** This measures the percent of the population living in EJ and non-EJ TAZs that lives close to a hospital by both auto and transit (walk access). Rather than defining what “close” means, we present the data as the percent of the population within 15, 30, 45 and 60 minutes of the closest hospital for auto and the percent of the population within 30, 45 and 60 minutes of the closest hospital for transit. Hospital location data are identical to that used for the average travel time measure above.
- **Percent of population close to a college or university:** This measures the percent of the population living in EJ and non-EJ TAZs that lives close to a college or university by both auto and transit (walk access). Rather than defining what “close” means, we present the data as the percent of the population within 15, 30, 45 and 60 minutes of the closest college or university for auto and the percent of the population within 30, 45 and 60 minutes of the closest college or university for transit. [College and university location data](#) are available from the DHS. Colleges and universities included are public and private two and four-year higher education institutions.

Results and Discussion of Analysis

Tables 5 through 12 along with the accompanying paragraphs present and discuss the results of the EJ analysis. The tables present results for EJ and non-EJ TAZs for both the 2050 E+C and 2050 PA scenarios. In addition, the tables include the percent change from the 2050 E+C to the 2050 PA scenario. Percent changes highlighted in green represent improvements (such as an increase in jobs accessible) while those highlighted in red represent deteriorating conditions (such as an increase in travel time).

Table 5 - Average Number of Jobs Accessible by Auto and Transit

Measure	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Average number of jobs accessible by auto within 30 minutes	EJ TAZs	492,479	506,223	2.8%
	Non-EJ TAZs	293,038	304,951	4.1%
Average number of jobs accessible by transit (walk access) within 60 minutes	EJ TAZs	185,232	229,012	23.6%
	Non-EJ TAZs	72,477	91,978	26.9%

EJ TAZs have a higher average number of jobs accessible by auto and transit in both the E+C and PA scenarios as compared to non-EJ TAZs. The difference is particularly pronounced for transit, where the average number of jobs accessible to EJ TAZs is about 2.5 times higher than that for non-EJ TAZs in both scenarios. This is not necessarily surprising since EJ TAZs tend to be concentrated in areas with more robust existing transit service as compared to non-EJ TAZs.

Auto access to jobs within 30 minutes exceeds transit access to jobs within 60 minutes across all TAZs. For example, in the 2050 PA scenario, auto access is more than two times greater than transit access in EJ TAZs and more than three times greater in non-EJ TAZs.

Comparing results between scenarios, both EJ and non-EJ TAZs benefit from the implementation of the projects in *Resilience 2050*. These benefits are particularly pronounced for transit accessibility. Average job accessibility by auto increases by 2.8% and 4.1% for persons living in EJ and non-EJ TAZs, respectively. For transit, both EJ and non-EJ TAZs see increases of around 25% from the 2050 E+C scenario to the 2050 PA scenario. EJ TAZs see an increase of 23.6% while non-EJ TAZs see an increase of 26.9%.

Table 6 - Average Number of Shopping Opportunities Accessible by Auto and Transit

Measure	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Average number of shopping opportunities accessible by auto within 30 minutes	EJ TAZs	276,928	278,316	0.5%
	Non-EJ TAZs	172,408	174,612	1.3%
Average number of shopping opportunities accessible by transit (walk access) within 60 minutes	EJ TAZs	158,952	166,520	4.8%
	Non-EJ TAZs	69,664	73,124	5.0%

The average number of shopping opportunities accessible by auto and transit is significantly greater in EJ TAZs versus non-EJ TAZs. Persons living in EJ TAZs have access to approximately 60% more shopping opportunities by auto in both scenarios. The difference is more pronounced for transit, where EJ TAZs have access to more than two times as many shopping opportunities regardless of scenario. Land use policies and development patterns have a lot of influence over shopping and retail locations. Retail and other commercial activity tends to be concentrated in urban and suburban activity centers. These areas are also more likely to be identified as EJ TAZs.

Auto access to shopping opportunities exceeds that for transit regardless of TAZ type or scenario. For EJ TAZs, auto access to shopping opportunities within 30 minutes is approximately 70% greater than that for transit within 60 minutes under both scenarios. For non-EJ TAZs, that number increases to more than two times greater for auto as compared to transit.

Shopping opportunities accessible by auto and transit are projected to increase from the 2050 E+C scenario to the 2050 PA scenario. Similar to job accessibility, the increases for transit are larger than that for auto. For auto, EJ and non-EJ TAZs see increases of 0.5% and 1.3%, respectively. Transit access to shopping opportunities increases by 4.8% and 5.0%, respectively, for EJ and non-EJ TAZs.

Table 7 - Average Usual Place of Work Commute Time by Auto and Transit

Measure	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Average commute time in minutes by auto (drive alone and shared ride)	EJ TAZs	20.16	20.17	0.0%
	Non-EJ TAZs	26.09	26.17	0.3%
Average commute time in minutes by transit (walk access)	EJ TAZs	57.81	55.56	-3.9%
	Non-EJ TAZs	63.70	60.96	-4.3%

Average commute times for EJ TAZs are lower than those for non-EJ TAZs across both modes and scenarios. Auto commute times are about 23% shorter for EJ TAZs at just over 20 minutes versus just over 26 minutes for non-EJ TAZs. Transit commute times are about 9% shorter in EJ TAZs as compared to non-EJ TAZs.

Auto commute times remain similar from the E+C to the PA scenario. The average commute time in EJ TAZs is essentially flat while the commute time in non-EJ TAZs increases by 0.3%.

Average transit commute times are significantly longer than those for auto regardless of TAZ type. However, the implementation of transit projects in *Resilience 2050* improves average transit commute times for both EJ and non-EJ TAZs. The average transit commute in EJ TAZs decreases by 3.9% while the average transit commute in non-EJ TAZs decreases by 4.3%.

Table 8 - Average Travel Time for Shopping Purposes by Auto and Transit

Measure	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Average travel time in minutes for shopping purposes by auto (drive alone and shared ride)	EJ TAZs	9.59	9.67	0.8%
	Non-EJ TAZs	11.47	11.54	0.6%
Average travel time in minutes for shopping purposes by transit (walk access)	EJ TAZs	40.94	39.29	-4.0%
	Non-EJ TAZs	46.51	43.21	-7.1%

The results for shopping travel times are similar to commute time trends. Average travel times for shopping purposes by auto are approximately 17% shorter for EJ TAZs as compared to non-EJ TAZs regardless of scenario, while transit travel times are approximately 10% shorter for EJ TAZs.

