

Title VI Plan/Program

The following pages document the procedures by which the mobility needs of traditionally underserved populations are identified and considered within the transportation planning process and to demonstrate the efforts South Central Planning and Development Commission has made on behalf of the Houma – Thibodaux MPO and Good Earth Transit to accommodate persons in our region who most need access to transit services.

*SOUTH
CENTRAL
PLANNING AND
DEVELOPMENT
COMMISSION
&
THE
HOUMA
THIBODAUX
MPO*

SCPDC & HTMPO
TITLE VI PLAN/PROGRAM

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Title VI Plan/Program and Supporting Documents for SCPDC & HTMPO

Introduction

Formed by Louisiana state legislation, South Central Planning and Development Commission (SCPDC) is a regional planning commission which is responsible for six parishes (counties) in south central Louisiana – Assumption, Lafourche, St Charles, St James, St John and Terrebonne Parishes. As a regional planning commission we do many things for our member jurisdictions. In addition to the Transportation Division major work groups within our Commission currently include: SCPDC’s Planning and Community Services Division, Building Code Permitting and Enforcement Division, Economic Development Division, Accounting and Personnel Department and Information Technology (IT) Department. As such, SCPDC administers many state and federal programs and grants for our region. Kevin Belanger, CEO of SCPDC, is the designated Title VI Coordinator for all these endeavors. SCPDC’s Civil Rights Compliance Plan/Program and related documents are available on the SCPDC’s website www.SCPDC.org and through many other means as detailed within this document.

SCPDC also conducts a variety of coordination efforts funded through various grants of the U. S. Department of Transportation. These include its ongoing relationship as staff to the Metropolitan Planning Organization for the Houma – Thibodaux Urbanized Area (HTMPO), coordination of Regional Highway Safety Programs and Public Transit Planning Programs. Projects carried forth with U.S. DOT funds include primarily transportation planning and coordination activities.

The Transportation Division of SCPDC staffs HTMPO, which is made up of a subset of SCPDC’s six parishes. The MPO’s parishes, as defined every ten years by the US Census Bureau and refined through the FHWA/FTA/DOTD designation process, currently include Lafourche, Terrebonne and a portion of Assumption Parish – the Houma-Thibodaux Urbanized Area.

It is through this function, staffing the MPO that SCPDC’s Transportation Division most frequently interacts with the FTA. As a result of that interaction and with the guidance from the Louisiana Department of Transportation and Development (LADOTD), FHWA Louisiana Division and FTA’s Region Six staff members, that the HTMPO’s Civil Rights Plan/Program and its supporting documents have been drafted, adopted and maintained by HTMPO throughout the years.

A small MPO (under 200,000 in population), the HTMPO does not receive Federal Transportation Funding directly. The MPO receives it’s funding from the State, and as such submits it’s Title VI Program to the LADOTD, who is the “primary” recipient of the FHWA and FTA funds. Once a year, as determined by the State, HTMPO’s Title VI Program is submitted to

the LADOTD in order to assist the State in its compliance efforts with FTA and FHWA. A copy of our latest submission is included in this document.

Towards these ends LADOTD requires the MPO to conduct analyses of our designated urbanized area to determine how its transportation planning efforts affect special populations and to ensure that services and infrastructure are provided appropriately. As such, the Houma Thibodaux MPO's Title VI Plan/Program, its Public Participation Plan and certain chapters of the Metropolitan Transportation Plan (MTP 2035) result from complying with this directive and are included within this document. The MPO's Civil Rights Compliance Plan/Program and related documents are available at SCPDC, on the MPO's website www.htmppo.org and through many other means as detailed within this document.

With regards to the FTA, it is important to note that the regional planning commission (SCPDC) does not operate a transit system, nor does HTMPO. As the staff to the HTMPO, SCPDC does provide regional transit planning activities on behalf of our member jurisdictions and our local transit providers including Good Earth Transit (GET) for which it receives an annual Section 5303 Metropolitan Transportation Planning Grant that is distributed by LADOTD.

In addition to the MPO's transit grants SCPDC has a New Freedom - Mobility Manager transit planning grant (LA-90-X362-00). This grant has been used by SCPDC to support its efforts with DOTD's State Transit Working Group and the River Parishes Transit Authority as well as with regional level transit efforts, including our Coordinated Human Services Transportation Planning and preparations to conduct a transit feasibility study for Lafourche Parish. This funding enables us to continue to dialogue with the state and work with our local providers in an effort to look for economies of scale and opportunities to further the goals set forth in the New Freedom grant application.

Since SCPDC receives the majority of its FHWA and FTA MPO Planning Grant money from the State, HTMPO has had little to no contracting opportunities to speak of. All HTMPO bidding and hiring of consultants are solicited under the auspices of the LADOTD, including design, engineering and construction. The SCPDC New Freedom grant is handled in a similar manner where there has been no contracting between the planning commission and consultants/contractors. Therefore there have been no subrecipients for SCPDC staff to monitor for compliance with Title VI. If, in the future, contracting opportunities are required SCPDC project/program managers will use the appropriate assurances identified in the grant funding the work.

The following pages document the procedures by which the mobility needs of traditionally underserved populations are identified and considered within the transportation planning process and to demonstrate the efforts South Central Planning and Development Commission has made on behalf of the Houma – Thibodaux MPO and Good Earth Transit to accommodate persons in our region who most need access to transit services.

