



Environmental Justice & Title VI Plan

August 2014



Rogue Valley Metropolitan Planning Organization

The RVMPO is staffed by the Rogue Valley Council of Governments

TABLE OF CONTENTS

Introduction.....	1
Map 1: RVMPO Planning Area.....	1
Chapter 1: RVMPO Process.....	3
1.1 Organization and Operation of the RVMPO.....	3
A. Nondiscrimination and Environmental Justice.....	4
B. RVMPO’s Role and Responsibilities in Nondiscrimination and Environmental Justice.....	5
1.2 Filing a Civil Rights Complaint	6
1.3 State and Federal Regulations	7
Chapter 2: Demographic Profile	9
2.1 Methodology	9
2.2 Demographic Findings and Population Maps	10
Map 2: Population Living Below the Poverty Level	11
Map 3: Senior Population	12
Map 4: Minority Population	13
Map 5: Limited English Proficiency (LEP) Population	14
Table 1: Race Alone and In Combination, and Ethnicity.....	15
Chapter 3: Implementation of Activities and Strategies	16
3.1 Status of Environmental Justice Planning.....	16
A. Title VI Coordinator	16
B. RVMPO Key Planning Products and Environmental Justice	16
C. Public Participation and Environmental Justice.....	17
D. Annual Title VI Reporting Requirements.....	18
E. Project Selection Process	18
F. Outreach to Organizations: Public Sounding-Boards.....	19
3.2 Future Considerations	19
A. Transportation Needs Assessment	19
B. Evaluation of Environmental Justice Outreach.....	19

Appedices	20
Appendix A: Federal Requirements for MPO Public Participation	21
Appendix B: Title VI Complaint Procedures and Complaint Form.....	22
Appendix C: Glossary	25
Appendix D: Project Evaluation Measures	29
Appendix E: US Census Poverty Threshold for 2012.....	30
Appendix F: Guidance for Transportation Planning	31

Introduction

The Rogue Valley Metropolitan Planning Organization (RVMPO) Environmental Justice and Title VI Plan has been developed to meet federal and state requirements for Metropolitan Planning Organizations (MPOs) to fulfill obligations under Title VI of the 1964 Civil Rights Act, the President's Executive Order on Environmental Justice (1994) and subsequent orders and enforcement regulations. Referred to generally as Title VI and Environmental Justice, the provisions are intended to prevent federally funded actions from having disproportionate impacts on certain populations and ensure that members of the public have equal access to the decision-making process.

The RVMPO Title VI Plan addresses civil rights law in three chapters:

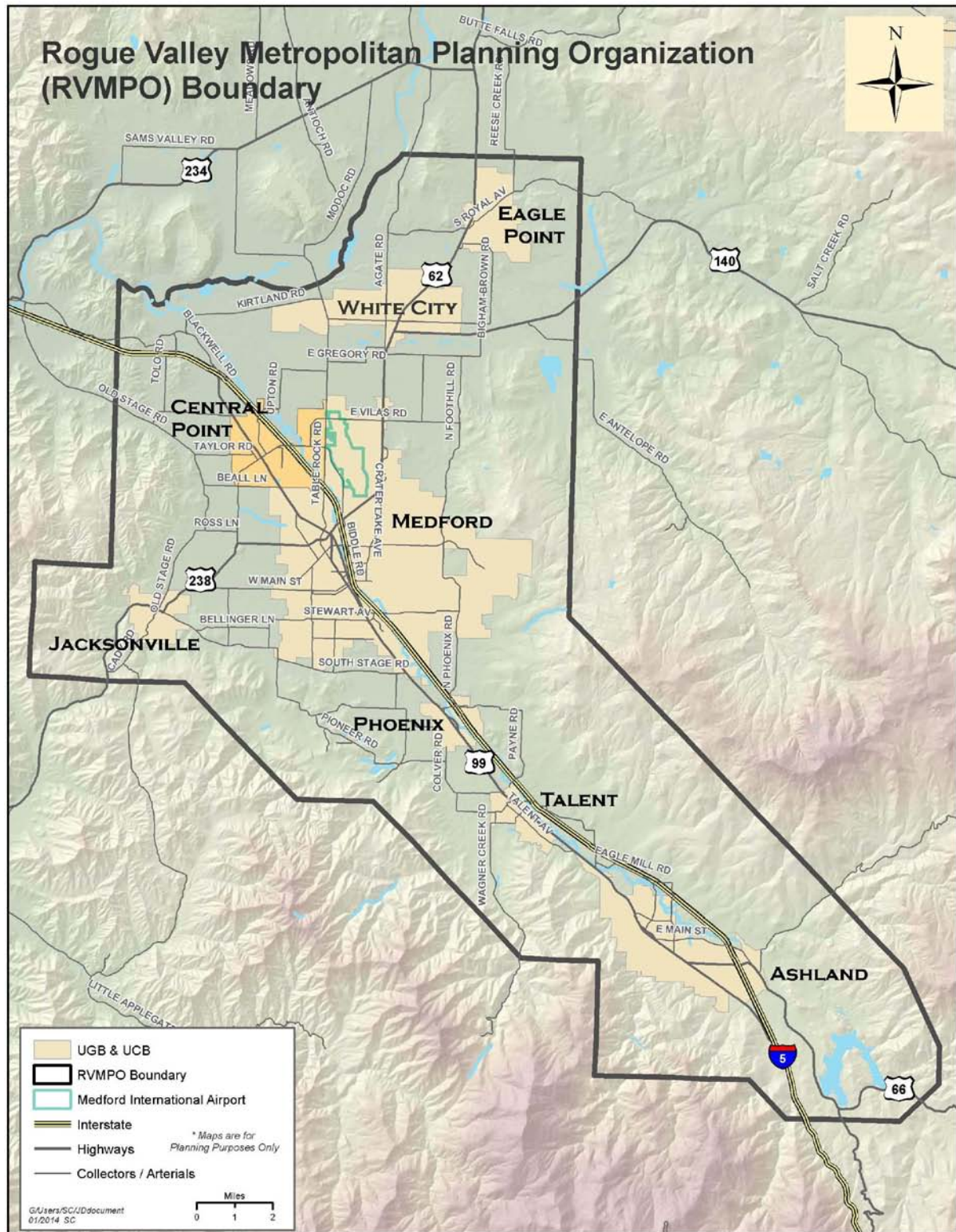
Chapter 1 provides information on the organization and operation of the RVMPO, the principles and regulations related to nondiscrimination and environmental justice, and the role and responsibilities of the RVMPO;

Chapter 2 presents a demographic profile of the Medford metropolitan planning area, including maps that identify areas that containing populations higher than the regional average for the various socio-economic groups;

Chapter 3 summarizes how nondiscrimination and environmental justice principles and requirements have been incorporated into planning activities. This chapter also offers direction for future efforts and presents methodologies for measuring the effectiveness of planning strategies.

All plans and documents referenced in this plan are available from the RVMPO at www.rvmppo.org. The RVMPO is staffed by the Rogue Valley Council of Governments, located at 155 N. 1st Street in Central Point, Oregon.

Map 1: RVMPO Planning Area



Chapter 1: RVMPO Process

This chapter provides an overview of metropolitan planning in the region, including the part that environmental justice and civil rights principles play in Rogue Valley Metropolitan Planning Organization (RVMPO) planning. The Title VI complaint process is described in Section 1.2, and specific federal and state authorities and requirements for incorporating environmental justice and civil rights in Section 1.3.

1.1 Organization and Operation of the RVMPO

In metropolitan areas over 50,000 population, the responsibility for transportation planning lies with designated Metropolitan Planning Organizations (MPO). The MPO was created in order to ensure that existing and future expenditures for transportation projects and programs were based on a continuing, cooperative, and comprehensive 93-C) planning process. Additionally, Oregon administrative rules define an MPO as “the organization designated by the Governor to coordinate transportation planning in an urbanized area of the state.” This includes developing the area's long-range transportation plan, the Rogue Valley Regional Transportation Plan (RTP), which addresses the region's projects, programs and policies for at least a 20-year period. It also includes maintaining the Metropolitan Transportation Improvement Program (MTIP), which is a short-range document listing transportation projects to be initiated within the MPO using federal funds, or deemed “regionally significant”.