Average auto travel times remain essentially unchanged from the 2050 E+C scenario to the 2050 PA scenario. Travel times by auto for EJ TAZs increase by 0.8% while travel times for non-EJ TAZs increase by 0.6%.

As with commute times, the average travel time for shopping purposes is much longer by transit as compared to auto. Transit times are approximately four times longer than those for auto across both TAZs and scenarios. However, both EJ and non-EJ TAZs see decreases in average transit travel times in the 2050 PA scenario. The average travel time decreases by 4.0% in EJ TAZs and by 7.1% in non-EJ TAZs.

Table 9 - Average Travel Time to Closest Hospital by Auto and Transit

Measure	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Average travel time in minutes to closest hospital by auto (drive alone and shared ride)	EJ TAZs	10.25	10.00	-2.4%
	Non-EJ TAZs	24.86	24.06	-3.2%
Average travel time in minutes to closest hospital by transit (walk access)	EJ TAZs	43.35	41.81	-3.6%
	Non-EJ TAZs	55.96	54.61	-2.4%

Average travel times to the closest hospital for EJ TAZs are lower than those for non-EJ TAZs across both modes and scenarios. Travel times to the closest hospital by auto are about 60% shorter for EJ TAZs at just over 10 minutes versus just over 24 minutes for non-EJ TAZs. Travel times to the closest hospital by transit are about 23% shorter in EJ TAZs as compared to non-EJ TAZs.

Auto travel times for EJ TAZs are projected to decrease from 10.25 minutes in the E+C scenario to 10 minutes in the PA scenario, a decrease of 2.4%. Non-EJ TAZ travel times to the closest hospital decrease by about a minute from 24.86 minutes to 24.06 minutes, a projected decrease of 3.2%.

As we saw with average commute and shopping travel times, average travel times to the closest hospital are longer for transit than they are for auto. As compared to auto, transit times are about four times higher for EJ TAZs and more than two times higher for non-

EJ TAZs across both scenarios. Average transit travel times to the closest hospital decrease for both EJ and non-EJ TAZs in the 2050 PA scenario. Walk access transit travel times decrease by 3.6% and 2.4% in EJ and non-EJ TAZs, respectively.

Table 10 - Percent of Population Close to a Supermarket by Auto and Transit

Measure	Time	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Percent of population within 15, 30, 45 and 60 minutes of the closest supermarket by auto (drive alone and shared ride)	15 min	EJ TAZs	99.2%	99.2%	0.0%
		Non-EJ TAZs	92.6%	93.7%	1.2%
	30 min	EJ TAZs	99.6%	99.6%	0.0%
		Non-EJ TAZs	97.8%	97.8%	0.0%
	45 min	EJ TAZs	100.0%	100.0%	0.0%
		Non-EJ TAZs	98.7%	99.5%	0.8%
	60 min	EJ TAZs	100.0%	100.0%	0.0%
		Non-EJ TAZs	99.6%	99.6%	0.0%
Percent of population within 30, 45 and 60 minutes of the closest supermarket by transit (walk access)	30 min	EJ TAZs	61.7%	66.3%	7.5%
		Non-EJ TAZs	32.5%	34.3%	5.5%
	45 min	EJ TAZs	85.7%	87.2%	1.8%
		Non-EJ TAZs	50.9%	51.5%	1.2%
	60 min	EJ TAZs	91.5%	91.9%	0.4%
		Non-EJ TAZs	54.9%	55.4%	0.9%

Auto access to a supermarket in the Baltimore region is uniformly good. Nearly 100% of the population is within a 15-minute drive regardless of scenario or TAZ type. In EJ TAZs,

supermarkets are within 15- and 30-minute drives of 99.2% and 99.6% of the population, respectively, and 100% of the population in EJ TAZs is within the remaining drive lengths. For non-EJ TAZs, approximately 93% of the population is within a 15-minute drive, nearly 98% is within a 30-minute drive, and nearly 100% is within a 45 or 60-minute drive.

Transit results are more mixed than those for auto. EJ TAZs have consistently higher percentages than those for non-EJ TAZs, but access remains significantly less than that for auto. For EJ TAZs in the 2050 E+C scenario, the percentage within 30, 45 and 60-minute transit trips of the closest supermarket is 61.7%, 85.7% and 91.5%, respectively. Non-EJ TAZs have worse results for transit as compared to EJ TAZs. For non-EJ TAZs, these numbers are 32.5%, 50.9% and 54.9%, respectively.

The percentage of the population close to a supermarket by auto remains essentially unchanged from the 2050 E+C to the 2050 PA scenario, mostly because auto access is already so high. However, the percentage of the population close to a supermarket by transit improves across the board for EJ and non-EJ TAZs upon implementation of the projects in the *Resilience 2050* preferred alternative. The largest changes occur for the percentage of the population within a 30-minute walk access transit trip of the closest supermarket. In the 2050 PA scenario, EJ TAZs see an increase of 7.5% while non-EJ TAZs see an increase of 5.5%. The remaining percent increases are less than 2%.

Table 11 - Percent of Population Close to a Hospital by Auto and Transit

Measure	Time	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Percent of population within 15, 30, 45 and 60 minutes of the closest hospital by auto (drive alone and shared ride)	15 min	EJ TAZs	85.5%	85.4%	-0.1%
		Non-EJ TAZs	58.4%	58.9%	0.9%
	30 min	EJ TAZs	98.4%	98.5%	0.1%
		Non-EJ TAZs	87.6%	89.0%	1.6%
	45 min	EJ TAZs	99.3%	99.4%	0.1%
		Non-EJ TAZs	92.2%	92.6%	0.4%
	60 min	EJ TAZs	99.6%	99.5%	-0.1%
		Non-EJ TAZs	95.5%	95.6%	0.1%
Percent of population within 30, 45 and 60 minutes of the closest hospital by transit (walk access)	30 min	EJ TAZs	29.3%	30.7%	4.8%
		Non-EJ TAZs	9.3%	9.1%	-2.2%
	45 min	EJ TAZs	60.7%	63.2%	4.1%
		Non-EJ TAZs	24.1%	25.3%	5.0%
	60 min	EJ TAZs	75.6%	78.1%	3.3%
		Non-EJ TAZs	36.7%	38.9%	6.0%