HOUMA THIBODAUX MPO
METROPOLITAN TRANSPORTATION PLAN (MTP 2040)
CHAPTER 4 TRANSIT

Transit

Introduction

This chapter will discuss transit service in the Houma-Thibodaux MPO. It will begin with a summary of relevant demographics and an overview of funding sources used for transportation-related projects. Next, a discussion of the existing transit conditions will follow which includes fixed-route, para-transit, and demand response services. Finally, the chapter will conclude with suggestions to improve transit service in order to support the following core goals: to increase access to the region's transit network; to improve the efficiency of the region's transit network; and to increase the coverage of the region's transit network.

Background

Transit is an effective alternative to the personal, single-occupancy vehicle. It can provide mobility to those for whom car ownership may not be possible and it expands upon the transportation options available to those who already own their own vehicle. Additionally, transit reduces roadway congestion which can decrease vehicle emissions and reduce the need for roadway expansion projects. MAP-21 encourages a multi-modal transportation network and allocates over \$21 billion for mass transit which can be used for such things as vehicle purchases, construction of transit facilities, and defrayment of day-to-day transit operating costs.

The unique geography of the study area makes the implementation of mass transit a challenge. Vast areas of wetlands which lie between inhabited ridges are generally unsuitable for road construction. Transporting passengers between rural and urban areas on sensitive wetlands requires a combination of both fixed route and demand response services.

As shown in Table 38, only 0.4 percent of commuter trips in the study area are made by transit. Investments to increase commuter trips by a few percentage points can be effective at increasing mobility, protecting air quality and managing travel demand.

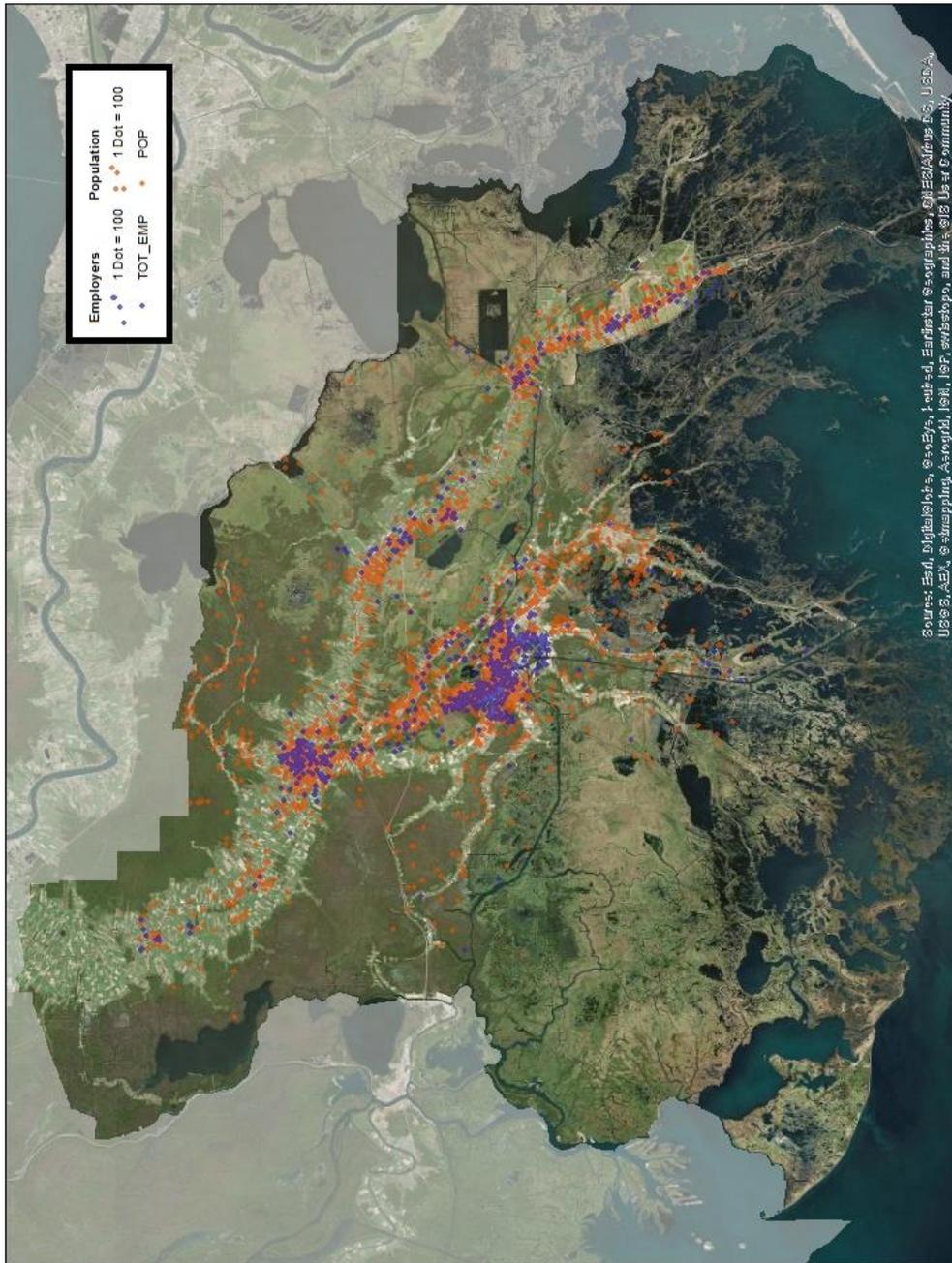
Maps 18 and 19 illustrate the concentration of jobs and residents in the cities of Houma and Thibodaux, and along region’s bayous. Map 20 and Map 21 illustrate the concentration of transit commuters and carless households respectively.

