



Title VI Plan

FY 2010-2011
Annual Report

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INTRODUCTION

As a recipient of state and federal funds, the Central Lane MPO is subject to the provisions of Title VI, including environmental justice.

Title VI of the Civil Rights Act of 1964 and other federal nondiscrimination statutes prohibit discrimination based on race, color, national origin, disability, age, gender, or income status in the provisions of benefits and services of programs and activities receiving federal funding. The regulations require:

- A pro-active approach to eliminating discrimination;
- The execution of Title VI Assurances as a condition of federal money;
- An identified Title VI liaison within the agency; and
- A complaint procedure accessible to all parties involved in a project.

Environmental Justice is the fair treatment and meaningful involvement of all people—regardless of race, ethnicity, income or education level—in environmental decision making, including for transportation issues. Further, environmental justice ensures that no population is forced to shoulder a disproportionate burden of the negative human health and environmental impacts of pollution or other environmental hazards.

In June, 2009, the Central Lane MPO adopted a [Title VI Plan](#). The Title VI Plan contains the following:

- A Nondiscrimination Policy Statement;
- Designation of a Civil Rights liaison;
- A written process for filing a Title VI complaint against the MPO;
- Data collection that identifies residential, employment, and transportation patterns of low-income and minority populations so that their needs can be identified and addressed, and the benefits and burdens of transportation investments can be fairly distributed;
- Title VI Standard Language for contracts to communicate the MPOs expectations about Title VI commitments to local agency partners; and
- A list of relevant authorities. The plan has been submitted to and approved by ODOT.

This document provides an overview of activities conducted over the last year (July, 2010 through June, 2011) to implement the Title VI Plan. The annual report provides an opportunity to evaluate and identify opportunities to improve implementation of the Title VI Plan, addressing public participation, planning, contracts, and training activities. This report largely follows the report template provided by ODOT for MPO planning managers to use for reporting on Title VI activities that occurred over the past year. The Citizen Advisory Committee has been consulted in development of the Annual Report. A copy of the annual report will be submitted to the ODOT Title VI Program Manager to be included in the ODOT region Title VI reports, and the subsequent state report for Federal Highway Administration (FHWA) and Federal Transit Administration (FTA).

Section I STATUS OVERVIEW OF THE TITLE VI PLAN

In July, the Oregon Department of Transportation Office of Civil Rights Title VI Program (OCR) performed a Title VI review of the MPO. The OCR review team consisted of ODOT's Office of Civil Rights Title VI Program Manager, Greg Azure, as well as Jerrica Pierson Seeger from JPSeeger Consultants. The review team collected and analyzed numerous documents, materials, and project files, website materials and performed an on-site review. This is one of the first of two reviews conducted statewide by OCR. In November, staff received the results of this review.

Overall, the final report was very complimentary of the MPOs Title VI program. The MPO earned a finding of 'No Deficiency' and, in several instances our program was found to be exceeding OCR expectations.

There were two areas noted as needing improvement, and several lesser suggestions and recommendations. The two key areas needing improvement addressed the accessibility of complaint forms and processes on the MPO website and need to develop a basic procedure for conducting periodic reviews of MPO subrecipients (e.g. the cities of Eugene, Springfield and Coburg, as well as Lane County and LTD) for Title VI compliance.

For the purposes of their review, OCR organized the MPO operations into four basic elements: 1) organization and staffing; 2) program plans 3) program implementation (policies and procedures); and 4) data collection and analysis. The following provides a brief overview of the findings in each of these sections:

Organization and Staffing

OCR found that the MPO's organizational structural meets federal requirements. A minor recommendation was included to clarify LCOG's Organizational Chart where it houses the Title VI program and identify the relationship with the Executive Director.

Program Plans

OCR found that the MPO's plans for Title VI, ADA, EJ, and LEP programs were in a mature state.

Program Implementation

OCR found that the MPO has policies and procedures that adequately address prompt public involvement strategies, environmental justice considerations, ADA accommodations, and complaint mechanisms. OCR also recognized the MPOs efforts to improve public participation strategies and tools in order to increase participation by minorities and other traditionally underrepresented groups.

One of the major noted areas for improvement concerned the need to improve the accessibility of the Title VI complaint form and process. OCR recommended that the MPO redesign the website so that a search could easily locate the complaint form and process. In

addition, OCR recommended that the MPO add a separate ADA complaint form and process and provide an independent link on the website.