Similar to supermarket data, auto access to the closest hospital is relatively good throughout the Baltimore region. Approximately 85% and 60% of the population in EJ and non-EJ TAZs is within a 15-minute drive of the closest hospital. Increasing the drive time to 30 minutes increases access to approximately 98% and 88% of the population in EJ and non-EJ TAZs, respectively. Nearly 100% of the population is within a 45 and 60-minute drive time of the closest hospital in EJ TAZs. These numbers are 92% and 95% for non-

EJ TAZs. The percentage of the population within the specified auto travel times increases slightly from the E+C to the PA scenario for most times and TAZ types, though all percentage changes are less than 2%.

EJ TAZs have consistently higher percentages within the specified transit travel times as compared to non-EJ TAZs. The percentages of the population close to a hospital in EJ TAZs is approximately three times higher for 30-minute transit trips, 2.5 times higher for 45 minutes, and approximately two times higher for 60-minutes. However, transit access is once again significantly less than that for auto travel. In the 2050 E+C scenario, 29.3% of the population in EJ TAZs is within a 30-minute transit trip of the closest hospital, while just 9.3% of the population in non-EJ TAZs meets this criteria. Percentages for EJ TAZs in the 2050 E+C scenario gradually increase to 60.7% and 75.6% for the remaining transit travel times. Just 36.7% of the population in non-EJ TAZs is within a 60-minute transit trip of the closest hospital in the E+C scenario.

The percentage of the population close to a hospital by transit increases for most times and TAZ types from the 2050 E+C scenario to the 2050 PA scenario. For EJ TAZs, the percentage of the population within 30, 45 and 60-minute transit trips of the closest hospital increases by 4.8%, 4.1%, and 3.3%, respectively. For non-EJ TAZs, these numbers are -2.2% (the lone negative result), 5%, and 6%.

Table 12 - Percent of Population Close to a College or University by Auto and Transit

Measure	Time	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Percent of population within 15, 30, 45 and 60 minutes of the closest college or university by auto (drive alone and shared ride)	15 min	EJ TAZs	87.2%	86.3%	-1.0%
		Non-EJ TAZs	53.7%	55.8%	3.9%
	30 min	EJ TAZs	98.8%	99.2%	0.4%
		Non-EJ TAZs	90.3%	92.4%	2.3%
	45 min	EJ TAZs	99.6%	99.6%	0.0%
		Non-EJ TAZs	97.1%	97.8%	0.7%
	60 min	EJ TAZs	100.0%	100.0%	0.0%
		Non-EJ TAZs	99.0%	98.9%	-0.1%
Percent of population within 30, 45 and 60 minutes of the closest college or university by transit (walk access)	30 min	EJ TAZs	31.5%	33.3%	5.7%
		Non-EJ TAZs	13.3%	14.4%	8.3%
	45 min	EJ TAZs	62.5%	66.5%	6.4%
		Non-EJ TAZs	28.5%	31.2%	9.5%
	60 min	EJ TAZs	79.1%	79.8%	0.9%
		Non-EJ TAZs	36.6%	38.8%	6.0%

Auto access to the closest college or university is greater than 90% for travel times of 30 minutes or greater for the population in both TAZ categories. More than 98% of the population in EJ TAZs is within a 30-minute drive of the closest college or university. There is a larger difference between EJ and non-EJ TAZ results for 15-minute auto access. Approximately 87% of the population in EJ TAZs is within a 15-minute auto trip of the closest college or university while approximately 55% of the population in non-EJ TAZs fits this criterion. EJ TAZs see little change from the 2050 E+C to the 2050 PA scenario, mostly because auto access is already so high. Non-EJ TAZs see slight increases of 3.9% and 2.3% upon implementation of the 2050 PA scenario for the share of the population within auto trips of 15 minutes and 30 minutes of a college or university, respectively.

Similar to the other closeness measures, the TAZ percentages for transit are significantly less than those for auto. For example, the percentage of the population within a 30-minute

transit trip of the closest college or university is approximately 32% in EJ TAZs and just 14% in non-EJ TAZs.

Transit results indicate consistently higher percentages for EJ TAZs as compared to non-EJ TAZs across all time thresholds and scenarios. The scale of the difference between EJ and non-EJ TAZs mirrors that for hospitals. Transit results for EJ TAZs are approximately two times higher than those for non-EJ TAZs regardless of the travel time or scenario. Non-EJ TAZs see larger increases from the 2050 E+C to the 2050 PA scenario, though they have more room to improve due to their low starting values. Non-EJ TAZs see increases of 8.3%, 9.5% and 6.0% for transit travel times of 30, 45 and 60 minutes, respectively. EJ TAZs see increases of 5.7%, 6.4% and 0.9% for the same travel times. Nearly 80% of the population in EJ TAZs is within a 60-minute transit trip of the closest college or university in the 2050 PA scenario as compared to 39% in non-EJ TAZs.

Analysis of Transportation System Investments

The measures analyzed indicate that the surface transportation investments in *Resilience 2050* should not have disproportionate impacts on EJ TAZs. The measures are discussed below in the order the results were presented above. They are grouped broadly into accessibility measures (jobs and shopping), travel time measures (commute, shopping purposes, closest hospital), and proximity measures (supermarket, hospital, college/university). Table 13 lists the full results for all measures.

EJ TAZs have access to more jobs and shopping opportunities on average as compared to non-EJ TAZs across both scenarios. This holds for both auto and transit access. All TAZs see increases in accessibility with the implementation of the *Resilience 2050* preferred alternative. Auto access measures see relatively small increases of around 4% or less for both EJ and non-EJ TAZs, though those for non-EJ TAZs are slightly larger. Transit access improvements are larger and are similar for EJ and non-EJ TAZs. Increases in job accessibility by transit are particularly pronounced, with projected increases of 23.6% in EJ TAZs and 26.9% in non-EJ TAZs.