Table 38 – Transit Commuters in Lafourche and Terrebonne Parishes

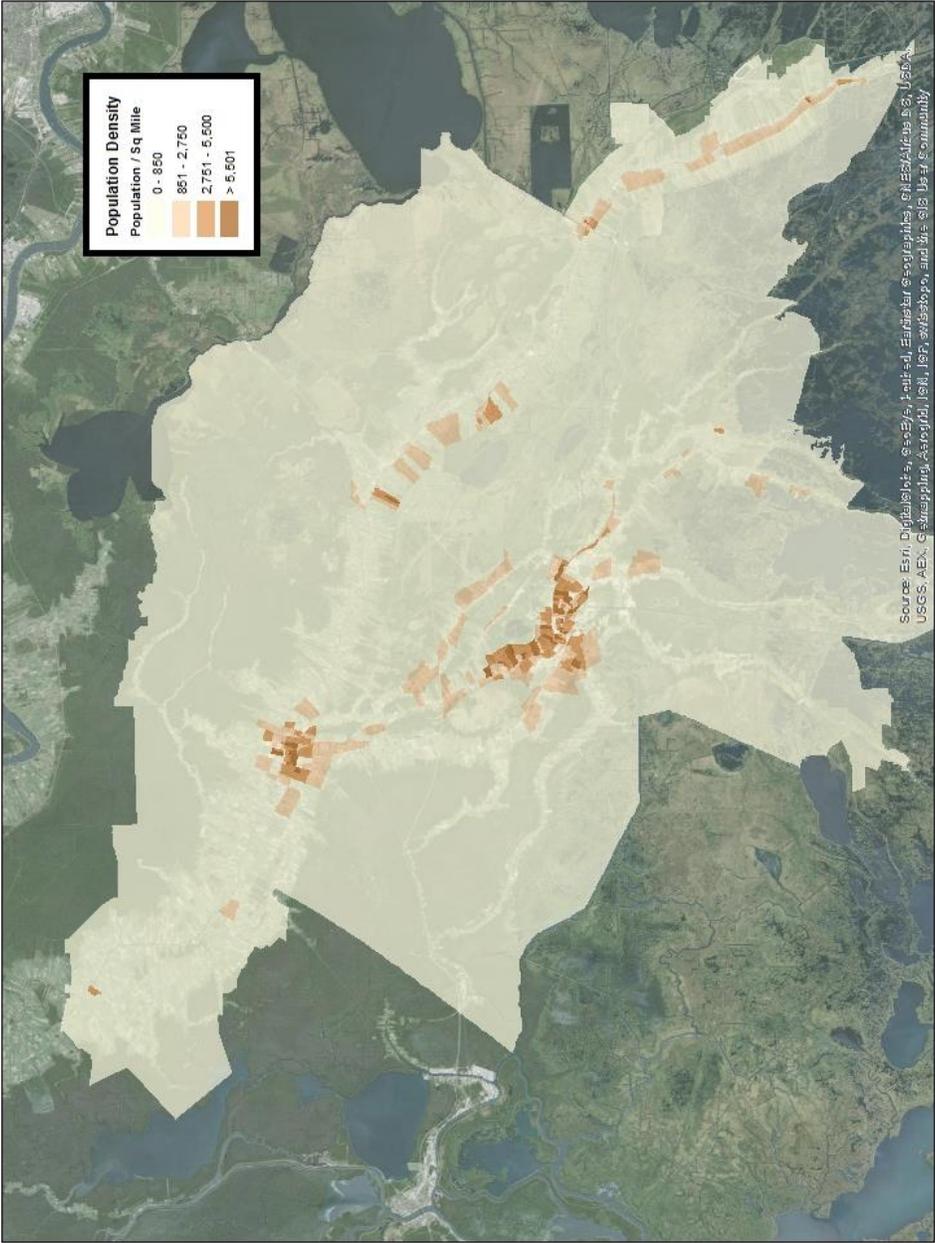
	2009		2010		2011		2012	
	Lafourche	Terrebonne	Lafourche	Terrebonne	Lafourche	Terrebonne	Lafourche	Terrebonne
Workers Age 16+	40,026	46,518	41,747	48,327	41,461	48,070	42,279	48,248
% Transit Commuters	0.5	0.9	0.5	0.9	0.6	0.6	0.4	0.4
# Transit Commuters	200	419	209	435	249	288	169	193