As a minor recommendation, OCR also recommended that the MPO continue to work with its committees and boards to improve community involvement in policy development.

Finally, OCR had some suggestions to improve our response to individuals with limited English proficiency, including the development on a guide on how to assist limited English proficient individuals in person or on a telephone call. The guidelines would be made available to all employees who have public contact. OCR noted the use of call triage services that direct the caller to the option of leaving a message of accessing information via a Spanish language selection, as well as the use of “I speak cards” to be placed near the public office counter to allow persons with limited English proficiency to identify the language needed for interpreting.

Data Collection and Analysis

OCR found that the MPO has an effective means to collect and analyze data on public involvement strategies and tools, ADA accommodations, LEP requests and resulting actions, internal Equal Employment Opportunity statistics and board and committee compositions.

There were not major areas noted for improvement under this element. As a minor recommendation, OCR recommended that the MPO continue its effort to collect data and ensure the accuracy of the data. As an example, OCR suggest that a staff member is assigned to greet people as they enter public outreach activities and stress the importance and purpose of the comment/feedback form, that it is voluntary, and strongly encourage the attendees to fill out the form.

OCR also recommended that the MPO continue to develop mechanisms to monitor and analyze data collected to determine the benefits and burdens on local communities impacted by transportation projects. OCR provided links to some suggested tools for the MPO to investigate in order to assist our ongoing efforts to evaluate our plans for environmental justice considerations. These tools included an impact review tool designed for King County (<http://www.kingcounty.gov/exec/%7e/media/exec/equity/documents/KingCountyEIRT0010.ashx>) as well as a health impact assessment tool (<http://who.int/hia/about/why/en/index.html>).

In summary the following recommended action items and suggested ideas that were included in the Audit results:

- Improve the Title VI complaint form accessibility on the MPO website.
 - Adopt an ADA complaint form.
 - Develop a basic procedure for conducting periodic reviews of MPO subrecipients (e.g. the cities of Eugene, Springfield and Coburg, as well as Lane County and LTD) for Title VI and ADA compliance.
 - Modify LCOG’s organization chart to show where the Title VI program is housed and the relationship with the Executive Director.
 - Develop desk procedures for the Title VI program on how to complete all tasks associated with the annual report and data collection.
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- Provide Title VI training to all MPO staff and refresher training annually. Provide Title VI training to all new employees within 90 days of hire. Develop internal Title VI Training Module.
- Develop emergency evacuation plan or training on existing plans to ensure sweepers are knowledgeable about aiding special needs persons.
- Develop a sign-in sheet for guests that requests information on any special needs in case of an emergency.
- Work with ODOT ADA to fill the review/monitor gap between planning activities and project development phases.
- Develop visual aid to show how different boards interact and add value one another and the decision-making process.
- Assign staff members to greet people as they enter public outreach activities and stress the importance of the comment/feedback form.
- Document how the MPO collects statistical data, and include this in procedural forms to ensure that the data is collected.
- Develop an LEP Guide on how to assist limited English proficient individuals in person or on a telephone call. Distribute to all employees who have public contact.
- Place posters or display holders near the front counter to allow persons with limited English to identify the language needed for interpreting.
- Explore including ADA language in sub-recipient contracts and guiding documents.
- Develop a self-check procedure for environmental justice consideration to be applied to all plans in the early stages of development.

The MPO has taken action to implement some of these recommendations and suggested ideas, and is working towards completing others, as outlined in Section II.

Section II TITLE VI PROGRESS REPORT

I. Title VI Plan

In June, 2009, the Central Lane MPO adopted a Title VI Plan. There have been no changes to the plan since adoption.

2. Organization, Staffing, Structure

The Executive Director of LCOG is responsible for ensuring the implementation of LCOG overall Title VI program. The Executive Director is as follows:

Lane Council of Governments
 Executive Director
 George Kloeppel
 (541) 682-4395

In addition, the Central Lane MPO, as a special program area within LCOG, shall have a designated Title VI Coordinator who is responsible for ensuring compliance, program monitoring, reporting, and education on Title VI issues within the MPO. The Title VI Coordinator for the Central Lane MPO is the Program Manager for LCOG Transportation Program and the Central Lane MPO, as follows:

Central Lane Metropolitan Planning Organization
 Program Manager
 Andrea Riner
 (541) 682-6512
 ariner@lcog.org

Appendix A contains an organizational chart that identifies where the Title VI responsibilities are managed within the organization and the connection to the Executive Director of LCOG.