With an estimated population of just over 175,400, the RVMPO planning area includes the urbanized area of Jackson County – cities of Ashland, Central Point, Eagle Point, Jacksonville, Medford, Phoenix, Talent, and White City, including surrounding unincorporated and rural areas.

The RVMPO is a function of the Rogue Valley Council of Governments (RVCOG), a voluntary association of local governments that provides a forum for coordinated problem solving and regional planning for Jackson and Josephine Counties. The Governor of Oregon designated RVCOG as the RVMPO on July 27, 1982. The RVCOG Board of Directors subsequently delegated responsibility for RVMPO policy functions to the RVMPO Policy Committee, a committee of elected and appointed officials from each jurisdiction within the urbanized area, including Rogue Valley Transportation District (RVTD) and the Oregon Department of Transportation (ODOT). The Policy Committee is the RVMPO’s decision-making board.

A. Nondiscrimination and Environmental Justice

Two key federal actions provide the basis for the civil protections addressed in this plan:

1. The 1964 Civil Rights Act and Title VI of the Act (nondiscrimination)
2. Executive Order No. 12898 signed by President Clinton in 1994 (environmental justice)

The Civil Rights Act, and specifically Title VI of the Act, establishes the prohibition of 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 to include **sex**, **disability**, **age** and **income**. Additionally, legislation has broadened the application of the protections to all activities of federal-aid recipients, sub-recipients and contractors regardless of whether a particular activity is receiving federal funding.

The 1994 Executive Order (No. 12898, also described at the end of the chapter, in the section listing all pertinent federal and state regulations) focused attention on Title VI of the Civil Rights Act 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.”

The three fundamental principles of environmental justice:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and 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 of these protections for minority and low-income populations.

Environmental justice must be considered in all phases of planning. Areas of focus and particular concern are: *public participation* – to ensure that protected populations have real and equitable opportunities to influence decisions; and an *analysis* – to assess the distribution of benefits and impacts on protected populations.

The last section of this chapter lists all related regulations and identifies their application to metropolitan planning. Of significance to MPOs, a Federal Highway Administration and Federal Transit Administration October 7, 1999, memorandum clarifies Title VI requirements in metropolitan and statewide planning by identifying a series of actions that can be taken to support Title VI compliance and environmental justice goals, as described on the following page.

Examples of MPO actions that support Title VI compliance and environmental justice goals:

- Develop a demographic profile of the metropolitan planning area that identifies the locations of socio-economic groups.
- Identify the transportation needs of low-income and minority populations.
- Assess the regional benefits and burdens of transportation system investments in the RTP and TIP for socio-economic groups.
- Have a public involvement strategy for engaging minority and low-income populations in transportation decision making.

The actions described in the text box above form the basis of this plan.

B. RVMPO's Role and Responsibilities in Nondiscrimination and Environmental Justice

The RVCOG and the RVMPO receive federal funds and therefore are subject to provisions of Title VI of the Civil Rights Act, including environmental justice. According to guidance from Federal Highway Administration (FHWA), MPOs serve as the primary forum where state transportation departments, transit providers, local agencies and the public develop regional transportation plans and programs to address a metropolitan area's transportation needs. While environmental justice concerns are more frequently raised during project development, Title VI compliance is involved in plans, programs, and activities of planning, all of which the RVMPO are actively involved.

To support Title VI and environmental justice, the FHWA states that 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.

Moreover, the Oregon Department of Transportation (ODOT) stipulates Title VI requirements of all sub-recipients of federal funds. A summary of which is provided below.

- Appoint a Title VI coordinator.
- Obtain Title VI training for coordinator and other key staff.

- Proactively prevent discrimination as defined in Title VI and related authorities; Disseminate Title VI program information to the public.
- Include Title VI compliant language in all contracts to second tier sub-recipients.
- Obtain and maintain data on race, ethnicity, age, gender, disability, limited English proficiency, and income of populations in service area.
- Proactively include traditionally under-represented populations (hard to reach through traditional notification process) in public involvement and informational processes.
- Analyze the benefits and burdens of activities and projects on the service area Title VI protected population.
- Perform periodic self-assessments for Title VI compliance.
- Develop annual Title VI reports and respond to periodic Title VI reviews by ODOT.
- Correct any deficiencies identified through a review or complaint.

1.2 Filing a Civil Rights Complaint

RVMPO has a Title VI complaint procedure in place. The process is available on the RVMPO website (rvmpo.org), referenced in the Public Participation Plan, and provided in Appendix B of this document, along with the complaint form. The procedures cover complaints filed under Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 against any program or activity administered by the RVCOG Planning and Community Development Program (which includes all RVMPO activities).

Any person who feels that he or she has been subjected to discrimination on the basis of race, color, national origin, sex, disability and age has the right to file a Title VI complaint with RVCOG. Intimidation or retaliation of any kind is prohibited by law.

Complaints must be filed (either in person or in writing) within 180 days of the alleged discriminatory event or practice. Complaints should be directed to the Title VI coordinator:

Andrea Napoli, RVMPO Title VI Coordinator
 RVCOG
 155 N. 1st Street
 P O Box 3275
 Central Point, OR 97502

These procedures do not deny or limit the right of a complainant to file a formal complaint with an outside enforcement agency (ODOT, U.S. Department of Transportation or FHWA) or to seek private counsel for complaints alleging discrimination.

1.3 Authorities and Guidance

This section contains the regulations, statutes and orders that establish the requirements for non-discrimination for the Rogue Valley MPO. United State Code (USC) and Code of Federal Regulations (CFR) citations are provided. Additionally included in this list are federally issued memorandums specific to MPO compliance with Title VI requirements.

Title VI of the Civil Rights Act of 1964 mandates, “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 subjected to discrimination under any program or activity receiving Federal financial assistance.” (23 CFR 200 and 49 CFR Part 21). As the designated Metropolitan Planning Organization (MPO) for the Rogue Valley region, the Rogue Valley Metropolitan Planning Organization (RVMPO) is responsible for transportation planning and implementation of transportation projects, and is thus required to comply with this law.

The following notations expand on the authority, requirements and standards of the 1964 Act:

Federal Aid Highway Act of 1973 (23 USC 324) established prohibition of discrimination based on gender.

Civil Rights Act of 1987 broadened the scope of Title VI coverage by expanding the definitions of “programs or activities” to include all programs or activities of Federal Aid recipients, sub-recipients and contractors, regardless of whether the programs and activities are federally assisted (Public Law 100259 {S. 557}, March 22, 1988).

Americans with Disabilities Act of 1990 (42 USC 12101 et seq. and 49 CFR Parts 27, 37 and 38) and the **Rehabilitation Act of 1973, Section 504**, (29 USC 794) extend the protections under Title VI of the Civil Rights Act of 1964 to prohibit discrimination of persons with disabilities; and in Title II requires that public transit be accessible to persons with disabilities. The Act states that all new transit vehicles must be made accessible to persons with disabilities, and that paratransit can be used to complement existing fixed-route service.

Age Discrimination Act of 1975 prohibits discrimination based on age (42 USC 6101).

Executive Order 12250 (28 CFR Part 41) requires consistent and effective implementation of various laws prohibiting discriminatory practices in programs receiving federal funding assistance, including Title VI of the Civil Rights Act of 1964.

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. **U.S. Department of Transportation (USDOT) Order 6640.23** contains policies and procedures for the FHWA to use in complying with E.O. 12898.

USDOT Order on Environmental Justice (DOT Order 5610.2) describes how the principles in the Executive Order are to be incorporated into programs and activities. The DOT order states that the DOT will not carry out any program, policy or activity that will have a disproportionately high and adverse effect on minority or low-income populations unless mitigation measures or alternatives that would avoid the adverse impacts are not practicable.

Executive Order 13166 is intended to improve access to federally conducted and federally assisted programs and activities for those who because of national origin have limited English language proficiency (LEP). The order requires federal agencies to review services, identify any needed services and develop and implement a program so that LEP populations have meaningful access. LEP guidance from the U.S. Justice Department sets compliance standards that federal fund recipients must follow to ensure that programs and services provided in English are accessible to LEP individuals, and thereby do not discriminate on the basis of national origin (protection afforded under the 1964 Civil Rights Act, Title VI). U. S. Department of Transportation Policy Guidance: Federal Register, Vol. 70, No. 239, pages 74087-74100, Dec. 14, 2005.

