



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation
Office of Civil Rights
355 Capitol St NE , Room 504
Salem, OR 97301-3871
Telephone (503) 986-4350
FAX (503) 986-6382

December 3, 2009

File Code:

George Kloeppe
Executive Director
Lane Council of Governments
859 Willamette Street, Suite 500
Eugene, Oregon 97401-2910

Dear Mr. Kloeppe,

First, I want to officially inform you that Central Lane Metropolitan Planning Organization Title VI Plan has been reviewed and approved by the Oregon Department of Transportation (ODOT).

Secondly, I want to acknowledge the Central Lane Metropolitan Planning Organization for the considerable commitment and investment of resources that were made to produce and obtain the organizational approvals of your Title VI Plan.

The Plan that you have developed and are operating under is a quality plan. It was a pleasure working with your staff during its development. I detected sincerity in this process that really shows that your organization embraces the spirit and intent of what is needed under the provisions Title VI of the Civil Rights Act of 1964. I look forward to working with your organization in the future and please let me know if I can assist you in anyway.

Again, congratulations on reaching this milestone!

Best Regards,

Greg Azure,
Title VI Program Manager
Office of Civil Rights
Oregon Department of Transportation

Cc: Andrea Riner, CLMPO
Stacy Clauson, CLMPO

RESOLUTION 2009-07

**ADOPTING THE CENTRAL LANE METROPOLITAN PLANNING ORGANIZATION
TITLE VI PLAN**

WHEREAS, the Lane Council of Governments Board has been designated by the State of Oregon as the official Metropolitan Planning Organization (MPO) for the Central Lane region; and

WHEREAS, the LCOG Board has delegated responsibility for MPO policy functions to the Metropolitan Policy Committee (MPC), a committee of officials from Eugene, Springfield, Coburg, Lane County, Lane Transit District, and ODOT; and

WHEREAS, the purpose of Title VI of the United States Civil Rights Act of 1964 and subsequent legislation, regulations, statutes and orders is to prohibit programs that receive Federal funds from discriminating against participants on the basis of race, color, national origin, disability, age, gender, or income status;

WHEREAS, the intent of these authorities is to insure that all persons regardless of their race, color, national origin, disability, age, gender, or income status are allowed to participate in Federally funded programs;

WHEREAS, the development of a written Non-Discrimination Agreement that expresses the agency's commitment to ensure non-discrimination based on race, color, national origin, disability, age, gender, or income status within any of its activities, programs or projects is a requirement of federal nondiscrimination statutes, regulations and orders; and

WHEREAS, the Central Lane Metropolitan Planning Organization has developed a written Non-Discrimination Agreement, entitled the Central Lane Metropolitan Planning Organization Title VI Plan, in coordination with the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and the Oregon Department of Transportation (ODOT); and

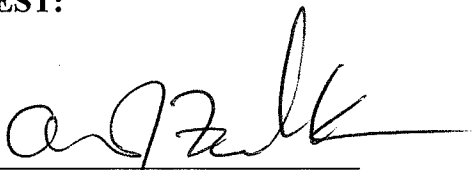
WHEREAS, public review and comment on the Title VI program has been conducted;

NOW, THEREFORE, BE IT RESOLVED:

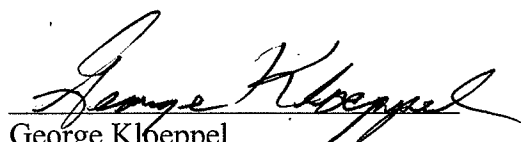
That the Metropolitan Policy Committee adopts the Central Lane Metropolitan Planning Organization Title VI Plan as presented in Exhibit A.

PASSED AND APPROVED THIS 11th DAY OF JUNE, 2009, BY THE METROPOLITAN POLICY COMMITTEE.

ATTEST:

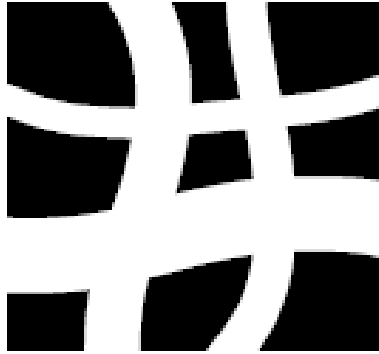


Alan Zelenka, Vice-Chair
Metropolitan Policy Committee



George Kloppel
Executive Director
Lane Council of Governments

CENTRAL LANE



MPO

TITLE VI PLAN

CENTRAL LANE METROPOLITAN
PLANNING ORGANIZATION

JUNE 2009

**CENTRAL LANE MPO
TITLE VI PROGRAM**

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INTRODUCTION

Lane Council of Governments (LCOG) is a voluntary association of local governments and districts that serves as a forum for developing policies and making decisions about regional growth management, economic, and transportation issues within Lane County, Oregon.

LCOG is composed of three different divisions: Administration and Businesses Services, Government Services, and Senior and Disabled Services. Since the latter two divisions contain programs and activities receiving federal financial assistance, all LCOG divisions are subject to the provisions of Title VI of the Civil Rights Act. The primary function of this Title VI Plan is to address Title VI requirements that apply to the Central Lane Metropolitan Planning Organization, a program area falling under the Government Services division. Requirements and procedures for other programs and activities within LCOG are contained in separate documents, including but not limited to LCOG Human Resources Procedures (Section 4.02 details the Civil Rights Complaint Process) and LCOG Affirmative Action Policy.

LCOG has been designated as the Metropolitan Planning Organization (MPO) for the Eugene-Springfield urbanized area located in Central Lane County. The Central Lane MPO serves as a forum for cooperative transportation decision making for the Eugene-Springfield metropolitan area and Coburg. In this role, LCOG is responsible for preparation of the regional transportation plan. As part of this work, LCOG performs a number of different functions, including:

- Establishing an annual work program for regional transportation planning tasks to be completed;
- Performing strategic analyses and technical modeling of the transportation system;
- Establishing a fair and impartial setting for regional decision making that includes federal, state, and local agencies dealing with transportation issues;
- Prioritizing transportation projects and developing a Metropolitan Transportation Improvement Program.
- Allocating state and federal funds for both capital and operating needs;
- Preparing financial analysis and project programming;
- Ensuring compliance with state and federal standards; and
- Providing opportunities for public involvement.

Governance, Boards, and Committees

The Central Lane MPO planning area covers the area within the urban growth boundaries of Eugene, Springfield, and Coburg, and a small area of Lane County adjacent to these urban areas (see Figure 1).

The decision making body 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.

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. The Technical Advisory Sub-Committee (TASC) is a subcommittee to TPC comprised of technical staff.

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.

NON-DISCRIMINATION and ENVIRONMENTAL JUSTICE

What is the Title VI of the Civil Rights Act of 1964?

Section 601 of the Civil Rights Act of 1964 prohibits discrimination “on the basis of race, color, or national origin” in any “program or activity receiving federal financial assistance.” Subsequent legislation has extended the protections under Title VI of the Civil Rights Act to prohibit discrimination based on gender, disability, age and income status. The Civil Rights Restoration Act of 1987 established that Title VI applies to all programs and activities of Federal-aid recipients, subrecipients and contractors whether those programs and activities are federally funded or not.

What is Environmental Justice?

In 1994, President Clinton issued Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The Executive Order focused attention on Title VI by providing that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

A series of orders have been issued by federal agencies requiring the incorporation of Environmental Justice principles into federal programs and policies. Additional clarifying materials have also been issued. The following materials are applicable to transportation planning issues:

- The United States Department of Transportation (DOT) issued an Order on Environmental Justice (DOT Order 5610.2) in 1997.
- The Federal Highway Administration (FHWA) issued an Order on Environmental Justice (FHWA Order 6640.23) in 1998.
- On October 7, 1999, FHWA and Federal Transit Administration (FTA) issued a memorandum to their respective field administrative offices clarifying Title VI requirements in metropolitan and statewide planning. The memorandum identifies a series of actions that can be taken to support Title VI compliance and Environmental Justice goals, improve planning performance, and minimize the potential for subsequent corrective action and complaint.
- In addition, the FTA has issued a Circular in 2007 (FTA 4702.1A) which contains requirements and guidelines for Metropolitan Planning Organizations.

There are three fundamental Environmental Justice principles:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations.

2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

Environmental justice must be considered in all phases of planning and focuses on enhanced public involvement and an analysis of the distribution of benefits and impacts. Environmental justice issues arise most frequently when:

- Some communities get the benefits of improved accessibility, faster trips, and congestion relief, while others experience fewer benefits;
- Some communities suffer disproportionately from transportation programs negative impacts, like air pollution;
- Some communities have to pay higher transportation taxes or higher fares than others in relation to the services that they receive; or
- Some communities are less represented than others when policymaking bodies debate and decide what should be done with transportation resources.

Although Environmental Justice concerns are more frequently raised during project development, Title VI applies equally to the plans, programs, and activities of planning, activities in which the Central Lane MPO are actively involved.

What is the relationship between Environmental Justice and Title VI?

The need to consider environmental justice is embodied in many laws, and regulations, including Title VI of the Civil Rights Act of 1964. The federal actions on Environmental Justice serve to reaffirm Title VI responsibilities by directing every Federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on "minority populations and low-income populations."

Environmental justice and Title VI concepts, which focus on understanding and properly addressing the unique needs of different socioeconomic groups, are vital components to effective transportation decision making.

What is the Central Lane MPO Role in Nondiscrimination and Environmental Justice?

As a recipient of state and federal funds, the Central Lane MPO is subject to the provisions of Title VI, including environmental justice. Based on Federal publication #FHWA-EP-00-0143, the MPO serve as the primary forum where State DOTs, transit providers, local agencies, and the public develop local transportation plans and programs that address a metropolitan area's needs. In this role, MPOs can help local public officials understand how Title VI and environmental justice requirements improve planning and decision making. To certify compliance with Title VI and address environmental justice, MPOs need to:

- Enhance their analytical capabilities to ensure that the long-range transportation plan and the transportation improvement program (TIP) comply with Title VI.
- Identify 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.
- Evaluate and – where necessary – improve their public involvement processes to eliminate participation barriers and engage minority and low-income populations in transportation decision making.

MPOs act as coordinators of the many agencies involved in transportation planning. The Central Lane MPO creates regional plans that follow federal guidelines for air quality and serve as a check on agency budgets. Regional plans contain projects from the State DOT, local government departments and transit providers. In this role, the MPO programs and distributes federal money to local agency partners for construction and infrastructure projects, data collection, and planning activities.

As the agency responsible for coordinating the regional transportation process, the Central Lane MPO makes sure that all segments of the population have been involved with the planning process. In compiling the projects that make up the regional plan, the Central Lane MPO is responsible for evaluating the impact on proposed transportation investments on population groups that may be traditionally underserved or underrepresented.

What has been Central Lane MPO practice?

It has been Central Lane MPO long-standing policy to actively ensure nondiscrimination, and to ensure that transportation planning includes consideration of the unique needs of Title VI protected populations. As a recipient of federal funds, Central Lane MPO has previously certified its commitment to nondiscrimination under Title VI of the Civil Rights Act of 1964.

In addition, Central Lane MPO has developed a Public Participation Plan that addresses the need to communicate with communities that may be traditionally underserved, such as people with disabilities, children and youth, senior, low-income and racial and ethnic minorities. As part of this effort, the Central Lane MPO maintains distribution lists that include members of communities that may be traditionally underserved. In addition, the CAC bylaws direct the MPC to seek out and include those traditionally underserved by existing transportation systems when making appointments to the CAC. The Central Lane MPO has also developed a Citizen’s Guide to use as an outreach tool – this document is aimed at a broad audience, with lots of graphics and color, in plain English that is short, easy to read and uses humor to explain key MPO products and how they are related, as well as information on how and why citizens should get involved.

In order to adapt and be able to adjust strategies to improve performance, the Central Lane MPO annually evaluates the response to public involvement techniques, including

an analysis of the region's population, income, language performance, ethnic status and other demographic factors.

What are the Central Lane MPO goals with regard to Title VI and Environmental Justice?

The Central Lane MPO is committed to preventing discrimination and to fostering a just and equitable society and recognizes the key role that transportation services provide to the community. The Central Lane MPO establishes the following basic principles to serve as overall objectives in implementing this Title VI program:

- Make transportation decisions that strive to meet the needs of all people.
- Enhance the public-involvement process to reach all segments of the population and ensure that all groups have a voice in the transportation planning process, regardless of race, color, national origin, gender, age, disability, and income status.
- Provide the community with opportunities to learn about and improve the quality and usefulness of transportation in their lives.
- Improve data collection, monitoring, and analysis tools that assess the needs of, and analyze the potential impacts of transportation plans and programs on Title VI protected populations.
- Avoid disproportionately high and adverse impacts on Title VI protected populations.
- Comply with the requirements of Title VI and accompanying rules and orders.

The following is a copy of Lane Council of Government's Non-Discrimination Policy Statement. This policy covers programs and activities within the Central Lane MPO as well as other divisions within LCOG.