EJ TAZs have lower average travel times across nearly all measures including commute time, travel time for shopping purposes, and travel time to the closest hospital. Implementation of the preferred alternative does not have a significant impact on average auto travel times in the region. Commute times and travel times for shopping purposes change by less than 1.0%. The average travel time to the closest hospital by auto decreases by 2.4% for EJ TAZs and by 3.2% for non-EJ TAZs. The preferred alternative has a slightly larger impact on transit travel times, with travel times for commuting, shopping, and to the closest hospital decreasing for EJ and non-EJ TAZs. Transit travel times for commuting and shopping decrease by slightly more in non-EJ TAZs as compared to EJ TAZs, though transit travel times for non-EJ TAZs were much longer to start. The average transit travel time to the closest hospital decreases more in EJ TAZs as compared to non-EJ TAZs, with reductions of 3.6% and 2.4%, respectively.

Proximity to supermarkets, hospitals, and colleges/universities by auto is quite good throughout the Baltimore region. Nearly 90% or more of the population in EJ and non-EJ TAZs lives within a 30-minute auto trip of all of these important destinations. EJ TAZs have consistently higher percentages as compared to non-EJ TAZs. This is most pronounced for the percentage of the population within a 15-minute auto trip of a hospital and college/university. Greater than 85% of the population in EJ TAZs is within a 15-minute auto trip versus less than 60% in non-EJ TAZs. Implementation of the preferred alternative yields only small changes in the percentage of the population close to these destinations by auto. All percent changes for auto are 2.0% or less except for two (15 and 30-minute auto trips to the closest college or university in non-EJ TAZs).

EJ TAZs see higher percentages in close proximity to these destinations by transit as compared to non-EJ TAZs for both scenarios. As with other measures, proximity to these important destinations by transit is significantly less than that for auto. However, implementation of the preferred alternative yields larger increases in the percentage of the population close to supermarkets, hospitals, and colleges/universities by transit as compared to auto. The percentage of the population close to all of these destinations increases for nearly all travel times and TAZ types. The lone decrease for transit proximity measures is for the share of the population within a 30-minute trip of the closest hospital in non-EJ TAZs. EJ TAZs see larger percent increases for most supermarket proximity measures by transit, while non-EJ TAZs see slightly larger percent increases for hospital and higher education proximity measures by transit.

Several other trends are worth noting:

- Auto access and mobility are uniformly better than that for transit. This holds for both EJ and non-EJ TAZs. For example, EJ TAZs are accessible to an average of 506,223 jobs in the preferred alternative scenario by auto (30 minutes) versus 229,012 by transit (60 minutes, walk access). These numbers for non-EJ TAZs are 304,951 and 91,978, respectively.
- While the auto measures are better than those for transit, transit accessibility and mobility see significantly larger increases with the implementation of the *Resilience 2050* preferred alternative. Only one auto data point (job accessibility in non-EJ TAZs) changes by more than 4.0% in either direction. Auto results are also decidedly more mixed, with several negative results. On the other hand, results for transit are uniformly positive with the implementation of the preferred alternative, with just one negative result in the hospital proximity measure. Many transit measures see increases of more than 4.0%. Job accessibility via transit sees the largest increases, with jumps of about 25% for both EJ and non-EJ TAZs in the 2050 PA scenario.
- The percentage increases from the 2050 E+C scenario to the 2050 PA scenario are relatively similar for EJ and non-EJ TAZs. Non-EJ TAZs tend to have slightly larger increases than EJ TAZs for some of the measures. However, non-EJ TAZs also start with worse baselines relative to EJ TAZs for these measures. EJ TAZs tend to have

larger absolute improvements as compared with non-EJ TAZs. For example, implementation of the *Resilience 2050* preferred alternative yields increases in the average number of jobs accessible by transit of 23.6% and 26.9% for EJ and non-EJ TAZs, respectively. This equates to nearly 44,000 more jobs accessible by transit to EJ TAZs and nearly 20,000 more jobs accessible by transit to non-EJ TAZs.

It is important to point out that the individual projects in *Resilience 2050* have largely not yet gone through the required environmental approvals or design process. As a result, the scope and limits of these projects could change. In addition, all projects involving federal funds are required to include an EJ analysis as a part of the federal approval process.

Table 13 - Full Results: Environmental Justice Analysis

Measure	TAZ Category	2050 E+C Scenario	2050 PA Scenario	Percent Change (E+C to PA)
Average number of jobs accessible by auto within 30 minutes	EJ TAZs	492,479	506,223	2.8%
	Non-EJ TAZs	293,038	304,951	4.1%
Average number of jobs accessible by transit (walk access) within 60 minutes	EJ TAZs	185,232	229,012	23.6%
	Non-EJ TAZs	72,477	91,978	26.9%
Average number of shopping opportunities accessible by auto within 30 minutes	EJ TAZs	276,928	278,316	0.5%
	Non-EJ TAZs	172,408	174,612	1.3%
Average number of shopping opportunities accessible by transit (walk access) within 60 minutes	EJ TAZs	158,952	166,520	4.8%
	Non-EJ TAZs	69,664	73,124	5.0%
Average commute time in minutes by auto (drive alone and shared ride)	EJ TAZs	20.16	20.17	0.0%
	Non-EJ TAZs	26.09	26.17	0.3%
Average commute time in minutes by transit (walk access)	EJ TAZs	57.81	55.56	-3.9%
	Non-EJ TAZs	63.70	60.96	-4.3%