The following is a staffing composition listing by position, race, and gender.

Job Title	Race	Gender
Program Manager	Caucasian	Female
Senior Planner	Caucasian	Male
Senior Planner	Caucasian	Female
Senior Planner	Caucasian	Female

Senior Planner	Caucasian	Male
Associate Planner	Caucasian	Female
GIS Assistant	Caucasian	Female
Assistant Planner	Caucasian	Female
Assistant Planner	Caucasian	Male

The decision making body for the Central Lane MPO is the Metropolitan Policy Committee (MPC), which was previously created by Eugene, Springfield, and Lane County to cooperate on issues of metro-wide importance. The MPO role was delegated to the MPC by the LCOG Board of Directors. The members of the Metropolitan Policy Committee in their role as the MPO are elected and appointed officials from Springfield, Eugene, Lane County, Coburg, Lane Transit District, and the Oregon Department of Transportation.

AGENCY	Voting Member 1	Voting Member 2	Ex Officio	TOTALS
Eugene	Mayor Kitty Piercy	Alan Zelenka	Jon Ruiz	
Springfield	Christine Lundberg	Hilary Wylie	Gino Grimaldi	
Lane County	Sid Leiken	Jay Bozievich	Liane Richardson	
LTD	Mike Eyster	Greg Evans	Mark Pangborn	
Coburg	John Thiel	N/A	Don Schuessler	
ODOT	Sonny Chickering	N/A	Savannah Crawford	
Minority	-	1	-	1
Women	2	1	1	4
Men	4	2	5	11
TOTAL	6	4	6	16

The Transportation Planning Committee (TPC) contains staff-level participation from the various local governments within the Central Lane MPO area, primarily transportation planners and engineers. The TPC conducts, under the direction of the LCOG Board and the MPC, the technical portions of the Central Lane Metropolitan Planning Organization transportation system planning. The TPC makes recommendations to the MPC. Each jurisdiction with membership on the TPC appoints its representatives. The TPC may appoint subcommittees as needed.

AGENCY	Member I	TOTALS
Director of Public Works – Lane County	Marsha Miller	
Director of Public Works - City of Eugene	Kurt Corey	
Director of Public Works - Springfield	Susie Smith	
Director of Planning – Lane County	Kent Howe	
Interim Planning Director - Eugene	Sarah Medary	
Planning Manager - Springfield	Greg Mott	
Director of Planning & Development - LTD	Tom Schwetz	
Development Services Department - LTD	Vacant	
Point2Point Program Manager	Theresa Brand	
Transportation Planning Manager – Lane County	Celia Barry	
Transportation Planning Manager - Eugene	Rob Inerfeld	
Transportation Manager- Springfield	Tom Boyatt	
City of Coburg	Petra Schuetz	
Lane Regional Air Pollution Authority	Ralph Johnston	
Region 2 Transportation Representative - ODOT	Sonny Chickering	
Manager – Eugene Airport	Tim Doll	
MPO's Citizens' Advisory Committee (CAC) chair	Dave Jacobson	
Federal Highway Administration Division Planning Engineer	Satvinder Sandhu	
Lane Council of Governments' Transportation and Public Infrastructure Program Manager (or designee)	Paul Thompson	
Minority	1	
Women	6	
Men	12	
TOTAL	18	

The Central Lane MPO has also formed a Citizen Advisory Committee (CAC) to involve the public in transportation planning and to inform decision making in the MPO area. The CAC advises the Metropolitan Policy Committee about regional transportation planning issues including how to involve the public, as well as recommendations on key products of the Central

Lane MPO, such as the Regional Transportation Plan and the Metropolitan Transportation Improvement Program. The CAC includes local citizens committed to representing a broad spectrum of geographical, social and economic interests. Members are appointed by the MPC, which has committed to making efforts to seek out and include those that may be traditionally underserved by existing transportation systems.

Member	TOTALS
Paul Adkins	
Diana Alldredge	
Rosalia Marquez	
Dick Beers	
Wendy Butler-Boyesen	
Philip Farrington	
Gary Gillespie	
Jennifer Smith	
Dave Jacobson	
Alexandre Lockfeld	
Bill Morganti	
Eleanor Mulder	
Sarah Strand	
Edward Winter	
Phillip Carroll	
Sonny Chickering (non-voting member and liaison to MPC)	
Minority	1
Women	6
Men	10
TOTAL	16

3. Complaints

The Central Lane MPO has not received any Title VI complaints during the reporting period for this annual report. The MPO has updated its website to improve the Title VI complaint form accessibility on the MPO website and to adopt an ADA complaint form per the recommendations of the Audit.

