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Title VI Program for Metro

Prepared for Federal Transit
Administration for the Oct. 1, 2007
through Sept. 30, 2011 reporting period.

Final Report

Submitted May 10, 2012



Metro | *Making a great place*

About Metro

Clean air and clean water do not stop at city limits or county lines. Neither does the need for jobs, a thriving economy, and sustainable transportation and living choices for people and businesses in the region. Voters have asked Metro to help with the challenges and opportunities that affect the 25 cities and three counties in the Portland metropolitan area.

A regional approach simply makes sense when it comes to providing services, operating venues and making decisions about how the region grows. Metro works with communities to support a resilient economy, keep nature close by and respond to a changing climate. Together we're making a great place, now and for generations to come.

Stay in touch with news, stories and things to do.

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INTRODUCTION

This is the Metro Regional Services' (Metro) Title VI program for submission to the Federal Transit Administration (FTA) on Metro's Title VI compliance activities as required by FTA Circular C 4702.1A. This report demonstrates Metro's compliance with Title VI regulations (49 CFR part 21); Executive Orders 12250 and 12898; FTA circular 4702.1A; and the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) as well as other applicable laws. Metro continues performance of its obligations in accordance with Metro's Title VI Plan sent to the Region X office of FTA in 2007 and revised in March 2010.

Metro submits this report as a federally designated Metropolitan Planning Organization (MPO) that receives grant funding directly from the FTA for regional transit planning. Metro is a directly elected regional government serving 1.5 million people living in the urbanized areas of the Portland metropolitan region. Metro's Title VI Coordinator and Office of Citizen Involvement are responsible for initiating and monitoring Title VI activities and for preparing these reports.

This report covers the period from October 1, 2007 through September 30, 2011. It includes the following information specified in FTA Circular 4702.1A, Sections IV.7 (reporting content requirements) and VII.1 (specific guidance for MPOs):

- I. A summary of Metro's planning processes that integrate considerations expressed in Title VI and the Executive Order on Environmental Justice, including demographic and statistical data for the Metro region;
- II. A statement on Metro's plans for providing language assistance for persons with Limited English Proficiency (LEP);
- III. A description of Metro's Title VI training opportunities and other efforts to combat discrimination and promote diversity;
- IV. A list of any Title VI investigations, complaints, or lawsuits filed in this reporting period;
- V. A copy of Metro's procedures for tracking and investigating Title VI complaints;
- VI. A copy of Metro's Title VI complaint form;
- VII. A copy of Metro's notice to the public that it complies with Title VI, instructions to the public on how to file a discrimination complaint and a description of the Metro publications and locations where the notice is posted;
- VIII. A description of the procedures the agency uses to pass financial assistance through to recipients. A description of the procedures the agency uses to provide assistance to subrecipients. A description of how the agency monitors subrecipients' compliance with Title VI and summary of the results of monitoring;
- IX. An acknowledgement that Metro has signed current year Certifications and Assurances in TEAM;
- X. A summary of all civil rights compliance reviews conducted by other local, state or federal agencies during the last three years; and

XI. A statement of any construction projects that have been undertaken by Metro using FTA funds during the reporting period.

Exhibit A Limited English Proficiency Plan: Metro's LEP Access Needs Assessment and Implementation Plan

Exhibit B Metro's Public Involvement Policy for Transportation Planning

Exhibit C A description of Metro's public involvement outreach efforts and steps taken to ensure that minority and low-income people had meaningful access to Metro's transportation-planning related planning activities during the 2007-11 reporting period

Exhibit D A copy of TriMet's Title VI notice and Metro's Title VI notice (adapted from TriMet's) as of March 15, 2012

Exhibit E A copy of a letter from the Oregon Department of Transportation's Office of Civil Rights acknowledging Metro's most recent annual compliance report and the agency's "superb effort" to meet federal civil rights requirements

I. SUMMARY OF METRO'S PLANNING PROCESSES FOR TITLE VI COMPLIANCE

A. Demographic and Statistical Data

The following demographic and statistical data respond to Chapter VII of FTA Circular C 4702.1A, regarding requirements for MPOs to provide a demographic profile.

Metro has gathered demographic and statistical data on race and ethnicity, minority groups, income level, language spoken, and sex of participants and beneficiaries of federally funded programs through census data, public opinion surveys, and self-identification on questionnaires. The data gathered are reviewed to ensure that Metro continues to meet the requirements of the Title VI program. Metro uses this in transportation planning for the following reasons:

1. To determine impacts and benefits of potential projects on minority and low-income neighborhoods;
2. To ensure equity in evaluating project applications submitted for inclusion in the Regional Transportation Plan and the Metropolitan Transportation Improvement Program; and
3. To develop public outreach strategies.

Portland State University published a report, "2010 Census Profiles: Oregon and its metropolitan areas," which compares population characteristics of Oregon metropolitan areas from the 2000 Census and the 2010 Redistricting Data Summary Files. The Oregon part of the Portland Metropolitan Statistical Area, which generally encompasses Metro's jurisdiction, grew by 13.8 percent over the decade. Several minority populations grew by a much faster rate. The Hispanic or Latino population grew by 65.7 percent, now comprising 11.7 percent of the metropolitan area's population. The second and third largest minority populations also grew at a faster rate than the overall population: Black/African American populations grew by 29.5 percent, comprising 4.1 percent of the area population, and Asian populations grew by 48 percent, comprising 7.7 percent of the population.

2000 and 2010 Census Summary
Portland-Vancouver-Hillsboro MSA (Oregon part)

POPULATION BY AGE GROUP	2000		2010		2000 to 2010 Change	
Total population	1,572,771	100.0%	1,789,580	100.0%	216,809	13.8%
Under age 18	390,133	24.8%	412,200	23.0%	22,067	5.7%
Age 18 and over	1,182,638	75.2%	1,377,380	77.0%	194,742	16.5%

AREA AND DENSITY

Land Area - Sq. Mi. (Source: 2010 Census)	4,399		4,399			
Persons per square mile	357.5		406.8		49.3	13.8%

HOUSING OCCUPANCY STATUS

Total housing units	652,270	100.0%	752,035	100.0%	99,765	15.3%
Occupied	614,568	94.2%	705,173	93.8%	90,605	14.7%
Vacant or Seasonal	37,702	5.8%	46,862	6.2%	9,160	24.3%

HISPANIC OR LATINO AND RACE¹

Total population	1,572,771	100.0%	1,789,580	100.0%	216,809	13.8%
Hispanic or Latino (of any race)	126,196	8.0%	209,125	11.7%	82,929	65.7%
Not Hispanic or Latino	1,446,575	92.0%	1,580,455	88.3%	133,880	9.3%
White Alone	1,265,551	80.5%	1,340,415	74.9%	74,864	5.9%
Black or African American Alone	44,115	2.8%	52,520	2.9%	8,405	19.1%
American Indian and Alaska Native Alone	11,853	0.8%	12,288	0.7%	435	3.7%
Asian Alone	76,247	4.8%	108,301	6.1%	32,054	42.0%
Native Hawaiian and Other Pacific Islander Alone	4,106	0.3%	7,212	0.4%	3,106	75.6%
Some Other Race Alone	2,302	0.1%	3,084	0.2%	782	34.0%
Two or More Races	42,401	2.7%	56,635	3.2%	14,234	33.6%

RACE ALONE OR IN COMBINATION²

Total population	1,572,771	100.0%	1,789,580	100.0%	216,809	13.8%
White	1,359,823	86.5%	1,495,740	83.6%	135,917	10.0%
Black or African American	56,696	3.6%	73,401	4.1%	16,705	29.5%
American Indian and Alaska Native	29,469	1.9%	38,719	2.2%	9,250	31.4%
Asian	92,981	5.9%	137,630	7.7%	44,649	48.0%
Native Hawaiian and Other Pacific Islander	9,004	0.6%	14,377	0.8%	5,373	59.7%
Some Other Race	81,777	5.2%	110,222	6.2%	28,445	34.8%

1. Data are shown for the Hispanic or Latino population, as well as for people who reported one race and for people who reported two or more races. The population of One Race is the total of the population in the 6 categories of one race. The population of Two or More Races is the total of the population in the 57 specific combinations of two or more races. The redistricting files include data for all 63 groups.

2. Data are shown for the 6 race alone or in combination categories. The concept "race alone or in combination" includes people who reported a single race alone (e.g., Asian) and people who reported that race in combination with one or more of the other major race groups (i.e., White, Black or African American, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, and Some Other Race). The concept "race alone or in combination," therefore, represents the maximum number of people who reported as that major race group, either alone, or in combination with another race(s). The sum of the 6 individual race "alone or in combination" categories may add to more than the total population because people who reported more than one race were tallied in each race category.

Sources: U.S. Census Bureau, 2010 Census, Public Law 94-171 Summary File; 2000 Census, SF1.

Tabulated by Population Research Center, Portland State University.

www.pdx.edu/prc

Minority populations are concentrated in two areas: the urban cores of Portland, Beaverton, Hillsboro, and Gresham; and the outer western and eastern tracts. Hispanic and Asian populations are concentrated in the outer census tracts; Black/African American populations are clustered predominately throughout the Portland urban core.

II. METRO'S PLAN FOR PROVIDING LANGUAGE ASSISTANCE FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

The agency's Limited English Proficiency Plan is attached as Exhibit A to this report. For more information on the interim steps Metro took to provide language assistance by March 31, 2012 see memo dated April 5 from Metro's Title VI designee (see Exhibit 1 to Metro's LEP Plan).