Average travel time in minutes for shopping purposes by auto (drive alone and shared ride)		EJ TAZs	9.59	9.67	0.8%
		Non-EJ TAZs	11.47	11.54	0.6%
Average travel time in minutes for shopping purposes by transit (walk access)		EJ TAZs	40.94	39.29	-4.0%
		Non-EJ TAZs	46.51	43.21	-7.1%
Average travel time in minutes to closest hospital by auto (drive alone and shared ride)		EJ TAZs	10.25	10.00	-2.4%
		Non-EJ TAZs	24.86	24.06	-3.2%
Average travel time in minutes to closest hospital by transit (walk access)		EJ TAZs	43.35	41.81	-3.6%
		Non-EJ TAZs	55.96	54.61	-2.4%
Percent of population within 15, 30, 45 and 60 minutes of the closest supermarket by auto (drive alone and shared ride)	15 min	EJ TAZs	99.2%	99.2%	0.0%
		Non-EJ TAZs	92.6%	93.7%	1.2%
	30 min	EJ TAZs	99.6%	99.6%	0.0%
		Non-EJ TAZs	97.8%	97.8%	0.0%
	45 min	EJ TAZs	100.0%	100.0%	0.0%
		Non-EJ TAZs	98.7%	99.5%	0.8%
	60 min	EJ TAZs	100.0%	100.0%	0.0%
		Non-EJ TAZs	99.6%	99.6%	0.0%
Percent of population within 30, 45 and 60 minutes of the closest supermarket by transit (walk access)	30 min	EJ TAZs	61.7%	66.3%	7.5%
		Non-EJ TAZs	32.5%	34.3%	5.5%
	45 min	EJ TAZs	85.7%	87.2%	1.8%
		Non-EJ TAZs	50.9%	51.5%	1.2%

	60 min	EJ TAZs	91.5%	91.9%	0.4%
		Non-EJ TAZs	54.9%	55.4%	0.9%
Percent of population within 15, 30, 45 and 60 minutes of the closest hospital by auto (drive alone and shared ride)	15 min	EJ TAZs	85.5%	85.4%	-0.1%
		Non-EJ TAZs	58.4%	58.9%	0.9%
	30 min	EJ TAZs	98.4%	98.5%	0.1%
		Non-EJ TAZs	87.6%	89.0%	1.6%
	45 min	EJ TAZs	99.3%	99.4%	0.1%
		Non-EJ TAZs	92.2%	92.6%	0.4%
	60 min	EJ TAZs	99.6%	99.5%	-0.1%
		Non-EJ TAZs	95.5%	95.6%	0.1%
Percent of population within 30, 45 and 60 minutes of the closest hospital by transit (walk access)	30 min	EJ TAZs	29.3%	30.7%	4.8%
		Non-EJ TAZs	9.3%	9.1%	-2.2%
	45 min	EJ TAZs	60.7%	63.2%	4.1%
		Non-EJ TAZs	24.1%	25.3%	5.0%
	60 min	EJ TAZs	75.6%	78.1%	3.3%
		Non-EJ TAZs	36.7%	38.9%	6.0%
Percent of population within 15, 30, 45 and 60 minutes of the closest college or university by auto (drive alone and shared ride)	15 min	EJ TAZs	87.2%	86.3%	-1.0%
		Non-EJ TAZs	53.7%	55.8%	3.9%
	30 min	EJ TAZs	98.8%	99.2%	0.4%
		Non-EJ TAZs	90.3%	92.4%	2.3%

	45 min	EJ TAZs	99.6%	99.6%	0.0%
		Non-EJ TAZs	97.1%	97.8%	0.7%
	60 min	EJ TAZs	100.0%	100.0%	0.0%
		Non-EJ TAZs	99.0%	98.9%	-0.1%
Percent of population within 30, 45 and 60 minutes of the closest college or university by transit (walk access)	30 min	EJ TAZs	31.5%	33.3%	5.7%
		Non-EJ TAZs	13.3%	14.4%	8.3%
	45 min	EJ TAZs	62.5%	66.5%	6.4%
		Non-EJ TAZs	28.5%	31.2%	9.5%
	60 min	EJ TAZs	79.1%	79.8%	0.9%
		Non-EJ TAZs	36.6%	38.8%	6.0%

Resilience 2050 Project Prioritization

The updated project prioritization process for *Resilience 2050* includes additional criteria related to the mobility needs of minority and low-income populations. The technical scoring criteria for the LRTP are drawn from regionally adopted goals and strategies, including accessibility, mobility, safety, security, environmental conservation and economic prosperity. The technical scoring methodology for the prior LRTP only incorporated potential impacts to EJ populations into two criteria, and the methods and points for integrating EJ impacts into these criteria were not well defined.

The BRTB adopted updates to the technical scoring criteria for *Resilience 2050* in November 2021. The updates shift the amount of points devoted to the existing goals, increasing the total number of points available to transit projects and adding scoring criteria for transit projects where they had previously been absent. These updates were made in response to public comments focused on improving transit accessibility, reliability and frequency and reducing the focus on cars and highways. Transit projects submitted for *Resilience 2050* were eligible for 55 technical scoring points as opposed to 50 technical scoring points for roadway projects.

The *Resilience 2050* technical scoring methodology also integrates impacts to EJ populations into most criteria. This yields a weighting for equity comparable to other

technical scoring criteria. The updated technical scoring methodology considers equity from multiple perspectives, recognizing, for example, that the impacts to safety might differ from changes to job access. Table 14 provides a brief summary of the methodology for incorporating impacts to EJ populations into the technical scoring criteria.

Table 14 - Resilience 2050 Technical Scoring Criteria Related to EJ Populations

Mode and Criteria	Methodology
Highway Safety	Project includes countermeasures anticipated to benefit low-income and minority populations, with a focus on non-motorist safety, speed reduction, and impaired or distracted drivers.
Transit Safety	Project incorporates features designed to improve system safety for low-income and minority transit riders.
Complete Streets	Project incorporates complete streets features (traffic safety; bicycle, pedestrian, & transit) anticipated to benefit low-income and minority populations
Access to Jobs	Degree to which the project improves access to jobs for low-income and minority workers within a 30 minute travel time by auto or 45 minute travel time for transit.
Environmental Conservation	Degree to which the project is anticipated to improve or have negative impacts on ecologically sensitive lands and culturally significant resources in proximity to low-income and minority populations. Projects can be awarded or deducted points for this criteria.
Evacuation Security	The degree to which a project enhances the multimodal evacuation mobility of vulnerable populations. Projects that intersect or are located entirely within census tracts with higher shares of vulnerable populations will receive more points.

Ongoing Activities

BMC staff and the BRTB are engaged in several ongoing activities intended to improve the procedures by which we identify and consider the needs of minority and low-income populations.

