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May 25, 2021

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

Dear Mr. Spence:

WSDOT reviewed and approved the city's annual report, ending April 2021. Both the report and executed Nondiscrimination Agreement should be accessible to the public, such as through your website. The next report, ending March 2021, will be **due by May 1, 2022**.

As Lacey's report was reviewed for its adherence with Title VI, WSDOT noted areas for improvement. One area still requiring attention is below, with more details in the transmittal email.

- The USDOJ/FHWA Safe Harbor benchmark is 5% of population or 1,000 people, *whichever is less*. For Lacey, the 'whichever is less' is 1,000 LEP people, not 5%. FHWA told WSDOT-OEO that even media releases are vital documents. Four Factor Analysis determines when population encountered/served may need translation/interpretation. Consequently, outreach efforts are tailored to those languages.

WSDOT-OEO updated Chapter 28 of the LAG Manual. The annual report changed, plus explanations of the federal requirements on Environmental Justice and serving those with Limited English Proficiency were expanded. The Chapter now includes complaint form and public involvement templates in 15 languages. Our Office will offer two different levels of Title VI training this year. Local Program's page includes the basic Level 1 training now. We recommend all staff with Title VI responsibilities attend the Level 1 training.

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](mailto:TitleVI@WSDOT.WA.GOV).

Sincerely,

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