III. A DESCRIPTION OF METRO'S TITLE VI TRAINING OPPORTUNITIES AND OTHER EFFORTS TO COMBAT DISCRIMINATION AND PROMOTE DIVERSITY

A. Title VI Training Opportunities

Metro encourages staff to seek training to improve the agency's expertise in providing meaningful access to low income, minority, LEP and other underserved communities. Training sessions attended during the reporting period included:

- **May 2007** – Metro offered Title VI training to staff of all Oregon and southern Washington MPOs. Jodi Petersen, FHWA Civil Rights Program Manager and Training Coordinator, Olympia, Washington provided the training, which attracted 37 participants.
- **May 2009** – Four members of Metro's public affairs staff attended an all-day Title VI training for transportation planning and public involvement staff in Oregon City. The training was put on by the national Title VI office of the Federal Highway Administration and the Oregon Department of Transportation's Office of Civil Rights Title VI program. Metro purchasing staff attended a training the day before that focused on Disadvantaged Business Enterprises.
- **August 2010** – Three Metro outreach and human resources staff attended a presentation sponsored by Multnomah County on public outreach to diverse communities. Led by Sisters of the Road, a service provider that works directly with the homeless, the presentation focused on lessons learned and advice for successful outreach to hard to reach communities.
- **September 2010** – Several Metro outreach staff attended a Public Relations Society of Oregon luncheon on "Diversity in Communications: Reaching an Ethnically Diverse Audience." The program featured speakers from minority communities giving specific advice on outreach strategies.
- **November 2010** – Michael Jordan, Metro's then-Chief Operating Officer, Jim Middaugh, Metro's Communications Director and Patty Unfred, Manager of Planning and Policy Communications, attended a half-day program on public involvement sponsored by the Immigrant and Refugee Community Organization. Staff coordination and an advance meeting to prepare for this session led to further and ongoing collaboration with IRCO.
- **April 2011** – Numerous Metro outreach and planning staff attended a T4America sponsored brown bag event titled "Who Gets Access? Transportation Equity from the National to the Local."
- **April 2011** – Fifteen Metro employees completed an intense six-week program, Uniting To Understand Racism. The class utilizes open and guided dialogue, video presentations and selected readings to help participants maximize their understanding of racism. Three communication department staff who are often involved in MPO related outreach efforts, plus a records retention specialist for the planning department, were among the participants.

- **May 2011** – Metro’s Title VI designee, attended a day-long event sponsored by Ecumenical Ministries of Oregon on climate change and social equity, titled “Climate Ethics and Equity Forum: Bringing Our Voices Together for Climate Justice.”
- **June 2011** – Metro sponsored a 90-minute presentation for agency staff on "Creating Relevant Messages for Hispanic Audiences." The session was led by by Hispanidad, a Hispanic marketing agency from Colorado that works with Metro and other government agencies. Metro hired the firm to develop marketing programs to encourage walking and biking in western Washington County, the area with the highest Latino concentration in the metropolitan area.

B. Metro’s Public Involvement Policy for Transportation Planning

Metro's Public Involvement Policy for Transportation Planning is attached as Exhibit B. It was adopted by the Metro Council Oct. 22, 2009 and remains agency policy in 2012. The document presents policies and procedures for public involvement to ensure that Metro, as the federally mandated and the state designated MPO for the Portland metropolitan region, meets the spirit and intent of applicable federal and state public involvement laws, regulations and authorities contained in the Safe, Accountable, Flexible, Efficient Transportation Equity Act—A Legacy for Users (SAFETEA-LU) and the guidance in Oregon state planning goal 1: citizen involvement. It also ensures that Metro, as a recipient of federal dollars, promotes equity and environmental justice to meet the spirit and intent of Title VI of the Civil Rights Act of 1964, The Civil Rights Restoration ACT of 1987, Executive Order 12898 on Environmental Justice; Executive Order 13166 on Limited English Proficiency; the National Environmental Policy Act of 1969 (NEPA); and the Americans with Disabilities Act (ADA). Lastly, it ensures that regional transportation plans and projects reflect public priorities and values, that transparency and accountability are part of Metro’s planning and decision-making and that Metro promotes excellence in regional planning. The policies in this document apply to all development of and updates to these policies and to Metro administered transportation planning and investments, including updates to the Regional Transportation Plan (RTP), the Metropolitan Transportation Improvement Program (MTIP) and corridor planning. For jurisdictions and agencies to receive federal funding through Metro-administered programs or projects, they must certify that they have conducted appropriate public involvement.

Attached as Exhibit C is a description of Metro’s public involvement outreach efforts and steps taken to ensure that minority and low-income people have meaningful access to Metro’s transportation-planning related activities during the 2007-11 reporting period.

C. Metro’s Diversity Action Team

The Diversity Action Team, which works to support and promote diversity at Metro, serves in an advisory capacity to the chief operating officer (COO) and the Senior Leadership Team regarding implementation of Metro’s Diversity Action Plan. The team is chaired by the COO and includes staff and directors representing Metro departments and facilities along with a Council liaison. The team has recently engineered a significant revision of the Diversity Action Plan, laying out goals, strategies, actions and indicators in four core areas: internal awareness and cultural sensitivity, recruitment and retention, committee membership and public involvement, and procurement. The Diversity Action Plan is attached as Exhibit 12 to Metro’s LEP Plan, attached to this Title VI Program as Exhibit A.

Metro’s newly appointed Diversity Program Manager will report quarterly to Metro’s Senior Leadership Team on Diversity Action Plan progress. The team recommends reviews and revisions to the COO, who then requests Metro Council approval of the revised plan. The COO is accountable for ensuring plan goals are implemented by department directors.

Diversity Plan Actions for fiscal year 2011-12:

- Circulate draft Diversity Action Plan for review among outside community groups representing diverse populations, then submit final plan for Council adoption.
- Hire a full-time Diversity Coordinator to report to the COO and facilitate a strategic approach to cultivating diversity in the organization, including implementation of the Diversity Action Plan.
- Expand internal and external network of relationships with diverse communities to meet recruitment, public involvement and procurement goals.
- Ensure diverse representation on hiring panels and in recruitment pools.
- Pursue opportunities to change committee bylaws and recruit new members to better reflect the region's demographics.
- Consult with diverse communities to determine how best to inform and engage residents about policy decisions that may affect them.
- Provide mandatory training regarding diversity goals in contract and procurement practices.
- Improve processes to track diversity in contracts and procurement.
- Provide sponsorship funds or resources (such as meeting space) to diverse communities on an ongoing and equitable basis.
- Develop a Limited English Proficiency plan to evaluate and address language assistance needs.

Diversity Plan Actions for fiscal years 2012-16:

- Commit to conducting a diversity survey of employees every two years.
- Provide diversity training to all employees, appointees and elected officials.
- Integrate diversity accountability into the employee performance appraisal process.
- Identify barriers to recruitment and retention of a diverse workforce.
- Research best practices at other organization for increasing diversity in recruitment and public involvement.
- Identify diverse communities' barriers to committee participation and develop recommendations to improve support.
- Build awareness and expectations among committees to increase diversity in membership.
- Implement Limited English Proficiency plan to evaluate and address language assistance needs.
- Improve demographic data collection through public involvement and surveys.
- Establish tools to track contacts and participation with diverse communities.
- Develop agency-wide process to consider diversity and equity in program policies and public outreach practices.
- Amend agency policies to increase diversity among procurement contractors and subcontractors.
- Conduct diversity audit in at least three of the Plan's core areas.

IV. TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS FILED IN THIS REPORTING PERIOD

Metro had no Title VI investigations, complaints, or lawsuits filed during the reporting period.

V. METRO'S PROCEDURES FOR TRACKING AND INVESTIGATING TITLE VI COMPLAINTS

If any individual believes that s/he or any other program beneficiaries have been the object of unequal treatment or discrimination as to the receipts of benefits and/or services, or on the grounds of race, color,

national origin, or sex, s/he may exercise their right to file a complaint with Metro. Every effort will be made to resolve complaints informally at the Metro, sub-recipient, and contractor's level.

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by Metro or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination.

These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

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

A. Procedure

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 written complaint with Metro's Title VI Coordinator. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The 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 (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
 - d. Allegations may be faxed or e-mailed and 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 mail a signed, original copy of the fax or e-mail transmittal for Metro 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. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to Metro for processing.
2. Upon receipt of the complaint, the Title VI Coordinator will determine the complaint's jurisdiction, acceptability, and the need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is

against one of Metro's subrecipients of federal funds, Metro will assume jurisdiction and will investigate and adjudicate the case. Complaints against Metro will be referred to the Oregon Department of Transportation's ("ODOT") Office of Equal Opportunity ("OEO"), for proper disposition pursuant to their procedures. In special cases warranting intervention to ensure equity, these agencies may assume jurisdiction and either complete or obtain services to review or investigate matters.

3. In order to be accepted, a 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, or national origin..
 - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, subrecipient, or contractor.
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for addition information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
5. Once Metro or ODOT decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five calendar days. The complaint will receive a case number and will then be logged into Metro's records identifying its basis and alleged harm, and the race, , color, or national origin, of the complainant.
6. In cases where Metro assumes the investigation of the complaint, Metro will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of Metro's written notification of acceptance of the complaint to furnish his/her response to the allegations.
7. In cases where Metro assumes the investigation of the complaint, within 40 calendar days of the acceptance of the complaint, Metro's Investigator (who may be one of Metro's Title VI designees, an outside inspector, or Metro's Title VI Coordinator) will prepare an investigative report for review by the Office of Metro Attorney and the COO. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

8. The investigative report and its findings will be sent to the Metro Attorney for review. The Metro Attorney will review the report and associated documentation and will provide input to the Investigator within 10 calendar days.
9. Any comments or recommendations from the Metro Attorney will be reviewed by Metro's Investigator. The Investigator will discuss the report and recommendations with the COO within 10 calendar days. The report will be modified as needed and made final for its release.
10. Metro's final investigative report and a copy of the complaint will be forwarded to FTA within 60 calendar days of the acceptance of the complaint.
11. Metro will notify the parties of its final decision.
12. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices, the complainant will be advised of the right to appeal to the U.S. Department of Transportation ("USDOT"). The complainant has 180 days after Metro's final resolution to appeal to USDOT. Unless facts not previously considered come to light, reconsideration or appeal to Metro will not be available.