To build an understanding of the ways in which the BRTB and BMC address equity in transportation policies, plans and programs, BMC launched an equity scan in the winter

of 2022. The project, supported by a consultant team, involved a review of current agency equity practices, interviews with peer agencies regarding notable practices, and facilitated discussions with BMC staff, the Transportation CORE, the BRTB Technical Committee and the BRTB. The end products of the study include a prioritized list of recommendations and supporting information BMC staff can use to advance equity through the four key BRTB planning processes: the unified planning work program (UPWP), the LRTP, the TIP, and the public participation plan (PPP).

BMC's internal equity working group is currently working on implementation of several of the recommendations from the equity scan, including at least one recommendation for each of the four key documents noted above.

BMC staff also participate in a number of external equity working groups, including the national MPO Equity Working Group.

Above and Beyond the Civil Rights Act - the Justice40 Initiative

The Biden-Harris Administration created the Justice40 Initiative to confront and address decades of underinvestment in disadvantaged communities. The initiative brings resources to communities most impacted by climate change, pollution and environmental hazards.

At the U.S. Department of Transportation (USDOT), Justice40 is an opportunity to address gaps in transportation infrastructure and public services by working toward the goal that at least 40% of the benefits from many grants, programs and initiatives flow to disadvantaged communities.

Justice40 allows USDOT to identify and prioritize projects that benefit rural, suburban, tribal, and urban communities facing barriers to affordable, equitable, reliable, and safe transportation. Through Justice40, USDOT will also assess the negative impacts of transportation projects and systems on disadvantaged communities and considers meaningful public involvement throughout a project's lifecycle.

For the first time in our nation's history, the Federal Government has made it a goal that 40 percent of the overall benefits of certain Federal investments flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. President Biden made this historic commitment when he signed Executive Order 14008 within days of taking office.



Baltimore
Metropolitan
Council

AMERICANS WITH DISABILITIES ACT SELF-EVALUATION 2024

This document, developed by the BMC ADA/504 Coordinator, in consultation with a Compliance Team, includes a physical evaluation of BMC's premises, and an analysis of BMC and BRTB policies and practices.



BALTIMORE METROPOLITAN COUNCIL AND BALTIMORE REGIONAL TRANSPORTATION BOARD

Title II of Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973 Self-Evaluation and Transition Plan

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About The BMC and the BRTB

The BMC is a private, non-profit planning entity in the Baltimore region. One of the organization's functions is to support the Baltimore Regional Transportation Board (BRTB) and its regional transportation planning activities. BMC also provides support to member local governments in several other areas including procurement, reservoir protection and water quality, sustainable community planning, and workforce development.

BMC Members

Anne Arundel County	Carroll County
Baltimore County	Harford County
Baltimore City	Howard County
Queen Anne's County	House of Delegates Representative
Senate Representative	Governor's Representative

BRTB Members

City of Annapolis	Queen Anne's County
Anne Arundel County	Representative of Public Transportation
Baltimore County	Maryland Department of Transportation
Baltimore City	Maryland Transit Administration *
Carroll County	Maryland Department of the Environment *
Harford County	Maryland Department of Planning *
Howard County	

* Non-Voting

Introduction and Statement of Commitment

As a recipient of federal funding, BMC must comply with a variety of federal and state legislative regulations. Regarding matters of nondiscrimination on the basis of disability, BMC falls under two federal laws, the Americans with Disabilities Act of 1990, and Section 504 of the Rehabilitation Act of 1973.

The ADA prohibits discrimination on the basis of disability. Title II of ADA applies specifically to all activities of state and local governments, including metropolitan planning organizations such as the BRTB, and requires that government entities give people with disabilities equal opportunity to benefit from all of the programs, services and activities that may be offered.

As the federally designated metropolitan planning organization, the BRTB must adhere to the standards set forth in Title II, which include both physical accommodations (accessibility to buildings and meetings) and in policies, practices and procedures. Under

Title II, the BRTB is required to make reasonable accommodations in order to provide access and to communicate effectively with people who have hearing, vision or speech impairments. Likewise, the BRTB is required to make reasonable modification to policies, practices and procedures where necessary to avoid discrimination.

The Rehabilitation Act prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors. The standards for determining employment discrimination under the Rehabilitation Act are the same as those used in Title I of the ADA.

Section 504 states that “no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under” any program or activity that receives federal financial assistance. Requirements common to the regulations set forth in Section 504 include reasonable accommodation for employees with disabilities, program accessibility and effective communication with people who have hearing or vision disabilities.

Title II of Americans with Disabilities Act includes more than program accessibility and barrier removal. There are also requirements for nondiscriminatory policies and practices and for the provision of auxiliary aids and services, such as sign language interpreters for people who are deaf and material in Braille for people who are blind.

As an MPO, the BRTB is required to perform the following:

- Apply ADA Law
- Apply Section 504 Law
- Appoint an ADA/504 Coordinator
- Provide an agency nondiscrimination statement
- Perform an agency self-evaluation
- Develop a Transition Plan
- Make auxiliary aids (TTD/TTY) available for use
- Provide assurance of compliance

BMC is committed to complying with both the letter and spirit of the requirements set forth in Title II of the ADA and Section 504 of the Rehabilitation Act (hereafter ADA/504).

Methodology for Self-Evaluation

This document was developed by the BMC ADA/504 Coordinator, in consultation with a Compliance Team, who assisted in the physical evaluation of BMC’s premises, and in the evaluation of BMC’s policies and practices. Team members reviewed and made recommendations to the Self-Evaluation document, as well as to the separately developed Transition Plan (found in the appendix, beginning on page 11).

This Self-Evaluation is divided into three parts: 1) an evaluation of BMC's policies and practices, 2) an evaluation of BMC's premises, and 3) the BMC website. This document describes the policies and procedures that BMC uses to comply with ADA/504. Steps that will be undertaken to correct any deficiencies are detailed in the appended Transition Plan.

Evaluation of BMC Policies and Practices

The following is a description of BMC's policies and practices that may affect people with disabilities.

