LANGUAGE ACCESS PLAN

For the Whatcom Council of Governments

Adopted by the WCOG Council Board
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Title VI Notice to Public

The Whatcom Council of Governments (WCOG) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person 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 WCOG receives federal financial assistance.

Any person who believes they have been aggrieved by unlawful discriminatory practice under Title VI has a right to file a formal complaint with WCOG. Any such complaint must be in writing and filed with the WCOG Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from WCOG at no cost and are available on WCOG's website.

Americans with Disabilities Act (ADA) information

This material can be made available in an alternate format by emailing the Whatcom Council of Governments at: wcog@wcog.org or by calling 360-676-6974. Persons who are deaf or hard of hearing may make a request by calling the Washington State Relay at 711.

Notificación de Titulo VI al Público

Por medio de la presente, el WCOG notifica de manera pública que la política del organismo es garantizar el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, el Decreto Ejecutivo 12898 sobre Justicia Ambiental, el Decreto Ejecutivo 13166 sobre el Dominio Limitado del Idioma Inglés, así como los estatutos y reglamentos relacionados en todos los programas y actividades. De acuerdo con lo estipulado en el Título VI, ningún individuo de los Estados Unidos de América deberá, con fundamento en su raza, color o nacionalidad, ser excluido de participar en, que se le nieguen los beneficios de, o ser víctima de discriminación en virtud de cualquier programa o actividad por el cual el WCOG reciba fondos federales.

Toda persona que se considere agraviada por una práctica discriminatoria e ilícita en virtud del Título VI tiene derecho a presentar una denuncia formal ante el WCOG. Cualquier denuncia de este tipo debe presentarse por escrito ante el coordinador del Título VI del WCOG dentro de un plazo de 180 días naturales a partir de la fecha de la presunta discriminación. El WCOG pone a disposición del público los formularios de denuncia del Título VI de manera gratuita en su página web.

Información de la Ley sobre Esta dounidenses con Discapacidades (ADA)

Este material puede ser disponible en formato alternativo enviando un correo electrónico a Whatcom Council of Governments al wcog@wcog.org o llamando al número gratuito 360-676-6974. Las personas sordas o con dificultades auditivas pueden solicitarlo llamando a Washington State Relay al 877-833-6399 TTY/877-833-6398

1. Introduction

The Whatcom Council of Governments (WCOG) is the Metropolitan Planning Organization (MPO) and the Regional Transportation Planning Organization (RTPO) for the Whatcom region of Washington State. As a recipient of federal financial assistance, WCOG is required to comply with Title VI of the Civil Rights Act of 1964, which provides:

> *No person in the United States, on the ground of race, color, or national origin, shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.*

When language services are not readily available to individuals with Limited English Proficiency (LEP), or where an individual with LEP is unaware of the availability of language assistance services, individuals with LEP may be less likely to participate in or benefit from the programs and services that WCOG provides.

This Language Access Plan (LAP) provides guidance and strategies to identify and address the language access needs of LEP individuals and ensure that everyone within our community has access to WCOG's programs, services, and information at no cost.

2. Definitions

The following terms and abbreviations are used in this plan:

ACS	American Community Survey
ADA	Americans with Disabilities Act
DOJ	U.S. Department of Justice
LAP	Language Access Plan
LEP	Limited English Proficiency
MPO	Metropolitan Planning Organization
RTPO	Regional Transportation Planning Organization
Title VI	Title VI of the Civil Rights Act of 1964 – prohibits discrimination on the basis of race, color, or national origin
WCOG	Whatcom Council of Governments
Whatcom County	In this plan "Whatcom County" includes both unincorporated Whatcom County and all local and tribal jurisdictions within

3. Needs assessment

To determine the language assistance needs of Whatcom County communities, WCOG uses a four-factor LEP analysis to determine its language assistance measures. The four factors are:

- The number and proportion of people with LEP served or encountered in the eligible service population.
- The frequency with which people with LEP come in contact with WCOG programs, activities, or services.
- The importance to people with LEP regarding WCOG's programs, activities, and services.
- The resources available to WCOG and the overall cost to provide assistance to people with LEP.