VI. METRO'S TITLE VI COMPLAINT FORM

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

Complainant's Information:

Name: _____
 Address: _____
 City/State/Zip Code: _____
 Telephone Number (Home): _____
 Telephone Number (Work): _____

Person Discriminated Against (if someone other than complainant):

Name: _____
 Address: _____
 City/State/Zip Code: _____
 Telephone Number (Home): _____
 Telephone Number (Work): _____

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

Race/Color (specify): _____ National Origin (specify): _____

On what date (s) did the alleged discrimination take place? _____

Describe the alleged discrimination. Explain what happened and who you believe was responsible
 (if additional space is needed, add a sheet of paper).

List names and contact information of persons who may have knowledge of the alleged discrimination.

Have you filed this complaint with any other federal, state or local agency, or with any federal or state court? Check all that apply.

Federal agency _____ State agency _____ Local agency _____
Federal court _____ State court _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____
Address: _____
City/State/Zip Code: _____
Telephone Number (Work): _____

Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant Signature Date

Attachments: Yes _____ No _____

Submit form and any additional information to:

Jim Middaugh, Director, Title VI Coordinator Phone: (503) 797-1505
Communications Department Fax: (503) 797-1799
Metro Email: jim.middaugh@oregonmetro.gov
600 N.E. Grand Avenue www.oregonmetro.gov
Portland, Oregon 97232-2736

VII. A COPY OF METRO'S NOTICE TO THE PUBLIC THAT IT COMPLIES WITH TITLE VI, INSTRUCTIONS TO THE PUBLIC ON HOW TO FILE A DISCRIMINATION COMPLAINT AND A DESCRIPTION OF THE METRO PUBLICATIONS AND LOCATIONS WHERE THE NOTICE IS

POSTED

A. Title VI Notices

The paragraph below is inserted in publications that are distributed to the public and is published on Metro's web site (www.oregonmetro.gov) and IntraMet (available to Metro employees).

Full Nondiscrimination Notice to the Public:

"Metro hereby gives public notice that it is the policy of the Metro Council to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Metro receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Metro. Any such complaint must be in writing and filed with Metro's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, see the web site at www.oregonmetro.gov or call (503) 797-1536."

When space is limited (such as on a postcard or factsheet) or cost is an issue, the abbreviated version is used.

Abbreviated Nondiscrimination Notice to the Public:

"Metro fully complies with Title VI of the Civil Rights Act of 1964 – which bans discrimination on the basis of race, color or national origin. For more information, or to obtain a Title VI Complaint Form, see www.oregonmetro.gov or call (503) 797-1536."

B. A Description Of The Metro Publications And Locations Where The Notice Is Posted

Metro publishes the longer version of its Title VI notice in all significant transportation planning documents, including but not limited to: metro area long range transportation plan (most recent update known as 2035 Regional Transportation Plan), Metropolitan Transportation Improvement Program, Draft Environmental Impact Statements and public comment reports on funding allocation decisions.

Since Metro is not a provider of public transit service, the agency does not post the notice in vehicles.

As of Jan. 20, 2012, the longer version of Metro's Title VI notice appears on a special web page for the topic, www.oregonmetro.gov/civilrights. The special web page makes the document more accessible because it can be found through searches on the agency's web page and on common Internet search engines. The longer version also has been posted at three locations in the agency's headquarters, the Metro Regional Center: the entrance to the Metro Council Chamber, the main entrance to the building near the security check-in desk and the Human Resources Department.

As of Jan. 26, 2012, Metro published and posted the notice in English. In its Draft Title VI Program submitted to FTA Jan. 31, 2012, Metro said it would take certain interim steps by March 31, 2012

to post a translated version of the longer notice as the agency develops its LEP Plan. This interim step was developed in January 2012, in cooperation with FTA Civil Rights Office staff.

As of March 16, 2012, Metro replaced its notices in the agency's headquarters with the translated version, which was adapted from TriMet's notice, with permission from the transit agency and the FTA Civil Rights Office. The notice is translated into the five languages identified in Factor 1 of TriMet's LEP Access Plan as being spoken by more than 1,000 LEP residents in the TriMet service area, which is nearly identical to the Metro service area. For more information on the interim steps Metro took to provide language assistance by March 31, see "A memo from Metro's Title VI designee on the agency's language assistance activities promised by March 31, 2012," attached as Exhibit 1 to Metro's LEP Plan, which is Exhibit A to this report.

Upon completion of a new LEP Factor 1 analysis, Metro's posting of the notice will be revised, as needed, to comply with the findings of the agency's LEP Plan, attached as Exhibit A to this report.

TriMet's Title VI notice and Metro's interim Title VI notice are attached as Exhibit D

VIII. A DESCRIPTION OF THE PROCEDURES THE AGENCY USES TO PASS FINANCIAL ASSISTANCE THROUGH TO RECIPIENTS. A DESCRIPTION OF THE PROCEDURES THE AGENCY USES TO PROVIDE ASSISTANCE TO SUBRECIPIENTS. A DESCRIPTION OF HOW THE AGENCY MONITORS SUBRECIPIENTS' COMPLIANCE WITH TITLE VI AND SUMMARY OF THE RESULTS OF MONITORING

A. Description of the procedures Metro uses to pass-through FTA financial assistance in a non-discriminatory manner

Any local jurisdictions, community groups, non-profit organizations and federally allowed "for profit" agencies are invited to submit applications/proposals to Metro for assistance. To the greatest extent **allowed by law**, Metro ensures equity in its procedures to pass-through federal financial assistance through the use of the following procedures:

- Standard Request For Application (RFA) is required from all applicants
- All applications are to be submitted by a published known date
- RFA contains all relevant screening criteria
- RFA publishes the guidelines and statutes of the federal program
- RFA contains relevant federal statutes and federal regulations, administrative requirements and internal policies
- RFA's are published in a manner that reach the largest eligible audience including but not limited to:
 - Metro website
 - Regional newspaper(s)
 - Minority newspapers
 - Internally generated list of potential applicants
 - Other
- Grants are awarded based on highest scores per the RFA criteria
- All documentation affecting the decision process through award or not award is maintained in an official file

B. Description of the procedures Metro uses to provide assistance to potential subrecipients applying for funding in a non-discriminatory manner.

To provide assistance to potential subrecipients on how to provide programs and services in a non-discriminatory manner, Metro uses the following procedures:

- Train all relevant Metro personnel in Title VI compliance procedures related to grant award processes
- Provide each applicant with Metro’s notice to the public informing people of their rights under Title VI
- Provide each applicant with Metro’s procedures on how to file a Title VI complaint
- Provide technical assistance and education to applicants with regards to any Title VI question
- Reply to questions of the RFA in a manner that does not give any applicant an “edge” over any other applicant
- Provide relevant Title VI demographic information to applicants

C. Description of how Metro monitors its subrecipients for compliance with Title VI and a summary of the results of this monitoring.

Metro will include Title VI language in all written grant agreements (refer to most recent federal Master Agreement, located at: <http://www.fta.dot.gov/documents/18-Master.pdf>) and will monitor accordingly for compliance. Thus, subrecipients are required to comply with Title VI and related nondiscrimination laws, and regulations.

Title VI requirements of all subrecipients – not limited to the following:

- Name a Title VI coordinator
- 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 subrecipients
- Perform periodic self-assessments for Title VI compliance
- Correct any deficiencies identified through a self assessment or a complaint filed
- Report quarterly to Metro on Title VI compliance

Complaints

- Provide the public access to a defined complaint process and complaint form (Metro’s can be used)
- Maintain a complaint log:
 - The filing date of the complaint
 - The status of in investigation
 - The response taken by the subrecipients to resolve the complaint
- Notify Metro when a complaint is lodged against a Metro subrecipient
- Submit completed complaint investigation (lodged against subrecipients) to Metro

Remedial Action

- Follow-up review

- Place subrecipients on deficiency status
 - Require, review and approve a corrective action plan
 - Monitor plan
 - Suspend federal payments until non-compliance is corrected
- Correction time period for deficiency status not to exceed 90 days

Metro is committed to achieving full compliance with Title VI of the Civil Rights Act of 1964 and all related non-discrimination laws. Through its policies, procedures and monitoring of all subrecipients of federal funds, Metro makes every effort to ensure that no person is excluded from participation in or is denied the benefits of any federally funded or non-federally funded Metro program or activity on the basis of race, color or national origin.

IX. RECIPIENT HAS SIGNED CURRENT YEAR CERTIFICATIONS AND ASSURANCES IN TEAM

As of January 17, 2012, Metro has signed current year Certifications and Assurances in TEAM.

X. A SUMMARY OF ALL CIVIL RIGHTS COMPLIANCE REVIEWS CONDUCTED BY OTHER LOCAL, STATE OR FEDERAL AGENCIES DURING THE REPORTING PERIOD

Metro is not aware of any compliance reviews conducted of the agency’s civil rights programs by any local, state or federal agency during the reporting period. The agency has not been notified of any deficiency in its program. Attached as Exhibit E to this report is a copy of a letter from the Oregon Department of Transportation’s Office of Civil Rights acknowledging Metro’s most recent annual compliance report and the agency’s “superb effort” to meet federal civil rights requirements.

