



## AGENDA

### Middle Rogue Metropolitan Planning Organization Policy Committee

*Date:* Thursday, January 15, 2015

*Time:* 2:30 p.m.

*Location:* Courtyard Conference Room, Grants Pass City Hall, 101 NW 'A' Street, Grants Pass, Oregon

*Phone :* Sue Casavan, RVCOG, 541-423-1360

*MRMPO website :* [www.mrmppo.org](http://www.mrmppo.org)

1. **Call to Order/Introductions/Review Agenda .....Darin Fowler, Chair**
2. **Review/Approve Minutes (Attachment #1) .....Chair**

#### **Public Hearing:**

- Chair opened the Public Hearing December 18, 2014 - (*Continued from the December 18, 2014 meeting.*)

3. **MRMPO Title VI Plan ..... Andrea Napoli**

*Background:* As a recipient of Federal funds, MRMPO must meet Title VI (of the Civil Rights Act) and Environmental Justice requirements. This includes adoption of a Title VI Program Plan to ensure nondiscrimination and equity in transportation planning. Staff has been working with ODOT, FHWA, and FTA in developing a Title VI Plan for MRMPO.

*Attachment:* #2 – Memo; Title VI Draft Plan document

*Action Requested:* Consider adoption of the Title VI Plan.

4. **MRMPO Planning Update..... Jonathan David**
5. **Public Comment\* .....Chair**

*\*(Limited to one comment per person, five minute maximum time limit)\**

6. **Other Business / Local Business .....Chair**  
(Opportunity for MRMPO member jurisdictions to talk about transportation planning projects.)

7. **Agenda Build for Next Meeting** ..... **Jonathan David**

8. **Adjournment** ..... **Chair**

The next MPO Policy Committee meeting is scheduled for Thursday, February 19, 2015 at 2:30 p.m. in the Courtyard Conference Room at Grants Pass City Hall.

- The next Middle Rogue MPO TAC meeting is scheduled for Thursday, February 5, 2015 at 1:30 p.m. in the Courtyard Conference Room at Grants Pass City Hall.

IN COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT, IF YOU NEED SPECIAL ASSISTANCE TO PARTICIPATE IN THIS MEETING, PLEASE CONTACT SUE CASAVAN, 541-423-1360. REASONABLE ADVANCE NOTICE OF THE NEED FOR ACCOMMODATION PRIOR TO THE MEETING (48 HOURS ADVANCE NOTICE IS PREFERABLE) WILL ENABLE US TO MAKE REASONABLE ARRANGEMENTS TO ENSURE ACCESSIBILITY TO THIS MEETING.



**SUMMARY MINUTES**  
*Middle Rogue Metropolitan Planning Organization*  
*Policy Committee*

**December 18, 2014**

The following attended:

Policy Committee

Darin Fowler, Chairman	Grants Pass
Pam Van Arsdale, Vice Chairman	Rogue River
Robert Brandes	Josephine County
Mike Baker	ODOT
Terry Haugen	Grants Pass

RVCOG Staff

Jonathan David	RVCOG
Dan Moore	RVCOG
Bunny Lincoln	RVCOG

Others Present

Ian Horlacher	ODOT
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**1. Call to Order / Introductions/ Review Agenda**

Chairman Darin Fowler called the meeting to order at 2:33 PM.

**2. Review / Approve Minutes**

The Chair asked if there were any changes or additions to the October meeting minutes.

**On a motion by Pam Van Arsdale, seconded by Mike Baker, the minutes were unanimously approved as presented.**

***Public Hearing:***

**The Chairman read the hearing procedure and opened the hearing.**

**3. MRMPO Title VI Plan**

This item was continued until January 15<sup>th</sup> to allow staff to consider and develop changes to the (draft) Plan. Mike Baker said Federal Highways were looking at Title VI Plans in greater detail. The need to have translators at meetings was discussed.

**On a motion by Terry Haugen, seconded by Mike Baker, the hearing was continued until Jan. 15, 2015.**

#### **4. Regional Transportation Plan (RTP) Draft Financial Plan (2015-2040)**

Dan Moore reviewed the 12/11/14 memo information. As required by Federal law, the RTP Financial Plan must show sufficient funding to implement the Plan. The Policy Committee must concur with chapter information.

The various Tables in the Plan include:

**Table 1 - Revenue Sources (Federal, State & local)**

**Table 2 - (Draft) Estimated Street Improvements Expenses.** The table will be finalized with TAC input, and then be returned to the Policy Committee at a later date within the next few months.)

- MRMPO Jurisdictions
- Short, medium and long range time frames. Federal/State funds anticipated (SML)
- Local Funds (SDCs, local fees & others)
- Totals (All potential revenues for the 25 year period)
- Non Capital Needs (Street programs - operations, maintenance & preservation)
- Available Capital Funds (available for projects)
- Tier 1 Funds (Regional & Federal \$)
- Discretionary Funds (MPO CMAQ, STP, “Enhance It” and ODOT modernization \$)

**Table 3 - Financial Assumptions** (This item will be updated with additional ODOT funding information)

Mike Baker questioned the \$50,000, Small City Allotments listed for Rogue River & Gold Hill. He also brought up **Table 2 - 2015-2020** under Other Funds – Gold Hill, stating that the calculations may be off. There were brief comments made on several other items, with the understanding that they would be brought up again when appendix A was discussed.