FHWA and FTA Memorandum on Title VI Requirements (October 7, 1999) clarifies Title VI requirements in metropolitan and statewide planning. The memorandum provides 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.

Administrative Regulations, 23 CFR 200 and 49 CFR 21 from Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) set requirements for state transportation departments to implement Title VI policies and procedures at the state and local levels.

USDOT Planning Assistance and Standards for metropolitan planning require 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” (23 CFR 450.316). Additional staff guidance from FHWA and FTA provides direction for assessing an MPO’s level of compliance with Title VI, and establishes a corrective process that can affect federal funding.

FTA Circulars 4702.1 & 4702.1B provides recipients and subrecipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out the USDOT Title VI regulations (49 CFR part 21).

Oregon DOT Title VI Plan, adopted in 2002, the plan provides a template for Title VI planning and reporting. Local agencies with approved Title VI program plans or nondiscrimination agreements must prepare a Title VI Annual Accomplishment Report to document Title VI Program compliance activities related to transportation projects. The state agency also has issued local agency guidelines for Title VI plans developed by local agencies.

Oregon Revised Statutes contain protections against discrimination in employment, accommodations and real property transactions based on race, color, religion, gender, sexual orientation, national origin, marital status, age, disability or family status.

Chapter 2: Demographic Profile

The RVMPO considers the impact that its programs may have on Title VI populations. This chapter serves as a resource for local and regional transportation planning by providing recent and statistically reliable information about areas of identified populations and population demographics using 2010 Census and 2007-2011 American Community Survey (ACS) data. The following population analyses have been prepared to assist in assessing the needs of, and analyzing the potential impacts on and benefits to protected populations, as well as assisting in outreach to such populations.

About the Data

It is important to note that past demographic profiles used by the RVMPO drew from information in the 2000 decennial census, where “long form” socio-economic survey data had been collected. The U.S. Census Bureau now uses the “short-form” for its decennial census, and the American Community Survey (ACS) now collects socio-economic information using monthly random surveys rather than a point-in-time decadal survey. The ACS survey data is accumulated and pooled over 12, 36, and 60 months in rolling estimates, with 5-year data being available for the RVMPO region at the census tract level (vs. block group for 2010 Census data). Due to this fundamental change in the way the information is now collected, decennial data and ACS data are not comparable. Additionally, due to current limitations of the recent implementation of the ACS, disabled populations within the RVMPO area are not able to be mapped at this time. This is a population class protected under Title VI which the RVMPO continues to recognize.

2.1 Methodology

Populations evaluated include those living below the poverty level, seniors, minorities, and those that speak English less than “well”. To assess the distribution of these protected populations within the RVMPO region, data from the 2010 Census and the ACS were used. As the decadal census no longer collects socio-economic data as explained in *About the Data*, above, information for low-income and limited English proficiency (LEP) populations was collected from the ACS.

Census and ACS data were collected and incorporated into a Geographic Information Systems (GIS) database and combined with RVMPO GIS base layers. Maps were created to identify and assess the distribution of Title VI populations within the MPO region. Population concentrations above regional averages have been identified at the census tract and block group levels.

2.2 Population Maps

In some locations within the RVMPO planning area, percentages of protected populations are higher than the average for the region as a whole. These instances of higher than regional average concentrations are provided visually on the maps contained in the following pages.

Population Living Below the Poverty Level (Map 2)

According to the U.S. Census Poverty Thresholds for 2012, the poverty threshold for a family of two adults and two children equated to an annual household income of \$23,283. Within the RVMPO area, more than 28,600 people (17.5% of the area's population) had income in the past 12 months falling below the poverty level during the 2007-2011 ACS period. According to 2007-2011 ACS data, the RVMPO area has an average poverty rate of 17.5%, while Jackson County averages 15.8%.

**Please note that the Census Bureau uses a set of dollar value thresholds that vary by family size and composition to determine those in poverty. For more information on how the poverty level is measured and calculated, please refer to the chart in Appendix E.*

Senior Population (Map 3)

Using 2010 Census data at the block group level, the senior population (age 65+) within the RVMPO area is 17.4% of the area's total population. This average is just slightly lower than the Jackson County Senior population average of 17.6%, and well over the national average of 13%.

Minority Population (Map 4 & Table 1)

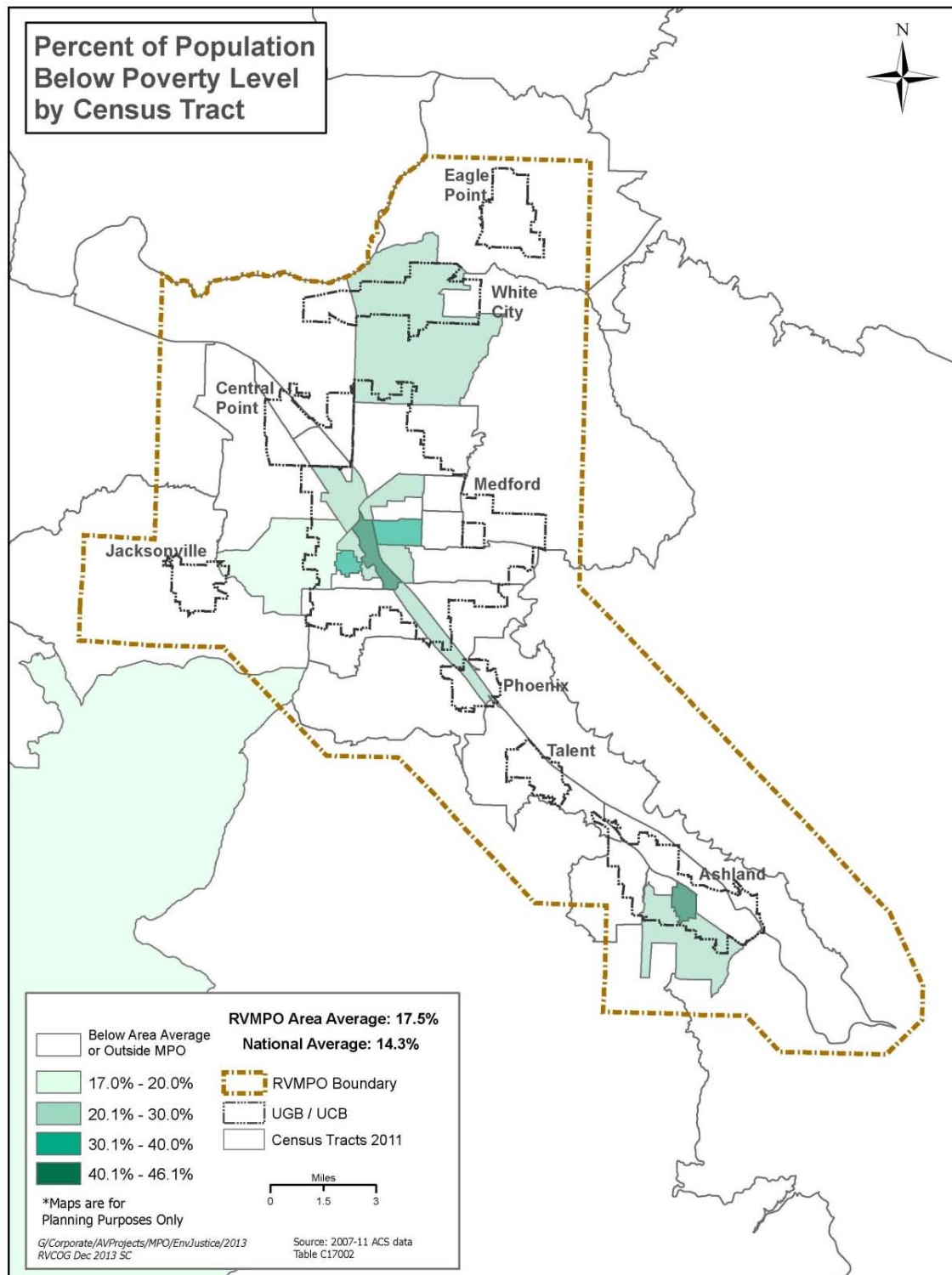
For this report, Minority is defined as all persons who identified themselves as non-white, mixed-race, or Hispanic in their choices of race and ethnicity during the 2010 Census. A total minority population of 30,948 resides in the RVMPO area and comprises 17.5% of the population. In comparison, 16.3% of the Jackson County population identifies as non-White.