XI. A STATEMENT OF ANY CONSTRUCTION PROJECTS THAT HAVE BEEN UNDERTAKEN BY METRO USING FTA FUNDS DURING THE REPORTING PERIOD

Chapter IV, Section 8 of the FTA’s Title VI Circular provides guidance on conducting an environmental justice analysis of construction projects. Metro did not undertake any construction projects using FTA funds during the reporting period.

Respectfully submitted,

Martha Bennett
Chief Operating Officer

Date: 5/10/2012

Jim Middaugh
Title VI Coordinator

Date: 5/10/2012

EXHIBIT B
Metro's Public Involvement Policy for
Transportation Planning

www.oregonmetro.gov

Public involvement policy for transportation planning

Submitted to Federal Transit Administration
May 2012



Metro's web site: www.oregonmetro.gov

Metro is the federally mandated metropolitan planning organization designated by the governor to develop an overall transportation plan and to allocate federal funds for the region. The Joint Policy Advisory Committee on Transportation (JPACT) is a 17-member committee that provides a forum for elected officials and representatives of agencies involved in transportation to evaluate transportation needs in the region and to make recommendations to the Metro Council. The established decision-making process assures a well-balanced regional transportation system and involves local elected officials directly in decisions that help the Metro Council develop regional transportation policies, including allocating federal transportation funds.

NONDISCRIMINATION NOTICE TO THE PUBLIC

Metro hereby gives public notice that it is the policy of the Metro Council to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Metro receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Metro. Any such complaint must be in writing and filed with the Metro's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, see the web site at www.oregonmetro.gov or call 503-797-1536.

1.0 INTRODUCTION

This document presents policies and procedures for public involvement to ensure

- that Metro, as the federally mandated, state designated Metropolitan Planning Organization (MPO) for the Portland metropolitan region, meets the spirit and intent of applicable federal and state public involvement laws, regulations and authorities contained in the Safe, Accountable, Flexible, Efficient Transportation Equity Act—A Legacy for Users (SAFETEA-LU)ⁱ and the guidance in Oregon state planning goal 1: citizen involvementⁱⁱ
- that Metro, as a recipient of federal dollars, promotes equity and environmental justice to meet the spirit and intent of Title VI of the Civil Rights Act of 1964ⁱⁱⁱ, The Civil Rights Restoration Act of 1987,^{iv} Executive Order 12898 on Environmental Justice^v; Executive Order 13166 on Limited English Proficiency^{vi}; the National Environmental Policy Act of 1969 (NEPA)^{vii}; and the Americans with Disabilities Act (ADA)^{viii}
- that regional transportation plans and projects reflect public priorities and values
- transparency and accountability in Metro’s planning and decision-making and promote excellence in regional planning.

Scope

The policies in this document apply to all development of and updates to these policies and to Metro administered transportation planning and investments, including updates to the Regional Transportation Plan (RTP), the Metropolitan Transportation Improvement Program (MTIP) and corridor planning.

For jurisdictions and agencies to receive federal funding through Metro-administered programs or projects, they must certify that they have conducted appropriate public involvement.

Schedule review and revision

This document was adopted by the Metro Council Oct. 22, 2009 and remains agency policy in 2012. These policies will be reviewed at least every four years and revised to reflect changes in federal or state public involvement requirements. A 45-day public comment period will be held prior to adoption of new public involvement policies or major revisions to existing policies.^{ix}

Definitions

A glossary of terms as they are used in this context is included at the end of this document.

2.0 METRO COMMITTEE FOR CITIZEN INVOLVEMENT

The Metro Committee for Citizen Involvement (MCCI) was established under Metro's home-rule charter in 1992 to assist with the development, implementation and evaluation of Metro's citizen involvement program and advise on how to best involve residents in regional planning activities. This committee also fulfills the guideline in state planning goal 1, which calls for regional agencies to use existing local citizen involvement programs established by counties and cities.

MCCI reviews and comments on public involvement plans agency-wide, including those developed for transportation plans and projects. The composition of the committee is not specified in the Metro charter, but state goal 1 (above) requires that the committee include representatives of the geographic areas of interest in land-use decisions. MCCI currently recruits representatives from county citizen involvement organizations, representatives from areas outside Metro's boundary, residents from Council districts in region, and at-large representatives. Recruitment is openly publicized. Terms are for two years, and members have the option of serving up to three terms.

3.0 METRO PUBLIC INVOLVEMENT POLICIES AND PROCEDURES

Metro public involvement policies reflect requirements in SAFETEA-LU; The National Environmental Policy Act of 1969 (NEPA), Title VI of the 1964 Civil Rights Act; Executive Order 12898 on Environmental Justice; Executive Order 13166 on Limited English Proficiency; the Americans with Disabilities Act (ADA); and Oregon state planning goal 1: public involvement.

SAFETEA-LU expanded public involvement requirements first introduced in 1991 with the Intermodal Surface Transportation Equity Act (ISTEA) and strengthened in 1998 in the Transportation Equity Act for the 21st Century (TEA-21). The expanded requirements added the need for early and continuous public involvement in planning, and for information to be presented in ways that make it understandable and accessible to the general public.

The National Environmental Policy Act of 1969 (NEPA) established a national policy for the protection of the environment. NEPA requires the consideration of potential impacts on social and natural resources during transportation decision-making.

The Americans with Disabilities Act (ADA) requires reasonable efforts be made to accommodate citizens with disabilities who wish to attend public meetings.

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the ground of race, color, national origin, or sex be excluded from participation in, be denied the benefits of or otherwise be subjected to discrimination under any program or activity receiving federal financial assistance. Executive Order 12898 on Environmental Justice requires equity in distribution of benefits and burdens of transportation plans and projects, and Executive Order 13166 on Limited English Proficiency requires proactive efforts to engage people with limited English proficiency in the planning process.

Oregon state planning goal 1: citizen involvement requires each governing body to adopt and publicize a program for citizen involvement that is appropriate to the scale of its planning effort. The public involvement program should allow for continuity of information and enable citizens to understand the issues. Goal 1 also calls for regional agencies to use existing local citizen involvement programs established by counties and cities.

These Federal and state requirements form the foundation of Metro public involvement policies with certain procedures required to implement those policies. In addition to the required procedures, Metro may recommend additional activities to help promote more meaningful or effective involvement, greater transparency and accountability in decision-making, and excellence in regional planning.

3.1 Early and continuous public involvement^{xxi}

Required procedures

Plans and programs: Metro will involve the public early and continuously throughout the planning process in developing major plans and programs, including the RTP, the Metropolitan Transportation Improvement Program (MTIP), corridor plans, and high-capacity transit lines plans.

Draft Environmental Impact Statement (DEIS): Metro will involve the public early in developing the DEIS, beginning the Purpose and Need statement and including a formal public comment opportunity.^{xii}

Recommended procedures

Early contact with stakeholders: Stakeholders in the planning process should be identified at the beginning of the planning process and notified of key decision points or opportunities to provide input.

3.2 Reasonable access to information

Required procedures

Access to information: The public will be provided reasonable access to technical information, and public information will be made available in electronically assessable formats, such as the World Wide Web.

Visualization techniques: Metro will employ electronic methods and visualization techniques, such as maps and charts, to provide information to the public. Metro will maintain a project web site where current information on major projects will be posted.

Languages other than English: If a plan or project significantly affects a population known to speak a language other than English, key information about the plan or project, the effect on the area, schedule of events and notices of public involvement opportunities will be made available in that language. Significance can refer either to the impact of the project or to the fact that the project will affect an area in which 5% or more of the people speak another language.

Contact information: Contact information for a staff person who can answer questions and provide more information will be included in all public notices and major publications.

Recommended procedures

Plain language: Information that the public needs to understand a program, project or plan should be written in plain language, with unusual terms defined and a minimum of jargon.

Interactivity: Where appropriate, information should be presented in an interactive format.

3.3 Access to public meetings

Required procedures

Convenient times and locations: All Metro's public meetings will be held at convenient times and in locations that meet the requirements of the Americans with Disabilities

Recommended procedures

Accessible by public transportation: All Metro's public meetings should be held in locations accessible by public transportation. Notices of those meetings should include information about the transit lines that serve those locations as well as the TriMet web address for route-planning and scheduling information.

3.4 Timely information

Required procedures

Timely manner: Information about projects and plans will be provided to the general public, affected public agencies, representatives of transportation agencies, private sector transportation entities and other interested parties, including segments of the community affected by transportation plans, programs, and projects in a timely manner.

3.5 Adequate public notice^{xiii}

Required procedures

Timing of notices: Notice of public involvement opportunities will be provided with adequate time for public review and comment prior to key decisions. Notice of RTP, MTIP and DEIS public comment opportunities must be published on Metro's web site 45 days prior to the opening of the opportunity.

Notice to minority, low-income, and people with limited English proficiency: Staff must take steps to notify minority and low-income people and people with limited English proficiency of comment opportunities. Notices must describe how to request translators, interpreters or services for those with a hearing disability.

Recommended procedures

Notice to organizations: Interested organizations that hold monthly meetings should receive notice of RTP, MTIP and DEIS public involvement opportunities 45 days prior to the opportunity, to allow time for one meeting cycle to occur where members can be informed of the opportunity. The general public should receive notice at least one week before the opportunity.

Notice content: At a minimum, notices should name the project, plan or program; describe how to participate in the opportunity at hand; provide the location of events or how and where to submit comments; and provide the beginning and ending times and dates for all public comment opportunities.