4. Planning

A. Monitoring and Review Process:

During the past year, the MPO has initiated or completed a number of transportation planning activities. The following briefly describes the public participation outreach for these activities:

MPO Planning Activity	Description	Public Involvement Tools	Public Involvement Metrics
MTIP adoption	FFY10-13 MTIP	<ul style="list-style-type: none"> ▪ 30-day Public Comment Period ▪ MPC Public Hearing ▪ Open House ▪ Notice to Interested Parties ▪ Web Notice ▪ Display ads 	<p>During public hearing, two members of the public testified.</p> <p>No written public comments received.</p> <p>Open House was attended by six CAC members and eight other members of the community.</p> <p>During public comment period, 305 pageviews to CLMPO website</p>
Regional Transportation Plan Amendment	Regional Transportation Plan amendment to add Eugene Franklin Multi-way Blvd.	<ul style="list-style-type: none"> ▪ 30-day Public Comment Period ▪ MPC Public Hearing ▪ Notice to Interested Parties ▪ Web Notice 	<p>No public comments were received.</p> <p>During public comment period, 316 pageviews to CLMPO website</p>
Public Participation Plan	Minor amendments to the PPP	<ul style="list-style-type: none"> ▪ 45-day Public Comment Period ▪ Notice to Interested Parties ▪ Web Notice ▪ CAC Review and Recommendation 	<p>No public comments were received.</p> <p>During public comment period, 434 pageviews to CLMPO website</p>
Air Quality Conformity Determination	Air Quality Conformity Determination from MTIP and RTP	<ul style="list-style-type: none"> ▪ 30-day Public Comment Period ▪ MPC Public Hearing ▪ Notice to Interested Parties ▪ Web Notice ▪ CAC Review 	<p>No comments were received.</p> <p>During public comment period, 268 pageviews to CLMPO website</p>

MPO Planning Activity	Description	Public Involvement Tools	Public Involvement Metrics
		and Recommendation	
Surface Transportation Program - Urban (STP-U) Funding	STP-U Funding request for Regional Transportation Options Plan	<ul style="list-style-type: none"> ▪ 30-day Public Comment Period ▪ MPC Public Hearing ▪ Notice to Interested Parties ▪ Web Notice 	Two written public comments received during the public comment period During public comment period, 314 pageviews to CLMPO website
West Eugene EmX Locally Preferred Alternative	Selection of Locally Preferred Alternative for West Eugene EmX	<ul style="list-style-type: none"> ▪ 30-day Public Comment Period ▪ Open House (Joint Open House with City of Eugene City Council and LTD Board) ▪ MPC Public Hearing (Joint Hearing with City of Eugene City Council and LTD Board) ▪ MPC Public Hearing ▪ CAC Review and Recommendation ▪ Significant additional public meetings conducted by LTD ▪ Press release ▪ Newspaper Display Ad 	Significant oral and written public testimony was submitted.

MPO Planning Activity	Description	Public Involvement Tools	Public Involvement Metrics
		<ul style="list-style-type: none"> ▪ Notice to Interested Parties ▪ Web Notice 	
Regional Transportation System Plan	Interactive web-map and survey as well as notices for transportation planning meetings occurring within the region	<ul style="list-style-type: none"> ▪ Web Notice 	4,802 visits between January 1, 2011 and May 3, 2011 221 comments collected on problems or needs in the transportation system and 53 comments collected on things that work well in the existing transportation system (through March 19, 2011)
Unified Planning Work Program	FY2012-2013 UPWP	<ul style="list-style-type: none"> ▪ 30-day Public Comment Period ▪ MPC Public Hearing ▪ Notice to Interested Parties ▪ Web Notice ▪ CAC Review 	No public comments.
Surface Transportation Program - Urban (STP-U) Funding	STP-U Funding request for Springfield's Thurston Road Overlay Project	<ul style="list-style-type: none"> ▪ 7-day Public Comment Period ▪ MPC Public Hearing ▪ Notice to Interested Parties ▪ Web Notice 	No public comments received.
Surface Transportation Program - Urban (STP-U) Funding	STP-U Funding request for Hyacinth Street Sidewalk Installation	<ul style="list-style-type: none"> ▪ 30-day Public Comment Period ▪ MPC Public Hearing ▪ Notice to Interested Parties 	Two written public comments received.