NON-DISCRIMINATION POLICY STATEMENT

In accordance with Title VI of the Civil Rights Act of 1964 and subsequent federal nondiscrimination directives such as the Federal-Aid Highway Act of 1973, the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, the Civil Rights Restoration Act of 1987, Americans with Disabilities Act of 1990 (ADA), Executive Order 12898 (Environmental Justice), and Executive Order 13166 (Limited English Proficiency), the Lane Council of Governments (LCOG) assures that no person shall, on the grounds of race, color, national origin, disability, age, gender, or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

Additionally, under Executive Order 12898 (Environmental Justice) and the subsequent USDOT/FHWA/FTA directives, LCOG, acting in its capacity as the Central Lane Metropolitan Organization (MPO), shall make every effort to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of the MPO programs, policies, and activities on Title VI protected populations.

LCOG 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. LCOG is aware that the Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors/consultants, whether such programs and activities are federally assisted or not.

In the event LCOG in its role as the MPO distributes federal aid funds to another governmental entity or subcontractor, LCOG will include Title VI language in all written agreements and will monitor for compliance. LCOG Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other LCOG responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.


George Kloeppel, Executive Director

July 14 2009

Date

AUTHORITIES

The following contains a compilation of the legal regulations, statutes or orders that together create the legal requirements for non-discrimination within the Central Lane MPO:

- Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 23 Code of Federal Regulations (CFR) 200.9 and 49 CFR Part 21). Since the Civil Rights Act was passed, other nondiscrimination authorities have expanded the scope and range of Title VI, including the following:
- The Federal Aid Highway Act of 1973 (23 USC 324) prohibits discrimination based upon sex (gender).
- Section 504 of the Rehabilitation Act of 1973 (29 USC 794) and Title II of the American with Disabilities Act (42 USC 12101 et seq. and 49 CFR Parts 27, 37, 38) extended the protections under Title VI of the Civil Rights Act of 1964 to prohibit discrimination based on disability.
- The Age Discrimination Act of 1975 prohibits discrimination based on age (42 USC 6101).
- The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not (refer to Public Law 100259 [S. 557] March 22, 1988).
- Executive Order 12250 (28 CFR Part 41) requires consistent and effective implementation of various laws prohibiting discriminatory practices in programs receiving Federal financial assistance, including Title VI of the Civil Rights Act of 1964 (42 United States Code (USC) 2000d et seq.).
- Executive Order 12898 (28 CFR 50) directs federal agencies to evaluate impacts on low-income and minority populations and ensure that there are not disproportionate adverse environmental, social, and economic impacts on communities, specifically minority and low-income populations. This order also directs federal agencies to provide enhanced public participation where programs may affect such populations.
- Executive Order 13166 is designed to improve access to federally conduct and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP). The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have

meaningful access to them. To assist Federal agencies in carrying out these responsibilities, the U.S. Department of Justice has issued a Policy Guidance Document, "Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons With Limited English Proficiency" (LEP Guidance). This LEP Guidance sets forth the compliance standards that recipients of Federal financial assistance must follow to ensure that their programs and activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination. The U.S. Department of Transportation has issued Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (DOT LEP Guidance, Federal Register, vol. 70, no. 239, pp. 74087–74100, December 14, 2005).

- 23 CFR 200 and 49 CFR 21 are administrative regulations from Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) that specify requirements for state DOTs to implement Title VI policies and procedures at the state and local levels.
- The U.S. Department of Transportation Planning Assistance and Standards require metropolitan planning organizations (MPOs) to seek out and consider "the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services" (refer to 23 CFR 450.316).
- The US Department of Transportation (USDOT) issued an Order on Environmental Justice (DOT Order 5610.2) which describes the process that the Office of the Secretary and each Operating Administration will use to incorporate environmental justice principles (as embodied in the Executive Order) into existing programs, policies, and activities. As the USDOT's response to Executive Order 12898, it generally describes the process for incorporating environmental justice principles into DOT programs, policies and activities. The objective of the Order is to ensure that the interests and well being of minority populations and low-income populations are considered and addressed during transportation decision making, and to achieve this by working within the existing statutory and regulatory requirements. Like E.O. 12898, the DOT Order does not create a new set of requirements for state and local agencies, but is intended to reinforce considerations already embodied in existing law, such as NEPA and Title VI. The Order states that DOT will not carry out any programs, policies or activities that will have a disproportionately high and adverse effect on minority populations or low-income populations unless "further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effect are not practicable."
- In 1998, the USDOT issued Order 6640.23 which contained policies and procedures for the FHWA to use in complying with Executive Order 12898.

- On October 7, 1999, FHWA and FTA issued a memorandum to their respective field administrative offices clarifying Title VI requirements in metropolitan and statewide planning. The memorandum provides division FHWA and FTA staff a list of proposed review questions to assess Title VI capability and provides guidance in assessing Title VI capability. Failure to be in compliance can lead to a corrective action being issued by FTA and/or FHWA, and failure to address the corrective action can affect continued Federal funding.
- In addition, the FTA has issued a Circular in 2007 (FTA 4702.1A) which contains requirements and guidelines for MPOs.
- The Oregon State DOT (ODOT) has adopted a Title VI Plan (Title VI Plan 2002), which is updated regularly. This plan can be used as a template for ODOT's sub recipients when creating their own plan or a letter can be signed in agreement to follow ODOT's plan. ODOT has also issued local agency guidelines for Title VI plans to be developed by local agencies.
- The Oregon State Revised Statutes contain a number of provisions addressing nondiscrimination contained in ORS 659A which address nondiscrimination in employment practices, public accommodations and real property transactions based upon race, color, religion, sex, sexual orientation, national origin, marital status, age, disability or familial status.
- The City of Eugene has adopted a local ordinance (Eugene City Code 4.613) that addresses nondiscrimination in employment practices, city contracts, housing practices, and public accommodation practices. The City's Ordinance addresses nondiscrimination based upon race, religion, color, sex, national origin, ethnicity, marital status, familial status, age, sexual orientation, source of income and disability.
- The City of Springfield has adopted regulations (Chapter 5 of the Springfield Municipal Code) addressing nondiscrimination in employment, housing, and places of public accommodation because of race, religion, color, sex, national origin, marital status, familial status, age, or disability.
- Lane County has adopted regulations (Lane Code 6.800) addressing nondiscrimination in public accommodations based upon race, religion, color, sex, national origin, marital status or physical handicap.
- Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 USC 2000d to 2000-4); 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; Department of Transportation Order 1050.2; 20 CFR 50.3; 28 CFR Part 42; 49 CFR Part 21; FTA Circular 4702.1; and FHWA guidelines in 23 CFR Part 200.

TITLE VI DELEGATION CHART

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

Lane Council of Governments

Executive Director

George Kloeppe

(541) 682-4395

Central Lane Metropolitan Planning Organization

Program Manager

Andrea Riner

(541) 682-6512

ariner@lcog.org

Appendix C provides an organization chart of LCOG that outlines the reporting relationship between the Transportation Program and the Executive Director of LCOG.

TITLE VI COORDINATOR/LEAD STAFF

The Title VI Coordinator for the Central Lane MPO is the Program Manager for LCOG Transportation Program and the Central Lane MPO. The Title VI Coordinator and his/her designee are responsible for supervising Title VI implementation, as well as monitoring and reporting on the Central Lane MPO compliance with Title VI regulations. The Title VI Coordinator or his/her designee overall responsibilities are as follows:

- Ensure full and fair participation by all potentially affected communities in the transportation decision making process.
- Ensure that no person is denied access to or participation in MPO programs.
- Avoid disproportionately high and adverse impacts on communities, in particular Title VI protected populations.

Additional information on specific actions that the coordinator can take to meet these responsibilities is provided in the sections devoted to General Program Administration, Public Involvement, and Program Development and Planning.

DEMOGRAPHIC PROFILE
CENTRAL LANE METROPOLITAN PLANNING ORGANIZATION (MPO)

Demographic Profile of Central MPO Planning Area

The Central Lane MPO considers the impact that its programs may have on Title VI protected populations. In addition, the Central Lane MPO evaluates the languages spoken by populations served by the Central Lane MPO in order to ensure that materials are translated, as needed.

In an effort to identify Title VI protected populations, the Central Lane MPO has used 2000 Census data analyzed by block groups and blocks (where available), and evaluated the following social and environmental characteristics: minority populations, low income populations, persons with disabilities, and seniors. This information was used to define potential communities of concern and then graphically overlap projects from the Regional Transportation Plan. This environmental justice baseline data analysis has been prepared to begin assessing the needs of, and analyzing the potential impacts on Title VI protected populations, as well as assisting the process of outreach to Title VI protected populations.

In addition, the Central Lane MPO has compiled Census data on the ability to speak English in order to identify the language proficiency of residents within the MPO boundaries.

Household Poverty Concentration

Within the Central Lane MPO, 15.4 percent of all households had an income below the 1999 federal poverty level, also called the “poverty threshold” (this equates to \$17,000 for a family of four). Map 1 of Appendix D shows the distribution of these populations overlaid with the RTP projects. Approximately 64 percent of these persons living at or below poverty lived in Eugene, 26 percent were within Springfield and 0.2 percent within Coburg.

There were 66 block groups where the concentration of persons living at or below the poverty level was above the regional percentage (15.4 percent). There were 34 block groups where 25 percent or more of the population was living in poverty. These block groups were generally located in the urban core. Block groups with the highest percentages are clustered around the University of Oregon.

The greatest density of households living below the federal poverty concentration, in which 36% or more of the households within each block group are low income, were concentrated in three major areas: the southern portion of the Harlow neighborhood, located between I-105 and the Willamette River; the West University, South Eugene High School and South University neighborhoods located on the periphery of the

University of Oregon campus in Eugene; and a portion of the Far West neighborhood in southwest Eugene.

Data Sources:

U.S. Census Bureau, Census 2000. Summary file SF3, table P92: Poverty Status in 1999 of Households by Household Type by Age of Householder:

<http://www.census.gov/main/www/cen2000.html>

U.S. Census Bureau, Household Income and Persons Below Poverty:

http://quickfacts.census.gov/qfd/meta/long_IPE120204.htm

Senior Population Concentration

Within the Central Lane MPO, 12 percent of the population was senior. For this analysis “senior” was assumed to consist of persons 65 years and older. Map 2 of Appendix D shows the distribution of these populations overlaid with the RTP projects. These populations were distributed throughout the Central Lane MPO.

Data Source:

U.S. Census Bureau, Census 2000. Summary file SF1, table P12: Sex by Age:

<http://www.census.gov/main/www/cen2000.html>

Minority Population Concentration

Within the Central Lane MPO, 13 percent of the population belongs to a minority group. For this analysis, “minority” was defined to be all persons who identified themselves as non-white or Hispanic. Map 3 of Appendix D shows the distribution of these populations overlaid with the RTP projects.

The results of this analysis indicated there were 50 census block groups in which the minority population was above the regional percentage (14 percent). There were nine block groups where the minority population was 25 percent or more of the total block group population.

Minority populations are generally concentrated near Springfield’s downtown, and in several Eugene neighborhoods, including the Downtown area; the Harlow neighborhood, located between I-105 and the Willamette River; and in portions of the Trainsong, Whitaker, Far West, River Road and Cal Young neighborhoods. In these areas, at least 19 percent of the block group population belongs to a minority (see map legend).

Data Source:

U.S. Census Bureau, Census 2000. Summary file SF1, table P4: Hispanic or Latino, and Not Hispanic or Latino by Race:

<http://www.census.gov/main/www/cen2000.html>

Disabled Population Concentration

Within the Central Lane MPO as a whole, 18 percent of the population was identified as disabled. For this analysis, the “disabled” population was defined to be all civilian non-institutionalized persons 5 years and older that identified themselves as disabled. Map 4 of Appendix D shows the distribution of these populations overlaid with the RTP projects.

Data Source:

U.S. Census Bureau, Census 2000. Summary file SF3, table P42: Sex by Age by Disability Status by Employment Status for the Civilian Non-institutionalized Population 5 Years and Over:

<http://www.census.gov/main/www/cen2000.html>

Persons Who Speak English Less Than “Well”

Data on ability to speak English were derived from the answers to the Census long-form questionnaire Item 11c, which was asked of a sample of the population. Respondents who reported that they spoke a language other than English in long-form questionnaire Item 11a were asked to indicate their ability to speak English in one of the following categories: "Very well," "Well," "Not well," or "Not at all."

The data on ability to speak English represent the person's own perception about his or her own ability or, because census questionnaires are usually completed by one household member, the responses may represent the perception of another household member. Respondents were not instructed on how to interpret the response categories in Question 11c.

People who reported that they spoke a language other than English at home, but whose ability to speak English was not reported, were assigned by the Census the English-language ability of a randomly selected person of the same age, Hispanic origin, nativity and year of entry, and language group.

Nationally 4.19 percent of the population reported an ability to speak English less than ‘Well’ while the percentage for Oregon was 3.27.

For Lane County, 1.37 percent of the population reported less than ‘Well’ English speaking ability. Within the TMA area, a comparable 1.48 percent of the population reported this.

Population Speaking English less than 'Well'	
Area	Percent of
U.S.	4.19%
Oregon	3.27%
Lane	1.37%
TMA	1.48%

People who use English as a second language come from a variety of lingual and cultural backgrounds. The Census groups these languages into three primary collectives including 'Spanish', 'Other Indo-European' language, and 'Asian and Pacific Island' languages. There is an additional category for Other. In both Lane County and the TMA areas, Spanish is the predominant second language to English. Asian and Pacific languages were spoken slightly more than Other Indo-European languages. These percentages also fluctuated slightly by age group as seen below.