ADA/504 Coordinator

BMC's ADA/504 Coordinator is charged with the following tasks:

- Collaborate and coordinate ADA/504 compliance efforts throughout the agency. BMC is a small office, composed of a planning department and administrative department. The ADA/504 Coordinator works closely with all of the staff in both departments.
- Serve as a point of contact and liaison to the public on ADA/504 compliance issues. Contact information is provided on the BMC website and in all BMC and BRTB publications.
- Establish and maintain collaborative relationships with critical external stakeholders, such as disability advocacy groups and government agencies.
- Monitor policies, procedures, practices and processes with respect to ADA/504 compliance; identify shortcomings in compliance and develop remedies.
- Investigate and resolve complaints filed under the ADA/504 grievance procedures. Grievance procedures are described on page 6.
- Monitor and update the implementation of the ADA/504 Self-Evaluation and Transition Plan.
- Provide or coordinate the provision of requested auxiliary aids and reasonable accommodations to individuals with disabilities.
- Perform ADA/504 program, process or compliance reviews; inspect facilities for accessibility.

Public Participation

The BRTB Public Participation Plan was updated in December 2022. The Plan includes policies to ensure compliance with the following statements:

The Baltimore Regional Transportation Board (BRTB) seeks to provide an open process that offers reasonable access to information, timely public notice, full public access to

key decisions and support for early and continued involvement of stakeholders in the metropolitan transportation planning process.

To ensure the public is aware of the BRTB's commitment to ensuring access for all, the following notice is placed on all BRTB agendas and meeting announcements (flyers, advertisements, etc.):

The Baltimore Regional Transportation Board (BRTB) operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, and other applicable laws.

BMC offers interpretation services, including language translation services and signage for the hearing impaired, at public meetings upon request with seven days advance notice. BMC will not exclude persons based on age, religion, or disability. For assistance, contact the Public Involvement Coordinator, comments@baltometro.org, or call 410-732-0500.

Dial 7-1-1 or 800-735-2258 to initiate a TTY call through Maryland Relay.

Usuarios de Relay MD marquen 7-1-1. Si se necesita información de Título VI en español, llame al 410-732-0500.

Public Meetings

All meetings held by BMC are open to the public. Most meetings are held in the BMC offices at 1500 Whetstone Way, Baltimore, Maryland 21230.

When meetings are conducted in other venues, BMC strives to assure that the facility is accessible, externally and internally. When possible, meeting locations are selected along public bus routes.

Sign language interpreters are made available if requested in advance of the meeting. Documents and handouts are also available in large print versions. BMC can also make printed material available as Braille, again if requested in advance. Information regarding this is included in meeting notices that are posted on the BMC website and in all advertising).

Publications

A Notice of Nondiscrimination is required to be placed in all plans, studies and processes undertaken by BMC.

NOTICE OF NONDISCRIMINATION

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BMC offers interpretation services, including language translation services and signage for the hearing impaired, at public meetings upon request with seven days advance notice. BMC will not exclude persons based on age, religion, or disability. For assistance, contact the Public Involvement Coordinator, comments@baltometro.org, or call 410-732-0500. Dial 7-1-1 or 800-735-2258 to initiate a TTY call through Maryland Relay.

Documents that directly address the needs of people with disabilities are the Public Participation Plan (discussed on page 14) and the Personnel Manual (discussed in Policy Numbers 101, 201 and 501).

Grievance Procedures for BMC Employees

It is the intent of BMC to ensure that no qualified individual, because of a disability, is discriminated against with regard to any term or condition of employment, provided that such individual can perform the essential functions of the job with or without reasonable accommodation.

A disability is defined as 1) a physical or mental impairment that renders the individual unable to perform, or significantly limits the individual's ability to perform one or more major life activities as compared to an average person in the general population, 2) a record of such an impairment, or 3) being regarded as having such an impairment.

Qualified individual is defined as an individual with a disability who satisfied the requisite skill, experience, education and other job-related requirements of the employment such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.

Reasonable accommodation is defined as a modification or adjustment to the job, the work environment, or the way things usually are done that enable a qualified person with a disability to enjoy an equal employment opportunity. BMC is not required to take such actions to accommodate that would result in undue financial and administrative burdens.

BMC, upon request, will provide reasonable accommodation to employee(s) in compliance with the ADA. Any employee who believes they need an accommodation in order to perform the essential functions of the job should notify their immediate supervisor. Requests will be handled on a case-by-case basis.

Any employee who believes they have been, or is being discriminated against, because or

as a result of a disability should first contact his immediate supervisor, as outlined in BMC's "open door" policy contained in the BMC Personnel Policy and Procedure Manual (updated 2016). If the employee is not satisfied with the conclusion of that interview, then they may file a grievance with the Executive Director, who will inform the ADA/504 Coordinator. Upon receipt of the formal grievance, the ADA/504 Coordinator will collect information, investigate the complaint, and make a recommendation to the Executive Director within ten business days. The complainant will be kept fully informed throughout the process, and will be notified in writing of the resolution.

Complaint Procedures for the General Public

BMC has established a process for investigating and resolving complaints alleging disability discrimination related to MPO services, programs and its office. Regulations implementing provisions of Section 504 and Title II of the ADA can be found at 49 CFR Parts 27 and 37, and 28 CFR Part 35.

BMC's ADA/504 Coordinator is responsible for overseeing investigations and responses to complaints of discrimination based on disability.

Required complaint information includes:

- Complainant's name, mailing address and daytime phone number.
- Specific information relating to the incident in question: date, time, location, how the person was discriminated based upon disability, and any other pertinent details.

Complaints with incomplete information may result in delayed investigations and responses. BMC will not respond to complaints without the complainant's name and mailing address.

Complaints may be submitted to BMC as follows:

- By telephone to BMC, 410-732-0500 ext. 1020. The ADA/504 Coordinator will talk to the complainant and obtain detailed information relating to the complaint. Information obtained from the telephone interview will be recorded in writing and read to the complainant.
- In writing to the BMC ADA/504 Coordinator. Complaints may also be faxed to 410-732-9574 or e-mailed to smahoney@baltometro.org.
- In person at BMC, 1500 Whetstone Way, Suite 300, Baltimore, Maryland 21230.

Normal office hours are from 8:00 a.m. until 4:30 p.m., Monday through Friday. It is advisable to call the ADA/504 Coordinator in advance to schedule an appointment.

Within three business days upon receipt of a complaint, a letter or card will be mailed to the complainant with the following information:

- Acknowledgment that the complaint has been received and is pending investigation.
- Estimated date by which a response will be sent to the complainant.

The ADA/504 Coordinator will investigate the complaint and respond in writing within a reasonable time, not to exceed 30 days from receipt of the complaint. The response will provide information concerning the resolution of the complaint.