Source: Census Bureau: 2009, 2010, 2011 and 2012 American Community Survey

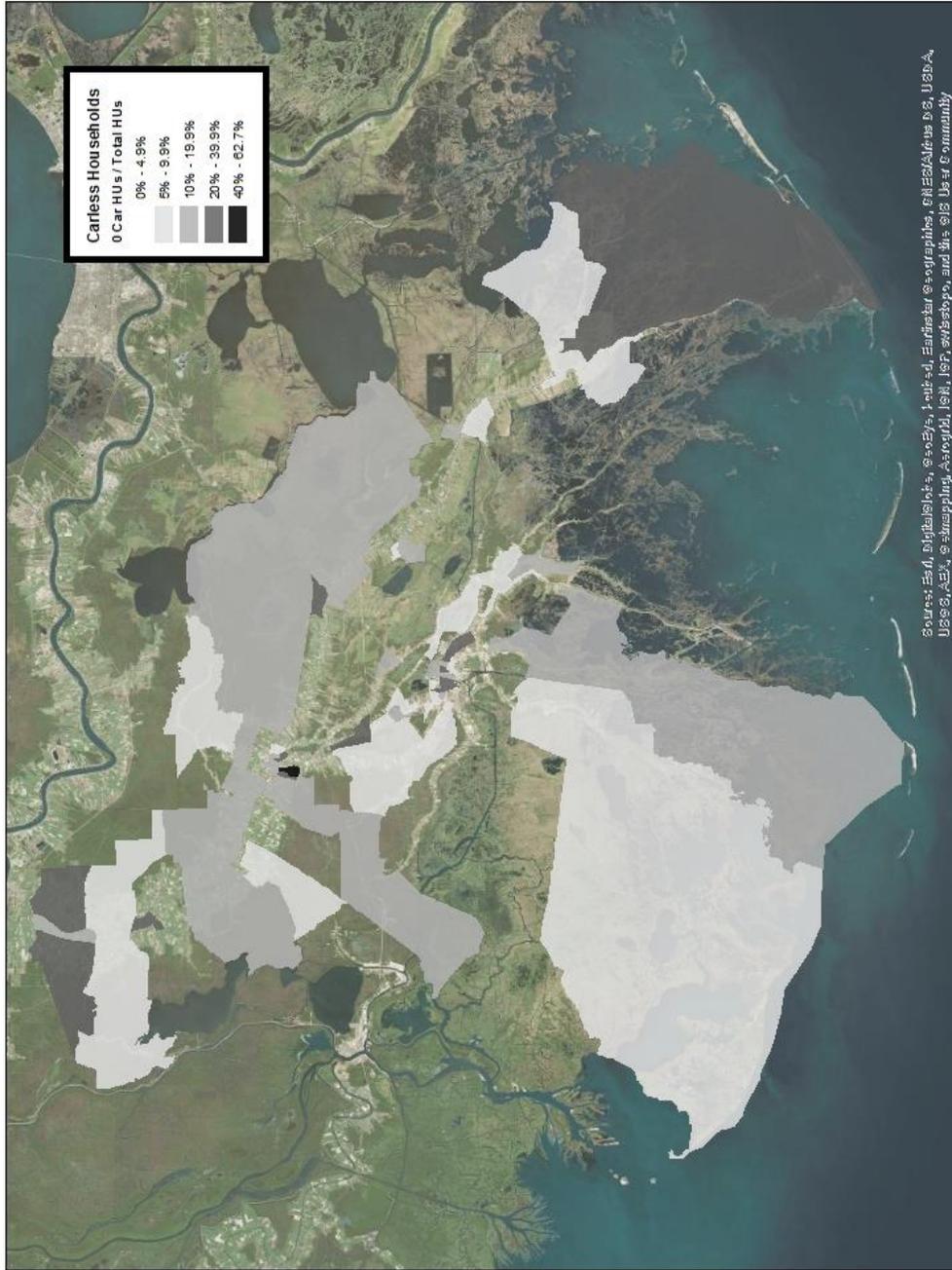
Map 18 – Concentration of Employers and Population in the MPO.



Map 19 – Population Density



Map 21 – Carless Households



Existing Transit Service

Existing transit service in the Houma-Thibodaux metropolitan area is provided by one urban public transportation provider, two rural transportation providers, and four agencies that provide transportation for the elderly and disabled.

Good Earth Transit

The urban agency, Good Earth, began operations on February 12, 1997 and is the only public bus service provider in the Houma-Thibodaux Metropolitan Area. Good Earth's mission is to provide "safe and reliable transit and quality service for Terrebonne Parish."



Good Earth's initial service in Terrebonne was provided by four bus lines which covered much of downtown Houma and connected to Nicholls State University. In 2008, the City of Thibodaux contracted Good Earth to expand service across its downtown. The result was the addition of a fifth bus route, a Thibodaux "loop," which connected Thibodaux to the existing Terrebonne lines.

Good Earth services an area of 57 square miles with a population of roughly 82,000. There are 369 bus stops. Service is provided weekdays from approximately 6:30am to 6:30pm and weekend service operates from approximately 8:30am to 4:30 pm on weekends with an average peak headway of about 40 minutes. Good Earth operates eight buses and two demand response vehicles.

Funding for operations and capital expenditures is provided by a combination of local, state, and federal funds along with fare box revenue as illustrated in Table 40. Table 39 provides an overview of service provided by Good Earth.

Table 40 – Good Earth Transit 2012 Revenue Sources and Expenditures

	Fare Revenue		Local Funds		State Funds		Federal Assistance		Other	
Operations	8%	\$151,045	27%	\$514,684	6%	\$112,006	56%	\$1,065,485	3%	\$48,476
Capital Expenditures	n/a	n/a	2%	\$2,038	0%	\$0	98%	\$115,563	0%	\$0