Dan Moore next called the Committee’s attention to Chapter 9 – Financial Plan, a part of the regional RTP.

Chapter sections and graphics include:

- Introduction
- Federal Regulations for Financial Constraint
- Fiscal Constraints
- Methodology (data)
- Key Terms & Acronyms
- Street/Transit System Revenue Funding Sources (State Highways (SHF), Statewide Transportation Improvement Program (STIP), Surface Transportation (STP), Congestion Mitigation & Air Quality (CMAQ), ODOT programs, and local street fees) **NOTE:** Based on a Committee query, Dan Moore will check to see if Jackson County has Transportation SDCs)
- **Figure 9.1** - Revenue Forecasts All Sources (will change for final document)
- **Definitions** - pages 3-4 (Mike Baker pointed out STP accuracy on page 3 that only federally funded and regionally significant projects are eligible for this funding.)

- Page 4 - Under “ODOT Fix It & Enhance Program, “multi-model” was changed to reflect the correct spelling of “multi-MODAL”...
- **Figure 9.2 - Transit System Revenues.** The accompanying narrative including section on Federal Transit Administration (FTA) programs, Bus & Bus Facilities, Enhanced Mobility for Seniors and Individual Disabilities, grants for rural areas and system maintenance, and a program to preserve high quality bus-related facilities.
- **State Transit Revenue Sources (Special Transportation Fund & Non-Emergency Medical Transportation)**
- **Local Transit Revenue Sources (Fareboxes & Bus Passes)**
- **Revenue Projections**
- **Risk Response** (including assumptions that funding level estimates may decrease in the future)
- **MRMPO RTP Funding Forecasts, Assumptions** (an explanation of Table 9.2 – Street & Transit System Revenue and Non-Capital Needs). Planned projects for which funding cannot be identified are illustrated in the Tier 2 project list, discussed in another chapter of the Plan.
- **Figure 9.3 – Street & Transit System Revenues & Non-Capital Needs Assumptions**

**Appendix A** – is comprised of Tables A-1 to A-21, covering Financial Forecasts & Assumptions (revenues & expenses) related to the MRMPO member municipalities and counties, funding allocations, a variety of population forecasts, MRMPO STP, CMAQ and ODOT revenues (FYE 2015-2040), ODOT Non-Modernization Highway Uses, Transportation Modernization Projects (including ODOT Region 3 shares), allocations to MRMPO for Transportation Modernization Projects, and JCT Revenue Projections/Expenses.

Dan Moore reviewed each of the Tables, and explained the methods by which the figures were derived. Gold Hill, Grants Pass, Rogue River, Jackson and Josephine Counties are included in the data, where applicable. Annual projections and assumptions were increased by various percentages where warranted. In competitive project categories, funding cannot always be guaranteed. Mike Baker pointed out that ODOT percentages would likely be decreasing over time. A brief discussion was held regarding the potential that each MPO, as well as Jackson & Josephine Counties might contribute, as a partner, to the JTC commuter program. No funding dedications were proposed. There is no allocation to RVACT.

Mike Baker stated that safety funding would go to the problems identified as being the worst in the region. Revenue and expenses for this category will be added to the Plan. ODOT will provide the estimates to COG Staff.

## **5. Regional Transportation Plan Freight Goals, Objectives & Strategies**

Jonathan David presented the edits to Freight Goal 1 G1-05 and G1-S5 as proposed by the TAC.

G1-S5 (b) was edited to read: Support local, regional and state ~~bond~~ **“funding”** measures to improve freight infrastructure.

**On a motion by Rob Brandes, seconded by Mike Baker the Committee adopted the Freight Goals, Objectives & Strategies with the requested text edit to G1-S5. The motion passed unanimously by voice vote.**

## **6. MRMPO Planning Update**

Jonathan David shared that the RVCOG Staff is on track with creation of the LMP for the RVMPO.

**7. Public Comment**

None.

**8. Other Business / Local Business**

Pam Van Arsdale will attend the OMPOC meeting.  
RR sold 21 building permits in 2014.

**9. Agenda Build for Next Meeting**

Letter of Support  
Discussed next meeting attendance.  
Verify election timing.

**10. Adjournment**

The meeting was adjourned at 3:50 p.m.

DRAFT



**Middle Rogue**  
**Metropolitan Planning Organization**  
**Regional Transportation Planning**

Gold Hill • Grants Pass • Rogue River • Jackson County • Josephine County • Oregon Department of Transportation

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**DATE:** January 5, 2015  
**TO:** MRMPO Policy Committee  
**FROM:** Andrea Napoli, Associate Planner  
**SUBJECT:** Title VI Plan Adoption

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As a recipient of federal funds, the MPO must comply with Title VI requirements during transportation planning activities.

- Title VI (of the Civil Rights Act) – Cannot discriminate on the basis of race, color, national origin, age, gender, disability, or income.
- Environmental Justice (EJ) Orders – Make efforts to involve traditionally underserved populations; ensure their fair share of benefits and avoid disproportionate negative impacts.