Factor #1: demographics/identification of LEP persons

This step uses estimates from the American Community Survey to establish the proportion and number of people in the Whatcom region who are LEP. In Whatcom County, 12.5% of the population speak a language other than or in addition to English at home. 8,712 people are LEP — 4% of Whatcom's total population.

As shown in **Figure 1,** Spanish is the most common language spoken by LEP individuals, making up 2.1% of the Whatcom region's population.

Figure 1: Estimated number of LEP individuals in Whatcom County [1]

Language	Speakers at Home	# LEP	LEP Percentage
Spanish	13,495	4,581	2.1%
Other	8,209	2,201	1.0%
Indo-European	3,648	959	0.4%
Russian & Other Slavic	2,118	971	0.4%
WHATCOM Population Total	**219,978**		

Total LEP	8,712		4.0%
Total Foreign Language Speakers	27,470		12.5%

Using Whatcom's school district data shown in **Figure 2,** a breakdown of specific languages spoken at home shows that 9.5% of students in Whatcom's school districts speak Spanish at home, 1.4% speak Punjabi, 0.7% speak Russian, and 0.7% speak Ukrainian. Note that the data

[1] *U.S. Census Bureau. "Language Spoken at Home for the Population 5 Years and Over." American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16001, https://data.census.gov/table/ACSDT5Y2024.C16001?q=Whatcom+County+c16001&t=Language+Spoken+at+Home. Accessed on 9 Jun 2026.*

table includes only counts from school districts within Whatcom County (Bellingham, Blaine, Ferndale, Lynden, Meridian, Mt. Baker, Nooksack).

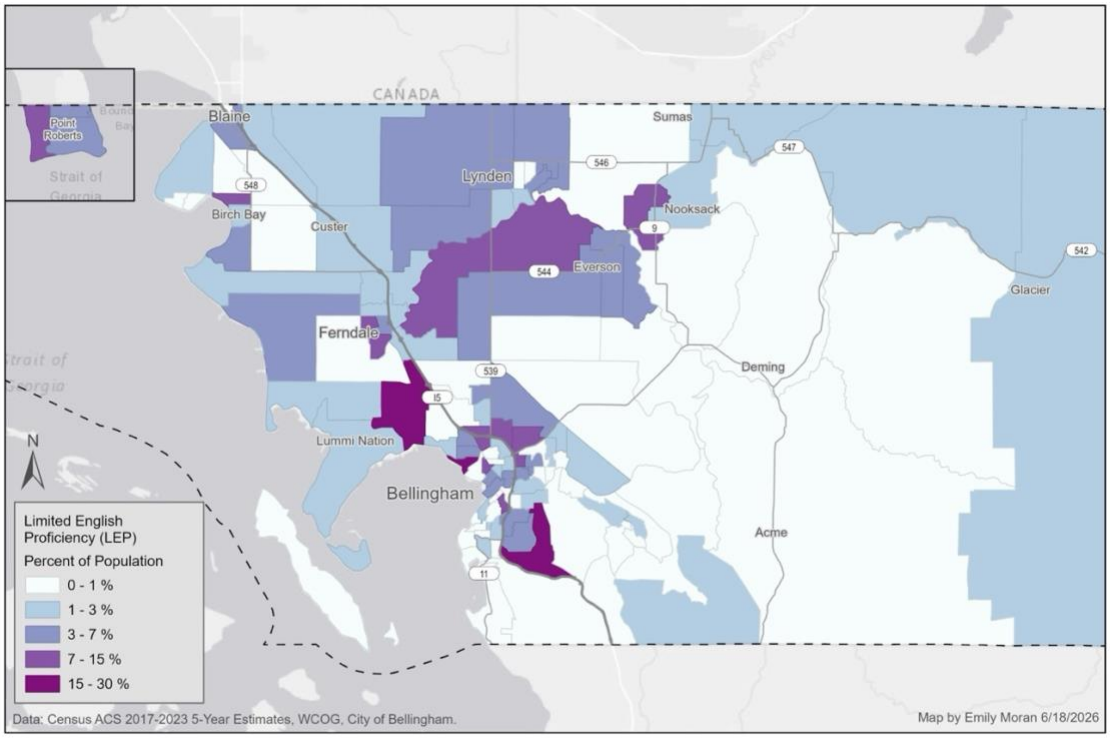
Additional information about languages spoken at home can be found in ***Appendix A: WSDOT Public Transportation Data Viewer Report*** for the Whatcom RTPO.