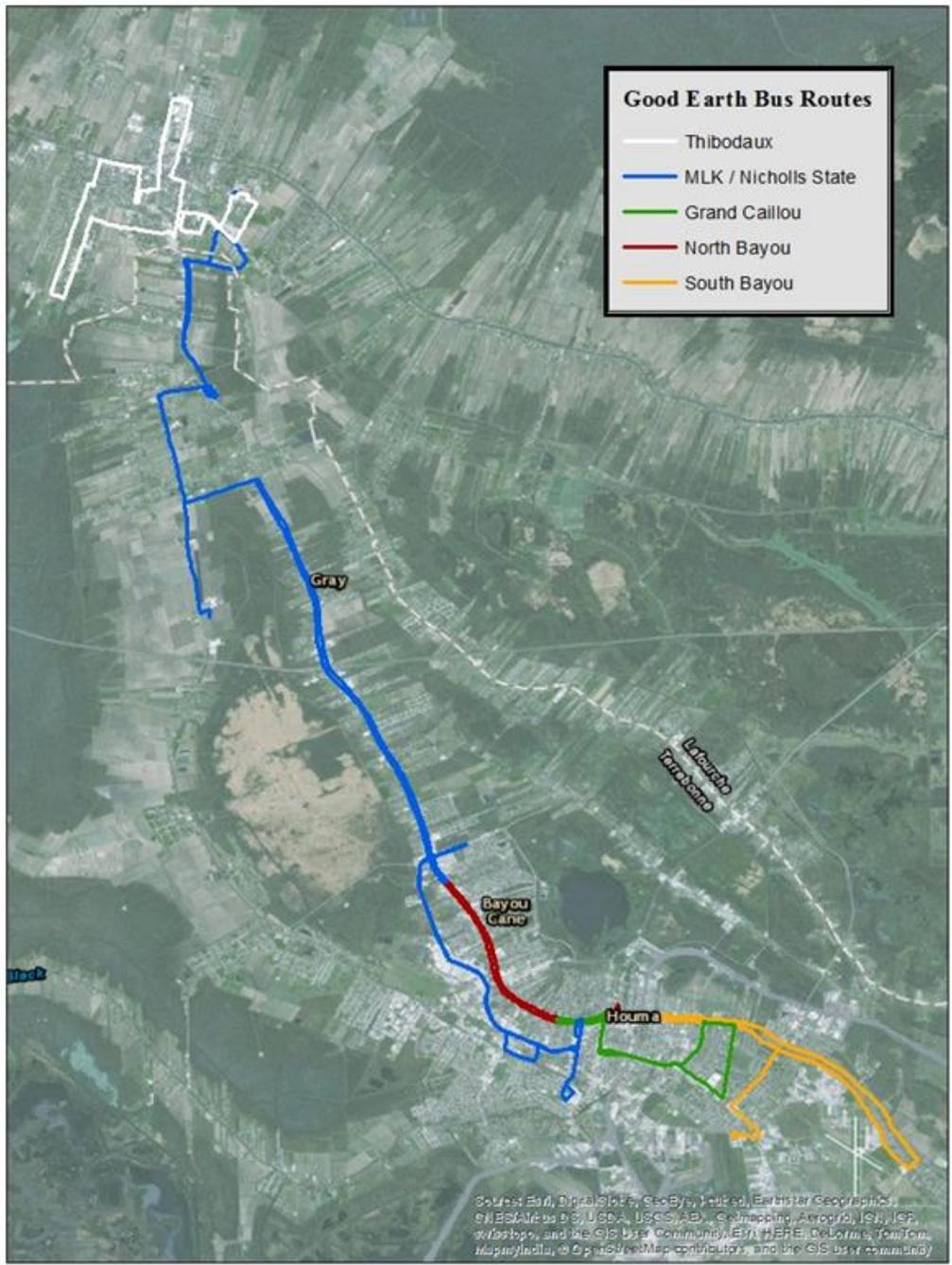
Source: 2012 National Transit Database

Table 39 – Summary of Good Earth Transit service

Service Consumption	
Annual Unlinked Trips	190,850
Service Supplied	
Annual Vehicle Revenue Miles	447,522
Annual Vehicles Revenue Hours	24,867
Vehicles Operated in Maximum Service	10

Source: 2012 National Transit Database

Map 20 – Good Earth Transit System Map



Para-Transit Providers

Several agencies provide para-transit service to the elderly and the disabled within the MPO. The rural public transportation providers are Terrebonne Parish Council on Aging and Assumption Parish Council on Aging. Both agencies receive section 5311 rural operating and capital assistance as well as section 5310 elderly and disabled capital assistance. Four agencies are funded solely by section 5310 to provide transportation services to the elderly or disabled. These agencies are the Terrebonne ARC, the Assumption ARC, the Lafourche ARC and the Lafourche Council on Aging. Figure x.x illustrates the concentration of elderly populations across the study area.