**To meet requirements of Title VI and EJ, the MRMPO must develop a Title VI Plan.**

MRMPO Title VI Plan Contents (plan attached):

- Authorities - Descriptions of nondiscrimination/EJ legislation and regulations applicable to transportation planning
- MRMPO Title VI Coordinator - Responsibilities
- Policy Statement - Commitment to nondiscrimination / environmental justice and annual reporting to ODOT
- Complaints - Description of discrimination complaint process
- Environmental Justice – Standards to meet and strategies; includes demographic info and mapping of EJ populations w/in MRMPO area
- Public Participation – Description of MRMPO adopted Public Participation Plan and includes involvement strategies targeted likely-underserved populations

Plan Development, Review, and Public Outreach:

- Developed using ODOT guidance; Corvallis and RVMPO plans as examples
- ODOT Office of Civil Rights review, comment, and approval
- MRMPO TAC review, comment, and recommendation of approval
- Newspaper and website announcements of public hearing / public comment period
- Special outreach to local EJ related organizations for comment
- FHWA and FTA review and comment



**Middle Rogue Metropolitan Planning Organization**

**Title VI Plan**

(Insert FY Year Adopted)



## **Middle Rogue Metropolitan Planning Organization**

### **Policy Committee**

Dan DeYoung	City of Grants Pass
Darin Fowler	City of Grants Pass
Don Skundrick	Jackson County
Gus Wolf	City of Gold Hill
Mark Gatlin	City of Grants Pass
Mike Baker	Oregon Department of Transportation
Pam VanArsdale	City of Rogue River
Robert Brandes	Josephine County
Simon Hare	Josephine County

### **Technical Advisory Committee**

Ian Horlacher	Oregon Department of Transportation
Chuck DeJanvier	Josephine County
John Krawczyk	City of Rogue River
John Vial	Jackson County
Josh LeBombard	Department of Land Conservation and Development
Kelli Sparkman	Oregon Department of Transportation
Lora Glover	City of Grants Pass
Rick Hohnbaum	City of Gold Hill
Scott Chancey	Josephine Community Transit
Terry Haugen	City of Grants Pass
Wayne Kauzlarich	Oregon Department of Environmental Quality

### **TAC Ex-Officio Members**

- US Federal Highway Administration (FHWA)
- Oregon Division US Federal Transit Administration (FTA)
- Oregon Division of State Lands (DSL)

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## **Background**

### **Organization and Function of the Middle Rogue Metropolitan Planning Organization**

In urbanized areas with a population over 50,000, the responsibility for transportation planning lies with designated Metropolitan Planning Organizations (MPO's). The Middle Rogue MPO (MRMPO) was created in order to ensure that existing and future expenditures for transportation projects and programs are based on a continuing, cooperative, and comprehensive (3-C) planning process. 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 that will address the region's projects, programs and policies for at least a 20-year period. It also includes maintaining a 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 50,000, the MRMPO planning area includes the urbanized area of Grants Pass. This consists of the cities of Gold Hill, Rogue River, and Grants Pass, the unincorporated communities of Merlin and Foot's Creek, and surrounding rural areas in both Josephine and Jackson Counties.

The MRMPO 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 MRMPO on March 20, 2013. The RVCOG Board of Directors subsequently delegated responsibility for MRMPO policy functions to the MRMPO Policy Committee, a committee of elected and appointed officials from each jurisdiction within the urbanized area, including the Oregon Department of Transportation (ODOT). The Policy Committee is the MRMPO's decision-making board.

### **Purpose of the Title VI Plan**

The purpose of this document is to comply with federal regulations under 49 CFR Part 21 and 23 CFR 200. The regulations require all recipients of federal funds comply with Title VI of the Civil Rights Act of 1964 and its subsequent federal acts, as shown under the Authorities section of this document on the following pages. The MRMPO is a recipient of Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) funds, and will likely use other federal funds under the ODOT Transportation and Growth Management (TGM) Program or similar programs.

## Authorities

There are numerous Congressional Acts and federal regulations on civil rights and equitable treatment of all members of the public that apply to the various aspects of transportation planning practices. The following is the most relevant of these Acts to the transportation planning practices of the MRMPO:

- **Title VI of the Civil Rights Act of 1964**  
Title VI of the Civil Rights Act of 1964 (42 USC 200d) states 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 subjected to discrimination under any program or activity receiving federal financial assistance.”*
- **The Uniform Relocation Assistance Act of 1970**  
The Uniform Relocation Assistance and Relocation Acquisition Act prohibits unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of Federal and Federal-Aid programs and projects (42 USC 4601).
- **Section 504 of the Rehabilitation Act of 1973**  
The Act (29 USC 790) states that:  
*“No qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from Federal financial assistance.”*
- **Federal Highway Act of 1973**  
The Act (23 USC 324) states that: *“No person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance under this title or carried on under this title.”*
- **The Age Discrimination Act of 1975**  
The Act (42 USC 6101) states that: *“No person shall on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”*
- **The Civil Rights Restoration Act of 1987**  
The Act expanded the coverage of previously enacted federal statutes prohibiting discrimination in employment and other areas. It restored the intent of Title VI and applies to all programs and activities of Federal aid recipients and contractors whether those programs and activities are federally funded or not.
- **Americans with Disabilities Act (ADA) of 1990**  
ADA (42 USC 126) prohibits discrimination against any individual on the basis of disability in regard to public services, public transportation, employment, housing, education, health, labor, communication devices and many more.

- **Environmental Justice (EJ) of 1994**

In February 1994 President Clinton signed Executive Order 12898 that directed 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.*"

- **Limited English Proficiencies (LEP) of 2000**

Executive Order 13166 protects people with Limited English Proficiency (LEP). The law requires that federal agencies shall work to ensure that people with limited English Proficiency have meaningful access to their services without unduly burdening the fundamental mission of the agency.