Figure 2: Languages spoken at home [2]

English	24,863 (85.4%)
Spanish	2,755 (9.5%)
Punjabi	400 (1.4%)
Other	320 (1.1%)
Russian	210 (0.7%)
Ukrainian	208 (0.7%)
Mixteco	137 (0.5%)
Vietnamese	93 (0.3%)
Arabic	41 (0.1%)
Aguacateco	39 (0.1%)
Chinese-Mandarin	32 (0.1%)
Grand Total	29,098 (100.0%)

[2] *WSDOT Public Transportation Data Viewer, https://experience.arcgis.com/experience/2168cab50d3a417a99250d3599a260bf/page/Page?views=Welcome); "Language Spoken at Home for the Population 5 Years and Over." American Community Survey, ACS 5-Year Estimates Detailed Tables, Table C16001 https://data.census.gov/table/ACSDT5Y2024.C16001?q=c16001&g=9700000US5300420*

Figure 3: Percent of LEP population by Census block group in Whatcom County



The map of Whatcom County in **Figure 3** displays the percent of population that are LEP individuals by Census block group.

Safe Harbor provisions

LEP safe harbor provisions are Department of Justice (DOJ) guidelines that protect federally funded organizations from civil rights violations. Organizations satisfy written translation obligations if they translate vital documents for LEP language groups making up 5% or 1,000 people of the eligible population, whichever is less.

Spanish meets the threshold of Safe Harbor provisions with over 4,500 LEP individuals in the Whatcom Region.

Factor #2: frequency of contact

Frequency with which LEP individuals contact WCOG's programs, activities, and services

WCOG infrequently comes into contact with LEP individuals. Because of the nature of WCOG's work as a planning organization, WCOG is most likely to encounter LEP individuals through participation in public meetings and customer service interactions.

WCOG public meetings occur roughly every other month at WCOG's office in downtown Bellingham. Most communication with the general public typically occurs via email, by phone, or in person. Most customer service interactions are with Whatcom Smart Trips program participants and are conducted in person at the WCOG office.

Materials have been provided in Spanish, Russian, and Ukrainian for outreach in school districts around the county, and Spanish language surveys and signage were provided for outreach as part of the Human Services Transportation Plan update. Digital surveys were also available in multiple languages. There has been minimal uptake of the translated materials.

Almost 100% of WCOG staff interaction has been with individuals who spoke English well. WCOG has not received any request for translation or interpretation services as of this year.

Factor #3: importance of services provided

The importance of WCOG programs, activities, and services to people with LEP

As the metropolitan and regional transportation planning agency, WCOG's interactions with the public are different than those of jurisdictions that own, operate, and maintain transportation networks in Whatcom. People in the region may be affected by regional transportation projects that the WCOG worked to advance through its planning and programming responsibilities.

Individuals may be impacted by the following WCOG's plans:

- The Regional/Metropolitan Transportation Plan
- Unified Planning Work Program
- Human Services Transportation Plan
- Safety Action Plan
- Public Participation Plan
- Title VI Plan
- Language Access Plan

All these planning efforts depend on meaningful public participation and input. Efforts to include LEP individuals in these discussions help ensure investment priorities reflect the whole community.