A record of all ADA/504 complaints will be maintained by BMC for a minimum of five years. Each record will include the name and address of the complainant, nature of the complaint, problems identified, resolution of the complaint and any resulting modifications made to a BMC program, service or its office facility.

Evaluation of BMC Premises

BMC utilized the *ADA Checklist for Existing Facilities* based on the 2010 ADA Standards for Accessible Design produced by: Institute for Human Centered Design – www.ADAchecklist.org.

BMC leases 13,761 square feet of the McHenry Row office building, 1500 Whetstone Way, Baltimore, Maryland 21230. The building is located on the corner of Whetstone Way and Woodall Street, and the entrance to the premises is on the Whetstone Way side.

Access to the building

The external entrance to the building is wheelchair accessible, as is the building lobby, meeting rooms and restrooms. The main entrance to the building has an automatic door opener. The entrance to the BMC's office on the 3rd floor does not have an automatic door opener. The main entrance does have a guard stationed inside that can provide assistance during business hours and there is a doorbell to the BMC office with a receptionist directly inside that can also provide assistance. BMC is located on the 3rd floor and is served by two elevators that are both wheelchair accessible. The call buttons are located 40 inches above the floor (54 inches maximum) and the in-car controls are 40 inches above the floor. The elevator is 75 inches deep and 65 inches wide.

BMC's location is adjacent to the MTA 94 and 71 bus lines as well as the Charm City Circulator's Banner Route.

Doorways and hardware

All internal and external doorways are wheelchair accessible. All door hardware is designed for use by people with disabilities and were found in good working order.

The doors are equipped with hardware that is operable with one hand and does not require tight grasping, pinching or twisting of the wrist. The operable parts of the hardware are 42 inches above the floor (minimum 34 inches, maximum 48 inches).

The 3rd floor entrance to the lobby is served by two double doors with a clear opening width of 70 inches total.

Signs designating rooms and spaces are provided all through the BMC office. Text characters contrast with their background and signs are also provided in Braille. The baseline of the lowest character is 54 inches above the floor (48 inches minimum, 60 maximum).

All doors have a minimum opening width of at least 32 inches clear, between the face of the door and the stop, when the door is open 90 degrees. All doors within the premises can be opened easily. For doors with a closer (main conference room) it takes slightly less than the 5 second minimum to close from an open position of 90 degrees to a position of 12 degrees from the latch.

Reception area

BMC's reception area is accessible by both visitors and employees. The reception counter is designed on one side to be easily accessed by people who use wheelchairs.

Supply room

The supply room is accessible, as are most supplies contained therein. Other obstacles are temporary, and consist of recently delivered supplies deposited in the room but not put away.

Coat closet

The coat closet is accessible. It does not have a clothes rod for people who use wheelchairs.

Kitchen

The entrance to the kitchen is accessible. The refrigerator is accessible. The microwave and toaster oven are easily accessible to someone in a wheel chair.

Offices

All offices are constructed to permit access and use.

Windows

The main conference rooms and offices have windows. Extension rods were installed so that the blinds may be reached and adjusted by someone who uses a wheelchair.

Internal navigation

Office hallways are accessible and generally free of obstacles.

Communication Devices

Office telephones are within easy access, or can be readily put within access. BMC utilizes Maryland Relay 7-1-1 to accommodate people with hearing impairments.

The BMC website is generally accessible by people with vision impairments.

Evaluation of BMC Website

On August 7, 1998, President Clinton signed into law the Rehabilitation Act Amendments of 1998 which covers access to federally funded programs and services. Under Section 508, agencies must give disabled employees and members of the public access to information that is comparable to access available to others.

BMC significantly complies with guidelines for making website material accessible, and conducts compliance checks annually or upon major website updates. The most recent was conducted on April 23, 2023 using the web accessibility evaluation tool AccessiBe "Web Content Accessibility Guidelines" (WCAG) 2.1 level AA success criteria. This audit runs dozens of tests that focus mainly on three categories: screen-reader adjustments (for blind users), keyboard navigation adjustments (for the motor impaired) and UI, design, and readability adjustments (for the vision impaired).

The following items were found to be noncompliant:

- Not all elements that behave as buttons are labeled as such.
- Not all links that open in a new tab explain to screen-readers that a new tab will open.
- Not all pages include an H1 title that provides information to blind users using screen-readers of what the main topic of the page is.
- Not all PDF documents are accessible by vision impaired people.

BMC's last major website update was in 2018, with a complete rebuild of baltometro.org planned in FY 2025. Achieving full Section 508 compliance will be a top priority during this process. Meanwhile, BMC staff will attempt to adjust the current website deficiencies as part of normal updates.

In addition to the BMC website, BMC uses Public Input, which is a community engagement platform that supports our public engagement process, to better reach, engage, understand, and communicate with residents. Public Input is 508.2 compliant and conducts ongoing user testing to make sure the user experience is better than the bare minimum compliance measures and ensure that they maintain WCAG AAA compliance.

Conclusions

Deficiencies noted within this Self-Evaluation are recorded in the Transition Plan, along with recommended improvements and a time frame for making those improvements. BMC reviews its public documents, including this one, once every four years. Any changes to programs, policies or practices are noted and the document is revised as needed.

Other documents in this series include: Title VI Program, Disadvantaged Business Enterprise Program, Public Participation Plan, and Limited English Proficiency Plan.

Appendix

This Transition Plan was developed as a result of the Self-Evaluation.

Deficiencies Identified during the Evaluation of BMC Policies and Practices

Deficiency	Remedy	Approx. Cost	Status
<i>BMC Personnel Policies and Procedures</i> to include the grievance procedures detailed in the Self-evaluation.	Amend the <i>BMC Personnel Policies and Procedures</i> to include the grievance procedures detailed in the Self-Evaluation.	Minimal - cost of administration time and legal services.	Estimated Spring 2024

Deficiencies Identified in Evaluation of BMC Premises

Deficiency	Remedy	Approx. Cost	Status
Internal navigation is occasionally impeded for people with disabilities by the presence of temporary obstacles.	Remove any obstacles that interfere with free flow of pedestrian traffic.	No cost.	Ongoing and as needed.