3.6 Public comment opportunities

Required procedures

General: Public comment will be sought prior to adoption of a final RTP, the allocation of funding to projects in the MTIP process and public involvement policies and on major changes or amendments to these plans and policies.

Public involvement policies: The public comment period on new or revised public involvement policies shall be at least 45 days.

RTP and MTIP: The public comment period on a draft RTP or MTIP and major amendments to the RTP or MTIP shall be at least 30 days for transportation plans and 45 days for those that involve land-use actions that trigger requirements for local plan updates. If the final plan or project differs significantly from the review draft, a second public comment opportunity must be offered.

RTP and MTIP Air-quality conformity: The draft conformity determination of the RTP and MTIP and supporting documentation shall be made available for a 30-day public comment period. Written notice shall be made of the availability of this material, and the material shall be provided to anyone who requests it. Comments made during the comment period shall be made part of the final decision record.^{xiv}

DEIS: The lead agency must involve participating agencies and the public in developing the DEIS purpose and need statement. Timing of the involvement is flexible,--i.e., it may take place early in the process before the statement is adopted or during the environmental review. The completed DEIS must offer a public comment opportunity. Unless the lead agency and all participating agencies agree to a longer comment period, the length of the comment period may not exceed 60 days beginning on the day the document is published in the *Federal Register*.

Recommended procedures

Early input on DEIS: Input should be sought from participating agencies and the public earlier rather than later, and prior to adopting the statement of purpose and need. Although later review of purpose and need is acceptable, early involvement is strongly encouraged as it allows for any discrepancies to be addressed early in the process.

Decisions with short timelines: When a decision has a very short timeline over which Metro has no control, notice will be sent as soon as possible after learning of the opportunity, and the length of the comment period shall be as long as possible. *This section shall not apply to major amendments made to the RTP.*

3.7 Consideration of public comments

Required procedures

Consideration of public comment: Decision makers will consider public comment in all major decisions related to adoption of regional transportation plans and programs. Metro will compile and respond to or summarize as appropriate, substantive comments submitted on the draft RTP, MTIP, and DEIS.

Record of public comment: A public comment report on major transportation plans, programs and projects will be compiled and made available to decision-makers and the public. The public comments received during formal, specified public comment periods will be archived and retained for a period of time specified by an official retention schedule that meets federal, state and regional requirements.

Recommended procedures

Availability of public comment records: The full text of public comments will be made available to the public in electronic formats, with hard copies provided upon request.

3.8 Consideration of the needs of traditionally underserved

Required procedures

Proactive consideration: The needs of populations traditionally underserved in the transportation arena, including low-income and minority people and people with limited English proficiency, will be considered in the planning process. Metro will seek input from minority and low-income populations in developing major transportation plans and programs, including proactive recruitment for Citizen Advisory Committees and, as appropriate, for

technical or policy advisory committees that are integral to the planning process. The needs of those populations will be explicitly considered in developing those plans and programs.

Interpreter and translator services: Services for people with hearing impairments or limited English proficiency will be provided at any public meeting with 24-hour advance notice.

Recommended procedures

Proactive notification and recruitment: Recruitment notices for community members on advisory committees that are integral to transportation plan development and decision-making and notices of public involvement opportunities will be sent to media outlets that serve minority populations and those with limited English proficiency.

3.9 Evaluation of public involvement activities

Required procedures

Activities to be evaluated: The public involvement program associated with each major plan, program or project will be evaluated for effectiveness and include an evaluation of the outreach to underrepresented populations as defined by Title VI and Executive Order 12898 on Environmental Justice. Metro's public involvement procedures will be reviewed by FHWA and the FTA during certification reviews.^{xv} Metro shall collect demographic information for major comment opportunities and public events and analyze the results at least annually.

Timing of evaluation: To ensure full and open access to all, Metro will review its public involvement efforts at least every four years, when the public involvement policies and procedures are reviewed and updated.

Recommended procedures

Timing of evaluation: At the close of major public involvement efforts, the success of those efforts should be evaluated for effectiveness using, for example, checklists, surveys or before and after tests. If the effort involved collection of demographic information, that information should be analyzed and the results captured in order to improve the next public involvement effort.

3.10 Coordination with state public involvement efforts

Required procedures

Coordination with state public involvement: Metro will coordinate public involvement efforts with those of the Oregon Department of Transportation whenever possible. Coordination may include holding joint open houses or hearings, forming joint citizen advisory committees, or developing joint public notices.

Recommended procedures

Joint public events: Metro will coordinate public events with ODOT in developing the MTIP and State TIP when timelines and schedules coincide. Coordination includes issuing joint public notices, holding joint public open houses and offering joint public hearings. Regional transit agencies may also be invited to participate in open houses where transit is a key part of the plan or program.

3.11 Development and maintenance of a public participation policy

Required procedures

Consultation with interested parties: Metro will develop and update public involvement policies in consultation with interested parties as defined in the current federal transportation authorization. Interested parties as defined in SAFETEA-LU include the general public, affected public agencies, public transportation employees, private transportation providers, public transportation users, freight shippers, users of bicycle and pedestrian facilities, disabled, and others as appropriate to the plan or project.

Policy review and updating: Those policies will be reviewed and updated every four years or sooner if there are major changes in federal or state requirements.

Recommended procedures

Plain language: Policies should be succinct and clearly written in plain language, with a minimum of jargon. A glossary should be included to define unfamiliar terms.

Numbering: Policy elements should be numbered for easy reference.

3.12 Development of public involvement plans

Required procedures

Public participation plans for major plans, projects and programs: SAFETEA-LU stipulates that MPOs must develop and utilize a public participation plan prior to adopting the RTP and the MTIP. Those public participation plans must be developed in consultation with interested parties, and the public must have input. In keeping with this requirement and the requirement for early and often involvement of the public in major planning projects, Metro will develop a public involvement plan before beginning the RTP or the MTIP in consultation with interested parties. The plan will be reviewed by the Metro Committee for Citizen Involvement (MCCI) as a representative of the general public.

Recommended procedures

Public review of plans: Public involvement plans for major plans, programs and projects, such as the RTP, the MTIP and corridor plans and projects, should be reviewed by interested parties and the general public in addition to MCCI.

Content of plans: Plans should list the types of public involvement opportunities that will be offered (e.g., citizen advisory committees, workshops, open houses, comment periods and formal public hearings), when the opportunities will be offered, strategies for addressing the concerns of minority and low-income populations, and key decision points where public comment will be sought.

Citizen Advisory Committee (CAC): If a CAC is used, it should be recruited as early as possible in the planning process. Application and service requirements should be widely disseminated. Major stakeholders and/or geographic should be represented. Special effort should be made to recruit people who can represent the interests of minority, low-income, elderly and disabled people.

GLOSSARY

Corridor—A transportation corridor is a swath of land in which at least one main line for transportation, such as a road to rail line, has been built. New transport lines may be built in existing corridors to minimize pollution or supplement mobility. Corridor plans may include plans for new light rail lines, parallel arterials or multi-use paths.

DEIS and FEIS—Draft and Final Environmental Impact Statements required by the National Environmental Policy Act for federal government agency actions that significantly affect the quality of the human environment. The document has four parts:

- (1) statement of the Purpose and Need
- (2) description of the Affected Environment, (3) description of the Range of Alternatives
- (4) description of the environmental impacts of the alternatives

The lead agency is required to seek public input on the Purpose and Need statement and seek public comment on the completed DEIS, but is generally not required to seek public comment on the FEIS.

Federal Register—Official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, as well as executive orders and other presidential documents. The *Federal Register* is published by the Office of the Federal Register, National Archives and Records Administration (NARA).

High capacity transit (HCT)—Public transit that has an exclusive right of way, a non-exclusive right of way or a combination and that make fewer stops, travels at higher speeds and carries more people than local service transit. Examples include light rail, commuter rail and bus rapid transit.

Major amendment (to the RTP or MTIP)—Changes to an RTP or MTIP that involve additions or deletions of projects or a significant change in scope of the project location or function. The addition of project details, minor elements or the adjustment of funding levels to previously approved projects or programs are not considered major amendments.

The following types of projects are *not* considered a major amendment: Bridge repair or replacement projects less than \$5 million in total cost; Preservation projects less than \$5 million on the Interstate system or less than \$2 million on the arterial system; Operations projects less than \$2 million; bicycle or pedestrian projects less than \$500,000; general planning or corridor studies less than \$200,000; appropriations for projects previously identified and approved by Metro resolution as regional priorities for federal earmarks; grants awarded through the ODOT Public Transit Division discretionary grant program; and emergency additions where imminent public safety hazard is involved. Additionally, projects that are exempt from air quality conformity analysis by federal rule or are determined to not be regionally significant for air quality purposes are not considered major amendments.

Metropolitan Planning Organization (MPO)—A federally mandated, state-designated transportation policy-making organization made up of representatives from local government and transportation authorities Urbanized areas with populations greater than 50,000 must have an MPO in order to receive federal transportation funding.^{xvi}

Metropolitan Transportation Improvement Program (TIP)—The federally required documentation of transportation investments scheduled for a metropolitan region during a

four-year cycle. In the Portland metropolitan area, the MTIP includes federal funding for transportation projects and programs administered by the Oregon Department of Transportation, Metro, TriMet and SMART.

Public involvement plan—A plan for involving key stakeholders and the general public in developing a specific, time-limited project, program, or plan. Public involvement plans identify key stakeholders, communication media, public involvement strategies and a timetable.

Public involvement policy—An organization’s overarching public involvement guidelines, such as those in this document. In this document, the public involvement policies are distinguished from public involvement plans by their general rather than specific application.