Data Source: U.S. Census Bureau, Census 2000. STF3 tables, by block group, "Population 5 and Over, Speak English not well or not at all":

<http://www.census.gov/main/www/cen2000.html>

Demographic Profile of Central Lane MPO Staff

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

CENTRAL LANE MPO TITLE VI PROGRAM AREAS

The Central Lane MPO is responsible for conducting technical modeling of the transportation system; facilitating the interaction of federal, state, and local agencies dealing with transportation issues; managing the analysis and process for maintaining conformity with federal air quality standards; preparation of financial analysis and project programming; and providing opportunities for public involvement.

As a result, the Central Lane MPO is involved in three different phases of a program: (1) Public Involvement, (2) Program Development & Planning, and (3) Reporting and Compliance. These three areas, together with General Administration, are applicable to Title VI regulations – they are referred to as the Title VI Program Areas and are referred to in the following sections as General Program Administration (which includes reporting and compliance), Public Involvement, and Program Development and Planning.

GENERAL PROGRAM ADMINISTRATION

The following are general Title VI responsibilities of the Central Lane MPO.

Legal/Operational Guidelines

- LCOG Procedures Manual
- LCOG Affirmative Action Policy

Elements of Central Lane MPO General Program Administration

Data Collection Procedures

Data collection is an important aspect of the Central Lane MPO Title VI and environmental justice plan. Collection of demographic information can assist in transportation planning to determine impacts and benefits of potential projects. Checking for environmental justice requires an examination of the distribution of benefits and burdens over time, space, and across various population groups. Demographic information can assist in identifying communities of concern. In addition, data collection can be used to develop outreach strategies and to monitor the effectiveness of outreach processes. Finally, data collection can be used to assess the demographic characteristics of those involved in the planning and decision-making process, including agency staff and policy and advisory committees.

As an initial step toward better integrating environmental justice into its work program, the Central Lane MPO has developed a baseline demographic profile (see Section VII) , which presents key demographic data describing the Central Lane MPO and identified population groups and communities to be considered for subsequent environmental justice analyses and activities.

Complaint Processing

If any individual believes that any program beneficiaries have been subjected to unequal treatment or discrimination based on the grounds of race, color, national origin, disability, age, gender, or income status, that individual may exercise their right to file a complaint with LCOG. Every effort will be made to resolve complaints informally at the Central Lane MPO, or at the sub recipient or contractor level. See Appendix B for complete complaint processing procedures.

Contracts and Intergovernmental Agreements

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. The standard language incorporated into these intergovernmental agreements requires that the partners comply with all applicable federal, state, and local laws, rules, ordinance, and regulations at all times and in the performance of the work. This provision would include the nondiscrimination and environmental justice provisions contained under Title VI of the Civil Rights Act and accompanying rules and orders.

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. Central Lane MPO is committed to following DBE contracting goals if they are to be established in the future.

Training Program

The Central Lane MPO will have a procedure for providing training for its employees and sub-contractors on Title VI and other Civil Rights statutes, either by developing and implementing its own training, or participating in trainings provided by ODOT or FHWA.

Public Dissemination

The Title VI Coordinator is responsible for disseminating Title VI program information to MPO employees, subrecipients, and beneficiaries as well as to the general public. Public dissemination will include the posting of materials on the Central Lane MPO website.

Annual Reports

The Title VI Coordinator is responsible for monitoring and compiling the accomplishment data for ODOT and FHWA to review. ODOT may request an accomplishment report from the Central Lane MPO incorporating all the data collected, Central Lane MPO Nondiscrimination Agreement [or Title VI Plan], as well as the MPO work plan and accomplishments.

Strategies for Integrating Title VI Responsibilities into Central Lane MPO General Program Administration

Data Collection Procedures

The following procedures are hereby established for data collection:

1. The Central Lane MPO shall continue to update the summary of staffing composition of those involved in MPO activities and plans. The report shall include job classification, race and gender.
2. The Central Lane MPO shall establish a reporting mechanism that includes a member composition for its policy and advisory committees, including the MPC, TPC, and CAC. The report shall include job classification (if applicable), race and gender.
3. Central Lane MPO staff shall strive to collect demographic information on public participants. This shall be accomplished by summarizing results from comment/feedback forms which request demographic information from participants at public meetings and workshops and public opinion polls. The submittal of demographic information will be voluntary.

4. The Central Lane MPO shall continue to maintain a demographic profile of the MPO planning area using the most current and appropriate statistical information available on race, income, and other pertinent data. As new information becomes available, staff shall update the Demographic Profile of the Central Lane MPO planning area in order to provide an up-to-date baseline report documenting populations of concern for environmental justice analysis.
5. Staff shall routinely evaluate public participation in order to determine whether the outreach plan has been successful in recruiting participation among Title VI protected populations.

Complaint Processing

6. The Central Lane MPO complaint procedure will be made available to the public on the Central Lane MPO website. Central Lane MPO will also prepare an information sheet for distribution to the public that describes the Central Lane MPO Title VI policy and complaint process.
7. The Central Lane MPO shall maintain records of complaints that it receives, as well as materials related to the investigation, final determination, and corrective actions, if any, that have been taken.
8. In cases where the complaint is against one of Central Lane MPO subrecipients of federal funds, the Title VI Coordinator for the Central Lane MPO shall decide whether to assume jurisdiction and investigate and adjudicate the case or whether to forward such complaints to ODOT for prompt investigation. In cases where the Title VI Coordinator does assume the investigation, ODOT may continue to review and monitor these investigations.
9. The Central Lane MPO will submit investigated reports to ODOT's Office of Civil Rights no later than sixty (60) calendar days after the complaint was filed. If a subrecipient is found to not be in compliance with Title VI, LCOG will work with the contracts staff and subrecipient to resolve the deficiency status and write a remedial action if necessary.
10. The Central Lane MPO will also forward Title VI complaints directly against the Central Lane MPO to Oregon Department of Transportation's (ODOT) Office of Civil Rights.

Contracts and Intergovernmental Agreements

11. As part of intergovernmental agreements or contracts with any sub-contracting entities, the Central Lane MPO will include language that requires compliance with the regulations relative to nondiscrimination and environmental justice.
12. For those subcontractors that it does use, the Central Lane MPO will monitor and report which contracts have been provided to minorities and women owned firms in the annual report.

Training Program

13. Employees and, in particular, Central Lane MPO program area managers will participate in ODOT sponsored Title VI training and other training opportunities that become available. It is intended that training be available that will provide comprehensive information on Title VI provisions, application to program operations, and identification of Title VI issues and resolution of complaints.
14. A summary of the training conducted will be reported in the annual update.

Public Dissemination

15. The Central Lane MPO shall prepare an information sheet for distribution to the public that describes the Central Lane MPO Title VI program.

Annual Reports

16. An annual executive summary will be submitted to the Executive Director, Metropolitan Policy Committee, and Citizen Advisory Committee reviewing Title VI accomplishments achieved during the year. The Title VI Coordinator will be responsible for coordination and preparation of the report.
17. A Title VI annual report will be submitted to the ODOT Regional Local Agency Liaison by August 15th of each year; the report will then be forwarded on to ODOT's Office of Civil Rights for review and approval. The update will report on accomplishments and changes occurring during the preceding year, and will also include goals and objectives for the following year.

Title VI Coordinator's Responsibilities

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's administration. As part of this responsibility, the Title VI Coordinator or designee will:

1. Ensure all Central Lane MPO program administration is in compliance with Title VI.
2. Monitor progress, implementation, and compliance issues.
3. Collect data supporting the Central Lane MPO nondiscrimination activities that are relevant to the MPO Title VI goals and objectives, including statistical data (e.g. race, color, gender, age, disability, and language proficiency) for use in planning and monitoring.
4. Disseminate Title VI program information to MPO employees, subrecipients, and beneficiaries as well as to the general public.
5. Include Title VI language in contracts and intergovernmental agreements.
6. For any consultants under direct contract with the Central Lane MPO, monitor and submit annual reports on Disadvantaged Business Enterprise participation in the Title VI Annual Report and Update.
7. Conduct training programs on Title VI and other related statutes.
8. Identify, investigate, and eliminate discrimination when found to exist in

connection with Central Lane MPO program areas.

9. Process, investigate, and attempt to resolve Title VI complaints regarding Central Lane MPO and its sub-recipients, consultants or contractors that are received by the Central Lane MPO.
10. Prepare a yearly report of Title VI accomplishments and goals. Review the Annual Title VI Report to determine the effectiveness of the Title VI program and related efforts.

PUBLIC PARTICIPATION

The goal of Central Lane MPO Public Participation is to “establish widespread understanding and support for regional transportation programs through development of an environment in which citizens, agencies and other interested parties in the metropolitan area are actively involved in meaningful and effective dialogue”. Central Lane MPO is committed to early and continuing public participation in transportation planning, programming, and implementation. In seeking public comment and review, the Central Lane MPO makes a concerted effort to reach all segments of the population, including Title VI protected populations. The Central Lane MPO Public Participation Plan also notes that “an effective public involvement process also will ensure that no one group of citizens is adversely affected”.

Legal/Operational Guidelines

- 23 CFR 450, Section 316 and The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) require that the metropolitan transportation planning process provide for proactive public involvement and provide complete information, timely public notice, full public access to key decisions, and early and continuing involvement of the public in developing plans.
- Central Lane MPO Public Participation Plan, which describes how the MPO will let the public know about opportunities to get involved with regional transportation planning
- Citizen Advisory Committee Bylaws, addressing membership, recruitment and tenure, meetings and voting and other key topics

Elements of Central Lane MPO Communications & Public Involvement Program

Citizen Advisory Committee - The Central Lane MPO has 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.

Web site – LCOG maintains an extensive website, www.thempo.org, which is updated regularly. The site includes information on the Central Lane MPO responsibilities, programs, key products, meeting calendars, agendas and minutes; contact information for staff; a search function; the Title VI Plan, complaint procedures, and complaint form; and a sign up form for e-mail notifications.

There is also a “Get Involved” page that provides information and a link to a pamphlet that serves as a citizen’s guide to transportation planning, information

on attending meetings, public comment periods, and tips for participating in public hearings, as well as other information.

LCOG consistently reviews the website to identify areas for improvement, including content organization and accessibility and removal of complex terminology in favor of information that is easy to read and designed for a broad audience.

LCOG is also planning to establish a central clearinghouse (titled Keep Us Involved) for information on all public involvement opportunities for transportation-related activities, plans, projects, and programs in this area being conducted by local, state, federal, and MPO entities.

Citizen Participation Guide – LCOG has developed a Citizen Participation Guide as a tool for the community to learn about transportation planning and how to get involved. Over 2,000 copies of the Guide have been broadly distributed to individuals, businesses, and community organizations, including many community and religious organizations. Copies are also available on the LCOG website. The CAC was heavily involved in the development of this guide, as well as its distribution.

Publications – Each year, LCOG issues a multitude of publications, reports, and maps as part of the agency’s work program, and responds to and processes a large number of data requests. The information can be accessed by the public through the Web site.

Press releases – Press releases are routinely sent to approximately 20 media outlets – daily and weekly newspapers, TV stations, and radio stations.

Meetings open to the public – Central Lane MPO board and committee meetings are open to the public. Meetings are organized in ways to encourage opportunities for the public to participate. The MPC, CAC, and TPC meet monthly at different times (morning, midday, and evening) to maximize attendance. Time for citizen comments is reserved at the start of all meetings. Meeting dates and times are posted well in advance on the agency’s Web site, as well as mailed to members of the MPO media list. Meetings are televised and webcast by MetroTV. Meetings at the Eugene Public Library are broadcast live; replays for all meetings are available. The meeting location is located in close proximity to transit service, is wheelchair accessible (WCA) and interpretation services can be provided when requested or need is anticipated.

Opportunities for public comment – LCOG provides opportunities for comment on adoption of amendments to transportation plans or programs. Comments are accepted by phone, fax, e-mail, US mail, and in person at any of the meetings. Public comment periods are advertised through e-mail notices, web and newspaper advertisements, and posters on buses.

Staff is accessible – Contact information for all staff is provided on the agency’s Web site, on project fact sheets and brochures, as well as on meeting agendas. Staff attends public meetings and are available to answer questions and take comments.

Mailings – LCOG routinely uses e-mail to keep the public informed of the agency’s programs, public comment periods, meetings, and publications. LCOG maintains an extensive e-mail list, including many community and religious organizations, senior, youth minority, low-income and other groups.

Events – Events such as workshops, open houses, and forums are held regularly, as needed.