Factor #4: resources available and overall cost

Resources available to WCOG and overall cost to provide assistance to people with LEP

WCOG is a relatively small MPO and RTPO and as such has limited resources to provide language assistance. Employees at WCOG speak English and a small amount of basic Spanish.

WCOG is committed to providing any translation service within reason. To determine what is feasible, WCOG will monitor translation costs and services on an annual basis.

Definition of vital documents

Vital documents are defined by the Federal government (prior to the removal of its LEP website) as follows: "A document will be considered vital if it contains information that is critical for obtaining Federal services and/or benefits or is required by law."

Non-vital information includes documents that are not critical to access such benefits and services.

Based on the list of vital documents included in WA State Department of Transportation's (WSDOT) LEP Accessibility Plan[3], relevant vital documents from WCOG may include:

- Applications
- Notices regarding the availability of free language access services for LEP individuals
- Outreach or informational material the lack of which may effectively deny a LEP individual meaningful access to WCOG's programs, services, or activities
- Forms, notices, or written material related to an individual's rights, requirements, or responsibilities regarding WCOG services, such as filing a discrimination complaint against WCOG.

Conclusion

Over 4,500 LEP individuals in Whatcom speak Spanish; and 4% of the population are LEP with a range of other first languages including Russian, Ukrainian, Punjabi, and Vietnamese. WCOG's planning and programming efforts may impact anyone in Whatcom County. That said, WCOG has had limited to no interaction with LEP individuals in the past few years.

Based on these factors, WCOG will provide vital documents in Spanish by default and offer translated versions of materials and translated services in any language upon request.

5. Language assistance measures

Interpretation

WCOG uses LanguageLine to provide telephone interpretation services in over 240 languages. Guidance on how to use this service is provided to WCOG staff and updated annually.

Translation

WCOG has all vital documents translated into Spanish and makes versions of other documents available on the website www.wcog.org. All content on WCOG's website is accessible in several languages.

WCOG will translate any document upon request. WCOG currently has language translation services for Spanish and Russian; methods of translating documents in other languages will be determined as needed.

Notice of translation services is printed on all WCOG Board agendas and summaries.

Notification of rights

All notifications of individual rights are posted in English and Spanish. For WCOG this specifically refers to our Title VI Notice to the Public and Americans with Disabilities Act (ADA) information.

[3] *WA State Department of Transportation. "Limited English Proficiency Accessibility Plan, https://wsdot.wa.gov/sites/default/files/2025-02/WSDOT-Limited-English-Proficiency-LEP-Accessibility-Plan-2024.pdf Accessed on 11 Jun 2026.*

All WCOG's policies are available on our website in English and Spanish. The web tool will provide translations in other languages, or they can be translated by a service upon request.

6. Staff training

Every year at WCOG's annual staff compliance meeting, WCOG's Title VI Coordinator provides training on Title VI requirements and procedures. This includes instruction on current LEP procedures.

7. Outreach/notification techniques

WCOG's interaction with the public is primarily engagement efforts related to development of regional transportation plans, public notification of board meetings and public hearings, collecting feedback on documents, voluntary participation in large scale travel surveys, and participation in incentive and encouragement programs conducted by the Smart Trips travel demand management program

Online translation features provide access to all WCOG's digital content in over a dozen languages. Printed materials that are distributed at events or through programs are available in Spanish and other languages upon request.

WCOG regularly updates its mailing lists to include community groups and organizations representing historically underserved communities, who may include LEP persons.

8. Monitoring and updating the LEP Plan

WCOG's annual Title VI Report updates its LEP and demographic data every year (although ACS survey data estimates may not change every year). This data review provides an opportunity to monitor LEP trends in the region for purposes of updating this plan as needed.

WCOG staff record all translation requests and translation documents produced and report this information to the Title VI Coordinator. WCOG will use this data to annually determine if additional automatically translated resources would be beneficial to LEP individuals. Staff also summarizes public interactions with LEP individuals to help inform the scope of effort to best meet stated accessibility goals.