Limited English Proficiency (LEP), Persons Who Speak English Less than "Well" (Map 5)

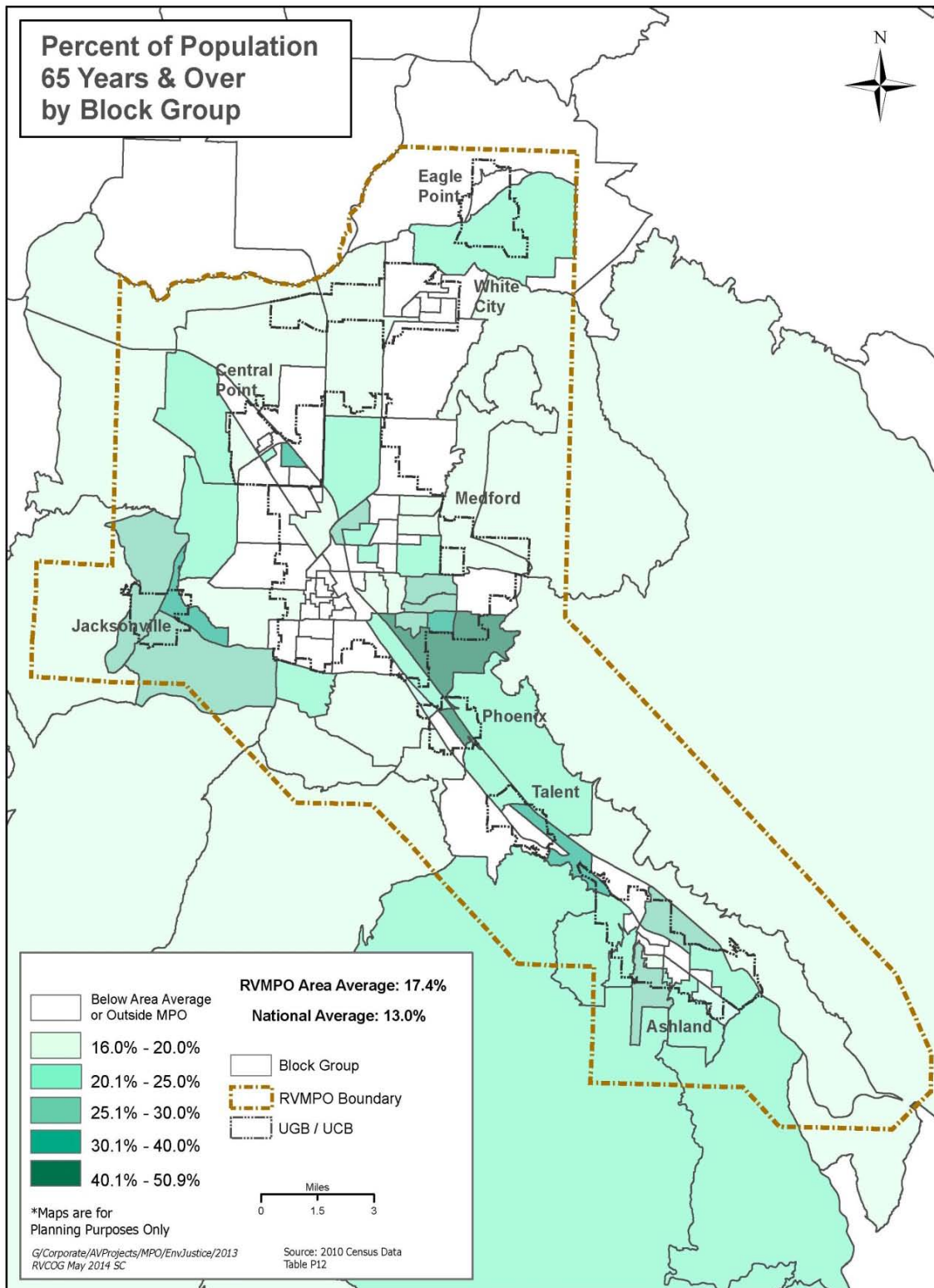
One of the categories covered under Title VI is national origin. Discrimination based on national origin includes that of a person's inability to speak, read, write, or understand English. In following *Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency*, those receiving federal financial assistance (recipients, sub-recipients, contractors) must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide.

Based on 2007-2011 ACS data, an average of 2.4% of the RVMPO area population speaks English less than "well" (those that speak English "not well" and "not at all"). In Jackson County, 2.1% of the population speaks English less than "well". Approximately 93% of the LEP population within the RVMPO area speaks Spanish as their first language. The RVMPO will upon request provide written/oral communications in Spanish.

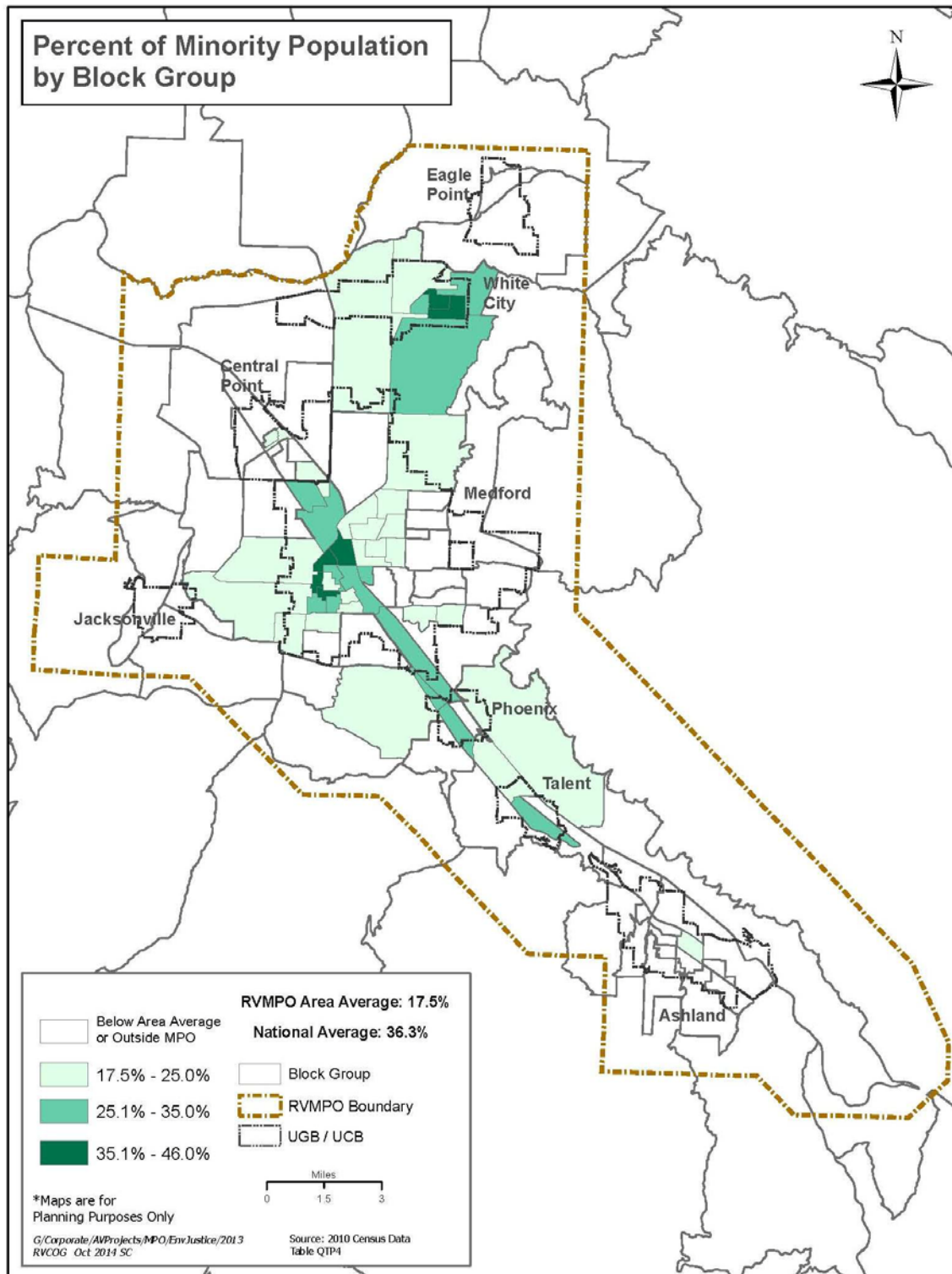
Map 2: Population Living Below the Poverty Level



