



Northwest Region
15700 Dayton Avenue North
P.O. Box 330310
Seattle, WA 98133-9710
206-440-4000
TTY: 1-800-833-6388
www.wsdot.wa.gov

September 2, 2020

Scott Spence, City Manager
City of Lacey
4200 College St SE
Lacey WA 98503

Re: Title VI Annual Report

Dear Mr. Spence:

WSDOT reviewed and approved the city's annual report, ending May 2020. Both the report and executed Nondiscrimination Agreement should be accessible to the public, such as through your website. The next report covers June 2020 through March 2021 and **due by May 1, 2021**. This will conform to revisions in the LAG Manual, Chapter 28.

As Lacey's report was reviewed for its adherence with Title VI, WSDOT noted areas for improvement. Specific details are in the transmittal email.

- The USDOJ/FHWA Safe Harbor benchmark (*required* translation of vital documents) is 5% of population or 1,000 people, *whichever is less*. FHWA told WSDOT-OEO that even media releases are vital documents. Four Factor Analysis determines when population encountered/served may need translation/interpretation so outreach efforts are tailored to languages in LEP areas.
- Environmental Justice and public engagement need attention. The revision to Chapter 28 should make clear what has been required.
- Again this year, goals for the upcoming year were missing. Chapter 28 of the LAG Manual instructs LPAs to set Title VI goals for upcoming reporting period.

WSDOT is updating the LAG Manual, with publication of a new Chapter 28 is expected very soon. New detailed guidance on language services and environmental justice is included. Watch Local Programs LTAP for the training schedule and registration details. We recommend at least two employees with Title VI responsibilities attend.

WSDOT is committed to providing any assistance you may need with Title VI. If you have questions, please contact me at 206-440-4778, or email TitleVI@WSDOT.WA.GOV.

Sincerely,

/s/Gretchen Gleue
Title VI Local Agency Compliance Lead
WSDOT – Office of Equal Opportunity