MPO Planning Activity	Description	Public Involvement Tools	Public Involvement Metrics
		<ul style="list-style-type: none"> ▪ Web Notice 	
USDOT Certification Review	Public Meeting to discuss Planning	<ul style="list-style-type: none"> ▪ 38-day Public Comment Period ▪ Listening Session ▪ Web-Notice ▪ Notice to Interested Parties ▪ Newspaper Display Ad ▪ Press Release 	Public comments are submitted directly to US FHWA and FTA representatives. At the time of the drafting of this report, the listening session had not occurred.

In addition to these planning activities, the Central Lane MPO has participated in statewide committees addressing Greenhouse Gas and Climate Change legislation. The Central Lane MPO created a webpage on its website to update members of the public on activities on these statewide committees.

It should be noted that staff conducted an Environmental Justice analysis of the current RTP at the time of adoption. This analysis will be updated prior to the adoption of the RTP Update in November, 2011. As part of conducting this analysis, the MPO will be developing a framework to use for environmental justice consideration to be applied to plans in the early stages of development, consistent with recommendations from the Audit.

B. Studies and Plans

As part of the development of the local Transportation System Plans and Regional Transportation System Plan, the region established a new collaborative website that provided members of the public with a one-stop place to go to obtain information on long-range transportation planning activities. This website also featured an on-line survey and on-line interactive map where members of the public could provide comments on specific concerns and benefits of the transportation system. The survey, which was started by 781 individuals, with approximately 82% completing the survey, collected demographic information, including gender, age, persons per household, ethnicity and/or race, and access to a private vehicle. The on-line interactive map allowed participants to submit comments by their use of different modes of travel and also allowed participants to note if they were a disabled transportation user.

The MPO has also received recently released data from the 2005-2009 American Community Survey that will be used in the update of its demographic profile that will be used in the Environmental Coordination information prepared for the RTP Update. As Census 2010 data is released, the MPO will use this data to update information, as needed.

In addition, the MPO did participate in a statewide effort to administer the Oregon Household Activity Survey to collect detailed information on the travel behavior of households within the MPO area. Data collected included trip locations, purposes, times, travel durations, vehicle characteristics, and other travel-related information. The final report from this study has not been released, but is anticipated to provide valuable information to use in identifying residential, employment, and transportation patterns of low-income and minority populations so that their needs can be identified and addressed, and the benefits and burdens of transportation investments can be fairly distributed.

C. Draft TIPs

The Central Lane MPO Metropolitan Transportation Improvement Program (MTIP) for federal fiscal years 2010-2013 was adopted in August 2010.

The MTIP is a listing of transportation improvements scheduled in the Central Lane Metropolitan Planning Organization (MPO) area during fiscal years 2010-2013. The MTIP lists projects for which application of specific federal funds will be made over the four years. Priorities for the use of specific federal funds are established during development of the MTIP. In addition, the MTIP contains a four-year listing of anticipated expenditures for locally funded projects drawn from the capital improvement programs of Eugene, Springfield, Coburg, Lane County, Lane Transit District, and the Oregon Department of Transportation (ODOT). MTIP projects are determined by the transportation needs identified in the area's long-range transportation plan, the MPO's Regional Transportation Plan (RTP).

The Central Lane MTIP is developed by the Transportation Planning Committee (TPC), which is responsible for most of the technical details of the transportation planning process. The TPC recommends the MTIP to the Metropolitan Policy Committee (MPC) for review and adoption. MPC, which is composed of elected or appointed officials from Eugene, Springfield, Coburg, Lane County, Lane Transit District, and ODOT, conducts a public hearing and adopts the MTIP on behalf of LCOG and the MPO. The MPC also determines that the MTIP complies with the federal requirements of the Clean Air Act Amendments of 1990.

A public participation outreach plan was developed for the MTIP. The overall goal of outreach was to gather input, inform the public, and build community contacts and interest. As part of the general outreach strategy, the MPO conducted the following activities:

- Conducted an Open House
- Conducted a public hearing at the MPC meeting; and
- Provided a 30-day public comment.