Regional Transportation Plan (RTP)— A plan that MPOs are required to develop for their metropolitan area and update every four years. The plan includes policies to guide the design of the transportation system and transportation system plan that looks ahead at least 20 years. Federal regulations may refer to this as the Metropolitan Transportation Plan.

Stakeholders—Individuals and organizations with an interest in or who are affected by the transportation planning process. Stakeholders include federal, state, regional and local officials, jurisdictions, institutions, community groups, transit operators, freight companies, shippers, the general public. SAFETEA-LU specifically names bicycle, pedestrian and freight interests and people who have traditionally been underrepresented in the planning process as stakeholders in transportation planning process.

-
- i SAFETEA-LU emphasizes strong planning processes and public involvement.
 - ii Oregon's Statewide Planning Goals and Guidelines, goal 1: citizen involvement OAR 660-015-0000(1).
 - iii Title VI of the Civil Rights Act of 1964 declares that no person shall be excluded from participating in any program receiving federal assistance on the basis of race, color or national origin.
 - iv The Civil Rights Restoration Act of 1987 restored the broad application of the Civil Rights Act of 1964 to include the entire agency or organization that receives federal funding as well as sub-recipients and contractors, 20 USC 1681.
 - v Executive Order 12898 on Environmental Justice requires mitigation or avoidance of actions that disproportionately and adversely affect minority and low income populations.
 - vi Executive Order 13166 on Limited English Proficiency requires providing access to services for people with limited English proficiency.
 - vii National Environmental Policy Act (NEPA) requires consideration of impacts on human environments.
 - viii 28 CFR 36 Americans with Disabilities Act requires government programs to be accessible to people with disabilities.
 - ix 23 CFR part 450, sub-part C, (i) requires a 45-day public comment period prior to adoption of public involvement process.
 - x 23 CFR 450.210 and 450.316 requires early and continuous public involvement.
 - xi FHWA/FTA Interim Policy on Public Involvement requires effective public involvement processes custom tailored to local conditions.
 - xii 23 CFR 771 Environmental Impact and Related Procedures requires early coordination and public involvement in project development.
 - xiii 23 USC 135 Provides for reasonable access to comment on proposed plans .
 - xiv State Conformity rule 340-252-0060 describes required consultations on air-quality determinations, including required public involvement.
 - xv 23 CFR part 450, subpart C, (x) addresses FHWA and FTA evaluation of the effectiveness of public involvement procedures as part of their MPO certification review.
 - xvi 23 USC 134 and 135 govern statewide and metropolitan transportation planning.



Metro | *People places. Open spaces.*

Clean air and clean water do not stop at city limits or county lines. Neither does the need for jobs, a thriving economy and good transportation choices for people and businesses in our region. Voters have asked Metro to help with the challenges that cross those lines and affect the 25 cities and three counties in the Portland metropolitan area.

A regional approach simply makes sense when it comes to protecting open space, caring for parks, planning for the best use of land, managing garbage disposal and increasing recycling. Metro oversees world-class facilities such as the Oregon Zoo, which contributes to conservation and education, and the Oregon Convention Center, which benefits the region's economy.

Metro representatives

Metro Council President – David Bragdon

Metro Councilors

Rod Park, District 1

Carlotta Collette, District 2

Carl Hosticka, District 3

Kathryn Harrington, District 4

Rex Burkholder, District 5

Robert Liberty, District 6

Auditor – Suzanne Flynn

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EXHIBIT C

A description of Metro's public involvement outreach efforts and steps taken to ensure that minority and low-income people had meaningful access to Metro's transportation-planning related planning activities during the 2007-11 reporting period

A. Summary of Metro's Public Involvement Program

Since its inception Metro has highly valued public participation in its varied projects that impact the Portland metropolitan area. Metro has adopted significant policies dating back to 1981 regarding public participation in its decision-making process. Metro's 1981 Public Involvement Program provides that "Metro will establish a public involvement program, emphasizing public information and public participation A public involvement program for Metro will take into consideration the broad range of Metro's diverse publics." See Metro Executive Order No. 5. In 2010, the Metro Council passed a resolution to adopt six desired outcomes for the region as part of the region's growth management policies, one of which being a commitment that "the benefits and burdens of growth and change are distributed equitably."

Metro has many committees that advise the Metro Council, Auditor and staff. Most of the current committees include community representatives. The Metro Council President is responsible for ensuring that the recruitment and selection process for appointments to vacant positions includes all segments of the community. Metro's broad and inclusive anti-discrimination policies apply to all advisory committees (Metro Code 2.19.030).

The Joint Policy Advisory Committee on Transportation (JPACT) serves as the policy board of Metro's MPO, along with the Metro Council. JPACT is comprised of 17 elected officials and transportation and transit agency leaders from across the region, including three members from Southwest Washington, which has its own MPO. The Metro Council must act on JPACT recommendations, but cannot amend them. JPACT is advised by the Transportation Policy Alternatives Committee, comprised of 15 professional transportation staff appointed by area cities, counties and government agencies, and six at-large community members.

When appointments and confirmation to advisory committees do not require specific geographical or other expertise, committee membership attempts to reflect the demographic profile of the region. Recruiting efforts by staff to contact community based organizations have brought greater diversity to the applicant pool in recent years and, consequently, to committee membership.

Metro has a new reporting structure as of the agency's reorganization in 2008; Jim Middaugh, Metro Director of Communications, is Metro's official Title VI Coordinator. He is the Director of Communications in the new organizational structure, having replaced Ms Kate Marx, Director of Public Affairs and Government Relations, who oversaw the previous quadrennial Federal Title VI plan in 2007. Middaugh reports directly to Metro's Chief Operating Officer, the chief executive of the agency. Dylan Rivera, senior public affairs specialist, currently serving as the Title VI designee as of FY 2010-11, following the retirement of previous Title VI designee Pat Emmerson in June 2010.

B. Steps taken to ensure that minority and low-income people had meaningful access to Metro's transportation-planning related planning activities during the 2007-11 reporting period

1. Regional Transportation Plan (RTP)

Initiated April 2006; federal component approved December 2007; state and federal project lists approved for air-quality conformity analysis December 2009; final approval achieved in June 2010.

Outreach for this project was conducted in accordance with Metro's Public Involvement Policy for Transportation Planning, attached as Exhibit A to this report.

The RTP, a 20-year blueprint for our region's transportation system, identifies transportation needs and investment priorities. Metro updates the RTP every four years. Metro began updating the RTP to 2035 in February 2006 and completed this update in June 2010. Metro staff created a public participation plan that was reviewed by the Metro Committee on Citizen Involvement early in the update process, before technical work began. The plan was updated as needed throughout the RTP updating process. The public involvement strategy for the RTP recognized the need for early and continuous public involvement and identifying the needs of low-income and minority populations.

A major addition to the 2035 RTP is the incorporation of equity as a key value, as reflected in specific policy goals and objectives. Metro, through the RTP process, developed measures to evaluate the regional transportation system's performance with regard to equity. The RTP public engagement process included the following elements:

- A scientific public opinion research poll conducted in Fall 2006 on high-priority needs and values to help inform the policies that form the basis of the RTP.
- Five targeted stakeholder workshops with community organizations and individuals to discuss transportation needs and goals in depth. The workshops actively recruited participants from groups and populations that historically have not been well represented in transportation planning and decision-making in the Portland metropolitan region. For example, a workshop focused on the "active living" movement included representatives from a health clinic that serves migrant agricultural workers, a project on transportation for the disabled and the advocacy group Elders in Action, among others. Two workshops specifically addressed equity issues. The first workshop, held in Spanish at Centro Cultural in the far western edge of the region, identified transportation issues and needs among the largest concentration of Hispanic residents. The second workshop addressed disparate environmental impacts of transportation problems. It included members of the Environmental Justice Action Group and minority and low-income populations who live in North Portland.
- The RTP update process has included two public comment opportunities so far: one in Fall 2007 on the federal component of the RTP and one in February 2008 on the air-quality conformity report. Display ads announcing these public comment opportunities were published in community and ethnic newspapers in addition to *The Oregonian*, the newspaper of record in the region. Public open houses and hearings were held at different times of the day and in different parts of the region. Care was taken to ensure that all events were held in ADA-accessible buildings that are served by public transportation.

In Fall 2009 Metro held open houses and public hearings during a 30-day public comment period on the 2035 RTP project list. During this report's reporting period, in Spring 2010, Metro held a 45-day public comment period on the full 2035 RTP. In both cases, public affairs staff made sure that minority and low-income communities received notification of the comment opportunities and proactively sought venues in those communities.

Other outreach for the Regional Transportation Plan, mostly during prior reporting periods, included:

- presentations at established groups and local elected councils

- project website with public review documents and other project publications and opportunities for public participation
- Forty-five days before the final comment period opened, electronic notices were sent to all neighborhood associations, citizen participation organizations, jurisdictions, tribes with any potential interest in the area, business and community stakeholders, and all individuals who asked to be included in our list of interested parties announcing the comment period and providing information on how to comment. A second notice was sent when the comment period opened. A public notice was published in The Oregonian, the newspaper of record for the metro area, and display ads were published in all ethnic newspapers and community newspapers. A press release was published on the Metro web site and sent to all area media.
- newsfeeds on Metro's general website and email newsletters
- fact sheets and maps
- all public comments received during the final public comment period were responded to in the final RTP adoption legislation (Exhibit H)

2. Regional Flexible Funding Allocation and the Metropolitan Transportation Improvement Program (MTIP)

Programming cycles every two years.

Outreach for this project was conducted in accordance with Metro's Public Involvement Policy for Transportation Planning, attached as Exhibit A to this report.