Map 3: Senior Population



Map 4: Minority Population



Map 5: Limited English Proficiency Population

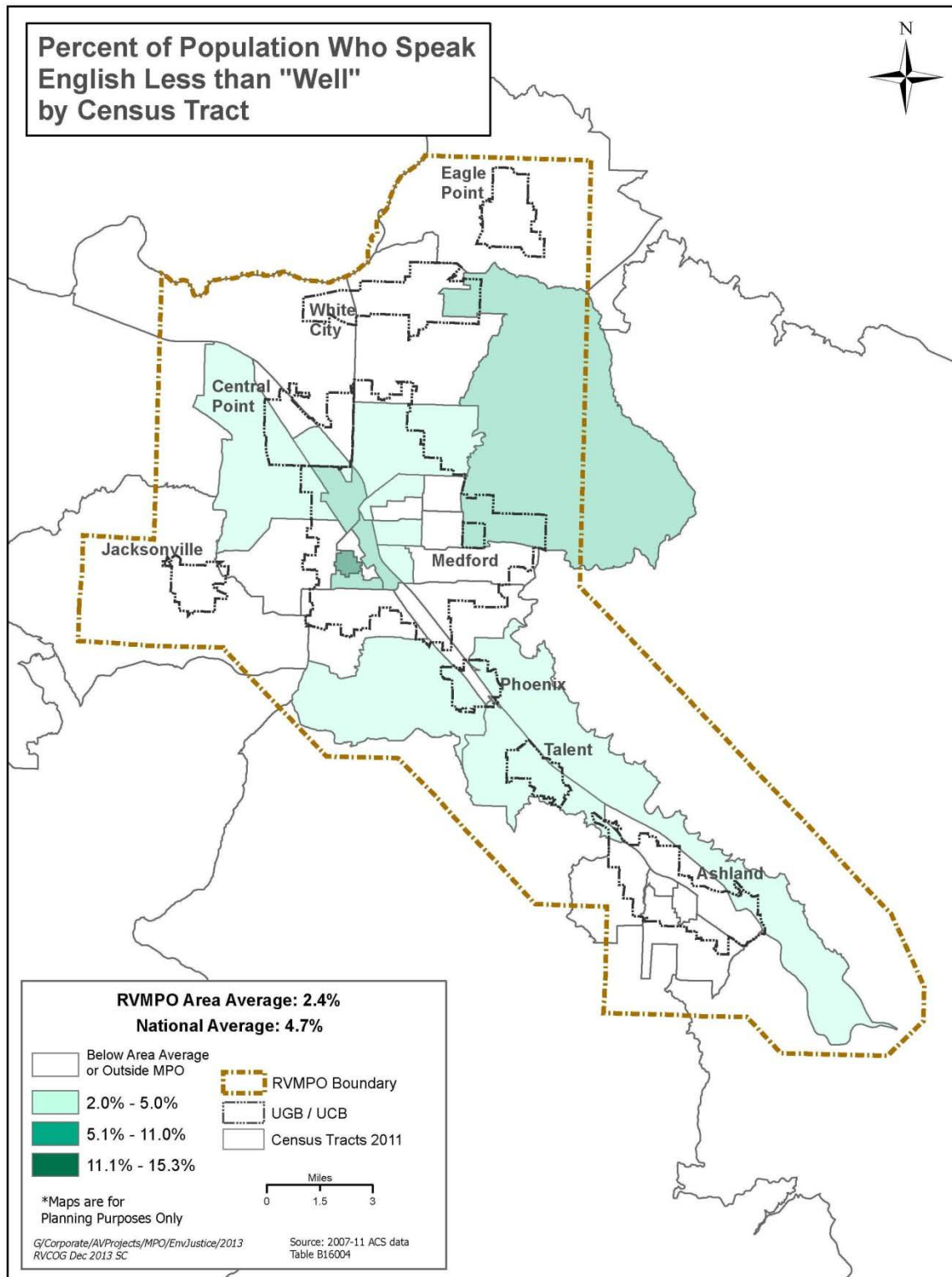


Table 1: Race Alone and in Combination (2010 Census Data)

Total Est. Population:	ONE RACE ALONE: and NOT HISPANIC OR LATINO								ONE RACE ALONE: and HISPANIC OR LATINO							
	Not Hispanic or Latino:	White alone	African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Two or More Races	Hispanic or Latino:	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone	Two or More Races
176771	156106	145823	1151	1599	2181	537	207	4608	20665	9474	138	475	56	32	8738	1752
	88.3%	82.5%	0.7%	0.9%	1.2%	0.3%	0.1%	2.6%	11.7%	5.4%	0.1%	0.3%	0.0%	0.0%	4.9%	1.0%

	RACE ALONE OR IN COMBINATION : and NOT HISPANIC OR LATINO											
Total Est. Population:	White alone or in combination	White alone	Black or African American alone or in combination	Black or African American alone	American Indian and Alaska Native alone or in combination	American Indian and Alaska Native alone	Asian alone or in combination	Asian alone	Native Hawaiian and Other Pacific Islander alone or in combination	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone or in combination	Some Other Race alone
176771	161257	155297	2397	1289	4977	2074	3664	2237	1139	569	10266	8945
	91.2%	87.9%	1.4%	0.7%	2.8%	1.2%	2.1%	1.3%	0.6%	0.3%	5.8%	5.1%

	RACE ALONE OR IN COMBINATION : and HISPANIC OR LATINO											
Total Est. Population:	White alone or in combination	White alone	Black or African American alone or in combination	Black or African American alone	American Indian and Alaska Native alone or in combination	American Indian and Alaska Native alone	Asian alone or in combination	Asian alone	Native Hawaiian and Other Pacific Islander alone or in combination	Native Hawaiian and Other Pacific Islander alone	Some Other Race alone or in combination	Some Other Race alone
176771	11039	9474	304	138	941	475	242	56	120	32	9921	8738
	6.2%	5.4%	0.2%	0.1%	0.5%	0.3%	0.1%	0.0%	0.1%	0.0%	5.6%	4.9%

Chapter 3: Implementation of Activities and Strategies

This chapter identifies RVMPO work products and activities, and discusses how environmental justice planning is incorporated into final products and decision making.

3.1 Status of Title VI / Environmental Justice Planning

This section summarizes planning efforts to fulfill environmental justice and Title VI requirements for MPO planning.

A. Title VI Coordinator

The RVMPO appoints and supports a Title VI coordinator who is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of administration. As part of this responsibility, the coordinator ensures that RVMPO program administration complies with Title VI. Compliance includes addressing civil rights complaints, engaging in public awareness activities, preparing annual Title VI reports, providing support and information to the region as requested, and collecting and maintaining up-to-date data to support ongoing nondiscrimination activities including updating and implementing this plan. The coordinator also is responsible for obtaining adequate training and other support for RVMPO staff involved in Title VI compliance, ensuring that projects undertaken by the RVMPO support environmental justice principles, and serves as the environmental justice point of contact.

B. RVMPO Key Planning Products and Title VI / Environmental Justice

The RVMPO accounts for environmental justice and Title VI considerations in its planning products and projects. On an ongoing basis, the RVMPO is responsible for adopting and maintaining the documents described below. Efforts made to include Title VI planning in each work product are described.