### **Title VI Annual Reporting Requirements**

Oregon MPO's are required to prepare and maintain on file an annual Title VI Accomplishment Report. Each July the MRMPO must submit its report to the Oregon Department of Transportation (ODOT) Title VI Program Manager and ODOT Region 3 planning staff. Information contained in the report is to be included in the ODOT region Title VI reports and the subsequent state report for Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). The following provides an example of information to be included in the MRMPO's annual Title VI Accomplishment report.

- Changes to the approved Title VI Plan.
- Changes to the Title VI Program reporting structure.
- Title VI complaints received.
- Planning activities performed and actions taken to promote Title VI compliance.
- Transportation studies or plans completed that provided Title VI related data.
- Public notification and comment solicitation efforts related to a draft Transportation Improvement Program (TIP).
- Public hearings held, including efforts to enhance participation and a summary of Title VI concerns raised and actions taken to address concerns.
- Presence of minorities and women in citizen participation efforts.
- Description of the process for issuing request for proposals (RFPs) and soliciting consultants.
- Actions taken to promote consultants' compliance with Title VI; number of consultants that have contracts with the MPO including dollar value; how many were Disadvantaged Business Enterprises (DBEs); efforts made to utilize DBE consultants; methods used during the review period to ensure Title VI related adherence to contract agreements.
- Actions taken to promote Title VI compliance regarding education and trainings, including monitoring and review processes, and their outcomes or status.
- Description of strategies for the upcoming year, including any significant problem areas.

## Title VI Coordinator

The MRMPO Title VI coordinator 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 MRMPO program administration complies with Title VI.

Title VI Coordinator responsibilities include:

- **Program Administration:** Implement the MRMPO Title VI Plan and update the document on a tri-annual basis.
- **Complaints:** Serve as the point of contact for civil rights complaints working directly with the Rogue Valley Council of Governments Executive Director.
- **Public Dissemination:** Engage in public awareness activities and provide Title VI and Environmental Justice support and information to the public or any requesting entity. Ensure public announcements or notices are posted of proposed planning activities, hearings and meetings, in newspapers, on the MRMPO website, by contact to organizations serving subject populations, or by other media reaching the affected community.
- **Legislative and Procedural Information:** Maintain current information on Federal laws, rules and regulations, ODOT guidelines, the current MRMPO Title VI Plan, Annual Title VI Reports, and other resource information pertaining to the implementation and administration of the MPO's Title VI program.
- **Annual Title VI Reporting:** Prepare annual Title VI reports to the Oregon Department of Transportation (ODOT) Office of Civil Rights. See page 3 of this plan for reporting details.
- **Data Collection:** Collect and maintain up-to-date data to support ongoing nondiscrimination activities.
- **Training:** Obtain adequate training and other support for MRMPO staff involved in Title VI compliance.
- **Project Evaluation:** Ensure that projects undertaken by the MRMPO support environmental justice principles.
- **Contact:** Serve as both the Title VI and Environmental Justice point of contact.

### **Agency:**

Middle Rogue Metropolitan Planning Organization (MRMPO)  
155 N. First Street  
P.O. Box 3275  
Central Point, OR 97520  
Ph: (541) 664-6674 Website: [www.mrmppo.org](http://www.mrmppo.org)

### **MRMPO Title VI and Environmental Justice Contact:**

Andrea Napoli, Associate Planner & Title VI Coordinator  
Ph: (541) 423-1369 Email: [anapoli@rvcog.org](mailto:anapoli@rvcog.org)

**MRMPO Planning Manager:**

Jonathan David  
Ph: (541) 423-1338 Email: [jdavid@rvcog.org](mailto:jdavid@rvcog.org)

*The Middle Rogue MPO is in a contract with the RVCOG for its administrative services. RVCOG handles the MPO's financial and personnel issues.*

**Agency:**

Rogue Valley Council of Governments (RVCOG)  
155 N. First Street  
P.O. Box 3275  
Central Point, OR 97520  
Ph: (541) 664-6674 Website: [www.rvcog.org](http://www.rvcog.org)

**RVCOG Contacts:**

Sandi Morton, Human Resources Director  
Ph: (541) 423-1334 Email: [smorton@rvcog.org](mailto:smorton@rvcog.org)

Michael Cavallaro, Executive Director  
Ph: (541) 423-1335 Email: [mcavallaro@rvcog.org](mailto:mcavallaro@rvcog.org)

## Policy Statement

The Middle Rogue Metropolitan Planning Organization (MRMPO) hereby certifies that, as a condition of receiving federal financial assistance, it will ensure that:

- No person shall on the ground of race, color, national origin, sex, age, disability or income status be excluded from participation in, be denied the benefits of or be subjected to discrimination under any program or activity that is fully or partially covered by federal financial assistance;
- Efforts will be made to facilitate the participation of persons with Limited English Proficiency (LEP) in transportation planning activities sponsored by MRMPO;
- Will submit to the Oregon Department of Transportation (ODOT) an annual certification of compliance with the requirements of Title VI, per the requirements of 49 CFR Part 21 and 23 CFR.

**Middle Rogue Metropolitan  
Planning Organization**

**Oregon Department of Transportation  
Office of Civil Rights**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date



## Complaint Process

### Informal Complaint:

Every effort will be made to obtain early resolution of informal complaints at the lowest level possible. **Informal complaints are those that have not been submitted or acknowledged in writing.** The option exists for informal mediation meeting(s) between the affected parties and the MRMPO Title VI Coordinator and the RVCOG Executive Director. The Title VI Coordinator and RVCOG Executive Director will make every effort to pursue a resolution to informal complaints.