Metro programs the Metropolitan Transportation Improvement Program for the Portland area. The Regional Flexible Funding program is the local name for two federal funds Metro administers: Congestion Management/Air Quality (CMAQ) and Surface Transportation Program. Metro includes environmental justice as a qualitative criterion in evaluating applications for the flexible funding program.

Public involvement activities for the 2010-13 MTIP began early in the process with creation of a Public Involvement Plan (PIP) reviewed by MCCI and refined in response to MCCI's suggestions and comments. One of the first activities in the PIP was outreach to jurisdictional leaders and community-based organizations, including those that represent minority, low-income, elderly and disabled people and people with limited English proficiency, to help shape the policies to guide screening and selection of applicant projects and programs. A summary report of the feedback was distributed to participants, with a description of the policies that were retained, modified or added as a result of the feedback.

During this reporting period, Metro completed the 2010-13 MTIP and began implementing the public participation plan for the Regional Flexible Funding allocation and development of the 2012-15 MTIP. The public participation plan includes a section specifically detailing the outreach and engagement of minority and low-income people, as well as people with limited English proficiency.

Since 2010, activity has focused on the allocation of flexible funds for federal fiscal years ending 2014-15. In the summer of 2010, JPACT and the Metro Council decided to allocate 75 percent of the flexible funds to Active Transportation/Complete Streets projects and 25 percent to Green Economy/Freight projects, with specific direction to staff to form a work group to advise on how these programs could ensure the projects they fund address the needs of environmental justice and underserved communities. JPACT and the council also directed that a task force advise them on policy guidance for the two programs.

Metro convened a working group on environmental justice and underserved communities in winter 2010-11, inviting stakeholder groups and service providers focused on housing and related issues to help inform the agency of community needs and concerns. Two participants in the working group were also appointed to serve on the task force. In two meetings at Metro, the working group advised public involvement and transportation planning staff. Working group participants also reviewed and provided comments on Metro's draft methodology for identifying EJ and underserved populations, services and mobility barriers.

The task force incorporated the EJ working group's suggestions into its recommended policy guidance and criteria. JPACT and the Council adopted the policy guidance and criteria in January 2011. In June, local agencies submitted project summaries and started to discuss with Metro how their outreach during project selection should include low income and minority communities.

3. Climate Smart Communities: Scenarios project

Initiated Fall 2010; expected completion in 2014.

Outreach for this project was conducted in accordance with Metro's Public Involvement Policy for Transportation Planning, attached as Exhibit A to this report.

The region has launched a multi-year process to design the best set of policies to reduce carbon emissions from transportation while helping achieve our goals of building livable, prosperous and equitable communities. To help engage policymakers and community stakeholders in a meaningful way, Metro convened about 250 participants at a Climate Leadership Summit at the Oregon Convention Center, Friday April 1, 2011. This was a joint meeting of the Metro Council, Metro Policy Advisory Committee (MPAC) and JPACT, but also included other elected officials, local government staff, and leaders from minority and underserved communities, community groups and the business community.

The scenarios have not been designed yet; local leaders who attended the summit provided input on what political, economic, social equity and other factors the region should consider as it studies the issue and forms scenarios for the region to test in summer 2011 and in 2012. Metro staff used keypad polling to ask the audience to weigh the effectiveness of land use and transportation strategies in meeting the region's goals for social equity, among other goals, such as economic development. Metro staff also invited EJ service providers and stakeholder groups, including those who participated in the Regional Flexible Funds program's environmental justice working group, to attend the summit.

In keypad polling responses, oral comments at the summit and in written comments afterwards, participants recognized that the scenario planning process needed to take into account the fiscal, social equity, public health and affordability issues facing the region. The polling showed specific results. For example, among community design strategies, mixed use development in centers/corridors rated the most favored in meeting all five policy goals, except for potential to help minority and underserved communities. This was underscored by written and oral comments from summit participants. Addressing social equity was raised 11 times in written comments, more than any other topic.

Metro's technical analysis of scenarios in early summer included analysis of equity considerations. And by June 30, staff had drafted a communication plan for fall 2011 that was intended to engage EJ and underserved communities as well as other stakeholders.

The scenarios project made use of Opt In, a new public opinion research tool developed by Metro's communication department. Opt In is an online panel of members of the public who have agreed to participate in periodic public opinion surveys on topics relevant to a variety of Metro programs. The scenarios project developed a poll for the Opt In audience that helped inform the agency of public views of some transportation related strategies for reducing carbon emissions (e.g.: use of incentives for the public to use car-sharing programs). By the end of the reporting period, Metro had contracted with seven local environmental justice, equity and diversity-related organizations to help the agency increase the number of low income and minority participants in the Opt In panel and also to develop long-term relationships. Metro also contracted with Su Publico, a culturally relevant marketing organization, to assist with outreach to the Latino, Hispanic and African American communities.

4. Portland-Milwaukie Light Rail Project Final Environmental Impact Statement

Initiation date: April 2007 - Refinement Phase; August 2007 to July 2008 - Supplemental Draft Environmental Impact Statement; August 2008 to October 2010 - Final Environmental Impact Statement; November 2010 - completed with issuance of the Record of Decision

Outreach for this project was conducted in accordance with Metro's Public Involvement Policy for Transportation Planning, attached as Exhibit A to this report.

The project area was analyzed for environmental justice populations. The demographics of the project area indicated no significant concentrations of minorities or people with limited English proficiency. Public outreach was extensive and conducted at multiple sites in the community. All sites were screened for ADA accessibility.

Outreach activities during the Supplemental Draft Environmental Impact Statement included:

- 14 meetings of the Citizen Advisory Committee between October 2007 and June 2008.
- 5 meetings of the Safety and Security Task Force, which was comprised of concerned citizens, between September 2007 and January 2008.
- 4 meetings of the Willamette River Crossing Partnership, which included property owners and neighborhood representatives from both sides of the river, between July 2007 and May 2008.
- 7 open houses, 3 "segment meetings," two community workshops and a public hearing were held from March 2007 to June 2008.
- 123 presentations to community groups, neighborhood associations, business organizations, interested advisory committees and local governments.
- 2 project newsletters, each mailed to approximately 12,000 community members.
- 3 Metro Councilor newsletters sent to approximately 1,400 community members.
- 3 Metro e-newsletters sent to approximately 4,700 community members.
- 10 fact sheets providing information and encouraging participation in the process.
- Updated, informational website.
- Postcards promoting participation in the process, including an 8,600 mailing in March 2008 and a 13,000 mailing in April 2008.
- Door-to-door canvassing in May 2008.
- 3,000 fliers distributed to local schools.
- Numerous media advisories, advertisements in local and general circulation papers, and more than 115 news stories about the project.

Metro collaborated with TriMet on public involvement and outreach during the Final Environmental Impact Statement phase. Outreach activities and materials during the Final Environmental Impact Statement phase included the following:

- over 225 public meetings in various locations along the alignment
- one-on-one meetings with residential and business property owners, educational institutions, neighborhoods, and interest groups with a key interest in the alignment
- monthly Citizens Advisory Committee meetings, with members representing communities along the alignment and specific user groups, including disabled transit riders
- project briefings to established organizations
- open houses to update community members on refined and updated light rail designs
- an actively maintained project mailing list
- project fact sheets and maps
- postcard notices of project events mailed to property owners adjacent to the alignment
- community calendar notices sent in advance of project events
- project website that contains upcoming meeting information and past meeting materials
- all public comments received during the SDEIS public comment period were responded to in the FEIS (Appendix P)

5. East Metro Connections Plan

Initiation date: March 2010

Outreach for this project was conducted in accordance with Metro's Public Involvement Policy for Transportation Planning, attached as Exhibit A to this report.

The East Metro Connections Plan is the first mobility corridor refinement plan to come out of the 2035 Regional Transportation Plan that will incorporate the goals and approach of Metro's mobility corridor strategy designed to better integrate land use, community and economic development, environmental and transportation goals at the corridor refinement plan stage. The East Metro Connections Plan will address the region's priority to improve mobility and access while ensuring that transportation investments support land use aspirations, promote economic development and help support job retention and expansion. Project partners include the cities of Fairview, Gresham, Troutdale and Wood Village, Multnomah County, ODOT and Metro. Additional participating entities include the city of Damascus, Clackamas County, the Port of Portland and TriMet. The project is anticipated to be completed by summer 2012.

The plan area has concentrations of poverty and ethnicity that are greater than the regional average. Initial assessment has begun to identify focus communities using Census and other data defining areas with higher percentages of minority, low income, low English proficiency, elderly, and young. Focus communities include Rockwood and portions of Fairview, Wood Village, downtown Gresham and southeast Gresham along the US 26 Corridor. There are areas where more than 20% of the population is below the federal poverty level. This includes the Rockwood neighborhood and portions of downtown Gresham. The plan area also has concentrations of minorities -- particularly in Rockwood, Fairview, Wood Village, portions of downtown Gresham, and southeast Gresham along the US 26 Corridor -- including concentrations of Hispanic and Latino populations, and concentrations of Eastern European populations. The plan area also has increasing numbers of youth and in some areas, higher percentages of youth than the region overall.

There is ongoing outreach to target these populations to ensure they have timely and accessible opportunities to participate by providing information about their challenges, wants and needs related to the transportation system. This outreach is being supplemented by fostering Metro's relationship with community based organizations (CBO) serving these populations. Metro conducted a scan of CBOs through personal interviews with staff/representatives. The scan

revealed specific information related to the following, which will be incorporated into Metro's best practices guide for community engagement.