These events were noticed to the public in a variety of ways, including a newspaper display ad, distribution to the MPOs mailing list, and a web notice.

In order to enhance broad citizen participation in the public process, the MPO also sent notice to its Environmental Justice contact list, which includes participants from the Community Focus

Group, as well as provided a notice in a local Latino newspaper, and provided outreach materials in Spanish.

During this process, the Citizen Advisory Committee provided recommendations for providing Lane Transit District with additional STP-U funding as part of the FFY10-13 MTIP in order to preserve existing transit routes that provide a vital transportation option for those with low-income and disabilities. This funding recommendation was later approved by the MPC.

D. Other Public Hearings

Beyond the public meetings noted above, no additional public hearings were held by the MPO during the reporting period.

E. Upcoming Year

The MPO plans to continue to collect statistical data (e.g. race, color, gender, age, disability, and language proficiency) for use in planning and monitoring.

In addition, during the upcoming year, the MPO has planned a number of different tasks to assist in the consideration of Title VI issues as part of our planning process, as follows:

- As part of the update process for the RTP, the MPO will be conducting the outreach strategies outlined in the Public Participation Plan, which includes an Open House, public comment period, Public Hearing, and notice via newspaper display ads, interior bus posters, notice to interested parties list, and website. The Citizen Advisory Committee has recommended some additional outreach strategies beyond those identified in the Public Participation Plan. The goal of these additional strategies is to respond to the Community Involvement Focus Group's¹ recommendations to have both high-tech and low-tech approaches. In addition, the strategies have been designed to respond to CAC's desires to broaden the outreach strategies. The strategies include a speaker's bureau as well as an on-line questionnaire. As part of the speaker's bureau, the MPO will be outreaching with different organizations, including representing different ethnic minorities, to host staff or members of the Citizen Advisory Committee to provide information and receive input. The speaker's bureau will provide an opportunity for the MPO staff and Citizen Advisory members to dialogue with host organizations about long-range transportation planning issues. MPO staff has continued to use the contacts from the Community Involvement Focus Group in order to organize these meetings.
- In order to provide appropriate notice of these public engagement opportunities, MPO staff also plans to update its e-mail distribution list, with assistance from representatives of the Community Involvement Focus Group, if possible.

¹ The Community Involvement Focus Group was convened in 2009 and contains representatives from traditionally underrepresented communities within the MPO, including low-income, disabled, minority, student, and business interests.

- Over the next year, the Central Lane MPO region is going to continue its work assisting the region’s jurisdictions complete transportation plans, including the following:
 - City of Springfield Transportation System Plan;
 - City of Eugene Transportation System Plan;
 - City of Coburg Transportation System Plan;
 - Regional Transportation Options Plan;
 - LTD Long Range Transit Plan; and
 - Regional Transportation Plan.

The MPO will be assisting to provide regional coordination of these public involvement processes. It is anticipated that public involvement for each of these plans will use a range of strategies, including stakeholder interviews, advisory committees, websites, on-line surveys, public workshops, and presentations to policy boards and councils.

- Finally, the region has received a HUD Sustainable Community Planning Grant. As part of the work under this grant, which will be occurring over the next several years, there will be several tasks that will be completed to assist the region in considering Title VI issues, as follows:
 - Professor Gerardo Sandoval at the University of Oregon will be conducting a participatory research program aimed at bringing Latino community views and perspectives into a participatory regional civic engagement process by recruiting a core group of Latino leaders to participate in regional planning efforts, providing recommendations for Consortium members to increase interaction with members of the Latino community, and identify social and economic indicators important to the Latino community.
 - Under HB 2001, the Central Lane MPO is required to develop two or more land use and transportation scenarios that accommodate growth while achieving a reduction in greenhouse gas emissions from light vehicles. In preparation for this scenario planning work, the grant will assess the potential impacts on Title VI populations relative to various GHG reduction strategies.
 - Also funded under the grant is the development of an Equity Atlas. This Atlas is intended to provide visual representation of communities of concern and their access opportunities to affordable housing, jobs, transit, schools, parks, shopping, and other community resources and amenities. This work will provide a better foundation for the region to consider how to distribute the burdens and benefits of policy and infrastructure choices.

5. Consultant Contracts (If applicable)

A. Monitoring and Review Process

Under the existing Intergovernmental Agreement with ODOT, the Central Lane MPO must obtain written approval from ODOT for any subcontracts for any work scheduled. Central Lane MPO use of subcontractors is limited and Central Lane MPO does not have existing

commitments for participation of Disadvantaged Business Enterprises (DBEs) in its contractual requirements.