### Formal Complaint: (in compliance with 23 CFR 200.9(b)(3))

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a formal complaint (written) with the MRMPO Title VI Coordinator. A formal complaint must be submitted within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. A formal complaint must meet the following requirements:
  - a. Complaint shall be in writing and signed by the complainant(s).
  - b. Include the date of the alleged act of discrimination.
  - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the incident.
  - d. 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. ***The complainant is required to provide a signed, original copy of the fax or e-mail transmittal for MRMPO to be able to process it.***
  - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing.
2. Complaints may be submitted to Andrea Napoli, MRMPO Associate Planner & Title VI Coordinator, through the following methods:
  - By Email: [anapoli@rvcog.org](mailto:anapoli@rvcog.org)
  - By Mail: MRMPO Title VI Coordinator  
Rogue Valley Council of Governments  
Post Office Box 3275  
Central Point, OR 97502
  - By Phone: 541-423-1369
  - By Facsimile: 541-664-7927
3. Upon receipt of the formal complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. All formal complaints will be referred to the Oregon Department of Transportation's (ODOT) Office of Civil Rights, for proper disposition pursuant to their procedures.

4. In order to be accepted, a formal complaint must meet the following criteria:
  - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
  - b. The allegation(s) must involve a covered basis such as race, color, national origin, sex, income, age, or disability.
  - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, subrecipient, or contractor.
  - d. The complainant(s) allegation must be detailed to specify all issues and circumstances of the alleged discrimination.
  
5. A formal complaint shall be investigated unless:
  - a. The complainant requests the withdrawal of the complaint.
  - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
  - c. The complainant cannot be located after reasonable attempts.
  
6. Contact information for the state and federal Title VI administrative jurisdiction is as follows:

Oregon Department of Transportation  
Mail: Office of Civil Rights Oregon Department of Transportation  
Attn. Title VI Officer 955 Center St. NE, Suite 471  
Salem, Oregon 97301

Phone: 503-986-4350  
Fax: 503-986-6382

Federal Highway Administration Office of Civil Rights  
Mail: 1200 New Jersey Avenue, SE  
8th Floor E81-314  
Washington, DC 20590

Phone: 202-366-0693  
Fax: 202-366-1599  
TTY: 202-366-5132

Federal Transit Administration Office of Civil Rights  
Mail: Attention: Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Phone: (202) 366-4043  
TTY: 1-800-877-8339

## Environmental Justice

### Background

Executive Order 12898, “Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-income Populations” was enacted in 1994 to reinforce Title VI of the Civil Rights Act of 1964. The Civil Rights Act states 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 subjected to discrimination under any program or activity receiving Federal financial assistance*” (U.S. Code 1964).

Executive Order 12898 states, “*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*” (Federal Register 1994). The Executive Order clearly adds the minorities and low-income people to the list of protected class.

MRMPO receives federal funds and is therefore responsible for integrating environmental justice standards into its transportation planning and programming activities. These standards include the following:

- Avoid, minimize, or mitigate disproportionately high and adverse effects of its activities on minority populations and low-income populations.
- Ensure involvement of low-income and minority groups in the decision making process.
- Ensure low-income and minority groups receive their fair share of benefits.

### Limited English Proficiency (LEP) (Executive Order 13166)

One of the categories covered under Title VI is national origin. A type of national origin discrimination includes discrimination based on a person’s inability to speak, read, write, or understand English. As a recipient of federal funds, the MPO must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information the MPO provides. Determination of “reasonable steps” are based on a four-factor analysis that takes into account the following: 1) the number and proportion of LEP persons in the MPO area who may be served or are likely to encounter an MPO program, activity or service; 2) the frequency with which LEP persons come in contact with MPO programs, activities or services; 3) the nature and importance of programs, activities or services provided by MPO to the LEP population; 4) the resources available to the MPO and overall costs to provide LEP assistance.

MRMPO Implications: As shown in Table 3 on page 11, the LEP population in the MRMPO planning area accounts for less than 1% of the total population (less than 500 persons). The MRMPO will upon request provide written/oral communications in Spanish, as well as conduct public outreach efforts to organizations that serve LEP populations in the MRMPO area.

**Demographic Profile: MRMPO Area Likely-Underserved Populations**

Below and the following pages contain tables, text, and maps that display information regarding Likely-Underserved populations within the MRMPO planning area. For purposes of this analysis, Likely-Underserved populations are defined as racial minorities, individuals living below the federal poverty level, those with Limited English Proficiency (LEP), and seniors (age 65+). Data gathered by the U.S. Census Bureau is used to identify such populations, which includes American Community Survey (ACS) data at 5-year estimates (2008-2012) and data collected from the 2010 U.S. Census decadal survey.

Data analysis will be conducted annually in conjunction with annual reporting requirements. The updated information will be amended into the MRMPO Title VI Plan, as needed.