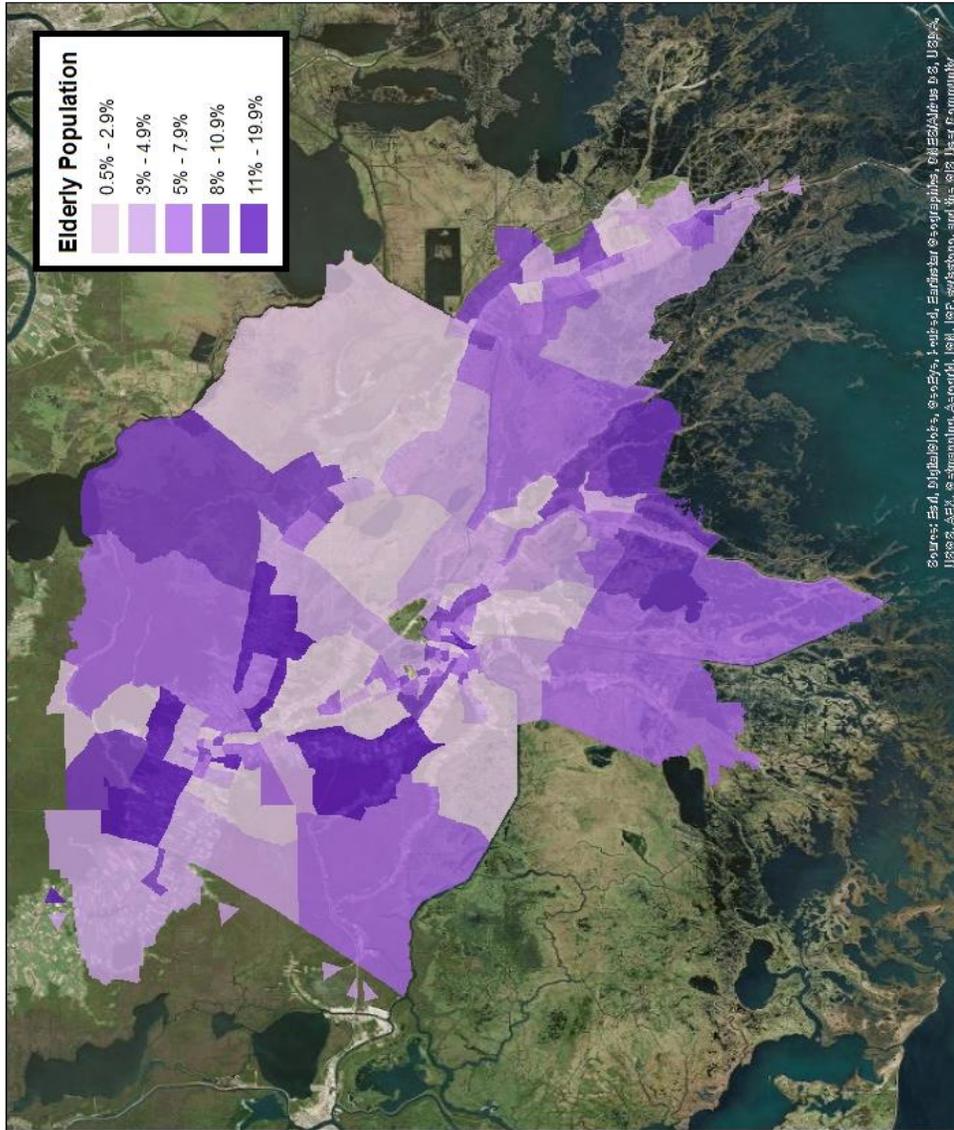
Coordinated Human Services Transportation Plan

The purpose of the Coordinated Human Services Transportation Plan is to identify the transportation needs of individuals with disabilities, older adults, and those with lower incomes, and to identify and prioritize strategies for meeting those needs. The primary reason for this is to promote transportation equity among those who may otherwise be transportation disadvantaged. In order for these populations to enjoy full participation in society that the general population has it is critical that they are provided transportation that is suited to their needs.

The Coordinated Human Services Transportation Plan for The Parishes of Assumption, Lafourche, St. James and Terrebonne is a “unified, comprehensive strategy for public transportation service delivery that identifies the transportation needs of Individuals with disabilities, older adults, and individuals with limited incomes, lays out strategies for meeting these needs, and prioritizes services for funding and implementation.”

South Central Planning and Development Commission, the regional planning body, holds quarterly coordinated Transit Committee meetings with a variety of transportation providers.

Map 21: Elderly Population



Transit Demand Model

The objective of the transit planning process is to provide the information necessary for making decisions on when and where improvements should be made to meet ridership demand. In order to identify potential unmet transportation need, population density, employment density, income and carless households was identified in the parish.

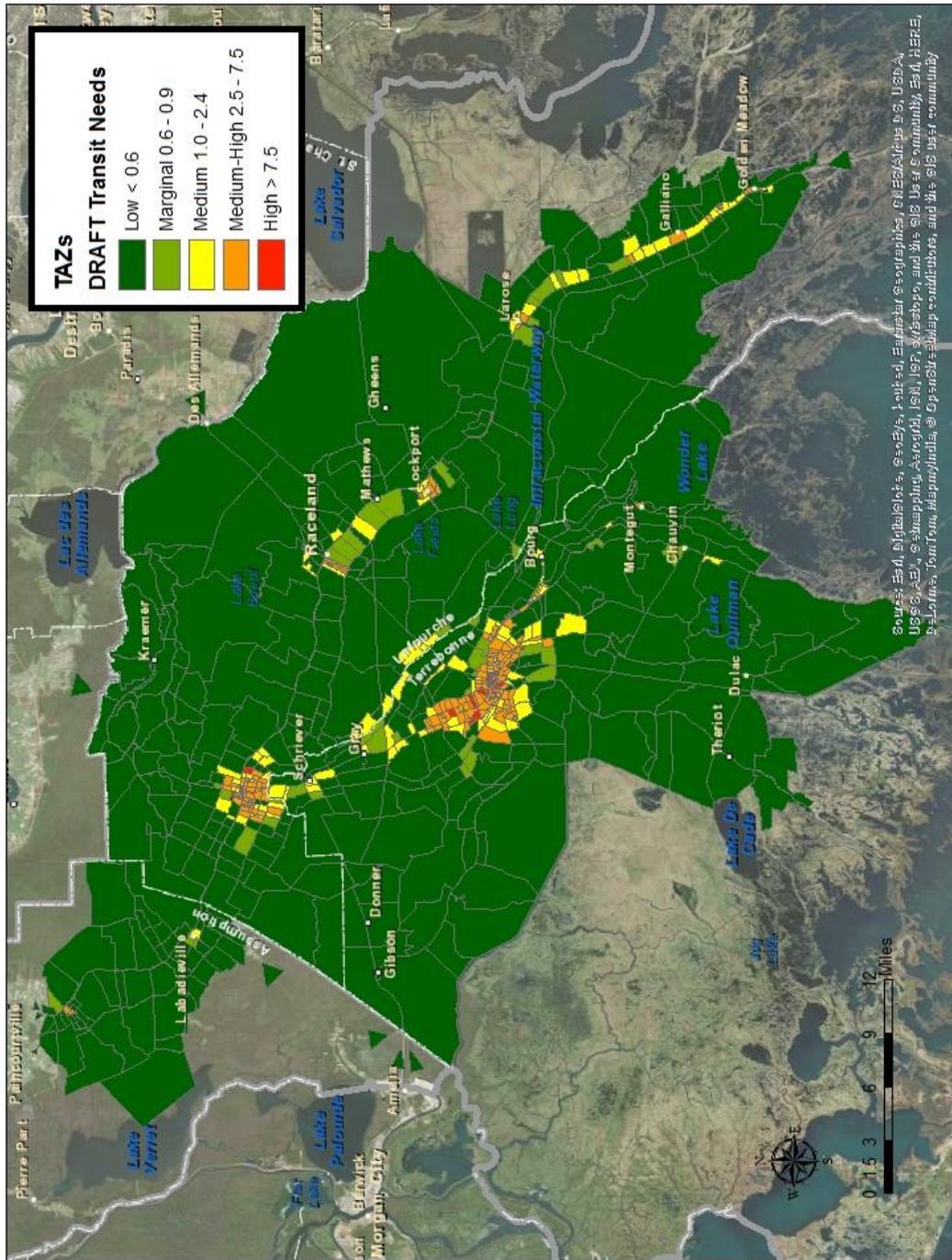
Density of population and jobs are the two most important factors in determining the need for transit service. Using data from MPO's across the nation, a regression analysis was created to properly weigh the importance of population density and job density and come up with an estimated need. Upon receipt of transit ridership information in the MPO, a more locally relevant regression analysis can be undertaken.