- populations served (youth, elderly, low-income, disabled, immigrant, minority, others)
- geographic locations served
- where the populations they serve live, work, shop and obtain other services
- how the CBO interacts with these populations
- recommendations for engaging these populations

Other outreach for East Metro Connections Plan has also included:

- public meetings, including Spanish content, survey and group discussion
- presentations at information fairs, community events, established groups and local elected councils
- newsletters mailed to every resident in Fairview, Troutdale and Wood Village
- email updates to Gresham residents
- project website with key findings and opportunities for public participation
- newsfeeds on Metro's general website and in weekly email newsletters
- fact sheets and maps
- online survey

6. Lake Oswego to Portland Transit Project Draft Environmental Impact Statement

The Draft Environmental Impact Statement phase of the project began in 2009, following Scoping (September 2007 to July 2008) and Refinement (December 2008 to June 2009). The project steering committee made its recommendation for a Locally Preferred Alternative in February 2011.

Outreach for this project was conducted in accordance with Metro's Public Involvement Policy for Transportation Planning, attached as Exhibit A to this report.

Local and regional transportation and land use plans call for Metro, TriMet and the cities of Portland and Lake Oswego to implement improved transit service connecting activity centers along Highway 43 in the Lake Oswego to Portland transit corridor. The purpose of the transit project is to optimize the regional transit system by improving transit within the Lake Oswego to Portland transit corridor, while being fiscally responsive and by supporting regional and local land use goals.

Alternatives Analysis

The Lake Oswego to Portland Transit and Trail Alternatives Analysis, begun in the summer of 2005, studied potential transit and trail alternatives in the corridor between Lake Oswego and Portland.

The study offered numerous opportunities for public involvement including: attendance at monthly Lake Oswego Project Advisory Committee meetings (July 2005–July 2007), a corridor and river tour for Project Advisory Committee members (January and September 2006), a community design workshop (May 30, 2006), 12 small group meetings with affected stakeholders (September–October 2006), study newsletters (May 2006 and May 2007), Metro councilor newsletters (June 2007), e-newsletters (April and May 2006; June, July and August 2007), study information on Metro's web site (ongoing), a corridor bus rider survey (January 2007), two open houses (June 2007), a public hearing (July 2007), a 74-day comment period (June 26–Sept. 7, 2007) and meetings with community and neighborhood groups (ongoing).

Through these public involvement and outreach activities, the project made more than 1,200 citizen contacts through submitted comments or by citizen attendance at meetings, workshops and open houses sponsored by Metro. During the public comment period, Metro received 214 public comments.

On Sept. 10, 2007 the Alternatives Analysis Steering Committee recommendation on alternatives to advance into a Draft Environmental Impact Statement (DEIS) and work program considerations.

Draft Environmental Impact Statement

Between September 2009 and January 2010, Lake Oswego to Portland Transit Project partners reached out to Highway 43 commuters to raise awareness of the project before introduction of a locally preferred alternative in summer 2010. The outreach included employer-based discussion groups and farmers' market tabling. Where practical, project partners asked members for voluntary ethnicity self identification through a survey sheet; however, few people provided that information.

The Draft Environmental Impact Statement's demographic analysis has identified small but significant low-income populations in the affected study area. The project team is developing a strategy to engage those populations in the process. As the DEIS analysis progressed, project partners continued to meet with neighborhood and business groups to raise awareness of the project and the issues that were to be addressed during the 45-day DEIS public comment period.

Publication of the project's Draft Environmental Impact Statement on Dec. 3, 2010 initiated a 60-day public comment period ending on Jan. 31, 2011. The public comment period included two open houses and one public hearing. The comment period, open houses and public hearing were advertised on the project web page (on Metro's website) and through newspaper ads, emails to interested parties, information distributed during community group briefings and public meetings, notices to local blogs and interest groups, and a post card mailed to property owners and interested parties throughout the corridor.

Sensitive populations identified in this corridor through the 2000 U.S. Census include people age 65 and older, people with low income and minorities. The project has targeted these populations through specific outreach, including: inclusion of nine representatives on the 23-person CAC that were over 65, one member on the CAC that was disabled, direct mailing to residents specifically reaching low-income persons, and community group briefings to existing neighborhood associations and other organizations with a majority of senior members. To further reach out to people with low incomes, elderly and minorities, the project also canvassed door-to-door in the neighborhoods identified to have a higher population of low-income residents, published information through elementary school newsletters to reach parents of low-income and minority children, hosted an information booth at grocery stores in low-income neighborhoods and provided information in newsletters, on websites and on bulletin boards of agencies serving low income, elderly and minority populations. Care was taken to ensure that all events were held in ADA-accessible buildings that were served by public transportation.

7. Vámonos Hispanic outreach project

Kaiser Permanente awarded Metro Regional Travel Options a \$75,000 grant in December 2010 to support a new project currently called "Vámonos! Let's explore Cornelius, Forest Gove and Hillsboro by bike and foot."

The goal of the project is to increase awareness of great places to bike and walk among families in Cornelius, Forest Grove and Hillsboro. During this quarter, RTO developed a new project web page in English and Spanish that can be found here:

<http://www.oregonmetro.gov/index.cfm/go/by.web/id=38129>

In May 2011, RTO hired a bilingual temporary employee, Maria Davila who continues to work on the project. She helped RTO conduct bilingual outreach with Latino families at 24 events from May to September, 2011.

The summer event outreach series, which concluded in September, led to face-to-face conversations with more than 3,300 people. More than 7,147 handouts related to biking and walking were distributed to families in the project area.

RTO estimates approximately 5,000 people have been directly reached by the work this far. Metro's Spanish-language marketing campaign and subsequent earned media coverage reached tens of thousands of others. It is estimated the walking and biking maps and materials will reach the hands of approximately 50,000 people. The media campaigns will reach tens of thousands more.

For more information on the event outreach, visit:

<http://news.oregonmetro.gov/1/post.cfm/families-learn-to-save-money-and-stay-healthy-with-metro-s-summer-outreach-efforts>

RTO ran a targeted media campaign from June to October 2011 to connect with the Hispanic community. This included radio spots, billboards and web resources about walking and biking. Metro plans to run Spanish radio ads, which is a very effective way to reach a Hispanic audience, to launch the map in spring and summer of 2012.

Additionally, Metro conducted one-on-one interviews with community leaders in the project area, such as non-profit leaders, business owners and government officials to help Metro determine how to create culturally relevant biking and walking maps. Metro learned about transportation barriers as well as cultural insights for developing effective tools to help families walk and bike in the project area. Some of the key findings from these interviews include:

- the need for an event series and face-to-face education as well as a printed map
- engaging youth to help involve parents
- attention to free and inexpensive activities and points of interest
- use visuals instead of words

As part of the Vámonos project, next quarter, the following organizations for Centro Cultural will receive a \$2,000 sponsorship from RTO and Kaiser Permanente to support its mission and its Día de los Niños festival in Cornelius. The organization also received a sponsorship during summer 2011. RTO gave Centro Cultural Walk There! books and Bike There! maps in English, as well as Bike There! quick guides in both Spanish and English.

The development phase of the map is underway. The maps and tools will launch in spring 2012.

In the coming quarter, RTO will administer sponsorships to partners to support the Vámonos project with conducting event outreach, translating materials and sitting on the steering committee. Originally, the goal was to have these sponsorships for outreach and education implemented by Q2, but the contracting process took longer than anticipated. Sponsorship letters will be sent January 2012.

EXHIBIT D

A copy of TriMet's Title VI notice and Metro's Title VI notice (adapted from TriMet's) as of March 15, 2012

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Metro項目的運作按照適用法律不考慮種族、膚色、國籍、宗教、性別、性取向、婚姻狀況、年齡或殘疾狀況，其中包括1964年民權法案第VI章和ORS第659A章的規定。欲索取更多有關Metro第VI章非歧視規定，或如果有人已經因為被非法歧視而感到屈辱而希望進行投訴，同時其符合第VI章或其它適用的法律，請聯系我們503-797-1536 (聽力障礙 TDD 503-797-1804 或發電子郵件至trans@oregonmetro.gov。



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EXHIBIT E

A copy of a letter from the Oregon Department of Transportation's Office of Civil Rights acknowledging Metro's most recent annual compliance report and the agency's "superb effort" to meet federal civil rights requirements.



Oregon

John A. Kitzhaber, M.D., Governor

Department of Transportation

Office of Civil Rights

955 Center St NE, Room 471

Salem, OR 97301

Phone: (503) 986-4350

Fax: (503) 986-6382

January 19, 2012

Dylan Rivera
Public Affairs Specialist, Transportation Planning
Metro
600 NE Grand Ave.
Portland, OR 97232-2736

Dear Mr. Rivera,

Please accept this letter of acknowledgement that the Oregon Department of Transportation (ODOT), Office of Civil Rights (OCR), Title VI Program has received your Title VI Compliance Report dated August 30, 2011. Along with this acknowledgement I would like to provide you several observations and comments that were developed during the review of the document.

First, I would like to recognize the superb effort Metro is doing to meet the federally required compliance responsibilities contained in Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Executive Order 13166 Improving Access to Services by Persons with Limited English Proficiency, and Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. ODOT is charged with ensuring that ODOT sub-recipients of federal transportation financial assistance are in compliance with these important regulations.

The report that ODOT has received from Metro covers the reporting period April 1, 2010 through June 30, 2011. Following are several brief comments to consider for subsequent reports:

- Be specific – provide more detail describing the efforts, activities, and outcomes as you conduct outreach and public involvement;
- It would be helpful to document a list of community organizations, and “established groups” that are engaged as you perform outreach and public involvement;
- ODOT is interested in the results of your efforts to contract with organizations to assist Metro in increasing participation of low-income and minority communities in your OPT In panel.

ODOT OCR looks forward to future collaboration to achieving our mutual goals.

Regards,

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