Note: Levels of Geography Available for Mapping EJ Populations

*The maps contained on the following pages identify concentrations of the area’s minority, low-income, and senior populations. Due to the limited availability of population data at smaller levels of geography for smaller communities such as those that comprise the MRMPO, a variety of census geographies had to be used for the mapping (ex: census tract, block group, census places). It should also be noted that for those Josephine County census tracts that lie partially within the MPO boundary, the data for the entire census tract was used. Please refer to the maps on the following pages for a visual depiction of the levels of geography used for this analysis.*

**Minority Population**

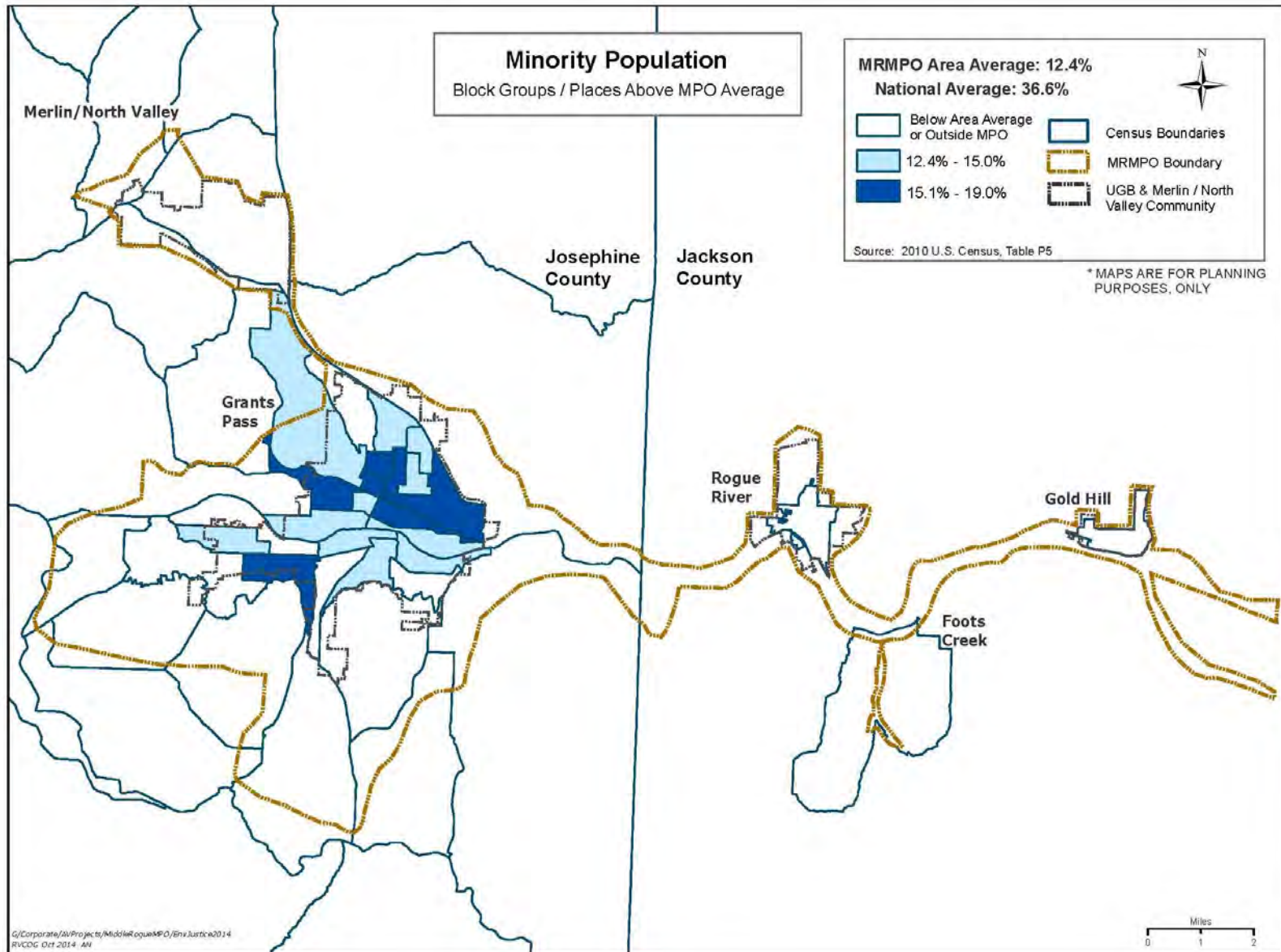
For purposes of this analysis, Minority is defined as persons who identified themselves as non-white, mixed-race, or Hispanic in their choices of race and ethnicity for the 2010 Census. Within the MRMPO Planning Area, the 2010 U.S. Census estimates 12.4% of the population belong to a minority group. Map 1 on the following page identifies block groups containing minority populations over the 12.4% area average. For comparison, the table below contains minority statistics at the national, state, county, and local levels.

**Table 1: Minority Population**

United States	36.3%
State of Oregon	21.5%
Josephine County	11.4%
Jackson County	16.3%
<b>MRMPO Area</b>	<b>12.4%</b>
Grants Pass	14.0%
Rogue River	8.8%
Gold Hill	8.0%

Source: 2010 U.S. Census, Table P5

**Map 1: Minority Population**



### Low-Income Population

According to 2008-2012 American Community Survey (ACS) data, 19.4% of individuals living within the MRMPO Planning Area had an income below the poverty level in the previous 12 months. Map 2 on page 13 illustrates the higher concentrated areas of poverty by census tract. The identified census tracts on the map contain low-income population percentages near and greater than the MRMPO area average of 19.4%.