- The **Unified Planning Work Program (UPWP)** is an annual plan of how the organization will use federal, state and local MPO planning funds to fulfill state and federal MPO planning obligations. Projects to address environmental justice, including efforts to comply with state and federal requirements, are described, and funds allocated. UPWP activities generally address data gathering, outreach to targeted populations and producing annual compliance reports and responding to complaints.
- The **Metropolitan Transportation Improvement Program (MTIP)** generally is updated bi-annually (and at least every four years) to program fully funded transportation projects that are ready to be implemented within the current four-year timeframe. RVMPO sets federal funding amounts and lists all projects of regional significance regardless of funding source. Project impacts to target populations are examined and scored during the discretionary fund project selection process, with public outreach (including environmental justice populations) conducted in the process of drafting and approving the MTIP consistent with the Public Participation Plan.
- The **Regional Transportation Plan (RTP)** is the long-range multi-modal plan updated every four years and providing a 20-year horizon of planned, funded transportation projects. It includes consultation with the public and identified interests and discussion of potential impacts. The discussion of impacts includes examination of projects relative to neighborhoods generally and environmental justice populations specifically. The public involvement component of developing and adopting the plan includes providing information, soliciting comments and providing a two-way flow of information between environmental justice communities and RVMPO decision makers, consistent with the Public Participation Plan.

C. Public Participation and Nondiscrimination / Environmental Justice

The RVMPO has developed a public participation plan that includes addressing public involvement and the need to communicate with populations that may be traditionally underserved. The plan sets goals and objectives for involving the public into decision-making processes. It includes descriptions of tools, techniques and procedures to be followed to ensure that the public has opportunities to learn about matters coming before the organization, voice preferences and opinions, see how public input is considered by decision makers and understand the impact that input has had on decisions made. As part of that, the RVMPO will upon request (via email, phone, or written request) provide written or oral translation in Spanish.

A key public involvement activity in the RVMPO Public Participation Plan is the RVMPO's Public Advisory Committee (PAC), which makes recommendations to decision makers. PAC positions represent all of the geographic areas of the RVMPO as well as the following topical interests: low-income, minorities, senior, public health, public transportation, and freight. Members must live, work, own property in, or do business within the geographical area they represent. To represent one of the six interest areas a member must demonstrate a particular interest or expertise in the topic. All PAC members are appointed by the RVMPO Policy Committee.

In order to adapt and be able to adjust strategies to improve performance, the RVMPO evaluates and updates their public involvement techniques. Federal requirements for MPO public participation can be found in Appendix A.

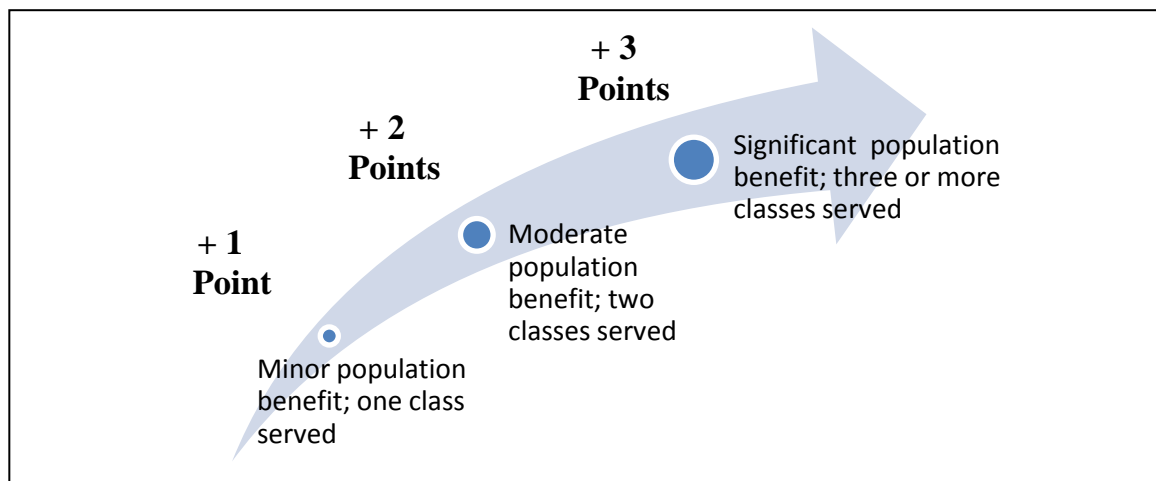
D. Annual Title VI Reporting Requirements

To meet the Oregon Department of Transportation (ODOT) Title VI requirements, the RVMPO must prepare an annual report documenting Title VI program compliance. The report provides an overview of activities to provide sufficient insight into Title VI program implementation efforts within the fiscal year. As the RVMPO contains a population less than 200,000, annual reports are not required to be submitted, but must be kept on record should ODOT conduct an audit. A summary of the required information to complete the annual report is contained in Chapter 1, Section 1.1.B of this plan.

E. Project Selection Process

As a recipient of federal funds, RVMPO must maintain a commitment to nondiscrimination and environmental justice. There are two federal funding sources over which the RVMPO has discretion: the Surface Transportation Program (STP) and the Congestion Mitigation and Air Quality (CMAQ) program. The RVMPO has developed criteria for evaluating and scoring project applications that apply for STP and CMAQ funds, which includes that based on service to targeted Title VI populations. This process includes identifying potential benefits or impacts on such populations by using the project application materials (project area map and description), and comparing to the population maps contained in Chapter 2 (see Section 2.2 Population Maps and Appendix E: Project Evaluation Measures). Projects earn a numerical score based on the level of benefit provided.

Figure 1: RVMPO Project Scoring Related to Environmental Justice



Projects are initially evaluated by staff, with staff results and application information being posted on the RVMPO website and advertised for public comment (30-days). The Technical Advisory Committee and Public Advisory Council review all materials and make recommendations to the Policy Committee, who ultimately determine all final funding decisions.

F. Outreach to Organizations: Public Sounding-Boards

RVMPO uses existing and recognized community groups to reach target populations and to engage the public in planning issues – especially as they relate to environmental justice. A number of organizations are contacted during public involvement activities. RVMPO maintains a roster of environmental justice-related groups, advocates and interested parties.

3.2 Future Considerations

This section identifies future work tasks that could enhance the RVMPO's response to environmental justice related concerns.

A. Transportation Needs Assessment

The RVMPO's Title VI program could benefit by conducting outreach to environmental justice populations to better understand the transportation needs of target populations. Due to potentially shifting areas of employment in relation to minority and low income populations and their need to access these locations, an assessment would help the region identify needs. Participants in the assessment should include Rogue Valley Transportation District, the regional Job Council, and the state Employment Division.

The most common measures of transportation benefits are improvements in accessibility, travel time to jobs or other activities, and availability of transportation services. The assessment would provide the region with travel information from targeted populations and information about unmet demand. The needs assessment should be updated periodically to measure the impact of service improvements and identify new demands.

B. Evaluation of Protected Population Outreach

Federal Metropolitan Planning guidelines require periodic review of the effectiveness of public involvement processes. RVMPO will review the public involvement process and activities to ensure that all interested parties, including transportation stakeholders and traditionally underserved groups, have the opportunity to provide input. By evaluating public involvement activities, it is possible to improve or add new activities to the MPO program and to discontinue those that are deemed ineffective. RVMPO staff will review the Public Participation Plan with respect to changes in local, state and federal legislation and in terms of its effectiveness in assuring that the process provides full and open access to the public. If the RVMPO, including both staff and committees, and the public determine that involvement techniques described in the plan are inadequate, additional techniques will be researched for inclusion into the RVMPO public involvement process.

Appendices

Appendix A: *Federal Requirements for MPO Public Participation*

Public involvement process requirements in 23 CFR450, Section 450.316(b) (1) that the RVMPO addresses through their Goals and Objectives are listed below.