$$\text{Transit Need} = (0.47 \times (\text{population} / \text{acre})) + (0.58 \times (\text{jobs} / \text{acre}))$$

MPO Needs Analysis

Using the formula above along with TAZ data, a sketch of transit needs in the MPO was created. It is important to note that this sketch is only an indication of transit friendliness and should not be the sole method used to determine if an area should increase transit development. This model indicates the relative viability of possible transit investment. A higher score indicates that the relative population and employment density in the area may support some form of transit system, or an increase in level of transit service.

Map 22: Transit Attractiveness



Action Plan

Goal 1: Increase coverage of the region's network

Strategy 1: Lafourche Transit Feasibility Study

A strong economy bolstered by an abundance of natural resources has given Lafourche Parish one of the lowest unemployment rates in the nation. Worker shortage has been a side effect of the low employment rate, and is a concern for parish officials hoping to encourage further economic growth. Lafourche parish believes that an expanded public transit system may help align workers region wide with jobs in Lafourche, and can also help bring students to and from vocational colleges.

South Central Planning and Development Commission has been contracted by Lafourche Parish to conduct a feasibility study for expanding transit service across the parish. The feasibility study will identify unmet transportation needs in Lafourche and suggest ways in which additional transit service may help.

Strategy 2: Vanpooling and travel demand management

With funds provided by the Department of Transportation, South Central Planning and Development will initiate a vanpooling pilot program to gauge the potential effectiveness of vanpooling in the region. For the pilot program, SCPDC will identify a local employer(s) to partner with in developing a vanpool program. The program has four phases, only the first two of which are currently funded:

- 1. Employer Selection (4 months)
- 2. Data Collection (2-3 months)
- 3. Implementation (14 months)
- 4. Annual Evaluation (2-3 months)

SCPDC will use the evaluation results to determine the best way to move forward with future vanpooling programs.

In addition to the TDM grant, SCPDC staff will continue to work with area employers to take advantage of existing IRS “commuter benefits.”

Strategy 3: Commuter Benefits

The Internal Revenue Service (IRS) offers tax incentives to employers who provide commuter benefits (Section 132(f) of the Internal Revenue Code) to their employees, such as defraying the cost of commuting by transit, bicycle, or vanpool. Although the IRS incentivizes employers to provide these benefits, many are unfamiliar with the program.

Local government agencies can support workers and encourage alternative modes of commuting by helping businesses become aware the commuter benefits program.

Strategy 4: Waterways as transit

Many stakeholders identified the region’s abundant bayous and waterways as an untapped resource for transportation and recreation.

While there appears to be regional interest in waterborne transportation, further study is needed to determine if the region’s waterways can be a viable form of transit.

Strategy 5: Downtown Houma “Trolley”

Stakeholders have indicated interest in a “trolley” service in downtown Houma. Further study is needed to determine where such service is needed, and how it might be implemented.

As this idea moves forward, to avoid confusion, it is suggested that the term “trolley” be reserved only for steel-wheeled cars which ride on rails. A vehicle which rides on rubber wheels, regardless of design elements, is a bus. The American Public Transportation Association (APTA) refers to buses which are designed to resemble trolleys as “trolley-replica buses.”

Strategy 6: Park and Ride in Downtown Thibodaux

Due to the concentration of numerous restaurants, retail businesses and government offices, lack of parking in downtown Thibodaux has been identified as a significant concern. A parking study completed in 2014 confirmed this, noting that nearly all downtown parking spaces were occupied between 9-10am.

As a solution, the city has expressed interest in the construction of multi-story parking facility - transit service could play a role by shuttling those parked at such a facility to downtown destinations. Further study is needed to determine the feasibility of constructing a new parking garage - including potential locations, funding sources, and what role transit might play in such a project.