Strategies for Engaging Title VI Protected Groups

The Central Lane MPO is committed to actively engaging traditionally underrepresented populations, and can use a variety of techniques to design and evaluate public involvement tools, including:

1. The MPC shall strive to appoint CAC members that represent Title VI protected groups. Further, LCOG will refine membership recruitment activities to better target populations that may be traditionally underserved or underrepresented.
2. In its operation, the CAC shall make an effort to seek out and consider the needs of those traditionally underrepresented populations or those by existing transportation systems. Further, the CAC shall investigate a range of techniques that more specifically target Title VI protected populations and make it easier for people to express their opinions within the transportation planning process.
3. LCOG will continue to maintain distribution lists which contain community organizations, leaders, and religious organizations that are engaged in issues affecting Title VI protected populations. Community organizations and their leaders are invaluable in building communication between agencies and underrepresented groups. Community groups also provide access to individuals and can serve as forums for participation. Often, community organizations reflect community-wide concerns and can advise an agency on useful strategies for interaction.
4. LCOG will send news releases to and place advertisements in minority newspapers and news outlets, as needed, as well as in free publications and other media outlets that may be accessed by Title VI protected population.
5. LCOG will evaluate its meeting times and locations to assure opportunities for a broad audience to attend. This would include, but not be limited to, assuring that the locations of public meetings are close to transit lines, and are accessible to the disabled, as well as held in a variety of times to provide the widest opportunity for involvement.
6. LCOG will create fact sheets to describe Title VI issues for use on the website and in other outreach. In order to expand notification of the Title VI plan,

advertisements, public notices, and press releases will include an abbreviated notice of Title VI and the complaint process, as follows: The Central Lane MPO fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations. These provisions require the fair treatment and meaningful involvement of all people—regardless of race, color, national origin, disability, age, gender, or income status. For more information, or to obtain a Title VI Complaint Form, see <http://www.thempo.org/> or call (541) 682-6512.

7. LCOG will annually evaluate the effectiveness of all communications and public involvement efforts and makes appropriate adjustments to its public involvement strategy. As part of this effort, LCOG will make efforts to outreach to different parties and determine whether any revisions are needed to assure better outreach.
8. LCOG will provide key technical information in formats and at places and times conducive to review by populations that may be traditionally underrepresented or underserved by existing transportation systems. This may include provision of information to sight-impaired persons, non-English speakers, or to persons without extensive formal schooling.

Strategies for Engaging Individuals with Limited English Proficiency

The Central Lane MPO has evaluated the language proficiency of residents within the MPO boundaries in order to determine whether language operates as an artificial barrier to full and meaningful participation in the transportation planning process.

LCOG has used information from the 2000 Census to determine the extent of the need for translation services of its materials. The results of the analysis showed that 1.48% of MPO residents reported that they spoke English either “not well” or “not at all.”

The DOT guidance outlines four factors that should be applied to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

Given this four factor analysis, Central Lane MPO need for translation of a broad number of products is limited. Targeted translation is necessary for key public involvement products and Title VI materials, such as for key documents including the Title VI Complaint Form.

LCOG will maintain a list of staff members who speak a second language. LCOG will also establish a list of nearby Court Certified Interpreters and businesses that can provide

translation services when the need arises. On its website, LCOG will also provide links to the translation service used on the State of Oregon's website or other suitable service as a means of providing translations of basic information in different languages. In addition, the Central Lane MPO will provide resources to facilitate participation for those whose primary language is Spanish, including evaluating different key public involvement products and outreach materials for translation.

Title VI Coordinator's Responsibilities

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's public involvement process. The Title VI Coordinator or designee will:

1. Assess communication and public involvement strategies to ensure adequate participation of impacted Title VI protected populations and address language needs as appropriate.
2. Ensure all communications and public involvement efforts of the MPO comply with Title VI.
3. Develop and distribute information on Title VI and MPO functions and plans to the general public. Provide information in languages other than English, as needed.
4. Disseminate information to individuals and organizations that may represent Title VI protected groups, to help ensure all interest groups in the region are represented in the MPO planning process.
5. Include an abbreviated Title VI Notice to the public in press releases, mailings, and on the Central Lane MPO website.
6. Notify affected Title VI protected populations of public hearings regarding proposed actions of the MPO, and make the hearings accessible to all residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified.
7. Design performance measures to evaluate public involvement and participation strategies to ensure adequate participation of impacted Title VI protected populations.
8. Ensure that the Central Lane MPO Citizen Advisory Committee is comprised of local citizens representing a broad spectrum of geographical, social and economic interests, including representation from Title VI protected populations, if possible.

PROGRAM DEVELOPMENT AND PLANNING

The Central Lane MPO is involved in developing long- and short-range transportation plans to provide efficient transportation services to the Eugene-Springfield urbanized area. In this role, the Central Lane MPO is responsible for preparation of the regional transportation plan. As part of this work, the Central Lane MPO performs a number of different planning functions, including:

- Establishing an annual work program for regional transportation planning tasks to be completed.
- Performing strategic analyses and technical modeling of the transportation system;
- Establishing a fair and impartial setting for regional decision making that includes federal, state, and local agencies dealing with transportation issues;
- Prioritizing transportation projects and developing a Metropolitan Transportation Improvement Program.
- Allocating state and federal funds for both capital and operating needs; and
- Preparing financial analysis and project programming.

The major area of impact by plans and programs is through decisions which identify one or more planned improvements over other options. This consequence may result from procedures and processes that shut a group out of the process, or from the failure to consider the impacts of various transportation system alternatives and programs of projects on one or more-identified groups.

Legal/Operational Guidelines

Primary guidance is provided by:

- The Metropolitan Planning Organization (MPO) Regulations 23 CFR 450.
- Safe Accountable Flexible Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU)
- Oregon Transportation Planning Rule

Key Planning and Programming Activities

The following describes some of the key planning and programming activities undertaken by the Central Lane MPO:

Unified Planning Work Program (bi-annual workplan). The Unified Planning Work Program (UPWP) is the Central Lane MPO annual transportation planning work program. The UPWP identifies the planning budget and the scope of planning activities that may be undertaken during the program year. The Central Lane MPO develops the UPWP in cooperation with federal, state, and local

jurisdictions and transportation providers. This document includes a description of planning tasks and an estimated budget for each task to be undertaken by the agencies participating in the Central Lane MPO metropolitan planning process. The UPWP also serves as a budgeting reference for planning tasks funded by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) to meet SAFETEA-LU requirements.

Metropolitan Transportation Improvement Program (short-range). The Metropolitan Transportation Improvement Program (MTIP) is a staged multi-year program of transportation improvements to be implemented during a 4-year period. The MTIP is required by the U.S. Department of Transportation as a prerequisite for federal funding for street, transit, and bike and pedestrian projects. In addition to satisfying federal requirements, the MTIP serves as a comprehensive source for information on all regionally significant transportation related projects planned by local jurisdictions and reflected by the Central Lane MPO.

Regional Transportation Plan (long-range). The Central Lane MPO is required to develop and regularly update a long range transportation plan for the Central Lane region. This plan must:

- Include a financial plan that demonstrates how the adopted plan can be implemented
- Not contribute to violations of the National Ambient Air Quality Standards
- Have at least a twenty year planning horizon
- Be updated every four years

Transportation Air Quality Conformity. In response to the Clean Air Act, the Environmental Protection Agency has established health-based National Ambient Air Quality Standards (NAAQS). Transportation conformity is a way to ensure that Federal funding and approval goes to those transportation activities that are consistent with the NAAQS. In the Central Lane MPO, air quality conformity must be demonstrated for the pollutant carbon monoxide (CO). The Central Lane MPO must demonstrate conformity for the RTP and the MTIP for CO.

Transportation Options. Transportation demand management (TDM) - or more recently called Transportation Options (TO) in Oregon - is a set of strategies, plans, and programs that influence traveler behavior for the purpose of reducing or redistributing the demand on the transportation system. The primary purpose of TDM/TO is to reduce the number and distance of vehicle trips while providing a wide variety of mobility options. There are many ways the Central Lane MPO contributes to and coordinates regional TDM/TO projects and programs. A primary coordination effort includes a partnership with **Point-2-Point** (formerly

Commuter Solutions), the region's TDM/TO program, which the MPO partially funds annually.

Statewide Transportation Improvement Program (STIP). The Statewide Transportation Improvement Program, known as the STIP, is Oregon's four year transportation capital improvement program. It is the document that identifies the funding for, and scheduling of, transportation projects and programs throughout the State. It includes projects on the federal, state, city, and county transportation systems, multimodal projects (highway, passenger rail, freight, public transit, bicycle and pedestrian), and projects in the National Parks, National Forests, and Indian tribal lands. The MTIP is included in the STIP.

Strategies for Addressing Environmental Justice (EJ) in Planning Efforts

The Central Lane MPO is committed to ensuring that these programs and plans meet the needs of all people to the maximum extent possible and avoid disproportionately high and adverse human health or environmental effects, including social and economic effects, on Title VI protected populations. Though it is recognized that much of the specific evaluation for environmental justice issues will occur at the specific project-level planning phase (which is the responsibility of the project proponent) rather than the overall transportation planning phase, the Central Lane MPO can use a variety of techniques to identify the risk of discrimination so that positive corrective action can be taken and to serve as a building block in subsequent decision making and analysis. These measures include:

1. The Central Lane MPO will document information used in identifying potential environmental justice issues as part of the Regional Transportation Plan Environmental Coordination effort or similar document. The analysis should include an evaluation and discussion of the following:
 - a. Identification of those areas within the Central Lane MPO that contain higher than average concentrations of socio-economic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice (EJ) and Title VI provisions, when compared to the Central Lane MPO area as a whole. To aid in this effort, the Central Lane MPO has prepared a demographic profile of the metropolitan planning area using census data to identify any block group with greater than the regional average of minority or low income households (see Appendix D).
 - b. Analysis of any disproportional impacts to different socio-economic groups. This can be done by comparing the plan impacts on the minority, low-income, senior, disabled and other populations with respect to the impacts on the overall population within the Central Lane MPO. GIS mapping can be used to overlay the locations of the transportation projects upon the EJ neighborhood map so that comparisons could be

made between the distributions of projects across the two community types (EJ vs. non-EJ).

- c. Evaluation of mitigation measures that could be considered to address adverse impacts, including avoidance, minimization, and opportunities to enhance communities and neighborhoods.
 - d. Overview of the public participation process and efforts made to ensure that all groups within the MPO have been involved in the decision-making or project information process through an effective and thorough public participation effort.
2. The Central Lane MPO will solicit and consider input from all groups and citizens concerned with, interested in, and/or affected by MPO transportation plans or programs, in particular the needs of those that may traditionally underserved by transportation systems. The Public Participation Section above MPO describes more particularly the steps that will be taken to solicit input.
 3. The Central Lane MPO shall document what changes have occurred as a result of public involvement, specifically involvement of Title VI protected populations.
 4. The Central Lane MPO will include evaluation criteria that address issues of environmental justice when awarding funds to local agencies for projects to include in the Metropolitan Transportation Improvement Program (MTIP) and Regional Transportation Plan. Potential criteria could include: impact on accessibility and/or travel times to jobs or other activities, transit service provision, the distribution of transportation funding and activities.
 5. In support of this effort, the MPO will work to enhance its analytical capabilities to evaluate the long-range transportation plan and the transportation improvement program impact on Title VI protected populations. Projects could include:
 - a. Using modeling capabilities to evaluate accessibility by travel mode for various trip purposes.
 - b. Evaluating the distribution of transportation projects or funds.
 6. The Central Lane MPO will function in its role as a regional coordinator to work with other agencies, if requested, in addressing environmental justice issues that may occur as part of MPO funded project development activities.

Title VI Coordinator's Responsibilities

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's planning process. As part of this responsibility, the Title VI Coordinator or designee will:

1. Ensure all aspects of the planning and programming process operation comply with Title VI.

2. Solicit and consider input from all groups and citizens concerned with, interested in, and/or affected by MPO transportation plans or programs, in particular the needs of those that may be traditionally underserved by transportation systems.
3. Use information from the Demographic Profile to inform planning decisions and assess the potential for any disproportional impacts to Title VI protected populations.
4. Develop a process for assessing the effects of transportation investments as part of actions on plan and programming documents. This would include:
 - a. Analysis of the population affected by the action.
 - b. Analysis of program impacts on Title VI protected populations, and
 - c. Determination of whether there will be a disproportionately high and adverse impact on Title VI protected populations.
5. Disseminate information to the public on the processes used and findings of the analysis, in accordance with all agency public involvement procedures.
6. Participate in regional coordination efforts to address issues of environmental justice during MPO funded project development activities, as necessary.

IMPLEMENTATION STEPS

Strategy	Process	Timing
Data Collection		
Collect statistical data (e.g. race, color, gender, age, disability, and language proficiency) for use in planning and monitoring.	Use available information from the American Community Survey, Census 2000, the latest Population Estimates, and other relevant information.	On-going
Establish a reporting mechanism that includes a staffing composition (e.g. job classification, race and gender) of those involved in MPO activities and plans.	Work with Human Resources to integrate into LCOG Affirmative Action Policy (Section G.2). Conduct a survey of Central Lane MPO staff to compare the existing composition with the general population of the MPO planning area.	Subsequent to adoption of Central Lane MPO Title VI plan, with updates to be completed each year prior to submittal of Annual Report (August 15 th)
Establish a reporting mechanism that includes a member composition (e.g. job classification, race and gender) for the MPC, TPC, and CAC	Revise bylaws, as needed. Conduct a survey of Central Lane MPO committee members to compare the existing composition with the general population of the MPO planning area.	Subsequent to adoption of Central Lane MPO Title VI plan, with updates to be completed each year prior to submittal of Annual Report (August 15 th)

Strategy	Process	Timing
Establish a reporting mechanism that includes information on race, ethnicity and gender of public participants.	<p>Develop procedures to gauge attendance of public participants, based on meeting format (e.g. include as part of Comment Form or survey, tally based on staff observations, etc.).</p> <p>Develop standard language to be included in Comment Forms.</p>	Subsequent to adoption of Central Lane MPO Title VI plan, with updates to be completed each year prior to submittal of Annual Report (August 15 th)
Complaint Processing		
Revise Procedures Manual to include complaint process information for Title VI complaints made to the Central Lane MPO.	Work with Human Resources to integrate into LCOG Procedures Manual (Section 4.02).	Subsequent to adoption of Central Lane MPO Title VI plan.
Establish Log for tracking Title VI complaints.	Work with Central Lane MPO staff to determine appropriate place and format to track any Title VI complaints.	Subsequent to adoption of Central Lane MPO Title VI plan.
Contracts and Intergovernmental Agreements		
Revise contract and intergovernmental agreements to include Title VI language.	<p>Work with Fiscal Services to revise boilerplate contract and intergovernmental agreement language.</p> <p>Initiate discussions with partners engaged in intergovernmental agreements about Title VI issues.</p>	Subsequent to adoption of Central Lane MPO Title VI plan.