1. Require a minimum public comment period of 45 days before the public involvement process is initially adopted or revised;
2. Provide timely information about transportation issues and processes to citizens, affected public agencies, representatives of transportation agency employees, private providers of transportation, other interested parties and segments of the community affected by transportation plans, programs and projects (including but not limited to central city and other local jurisdiction concerns);
3. Provide reasonable public access to technical and policy information used in the development of plans and TIPs and open public meetings where matters related to the Federal-aid highway and transit programs are being considered;
4. Require adequate public notice of public involvement activities and time for public review and comment at key decision points, including, but not limited to, approval of plans and TIPs (in nonattainment areas, classified as serious and above, the comment period shall be at least 30 days for the plan) TIP and major amendment(s);
5. Demonstrate explicit consideration and response to public input received during the planning and program development processes;
6. Seek out and consider the needs of those traditionally underserved by existing transportation systems, including but not limited to low-income and minority households;
7. When significant written and oral comments are received on the draft transportation plan or TIP (including the financial plan) as a result of the public involvement process, a summary, analysis, and report on the disposition of comments shall be made part of the final plan and TIP;
8. If the final transportation plan or TIP differs significantly from the one which was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts, an additional opportunity for public comment on the revised plan or TIP shall be made available;
9. Public involvement processes shall be periodically reviewed by the MPO in terms of their effectiveness in assuring that the process provides full and open access to all;
10. These procedures will be reviewed by the FHWA and the FTA to assure that full and open access is provided to decision-making processes.
11. The MPO public involvement processes shall be coordinated with statewide public involvement processes wherever possible to enhance public consideration of the issues, plans, and programs and reduce redundancies and costs.

Appendix B: Title VI Complaint Procedures and Complaint Form

The procedures and form below support Section 1.2 Filing a Civil Rights Complaint.

Complaint Procedures

Complaint is received in person or in writing by the Title VI Officer.

1. If the complaint is received by phone or a written complaint provides incomplete information, the complainant will be requested to complete RVCOG's discrimination complaint form.
2. Upon receipt of the signed complaint form, the Title VI Officer will record the complaint in a log, determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation.
3. The first step in conducting the investigation will be the preparation of an investigation plan, identifying the following elements:
 - Basis of complaint;
 - Issues to be addressed;
 - Information needed to answer the questions posed by the issues (what actually happened, who was involved, past practices, etc.);
 - Sources from which the information will be obtained (witnesses, written documents, etc.);
 - How the information will be obtained (telephone interviews, travel to other offices, review of records, etc.); and
 - Projected timeline for completion.
5. Within five (5) working days of receiving the complaint, the complainant will be notified in writing by the Title VI Officer regarding who will be conducting the investigation and the anticipated timeline for completion.
6. One of the first steps in the investigation will be to meet with the complainant to clarify the issues, obtain additional information and determine if informal resolution might be possible.
7. The Executive Director will be notified of the complaint.
8. The respondent (individual named in the complaint) will be notified of the complaint and the status of the investigation.
9. An attempt will be made to resolve the complaint informally or through mediation within the first 30 days.
10. If it is determined that informal resolution is not feasible, the investigator will proceed with the steps outlined in the investigation plan (interview witnesses, obtain written documentation, etc.).

11. After completing the investigation, information will be evaluated and a written report prepared. The report shall contain the following elements:
 - A description of the allegation;
 - A summary of the investigation;
 - Relevant facts (findings); and
 - Supporting documents attached, when appropriate.
12. The written investigation report will be submitted to the Executive Director within 60 days of the time the complaint was received. If circumstances require additional time, a status report will be submitted.
13. A copy of the report may also be sent to the RVCOG Counsel for review.
14. The investigator will meet with the Executive Director to discuss the findings and what further action may be appropriate.
15. The agency's final decision shall be made by the Executive Director.
16. The complainant and appropriate managers shall be notified in writing of the results of the investigation.
17. If the agency decision is adverse to the complainant, the complainant shall be notified of their appeal rights:
 - Internally, an appeal may be made to RVCOG's Executive Director.
 - External appeals under Title VI may be made to ODOT Region III Office.

Copies of all Title VI complaints and investigative reports will be sent to the ODOT Region III Office within 60 days of receipt of the complaint whenever possible. If, for some reason, the investigation cannot be completed within the timeframe, a status report shall be submitted to ODOT at this stage and the report shall follow upon completion.

**Rogue Valley Council of Governments ■ Rogue Valley Metropolitan Planning Organization
Discrimination/Harassment Complaint Form**

Name		Work Phone																					
Supervisor		Home Phone																					
Department	Position	Date of Hire																					
INFORMATION																							
Type of Complaint: <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Sex <input type="checkbox"/> Age <input type="checkbox"/> Religion <input type="checkbox"/> Disability <input type="checkbox"/> National Origin <input type="checkbox"/> Sexual Orientation																							
Nature of Complaint: (Describe the events, incident, etc. that led to your call today. Include who was involved, what was said, where it happened, and when it occurred. Please use the back of this form if additional space is needed.) 																							
Contact at: <input type="checkbox"/> Work <input type="checkbox"/> Home <input type="checkbox"/> Other _____																							
Witnesses:																							
Signature: _____ Date: _____ <div align="center"> <u>Return to:</u> Rogue Valley Metropolitan Planning Organization Coordinator Rogue Valley Council of Governments P O Box 3275 Central Point, OR 97502 </div>																							
Investigator's Disposition																							
Date Received:																							
Required Follow Up:																							
Name (Investigator):		Date Resolved:																					
Investigator: (Identify potential issues to determine appropriate follow-up) <table border="0"> <tr> <td>Age</td> <td>Disability</td> <td>Ethics</td> <td>Policies/Rules</td> <td>Safety</td> <td>Religion</td> <td>Mgmt Concern</td> </tr> <tr> <td>Gender</td> <td>Discipline</td> <td>Payroll</td> <td>Attendance</td> <td>Conduct</td> <td>Violence</td> <td>Race/Nat'l Origin</td> </tr> <tr> <td>Benefits</td> <td>Drugs/alcohol</td> <td>Performance</td> <td>Wage/hour</td> <td>Sexual Orientation</td> <td>Conflict of Interest</td> <td></td> </tr> </table>			Age	Disability	Ethics	Policies/Rules	Safety	Religion	Mgmt Concern	Gender	Discipline	Payroll	Attendance	Conduct	Violence	Race/Nat'l Origin	Benefits	Drugs/alcohol	Performance	Wage/hour	Sexual Orientation	Conflict of Interest	
Age	Disability	Ethics	Policies/Rules	Safety	Religion	Mgmt Concern																	
Gender	Discipline	Payroll	Attendance	Conduct	Violence	Race/Nat'l Origin																	
Benefits	Drugs/alcohol	Performance	Wage/hour	Sexual Orientation	Conflict of Interest																		

F:\TR\ADMIN\TITLE_VI\title vi complaint form.doc

Appendix C: Glossary

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 manmade 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 – Statements in every application for U.S. DOT financial assistance confirming that the applicant will comply with the U.S. DOT's Title VI regulations.

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

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 – Policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and lack substantial 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.

Disproportionately High and Adverse Effect on Minority and Low-Income Populations - An adverse effect that: (1) is predominantly 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 sub-recipient 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 services 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 DOT 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 DOT that is the principal source of federal financial assistance to 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.

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 U.S. Department of Health and Human Services poverty guidelines.

Low-Income Population - 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) who would be similarly affected by a proposed FHWA program, policy, or activity.

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 - 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.

Moving Ahead for Progress in the 21st Century (MAP-21) – The current bill that governs the country's federal surface transportation spending.

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. ODOT is the administrative agency that responds to policy set by the Oregon Transportation Commission (OTC).

Policy Committee - An intergovernmental policy group that makes RVMPO decisions. It consists of elected and appointed officials from all member jurisdictions: Ashland, Central Point, Eagle Point, Jacksonville, Medford, Phoenix, Talent, White City, Jackson County, Rogue Valley Transportation District and ODOT.

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 for carrying out the metropolitan transportation planning requirements of federal highway and transit legislation in cooperation with the state and other transportation providers.

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 Advisory Council – An RVMPO committee composed of residents and business operators from all communities within the RVMPO, plus advocates for the special-interest areas of transit, low-income families and minority communities. Acts as a community sounding board for RVMPO issues and makes recommendations to the Policy Committee.

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's 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 identifies all of the transportation improvements scheduled for funding over a minimum of the next 20 years.

Rogue Valley Council of Governments (RVCOG) - A voluntary association of 22 local governments and regional institutions in Jackson and Josephine counties dedicated to local and regional problem solving. RVCOG is a resource for technical expertise and project management and serves as a collective voice for the region when working with state and federal agencies.

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) – The previous transportation bill that governed the country's federal surface transportation spending for federal fiscal years 2005 - 2011.

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) – (Also known as a Metropolitan Transportation Improvement Program, MTIP) 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.