The Central Lane MPO sought and has received permission to subcontract these services from ODOT as needed.

Because of the nature of the contracts that the Central Lane MPO pursues, which include technical studies and modeling efforts, it is typical for the MPO to use a sole source contracting process.

The MPO obtains approval from ODOT to contract with these vendors, and selects the consultants based on their expertise. This is similar to the process that ODOT uses to select sole source contracts with their approved vendor list.

B. Consultant Contracts

The Central Lane MPO executes intergovernmental agreements with MPO partners in association with distribution of Federal Surface Transportation Program-Urban (STP-U) funds for performance of specific projects or activities. As part of this process, the Central Lane MPO has completed Intergovernmental Agreements with the cities of Eugene and Springfield, as well as Lane County and Lane Transit District. These agreements all contain a non-discrimination clause.

Over this year, the Central Lane MPO entered into contracts with consultants funded through ODOT or ODOT Public Transit funding, as follows:

Consultant Name	Dollar Value of Contract	Disadvantaged Business Enterprises (DBEs)
Good Company	\$7,500	Yes, Certification 3644
John Parker Consulting (JPC)	\$13,800	No, but is certified as an Emerging Small Business (Certification Number 5251)
Urban Analytics	\$20,000	Yes, Certification Number W2F6016639 in Washington State
Lockwood Research	\$1,846.30	No

These contracts all represent sole source for small amounts that are below the agency's level to triggers an RFQ or RFP process.

The Central Lane MPO sought and has received permission to subcontract these services from ODOT as needed.

Agreements with consultants contain a non-discrimination clause, as follows: **NON DISCRIMINATION** [Name of firm], with regard to the work performed under this Agreement, shall not discriminate on the basis of race, color, national origin, Limited English Proficiency, gender, income, age, or disability. [Name of firm] shall not participate either directly or indirectly in the discrimination prohibited by Federal statutes, regulations, executive

orders, and Federal requirements. [Name of Firm] shall comply with regulations relative to nondiscrimination and environmental justice including those described in Title VI of the Civil Rights.

C. Upcoming Year

The MPO plans to continue to monitor and report on consultant contracts with respect to DBE issues. Central Lane MPO is committed to following DBE contracting goals if they are to be established in the future.

6. Education & Training

A. Monitoring and Review Process

As noted previously, the MPO's Title VI program was reviewed by ODOT during the previous year. The MPO earned a finding of 'No Deficiency' and, in several instances our program was found to be exceeding OCR expectations. There were two areas noted as needing improvement, and several lesser suggestions and recommendations. The MPO is working to implement these recommendations and suggestions.

An annual Title VI report was prepared at the end of last year. Several goals for this year were established under this report, including:

- Continue efforts to broaden the MPO's public outreach strategies to reach a broader cross-section of the community.
- Follow DBE contracting goals if they are to be established in the future; and
- Continue to seek Title VI training opportunities in the coming year.

The MPO has made progress on the outreach strategies, with the MPO initiating new outreach strategies as part of the RTP update. The MPO continues to work on DBE and training opportunities.

B. Complaints

There have been no civil rights complaints filed with the state concerning training and educational opportunities by the Central Lane MPO.

C. NHI Training

Staff has attended a number of different training opportunities throughout the year, though none specifically offered by the National Highway Institute.

D. Title VI Training

Staff has participated in the following Title VI training opportunities over the last year:

- FTA Office of Civil Rights webinar on the principles and DOT Regulations of Title VI of the Civil Rights Act of 1964 (March 15, 2011). This training was attended by Stacy Clauson, Assistant Planner.

E. Upcoming Year:

The MPO plans to continue to monitor Title VI progress, implementation, and compliance issues. The MPO will seek Title VI training opportunities in the coming year. In addition, as recommended in the Audit, the MPO will be seeking opportunities to provide training to new staff, and in the process will develop training modules. MPO staff will also work other LCOG staff that may interact with the public on a regular basis to provide resources for assisting Limited English Proficient customers.

*LCOG: T:\MPO\Committees\MPC\FY11\June 11\MPC5.e -Attachment2-TitleVI_AnnualReview.doc
Last Saved: Friday, June 03, 2011*

Exhibit A