Strategy	Process	Timing
Monitor and report on consultant contracts.	Identify which contracts have been provided to minorities and women owned firms in the annual report.	Subsequent to adoption of Central Lane MPO Title VI plan, with updates to be completed each year prior to submittal of Annual Report (August 15 th)
Training		
Conduct training programs on Title VI and other related statutes.	<p>Work with Human Resources to integrate into LCOG Affirmative Action Policy.</p> <p>Coordinate with ODOT's Title VI Officer to identify training opportunities.</p> <p>Investigate potential to co-sponsor FHWA or ODOT-led training seminars (e.g. seminar to be held at OPI, other).</p> <p>Include costs associated with training in budget.</p>	On-Going and as part of budgetary cycle.
Public Dissemination		
Develop Title VI information for dissemination to the general public.	<p>Develop information sheet describing Central Lane MPO Title VI policy.</p> <p>Create page on Central Lane MPO website for general information as well as information on how to file complaints.</p> <p>Revise standard press release language to include notification about Title VI issues.</p>	Subsequent to adoption of Central Lane MPO Title VI plan.

Strategy	Process	Timing
Provide the Title VI complaint procedure on the Central Lane MPO website.	Post complaint form as well as translated version to Central Lane MPO website.	Subsequent to adoption of Central Lane MPO Title VI plan.
Translate key materials to engage individuals with Limited English Proficiency.	<p>Identify or develop key summary materials for translation.</p> <p>Work to translate materials into one or more languages.</p> <p>Investigate potential of involving the target community in the review of translated materials to eliminate inappropriate word choice and increase the effectiveness of the messages.</p>	Subsequent to adoption of Central Lane MPO Title VI plan, as well as On-Going.
Revise website to include links to on-line translation software.	<p>Investigate connecting with State’s translation software or software used by LCOG Senior and Disabled Services Division.</p> <p>Place notice on Central Lane MPO front page about the availability of translation services and contact phone number for more information.</p>	Subsequent to adoption of Central Lane MPO Title VI plan.
Evaluation Tools		
Design evaluation criteria to assess long-range transportation plan and the transportation improvement program impacts on Title VI protected populations.	Work with TPC, CAC and MPC to design criteria.	Subsequent to adoption of Central Lane MPO Title VI plan.

Strategy	Process	Timing
Design performance measures to evaluate public involvement and participation strategies to ensure adequate participation of Title VI protected groups.	Convene CAC and Central Lane MPO staff to discuss.	Subsequent to adoption of Central Lane MPO Title VI plan.
Annual Reports		
Monitor progress, implementation, and compliance issues.	Convene CAC and Central Lane MPO staff to discuss progress.	On-Going.
Prepare a yearly report of Title VI accomplishments and goals.	Establish template for Annual Report. Work with Central Lane MPO staff to determine appropriate place and format to track information to be compiled for annual reports.	Subsequent to adoption of Central Lane MPO Title VI plan, with updates to be completed each year prior to submittal of Annual Report (August 15 th)
Public Participation		
Establish new criteria and revise bylaws for appointment to the CAC which addresses representation from Title VI protected groups.	Convene CAC and Central Lane MPO staff to discuss. (see Section 3 of bylaws).	Subsequent to adoption of Central Lane MPO Title VI plan. Recruitment objective is On-Going.

Strategy	Process	Timing
<p>Enhance public notices and meetings to broaden participation by Title VI populations</p>	<p>Review press release distribution lists to determine whether additional media outlets should be added.</p> <p>Review and update Central Lane MPO Environmental Justice mailing list, as needed. Include elected officials, neighborhood associations, clergy, faith based groups, minority chambers of commerce, neighborhood business associations, community development corporations, local advocacy groups, and homeowners associations.</p> <p>Evaluate meeting times and locations to assure opportunities for a broad audience to attend.</p> <p>Investigate co-sponsoring events with social service providers in the area and provide interpreters and child care to increase turnout.</p>	<p>Subsequent to adoption of Central Lane MPO Title VI plan.</p> <p>Updates to Public Notices are On-Going.</p>

Strategy	Process	Timing
<p>Investigate a range of techniques that more specifically target minority and low-income communities and make it easier for people to express their opinions within the transportation planning process.</p>	<p>Convene CAC to discuss where the MPO is deficient in its outreach and public participation methods, and how it can improve these methods.</p> <p>Initiate dialogue with environmental justice groups to get their direct input on what types of outreach activities the communities would like to see.</p> <p>Continue to enhance use of announcements or articles in community or ethnic newspapers, flyers at local destinations/activity centers, announcements on local radio stations, ads in transit vehicles, and “tabling” at community fairs or events.</p> <p>Consider sending information through schools for children to take home to their parents, or developing a class project around the transportation project.</p>	<p>On-Going</p>
<p>Include a person having language translation skills in key public meetings.</p>	<p>Establish procedures for use of on-call interpretation services and/or adapt S&DS Procedure 6.6 addressing Interpreter Services for Central Lane MPO.</p> <p>Establish contract for on-call interpretation services, if those are not already in place.</p>	<p>Subsequent to adoption of Central Lane MPO Title VI plan.</p>
<p>Program Development and Planning</p>		

Strategy	Process	Timing
<p>Include evaluation criteria that include issues of environmental justice when selecting projects to include in the Metropolitan Transportation Improvement Program (MTIP) and Regional Transportation Plan</p>	<p>Place items in work program that devote staff time to assessing and developing environmental justice approaches.</p> <p>Work with CAC to develop appropriate evaluation criteria.</p>	<p>Subsequent to adoption of Central Lane MPO Title VI plan.</p> <p>Evaluation to be done as part of development of RTP and MTIP.</p>
<p>Assess the regional benefits and burdens of transportation system investments for different socio-economic groups when updating the Metropolitan Transportation Improvement Program (MTIP) and Regional Transportation Plan (RTP).</p>	<p>Develop and apply tests for disproportionate distributions of impacts.</p> <p>Work with the CAC to refine the analytical measures proposed to assess environmental justice impacts. The CAC can help to identify areas of concern to the community.</p>	<p>Subsequent to adoption of Central Lane MPO Title VI plan.</p> <p>Evaluation to be done as part of development of RTP and MTIP.</p>

GLOSSARY/ACRONYM LIST

Adverse Effects - The totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic *effects*, which may include, but are not limited to: bodily impairment, infirmity, illness or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.

Americans with Disabilities Act (ADA) - Federal civil rights legislation for persons with disabilities, signed into law in 1990, that prohibits discrimination specifically in the areas of employment, public accommodation, public services, telecommunications, and transportation. Transportation requirements include the provision of "comparable paratransit service" that is equivalent to general public fixed-route service for persons who are unable to use regular bus service due to a disability.

Assurances - Every application for U.S. DOT financial assistance must include assurances that the applicant will comply with the U.S. DOT's Title VI regulations.

Certification - Every application by a state agency (e.g., a state DOT) to carry out a program involving continuing federal assistance must include a statement that the program is being carried out in accordance with the Title VI regulations.

Citizens Advisory Committee (CAC) - Representative stakeholders that meet regularly to discuss issues of common concern, such as transportation, and to advise sponsoring agency officials. These groups effectively interact between citizens and their government.

Department of Transportation (DOT) - When used alone, indicates U.S. Department of Transportation. In conjunction with a place name, indicates state, city, or county transportation agency (e.g., Oregon Department of Transportation is ODOT).

Discrimination – Any act or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate Impact – Facially neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient's policy or practice lacks a substantial legitimate

justification.

Disparate Treatment - Actions that result in circumstances where similarly situated persons are treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Disproportionate - Appreciably exceeds or is likely to appreciably exceed those on the general population or other appropriate comparison group.

Disproportionately High and Adverse Effect on Minority and Low-income Populations - An adverse effect that:

- (1) is predominately borne by a minority population and/or a low-income population, or
- (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

Environmental Justice (EJ) - Environmental justice assures that services and benefits allow for meaningful participation and are fairly distributed to avoid discrimination.

Environmental Justice Activity - An action taken by DOT, FTA, or a recipient or subrecipient of FTA funding to identify and address adverse and disproportionate effects of its policies, programs, or activities on minority and/or low-income populations, consistent with Executive Order 12898 and the DOT Order 5610.2 on Environmental Justice.

Federal financial assistance – Includes:

- (1) grants and loans of Federal funds;
- (2) the grant or donation of Federal property and interests in property;
- (3) the detail of Federal personnel;
- (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
- (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

Federal Highway Administration (FHWA) - A branch of the US Department of Transportation that administers the federal-aid Highway Program, providing financial assistance to states to construct and improve highways, urban and rural roads, and bridges. The FHWA also administers the Federal Lands Highway Program,

including survey, design, and construction of forest highway system roads, parkways and park roads, Indian reservation roads, defense access roads, and other Federal lands roads.

Federal Transit Administration (FTA) - A branch of the US Department of Transportation that is the principal source of federal financial assistance to America's communities for planning, development, and improvement of public or mass transportation systems. FTA provides leadership, technical assistance, and financial resources for safe, technologically advanced public transportation to enhance mobility and accessibility, to improve the Nation's communities and natural environment, and to strengthen the national economy.

Geographic Information System (GIS) - Computerized data management system designed to capture, store, retrieve, analyze, and display geographically referenced information.

Lane Council of Governments (LCOG) - LCOG is a voluntary association of local governments in Lane County, Oregon. Dedicated to solving area-wide problems, LCOG helps area cities, Lane County, educational districts, and special-purpose districts reach their common goals. LCOG serves as the MPO for Central Lane County as designated by the Governor in 1974.

Limited English Proficient (LEP) Persons - Persons for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes people who reported to the U.S. Census that they do not speak English well or do not speak English at all.

Low-Income - A low-income person is a person with a household income at or below the Federal Department of Health and Human Services poverty guidelines.

Low-Income Populations - A low-income population means any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed FHWA program, policy, or activity.

Metropolitan Policy Committee (MPC) - An intergovernmental policy group that comprises representatives from Eugene and Springfield Council, Coburg, Lane County Board of Commissioners, the Lane Transit District Board of Directors, and the Oregon Department of Transportation. MPC has been delegated certain responsibilities by the Lane Council of Governments Board of Directors to provide policy guidance on the transportation planning process in the Metro area.

Metropolitan Planning Organization (MPO) – A federally designated regional policy body, required in urbanized areas with populations over 50,000, and designated by local officials and the governor of the state. Responsible in cooperation with the state and other transportation providers for carrying out the metropolitan transportation planning requirements of federal highway and transit legislation.

Lane Council of Governments serves as the MPO in the central Lane area as designated by the Governor in 1974. An MPO does not have land use authority.

Minority - A minority is any individual who is an American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; and Hispanic.

Minority Population - A minority population means any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FHWA program, policy, or activity.

Mitigation - To avoid, minimize, rectify, or reduce an impact, and in some cases, to compensate for an impact.

National Origin - The particular nation in which a person was born, or where the person's parents or ancestors were born.

Oregon Department of Transportation (ODOT) - The State agency that manages the highway system within Oregon. ODOT's mission is to provide a safe, efficient transportation system that supports economic opportunity and livable communities for Oregonians. ODOT is the administrative agency that responds to policy set by the Oregon Transportation Commission (OTC).

Project Development - The phase a proposed project undergoes once it has been through the planning process. The project development phase includes a more detailed analysis of a proposed project's social, economic, and environmental impacts and various project alternatives. What comes from the project development phase is a decision reached through negotiation among all affected parties, including the public. After a proposal has successfully passed the project development phase, it may move to preliminary engineering, design, and construction.

Public Meeting - A formal or informal event designed for a specific issue or community group where information is presented and input from community residents is received

Public Participation - The active and meaningful involvement of the public in the development of transportation plans and programs.

Recipient - Any State, political subdivision, instrumentality, or any public or private agency, institution, department or other organizational unit receiving financial assistance from the Federal government.

Regional Transportation Plan (RTP) - A document resulting from regional or statewide collaboration and consensus on a region or state's transportation system, and serving as the defining vision for the region's or state's transportation systems and services. In metropolitan areas, the plan indicates all of the transportation improvements scheduled for funding over a minimum of the next 20 years.

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) - Bill that governs United States federal surface transportation spending.

Subrecipient - Any entity that receives Federal financial assistance as a pass-through from another entity.