**Table 2: Population Living Below the Poverty Level**

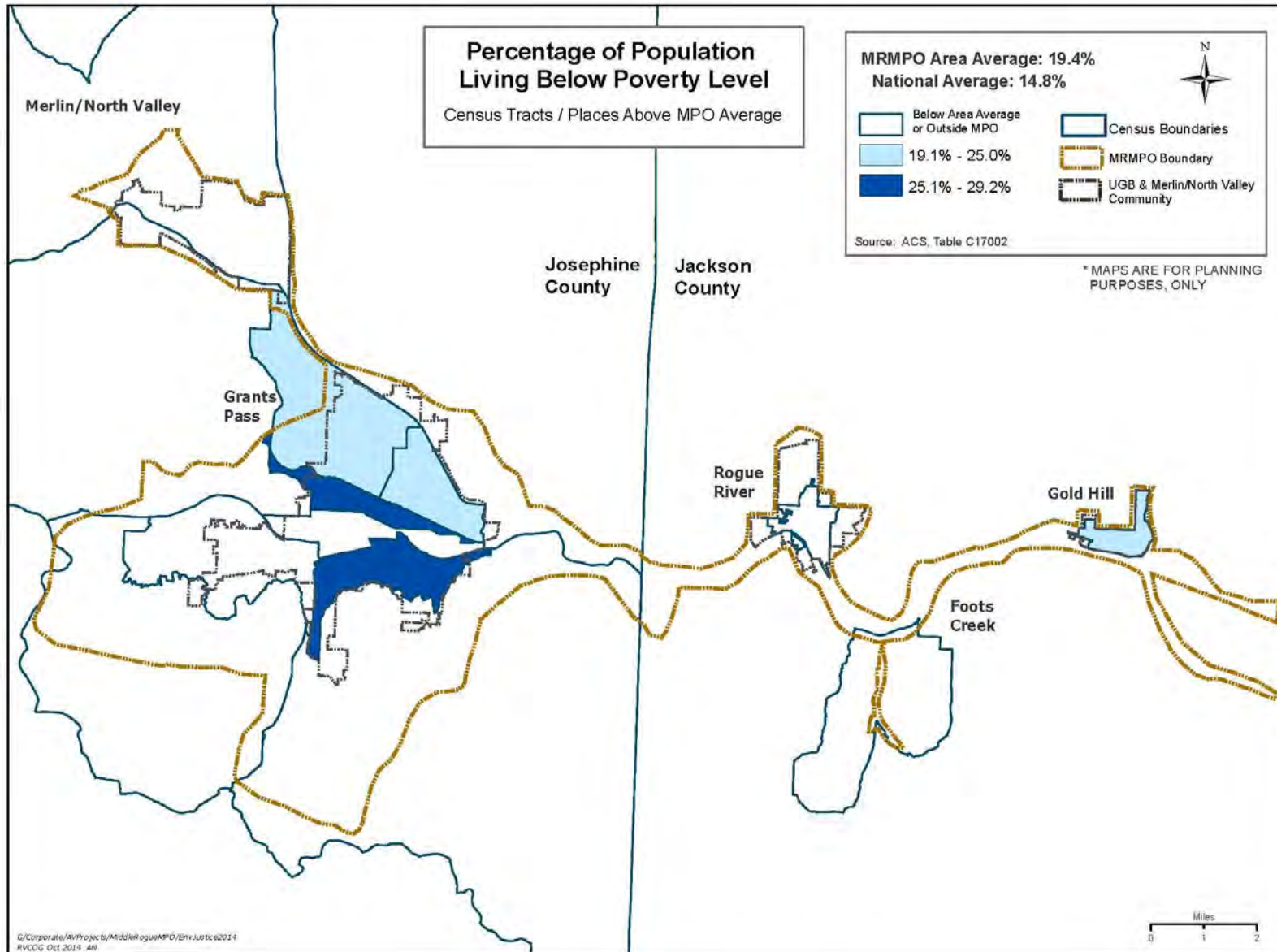
United States	14.8%
State of Oregon	15.5%
Josephine County	20.0%
Jackson County	16.6%
<b>MRMPO Area</b>	<b>19.4%</b>
Grants Pass	20.1%
Rogue River	17.5%
Gold Hill	19.1%

Source: 2008-2012 ACS, Table C17002

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**Map 2: Population Living Below the Poverty Level**



### Limited English Proficiency (LEP) Population

Data on ability to speak English were derived from the answers to the American Community Survey questionnaire Item 14.c, where respondents were asked to indicate their ability (and others in their household age 5+) to speak English. For purposes of LEP population identification, only those that selected “Not well” or “Not at all” were used in this analysis.

**Table 3: Those Who Speak English Less than “Well”**

United States	4.7%
State of Oregon	3.5%
Josephine County*	<1.0%
Jackson County*	2.2%
<b>MRMPO Area*</b>	<b>&lt;1.0%</b>
Grants Pass*	<1.0%
Rogue River*	1.0%
Gold Hill*	1.1%

Source: 2008-2012 ACS, Table B16004

\*High margin of error due to small sample sizes.

### Senior Population

According to 2010 Census data, approximately 21.7% of the population within the MRMPO area are age 65 or over. This regional average is used in Map 3, page 14, where senior populations higher than the MPO area average have been identified. The information in Table 4 below is provided for comparison purposes.