Transportation Planning - A collaborative process of examining demographic characteristics and travel patterns. 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 at least 20 years; short-range programming of specific projects usually covers a period of 4 to 5 years.

Technical Advisory Committee - A RVMPO committee of staff from the public works and planning departments of all member jurisdictions. It provides technical expertise and recommendations to the decision-making committee, the Policy Committee.

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.

Appendix D: Project Evaluation Measures

RVMPD Evaluation Measures – Goals and Project Funding Criteria

	RVMPD Goal	2034 RTP Goal	SAFETEA-LU / MAP-21 MPO Requirements	Evaluation Criteria	How Measured
1: Mobility		Plan for, develop and maintain a balanced multi-modal transportation system to address existing and future needs.	Enhance the integration and connectivity of the transportation system, across and between modes for people and freight.	1. Safety or security issue addressed, Accident/injury reduction	Describe safety problem, and how project would reduce number and severity of crashes. (If project demonstrates air quality benefit it will be evaluated for CMAQ.)
				2. Congestion relief/reduce delay	Level of Service improvement; idle time reduced. HDV may be calculated separately. (To qualify for CMAQ project must provide cost-effective congestion mitigation that provides an air quality benefit. If project adds capacity, it will not be considered for CMAQ.)
		Optimize safety and security of the transportation system.	Increase accessibility and mobility. Increase safety of the transportation system. Increase security of the transportation system.	3. Promote connectivity (more direct travel, network infill)	Describe connectivity feature. If project reduces VMT it could help the region meet greenhouse emission requirements.
				4. Population # served (ADT, pop/jobs win 1/2-mi)	Provide traffic count; estimate # jobs and population that will be served by this project. Objective is to show the number of people who will be served by the project. Staff will estimate population & employment using RVMPD model data. Numbers generated will be used to estimate VMT reduction and air quality benefit.
2: Community Vitality & Livability	Continue to work toward more fully integrating transportation and land use planning.	Use transportation investments to foster compact, livable communities. Develop a plan that builds on the character of the community, is sensitive to the environment and enhances quality of life.	Protect and enhance the environment, promote energy conservation, improve quality of life, and promote consistency between transportation improvements and planned growth and economic development.	1. Benefit/Impact on senior, disabled, low-income, or minority populations	Does the project impact protected populations based on RVMPD Environmental Justice Plan
				2. Support Alternative Measure 2: improve transit accessibility	Is the project located along existing/planned transit route? Does the project promote or support an increase in housing along fixed route transit? Level of density within 1/4 mile buffer of project area.
		Use transportation investments to foster economic opportunities.	Support economic vitality especially by enabling global competitiveness, productivity and efficiency.	3. Support Alternative Measure 5: Increase % housing in downtowns, mixed use/ pedestrian friendly areas Support Alternative Measure 6: Increase % employment in downtowns, mixed use/ pedestrian friendly areas	Is the project located in a downtown, activity center, designated TOD or other mixed-use (residential/employment) area? Does the project support, or is it part of, a high-density (at least 10-units/acre for housing) area? Describe the relationship
				4. Benefit to freight movement, commercial traffic	Describe the benefit to movement of commercial vehicles. (If project reduces truck VMT or emissions – esp. pre 1986 trucks – project will be evaluated for CMAQ.)
3: Transportation Options	Increase integration and availability of transportation options.	Use incentives and other strategies to reduce reliance on single-occupant vehicles.		1. Encourage/support SOV reduction; Reduce auto dependence.	Does the project reduce SOV use; what elements of project contribute?
				2. Support Alternative Measure 1: increase transit, bike, ped mode share	Describe how the project will increase use of alternative modes
				3. Support Alternative Measure 3: increase bike facilities	Provide total length of bicycle lane and/or describe other improvement
				4. Support Alternative Measure 4: increase sidewalks on collectors, arterials in TOD areas	Provide total length of qualifying sidewalks
4: Resource Conservation	Incorporate environmental and energy conservation into the RVMPD planning process.	Maximize efficient use of transportation infrastructure for all users and modes.	Promote efficient system management and operation.	1. Address/mitigate environmental impacts	Describe project's benefit to natural environment. Does project include conservation features (ex. permeable surface)
				2. Air quality benefit, long term including NOX and VOC.	If there are air quality benefit in addition to responses provided to RED-TEXT criteria, describe. Emission reductions and cost/benefit analysis will be done based on responses provided to items in red. Numbers supplied or staff-generated for Mobility item 4 will be used in this analysis.
				3. Reduce greenhouse gas emissions (CO ₂)	Does the project reduce reliance on travel by combustion vehicles, or shift to lower-carbon fuel? (It's anticipated that projects contributing to the Alternative Measures will reduce GHG emissions.)
		Encourage use of cost-effective emerging technologies to achieve regional transportation goals.	Emphasize the preservation of the existing transportation system.	4. Use emerging/new technology	Describe technology to be incorporated into project.
				5. Preserves existing transportation asset	How does the project extend the life of facility without the construction of new facilities? Does the project refurbish existing facility? (If facility is transit, bike or pedestrian it will be considered for CMAQ evaluation.)
				6. Reduce VMT	Reduction formula based on project type.
				7. Improve system efficiency	Describe efficiency: Facility able to handle greater ADT without expansion; Improve other transportation function with smaller investment, reduced operational costs; other?
				8. Lifespan	Useful life of investment. For roadway projects, uniform lifespan applies as determined by predominate material used: concrete = 30 yrs; asphalt = 20 yrs; bike lanes = 20 yrs.
				9. Other public, private funding sources (leverage)	List overmatch, other funds

Items in red will be part of CMAQ funding evaluation unless specifically disqualified (adds capacity, maintains existing facility/service)

(1) Greenhouse gas emissions can be reduced by reducing congestion, increasing operational efficiency, supporting alternative modes reducing use of combustion vehicles, and shifting to lower-carbon fuels (<http://www.deq.state.or.us/ag/committees/lowcarbon.html>)

Revised August 2014

Appendix E: *U.S. Census Poverty Thresholds for 2012 by Size of Family and Number of Related Children <18 Years*

Size of family unit	Related children under 18 years								
	None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One person (unrelated individual).....									
Under 65 years.....	11,945								
65 years and over.....	11,011								
Two people.....									
Householder under 65 years.....	15,374	15,825							
Householder 65 years and over.....	13,878	15,765							
Three people.....	17,959	18,480	18,498						
Four people.....	23,681	24,069	23,283	23,364					
Five people.....	28,558	28,974	28,087	27,400	26,981				
Six people.....	32,847	32,978	32,298	31,647	30,678	30,104			
Seven people.....	37,795	38,031	37,217	36,651	35,594	34,362	33,009		
Eight people.....	42,271	42,644	41,876	41,204	40,249	39,038	37,777	37,457	
Nine people or more.....	50,849	51,095	50,416	49,845	48,908	47,620	46,454	46,165	44,387
Source: U.S. Census Bureau.									

Appendix F: *Guidance for Transportation Planning*

A manual published in 2002 by the National Cooperative Highway Research Program, “Technical Methods to Support Analysis of Environmental Justice Issues,” provides direction for identifying and addressing environmental justice-related impacts. A summary of the report’s recommendations includes the following:

- The most common measures of transportation benefits are accessibility, travel time to jobs or other activities, and availability of transportation services.
- Measures of burden should be evaluated at the project level; these should include NEPA-specific effects (aesthetic, historic, cultural, economic, social and health).
- Environmental justice should be addressed based on the magnitude of the effects, and not the size of the population in question.
- Agencies should utilize population projections that are at least 20 years out.
- Agencies should look at the distribution of who pays for the transportation project based on the existing tax structure.
- Agencies should consider creating “quality of life” system maps by overlaying bus and rail services, arterials and highways, Jobs Access Reverse Commute services, hospitals, and employment centers, and by examining their proximity to environmental justice populations.
- Agencies should develop regression models for transportation benefits using and Index of Dissimilarity.
- Transportation modeling is a good way to examine transportation benefits distribution and travel forecasts.
- Use the Census as the main source of data, but supplement it with other sources, such as the Department of Human Services’ welfare client data or school lunch program data.

The summary can be used a check-list to measure the adequacy and thoroughness of an environmental justice—Title VI planning program.