Title VI - Title VI of the Civil Rights Act of 1964. Prohibits discrimination in any program receiving federal assistance.

Title VI Protected Populations – A population specifically identified in Title VI and related statutes, including race, color, national origin, disability, age, gender, or income status.

Transportation Improvement Program (TIP) - A staged, multiyear (four to five years) listing of surface transportation projects proposed for federal, state, and local funding within a metropolitan area. MPOs are required to prepare a TIP as a short-range programming document to complement its long-range transportation plan. TIPs contain projects with committed or reasonably certain funds. Also known as a Metropolitan Transportation Improvement Program (MTIP) in MPO areas.

Transportation Planning - A collaborative process of examining demographic characteristics and travel patterns for a given area. This process shows how these characteristics will change over a given period of time, and evaluates alternatives for the transportation system of the area and the most expeditious use of local, state, and federal transportation funding. Long-range planning is typically done over a period of 20 years; short-range programming of specific projects usually covers a period of 4 to 5 years.

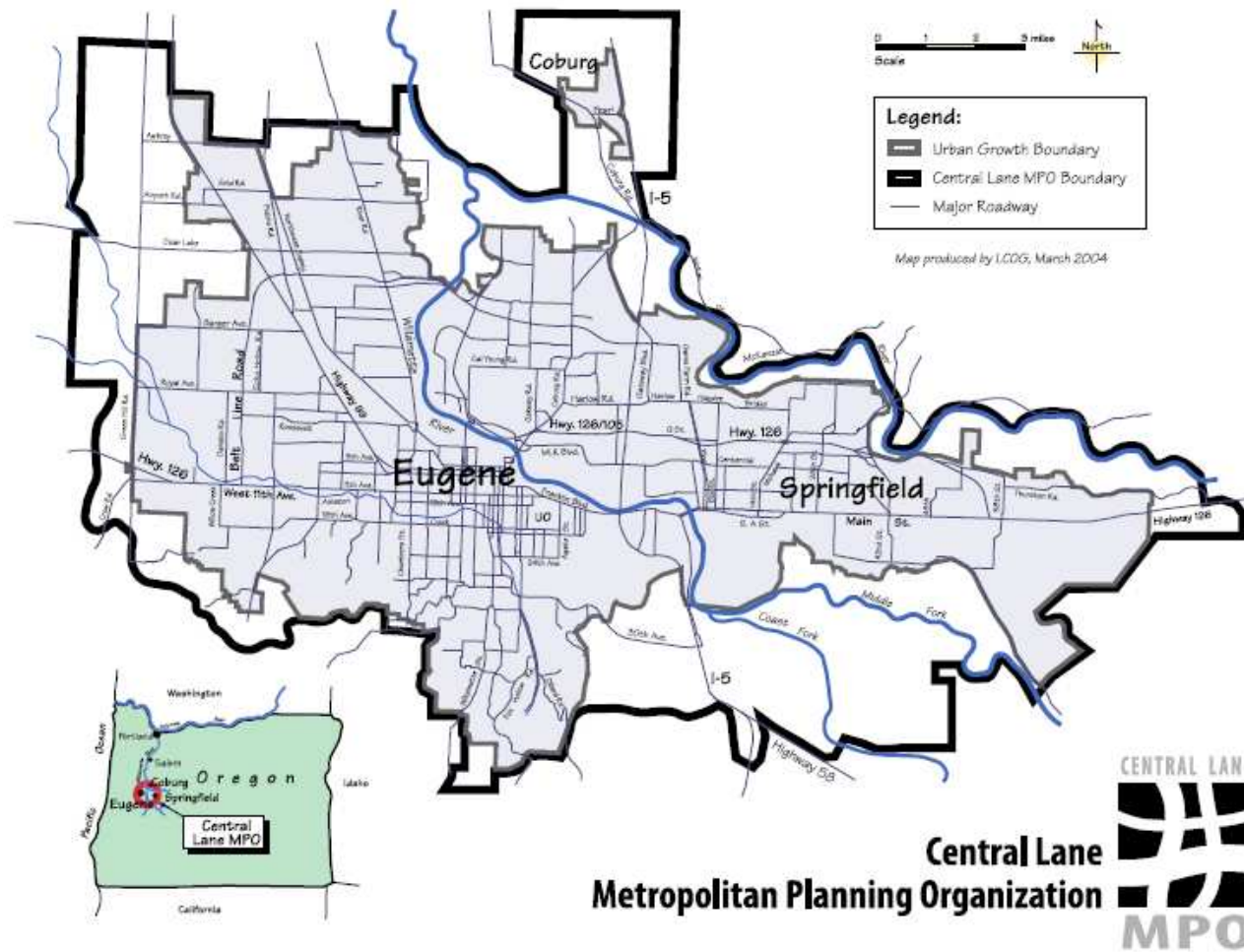
Transportation Planning Committee (TPC) - A Central Lane MPO committee of technical staff from the public works and planning departments of Eugene, Springfield, Coburg, Lane County, LTD, LCOG and ODOT. Provides technical expertise and recommendations to the policy board, MPC.

Transportation Planning Rule (TPR) - A state planning administrative rule, adopted by the Land Conservation and Development Commission in 1991 to implement state land use planning Goal 12, Transportation. The TPR requires metropolitan areas to show measurable progress towards reducing dependence on automobiles.

Unified Planning Work Program (UPWP) - The management plan for the (metropolitan) planning program. Its purpose is to coordinate the planning activities of all participants in the planning process.

Figure 1

FIGURES



APPENDICES

APPENDIX A

A copy of the Public Participation Plan can be accessed via the following link:

<http://docs.lcog.org/PDF/FinalPPPComplete020507.pdf>

APPENDIX B

Central Lane MPO DISCRIMINATION COMPLAINT PROCEDURE

Introduction

The Central Lane MPO discrimination complaint procedures are intended to provide aggrieved persons an avenue to raise complaints of discrimination regarding the Central Lane Metropolitan Planning Organization (MPO) programs, activities and services as required by statute.

Purpose

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990.

Any person who feels that he or she has been excluded from participation in, denied benefits of, or been subjected to discrimination in any of Central Lane MPO's programs, services, or activities, on the basis of race, color, national origin, disability, age, gender, or income status has the right to file a complaint.

Complaints shall be directed to:

Central Lane Metropolitan Planning Organization
Program Manager
859 Willamette, Suite 500
Eugene, OR 97401
(541) 682-6512
ariner@lcog.org

Intimidation or retaliation of any kind is prohibited by law.

Any person who would like to file a complaint should follow the procedure described below. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution, at any stage of the process. The Title VI Coordinator will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Roles and Responsibilities

- The Program Manager for the Central Lane MPO has overall responsibility for the discrimination complaint process and procedures.
- The Program Manager for the Central Lane MPO is responsible for conducting an impartial and objective investigation, collecting factual information and preparing a fact-finding report based upon the information obtained from the investigation.

Applicability

The complaint procedures apply to the beneficiaries of the Central Lane MPO's programs, activities, and services, including but not limited to the public and other sub-recipients of Federal and State funds.

Eligibility

Any person who believes that he/she has been excluded from participation in, denied benefits or services of any program or activity administered by the Central Lane MPO or its sub-recipients, consultants, and contractors on the basis of race, color, national origin, disability, age, gender, or income status may bring forth a complaint of discrimination under Title VI and related statutes.

Time Limitations

Complaints must be filed no later than 180 days after:

- The date of the alleged act of discrimination; or
- The date when the person(s) became aware of the alleged discrimination; or
- Where there has been a continuing course of conduct, the date on which the conduct was discontinued.

Receipt of Complaints

Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or e-mail transmittal for Central Lane MPO to be able to process it.

Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to Central Lane MPO for processing.

Type of Complaints

All Title VI and related statute complaints are considered formal as there is no informal process. Complaints must be in writing and signed by the complainant. Complaints must include the complainant's name, address and phone number and shall be sufficiently detailed to specify all issues and circumstances of the alleged discrimination.

Complaint Basis

Allegations must be based on issues involving race, color, national origin, disability, age, gender, or income status. The term “basis” refers to the complainant’s protected group status.

Protected Group Categories	Definition	Examples
Race	An individual belonging to one of the accepted anthropological racial groups; or the perception, based on physical characteristics that a person is a member of a racial group.	Black, White, Hispanic, Asian, Native American Indian, Filipino, or Pacific Islander
Color	Color of skin, including shade of skin within a racial group.	Black, white, light brown, dark brown, etc.
National Origin	National birth site. Citizenship is not a factor. Discrimination based on language or a persons accent is covered by national origin.	Mexican, Cuban, Japanese, Vietnamese, Chinese
Sex	Gender	Women and men
Age	Persons of any age	21 year old person
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, deaf, mobility limitations, etc.

Complaint Processing

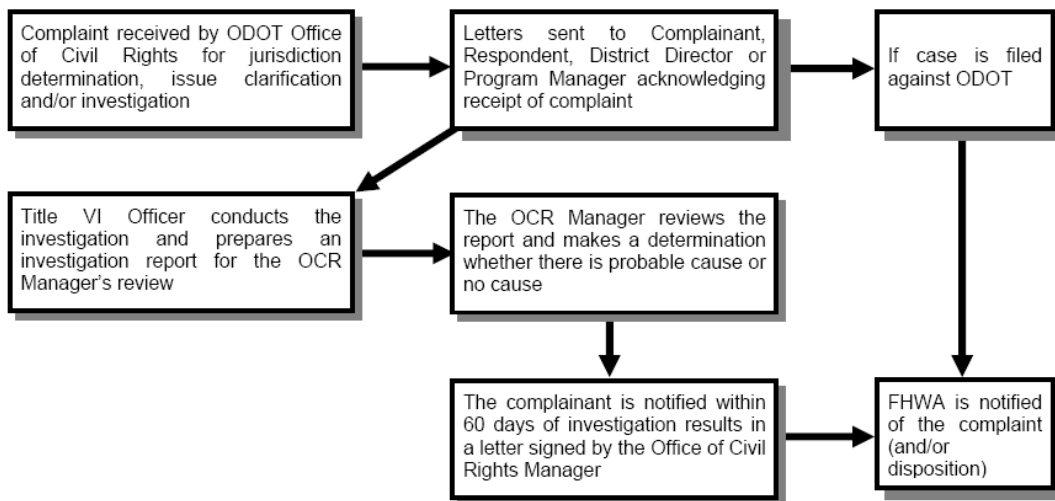
1. A complaint should be filed in writing, contain the name, address, and signature of the person filing it, and a description of the alleged discriminatory event or practice, including:
 - a. The date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
 - b. A detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.

- c. In cases where the complainant is unable or incapable of providing a written statement, the complainant will be assisted in converting the verbal complaint into a written complaint. All complaints however must be signed by the complainant.
2. In order to be accepted, a complaint must meet the following criteria:
 - a. A complaint must be filed within 180 days of the alleged discriminatory event or practice.
 - b. The allegation(s) must involve a covered basis such as race, color, national origin, disability, age, gender, income status, or retaliation.
 - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, subrecipient, or contractor, or, in the case of ADA allegations, an entity open to the public.
3. Upon receipt of the complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. The complaint shall be investigated unless:
 - a. The complaint is withdrawn.
 - b. The complainant fails to provide required information after numerous requests.
 - c. The complaint is not filed timely (within 180 days).
 - d. Any issues that do not involve discrimination, or are not based on a protected basis will be directed to the appropriate entity. Under no circumstance is the complainant discouraged from filing a complaint.
4. The following process shall be used for investigating complaints against one of Central Lane MPO's subrecipients:
 - a. Once received, the complaint will receive a case number and will then be logged in the Central Lane MPO's records identifying the name and address of the person filing the complaint; the date of the complaint; the basis of the complaint; the disposition of the complaint; and the status of the complaint.
 - b. In cases where the complaint is against one of Central Lane MPO's subrecipients of federal funds, the Title VI Coordinator for the Central Lane MPO shall decide whether to assume jurisdiction and investigate and adjudicate the case or whether to forward such complaints to ODOT for prompt investigation. In cases where the Title VI Coordinator does assume the investigation, ODOT may continue to review and monitor these investigations.
 - c. Once the Central Lane MPO decides to accept the complaint for investigation, the complainant and the respondent will be sent a letter,

acknowledging receipt of the complaint, the name of the investigator, and is provided with his/her rights under Title VI and related statutes.

- d. The Title VI Coordinator will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of Central Lane MPO's written notification of acceptance of the complaint to furnish his/her response to the allegations.
 - e. Within sixty (60) calendar days, the Central Lane MPO Title VI Coordinator will evaluate the information and prepare a written report that includes a description of the allegation, a summary of the investigation, relevant facts and findings, and supporting documents. The Title VI Coordinator may consult with the Central Lane MPO's legal counsel as needed.
 - f. The Title VI Coordinator will notify the complainant, the respondent and appropriate managers in writing of the results of the investigation. The notification will advise the complainant of his/her right to file a formal complaint with another agency, if they are dissatisfied with the final decision rendered by the Central Lane MPO.
 - g. Central Lane MPO's final investigative report and a copy of the complaint will be forwarded to ODOT's District Title VI Coordinator within 60 calendar days of the acceptance of the complaint. ODOT's District Title VI Coordinator is responsible for sharing the report with FHWA and FTA as part of its Annual Title VI Update and Accomplishment Report.
5. In order to ensure that there is no conflict of interest, all complaints against the Central Lane MPO shall be forwarded to ODOT for review. The following process shall be used for investigating complaints against Central Lane MPO:
- a. Once received, the complaint will receive a case number and will then be logged in the Central Lane MPO's records identifying the name and address of the person filing the complaint; the date of the complaint; the basis of the complaint; the disposition of the complaint; and the status of the complaint.
 - b. The Title VI Coordinator shall forward the complaint to ODOT for prompt investigation. The following information will be included in every notification to the ODOT District Title VI Coordinator:
 - (a) Name, address, and phone number of the Complainant.
 - (b) Name(s) and address (es) of alleged discriminating official.
 - (c) Basis of complaint (i.e., race, color, national origin, disability, age, gender, or income status, etc.).
 - (d) Date of alleged discriminatory act(s).