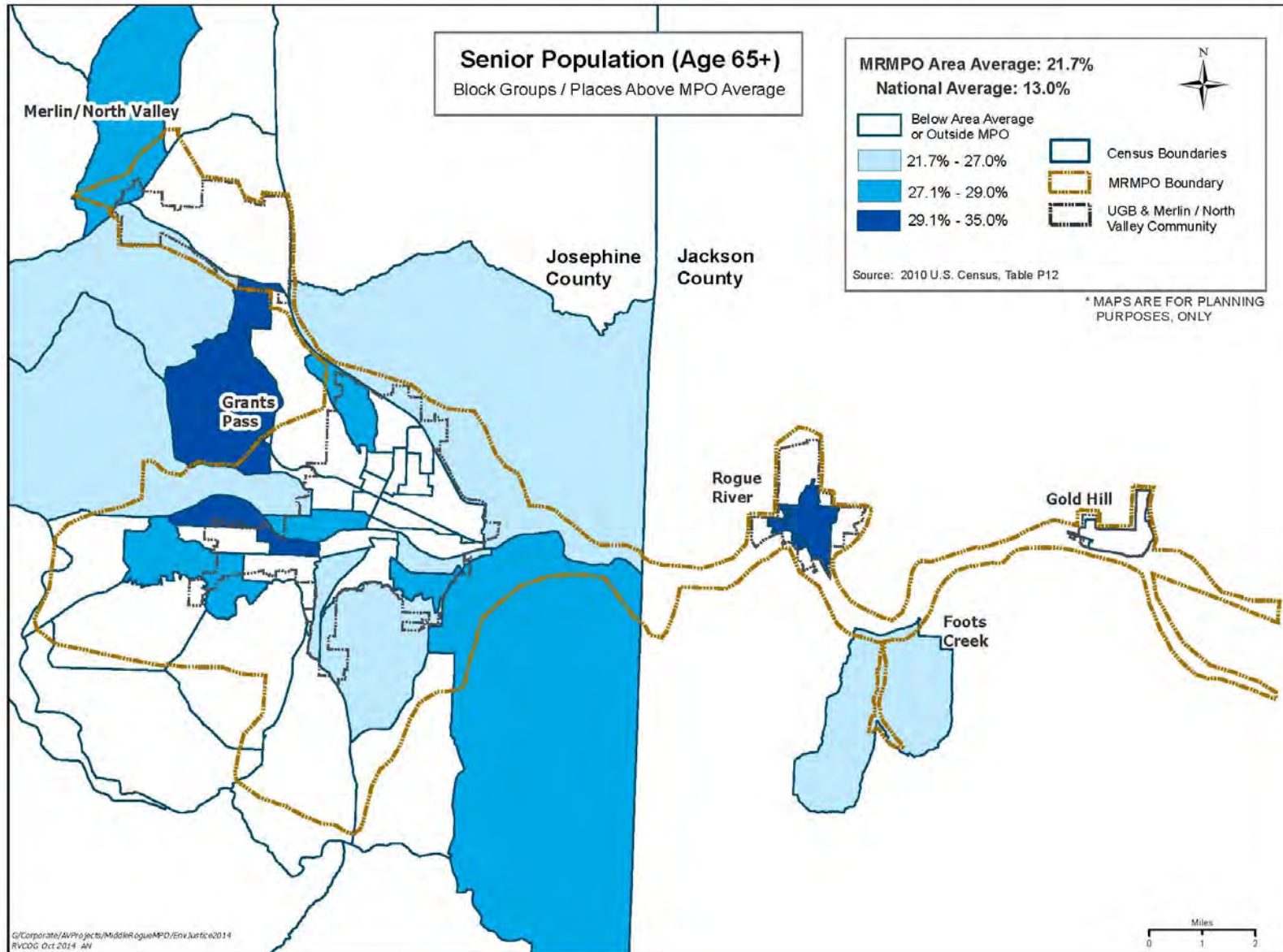
**Table 4: Population Age 65+**

United States	13.0%
State of Oregon	13.9%
Josephine County	22.3%
Jackson County	17.6%
<b>MRMPO Area</b>	<b>21.7%</b>
Grants Pass	18.6%
Rogue River	29.6%
Gold Hill	14.4%

Source: 2010 U.S. Census, Table P12



**Map 3: Senior Population**



## **Public Participation**

### **MRMPO Public Participation Plan**

The MRMPO has an adopted Public Participation Plan that describes methods, strategies and desired outcomes for public participation, addressing outreach to a broadly defined audience of interested parties. The purpose of the plan is to provide all interested parties with reasonable opportunities to comment on the MRMPO's plans, programs and projects. The plan is intended to encourage, facilitate and follow through on public comments, concerns and suggestions by establishing procedures for providing full public access to information and decisions, timely public notices, and early and continuing public involvement in plan development.

### **Strategies for Involving Likely-Underserved Populations**

To better involve Likely-Underserved Populations, MRMPO may employ a combination of the following measures:

- Consulting with community organizations that serve Likely Underserved communities (such as social, religious, non-profit, and government entities)
- Purchasing advertisement and/or placing public notification in publications serving Likely-Underserved communities
- Providing assistance, upon request, and with 48 hours notice, to the hearing and visually impaired, those not fluent in English, and others requiring assistances at all MPO meetings, hearings and public events. Public notices of these events shall notify the public of this opportunity. Meetings shall be held in ADA-compliant venues and RVCOG staff Spanish translators are available
- Selecting meeting sites that are accessible by transit and centrally located to be reasonably accessible by means other than the automobile