- (e) Date of complaint received by the Central Lane MPO.
 - (f) A statement of the complaint.
 - (g) Other agencies (State, local or Federal) where the complaint has been filed.
 - (h) An explanation of the actions the Central Lane MPO has taken or proposed to resolve the allegation(s) raised in the complaint.
- c. The procedure that the Office of Civil Rights will use to investigate such complaints can be found at ODOT's Office of Civil Right's website and are included in ODOT's Title VI Plan. A general outline of the process is provided as follows:



Annual Log of Complaints

The Central Lane MPO Title VI Coordinator will maintain a log of all complaints received. The log will include the following information:

- a. Name of Complainant.
- b. Name of alleged discriminating official or situation.
- c. Basis of Complaint (i.e., race, color, national origin, disability, age, gender, or income status).
- d. Date complaint was received by the Central Lane MPO.
- e. Date the Central Lane MPO Title VI Coordinator notified the ODOT's District Title VI Coordinator of the complaint.
- f. Explanation of the actions the Central Lane MPO has taken or proposed to resolve the allegation(s) raised in the complaint(s).
- g. The final disposition of the complaint.

h. The date in which the complainant, respondent, and ODOT's District Title VI Coordinator was notified of the disposition.

TITLE VI PROGRAM AND RELATED STATUTES

COMPLAINT FORM

Note: We are asking for the following information to assist in processing your complaint.
If you need help in completing this form, please let us know.

Section I

Name: _____

Address: _____

Telephone Numbers:

(Home) _____ (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

Have you previously filed a Title VI complaint with this agency? Yes ____ No ____

Section IV

Date of Alleged Incident: _____ (Note: Complaints must be filed within 180 days of the alleged act of discrimination.)

Which of the following best describes the reason you believe the discrimination took place?

Race	Color	National Origin	Gender
Age	Disability	Income Status	

Name of agency complaint is against:

Contact person: _____ Title: _____

Telephone number: _____

On separate sheets, please describe your complaint. Explain as briefly and clearly as possible what happened and how you were discriminated against. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Also attach any written material, photographs, etc. pertaining to your case and provide any other documentation that is relevant to this complaint. Please include the basis of the complaint; race, color, national origin, disability, age, gender, or income status.

Section VII

How can this complaint be resolved? How can the problem be corrected?

Please sign here: _____

Date: _____

[Note - We cannot accept your complaint without a signature.]

Please mail your completed form to:

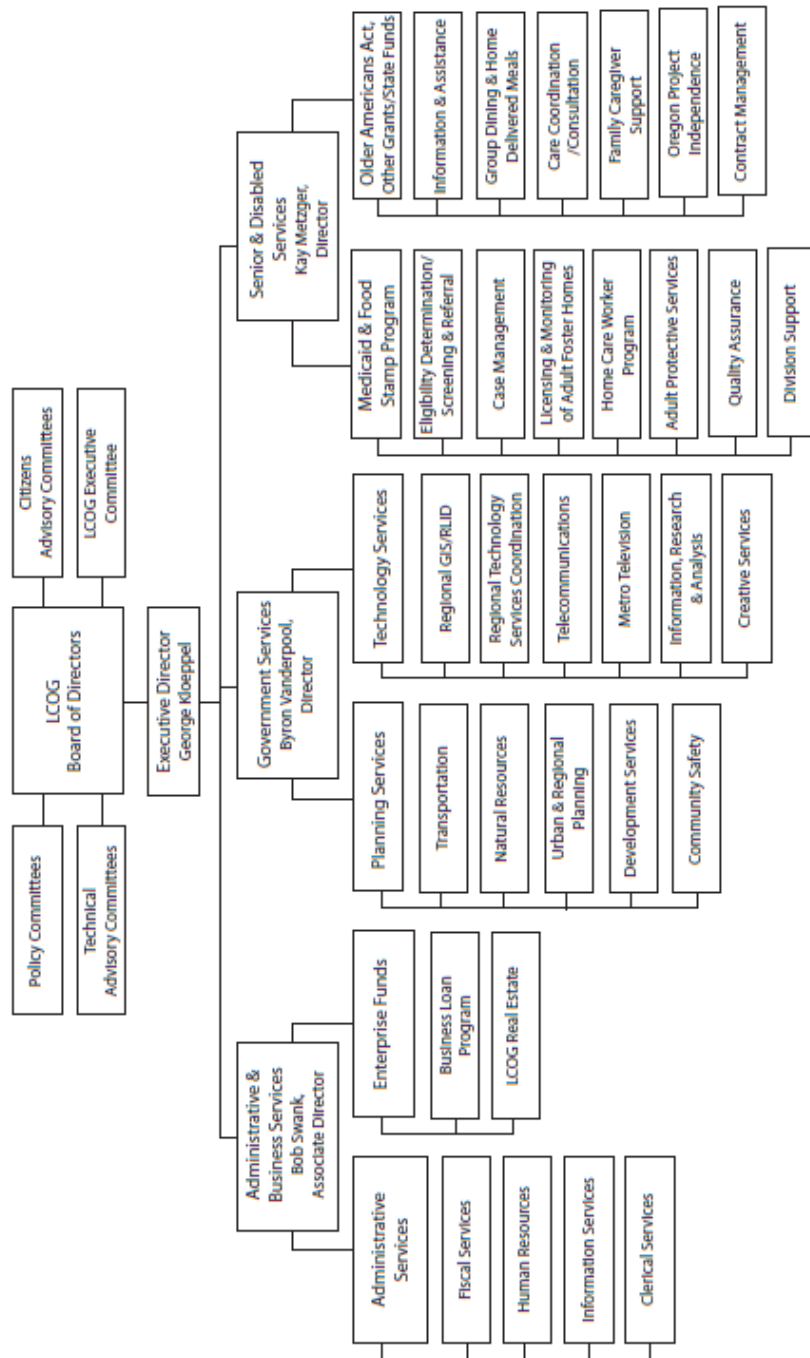
Central Lane Metropolitan Planning Organization

Title VI Coordinator

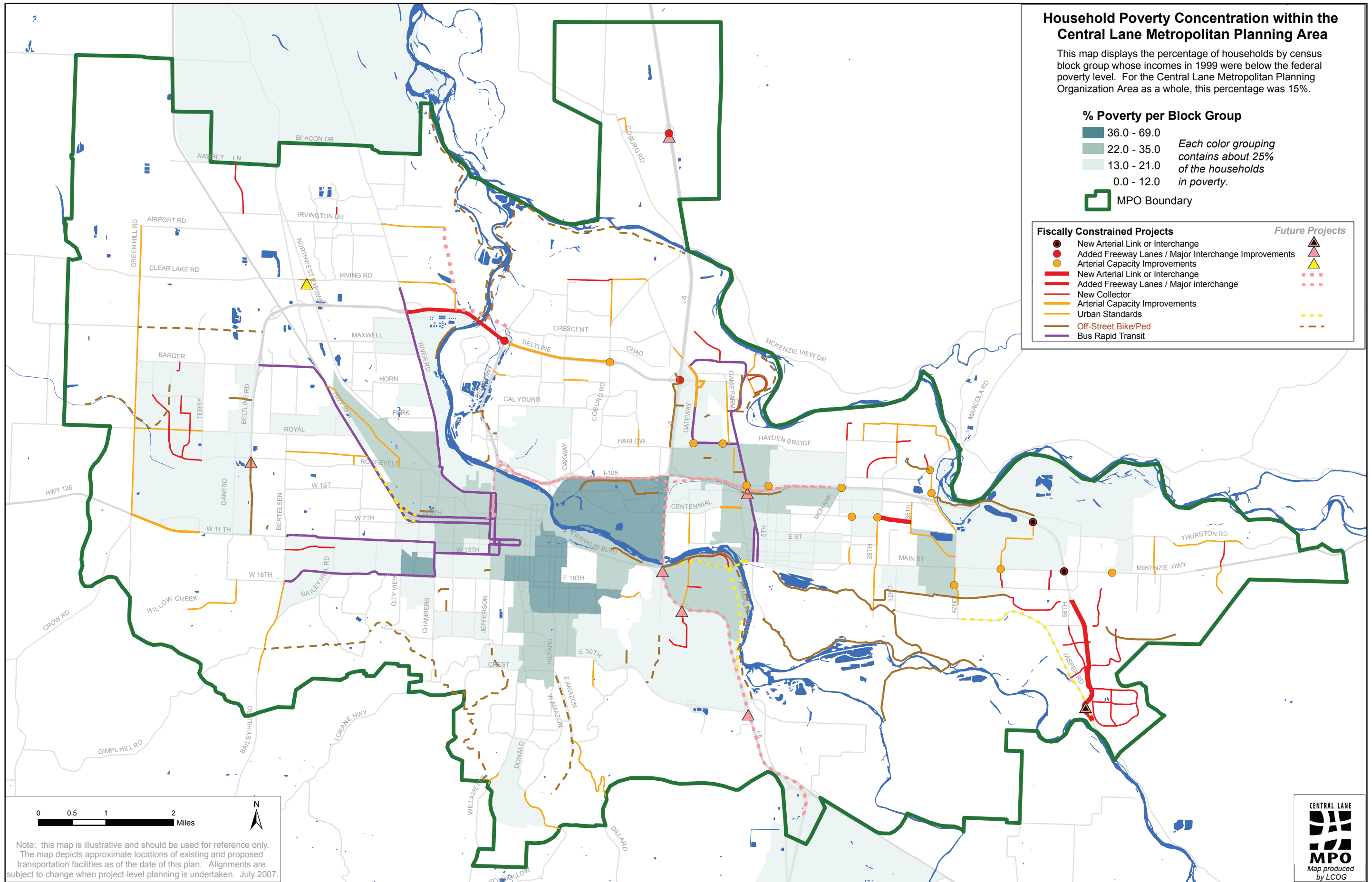
859 Willamette, Suite 500

Eugene, OR 97401

APPENDIX C



04/08



Household Poverty Concentration within the Central Lane Metropolitan Planning Area

This map displays the percentage of households by census block group whose incomes in 1999 were below the federal poverty level. For the Central Lane Metropolitan Planning Organization Area as a whole, this percentage was 15%.

% Poverty per Block Group

- 36.0 - 69.0
- 22.0 - 35.0
- 13.0 - 21.0
- 0.0 - 12.0

Each color grouping contains about 25% of the households in poverty.

MPO Boundary

Fiscally Constrained Projects

- New Arterial Link or Interchange
- Added Freeway Lanes / Major Interchange Improvements
- Arterial Capacity Improvements
- New Arterial Link or Interchange
- Added Freeway Lanes / Major interchange
- New Collector
- Arterial Capacity Improvements
- Urban Standards
- Off-Street Bike/Ped
- Bus Rapid Transit

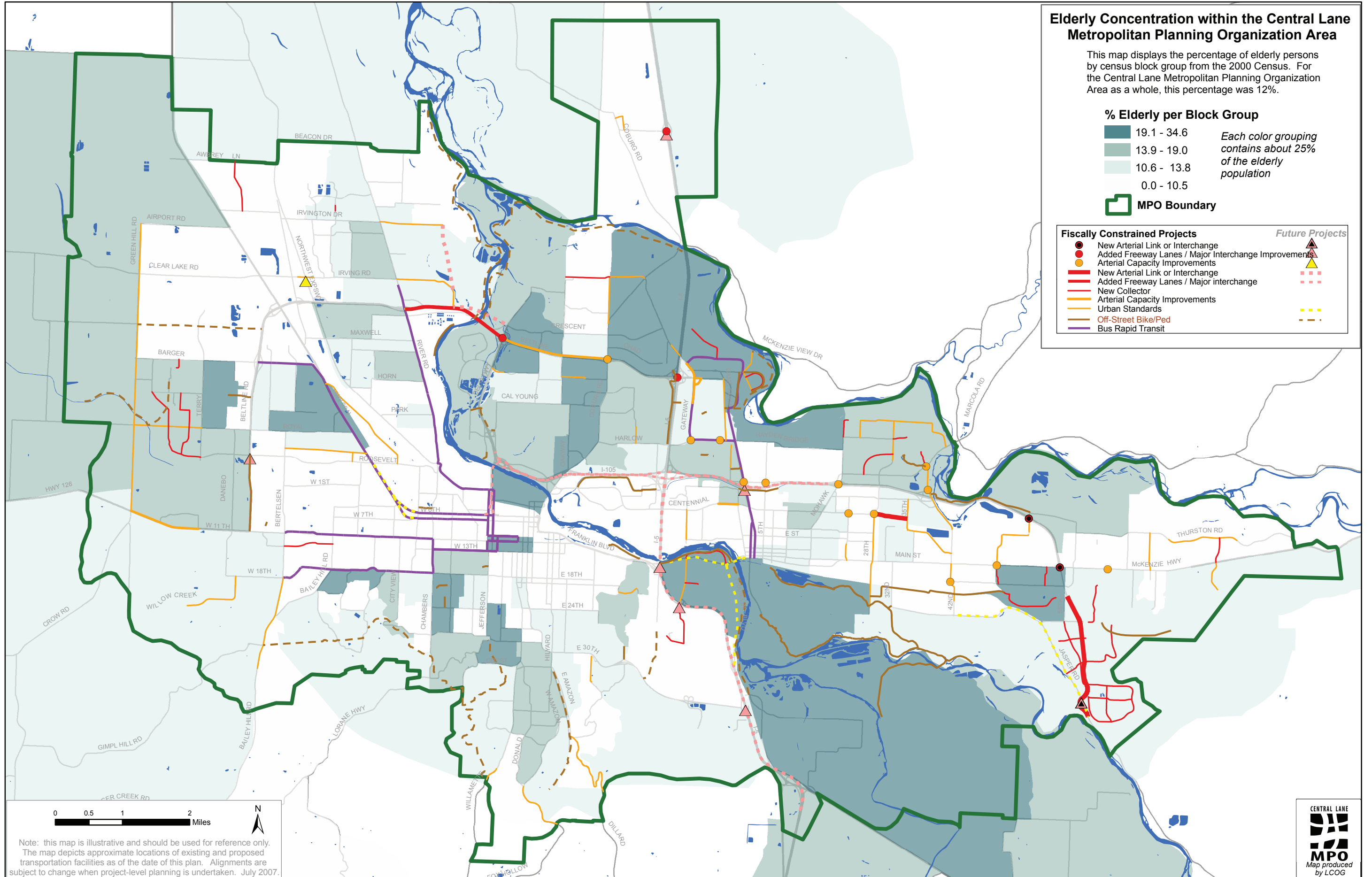
Future Projects

- New Arterial Link or Interchange
- Added Freeway Lanes / Major Interchange Improvements
- Arterial Capacity Improvements
- New Collector
- Arterial Capacity Improvements
- Urban Standards
- Off-Street Bike/Ped
- Bus Rapid Transit



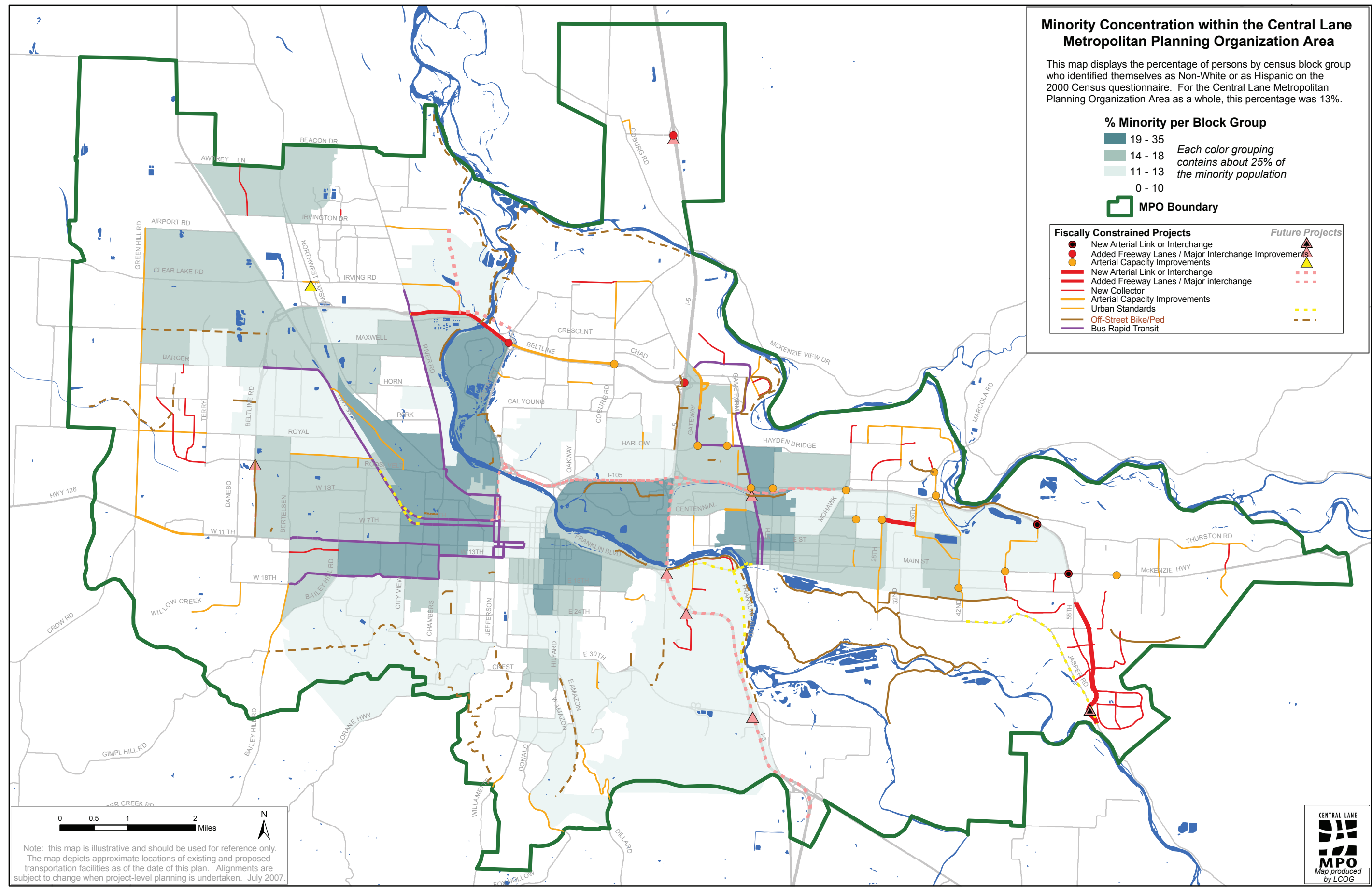
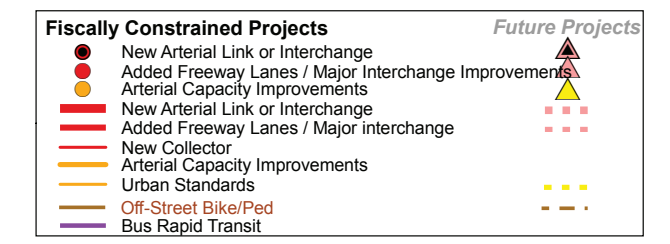
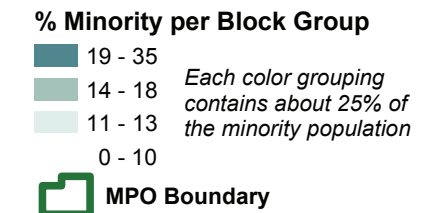
Note: this map is illustrative and should be used for reference only. The map depicts approximate locations of existing and proposed transportation facilities as of the date of this plan. Alignments are subject to change when project-level planning is undertaken. July 2007.



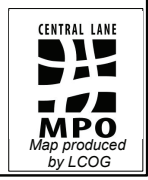


Minority Concentration within the Central Lane Metropolitan Planning Organization Area

This map displays the percentage of persons by census block group who identified themselves as Non-White or as Hispanic on the 2000 Census questionnaire. For the Central Lane Metropolitan Planning Organization Area as a whole, this percentage was 13%.



Note: this map is illustrative and should be used for reference only. The map depicts approximate locations of existing and proposed transportation facilities as of the date of this plan. Alignments are subject to change when project-level planning is undertaken. July 2007.



Disabled Concentration within the Central Lane Metropolitan Planning Organization Area

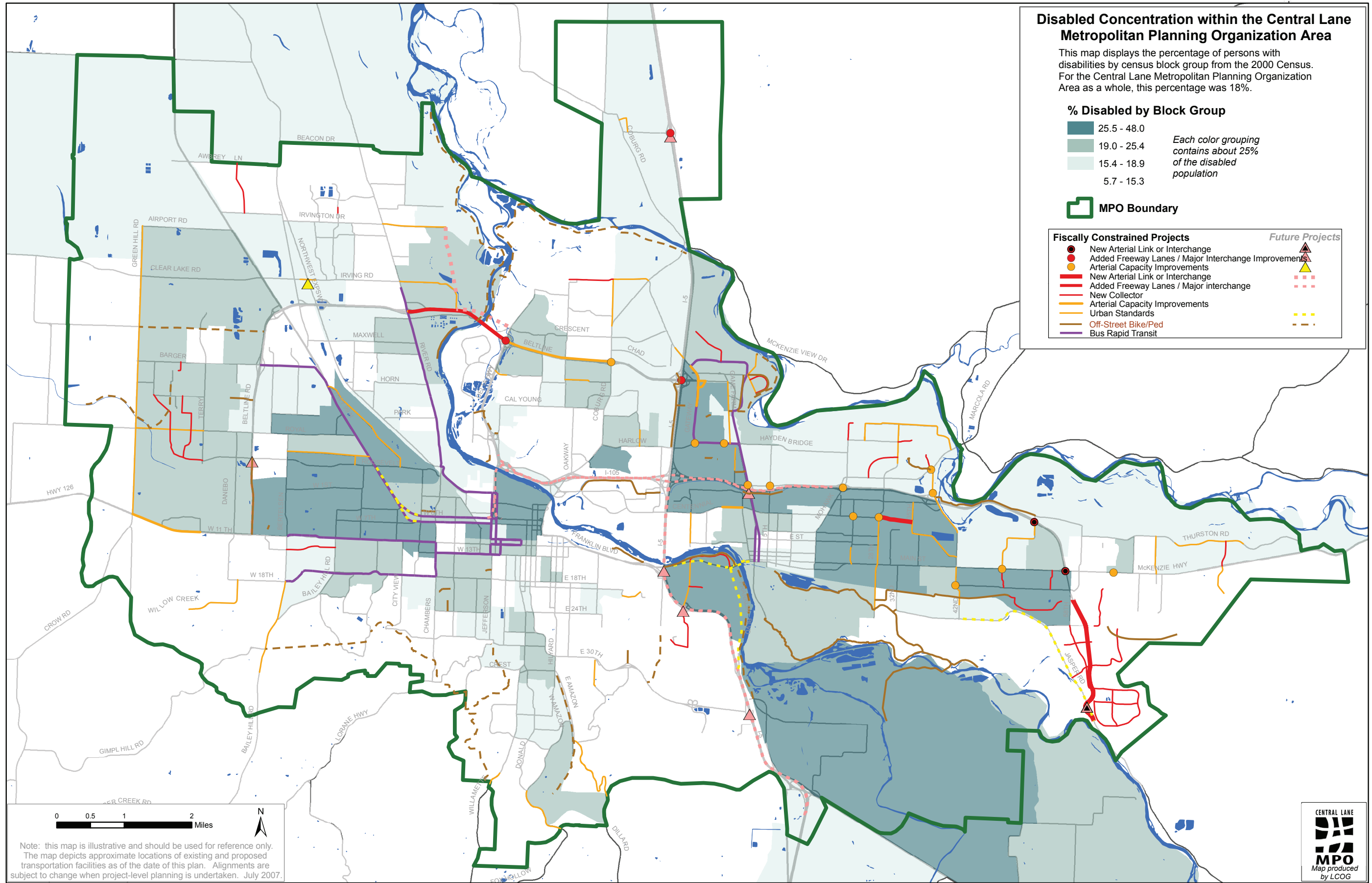
This map displays the percentage of persons with disabilities by census block group from the 2000 Census. For the Central Lane Metropolitan Planning Organization Area as a whole, this percentage was 18%.

% Disabled by Block Group

- 25.5 - 48.0
 - 19.0 - 25.4
 - 15.4 - 18.9
 - 5.7 - 15.3
- Each color grouping contains about 25% of the disabled population*

 MPO Boundary

- | Fiscally Constrained Projects | Future Projects |
|---|---|
| ● New Arterial Link or Interchange | ▲ New Arterial Link or Interchange |
| ● Added Freeway Lanes / Major Interchange Improvements | ▲ Added Freeway Lanes / Major Interchange Improvements |
| ● Arterial Capacity Improvements | ▲ Arterial Capacity Improvements |
| — New Arterial Link or Interchange | - - - New Arterial Link or Interchange |
| — Added Freeway Lanes / Major Interchange | - - - Added Freeway Lanes / Major Interchange |
| — New Collector | - - - New Collector |
| — Arterial Capacity Improvements | - - - Arterial Capacity Improvements |
| — Urban Standards | - - - Urban Standards |
| — Off-Street Bike/Ped | - - - Off-Street Bike/Ped |
| — Bus Rapid Transit | - - - Bus Rapid Transit |



0 0.5 1 2 Miles

Note: this map is illustrative and should be used for reference only. The map depicts approximate locations of existing and proposed transportation facilities as of the date of this plan. Alignments are subject to change when project-level planning is undertaken. July 2007.