Goal 2 – Improving the existing transit network

Cost effective improvements

There are many strategies which can increase the effectiveness of a transit system, many of which were articulated by stakeholders during the MTP update consultation process. A 2011 study entitled “Increasing Bus Ridership through Technological and Aesthetic Innovations” analyzed various improvements to a transit network by its capital costs, operational costs, roll-out capacity, improvement in trip quality, and ability to increase ridership and ranked them in order of effectiveness. The study found that the most effective improvements are:

- **Strategy 1:** Phone App / SMS Messaging – ranked as the most useful improvement to a transit system. Buses equipped with GPS tracking devices can provide real time information to riders via smart phone apps or SMS messaging, making transit more enjoyable and convenient.
- **Strategy 2:** Social Media – social media such as Facebook, Instagram and Twitter provide easy, low or no cost ways for transit providers to advertise services and update riders with real time route information. Social media is also an excellent tool for soliciting input from riders. The caveat, however, is that poorly maintained social media sites can be more of a liability than none at all. A Facebook page which is not maintained promotes an image of an organization which is “uncool,” or unreliable.
- **Strategy 3:** Bus Shelter Sponsorships – Since bus shelter modernization or beautification may be cost prohibitive, business sponsorships are a potential be a solution. Businesses can use shelters to creatively market their goods while supplying riders with shelter amenities such as seating, lighting or real time information, at little or no cost to the agency.
- **Strategy 4:** Transit Map Redesign – Transit maps are an important tool in educating riders about the services offered, yet riders are often confused by substandard designs. Maps which require readers to flip back and forth, time table schedules which make arrival and departure times hard

to understand, and map scaling which makes distances difficult to gauge are common concerns. Well-designed, user friendly maps have been shown to increase ridership.

Additional Strategies

- **Strategy 5: Better information at transit stops / signage** – Lack of rider education was cited as a concern in the study area; many riders were unfamiliar with routes and schedules. Transit stops which currently provide no information about the network could be redesigned to better educate riders about the services offered.
- **Strategy 6: Additional shelters** – of the 369 stops on Good Earth routes, only 4% are covered, leaving riders exposed to wind and rain while they wait. LADOTD has prevented the placement of shelters at some locations along state highways due to line of sight impairment for automobile drivers.
- **Strategy 7: Better sidewalk access / ADA compliance** – Since transit stops are most often accessed on foot, pedestrian infrastructure goes hand in hand with great transit service. Transit stops should be connected to nearby streets and sidewalks. Further information regarding ADA regulations for transit projects can be found in [Sections 810](#) of the ADA Standards for Transportation Facilities.
- **Strategy 8: Transit Art / Design** – as stated in the MTP 2040 vision statement, “visually attractive access to the network” is a priority. Well-designed transit stops which can incorporate artwork, local elements, or cultural flare can beautify neighborhoods and be a point of pride for the transit agency as well as the city. Aesthetically attractive bus shelters make riding transit appear more acceptable and breaks up the homogeneity and utilitarian nature of common shelters.
- **Strategy 9: Service Frequency and Headways** – Good Earth Transit provides bus service from approximately 6am-6pm on weekdays, and 8am-4pm on weekends. The Thibodaux Loop does not run on weekends. With peak headways at approximately 40 minutes, the existing transit lines currently do not provide frequent enough service to make transit a viable mode of

transportation for many potential users. The system currently has few, if any, choice riders. Increasing ridership without increasing frequency may be very difficult.

- **Strategy 10: Land Use** – Mass transit works better in some areas than in others. Two factors which have the greatest impact on the viability of transit is the population density and job density within walking distance of a transit stop. Walking distance is generally defined as ¼ of a mile. Clustering development around transit stops allows people to easily access home, work, shopping and other needs via transit. Conversely, low-density development puts people and their destinations far from walking distance of transit stops, forcing them to rely solely on an automobile. Land use regulations which encouraged higher-density, walkable development near transit stops is one of the most critical components of a successful mass transit network.

[Discussion of low-density land use in the study area, and its implications for fixed route transit – inserted here or elsewhere in the section]

Funding Sources

Federal

Federal funding for transit projects is made available through the following formula grants.

- 5309, Fixed Guideway Modernization: Modernization of existing rail systems and newer fixed guideway systems.
- 5311, Formula Grants for Other than Urbanized Areas: Funding for transportation in rural areas with populations of less than 50,000.
- 5316, Job Access and Reverse Commute Program: Funding to address transportation challenges faced by welfare recipients and low-income persons seeking to obtain or maintain employment.
- 5317, New Freedom: Funding for additional tools to help Americans with disabilities overcome existing barriers to integration into society and the work force.

- 5303, 5304, 5305, Metropolitan & Statewide Planning: Supports cooperative, continuous, and comprehensive planning for transportation investment decisions.
- 5311 (B): Training, technical assistance, research, and related support services in rural areas.
- 5310, Transportation for Elderly Persons and Persons with Disabilities: Funding for the purpose of assisting private nonprofit groups in meeting transportation needs of the elderly and persons with disabilities.

State

L.000094 Urban Transit funding is \$500,000 in revolving funds which has been allocated for transit projects with an 80/20 local match. These funds are eligible to pay for capital expenses within the MPO boundary such as fleet conversions, bus shelters, sidewalks near a bus shelter, etc.

HOUMA THIBODAUX MPO
METROPOLITAN TRANSPORTATION PLAN (MTP 2040)
CHAPTER 7 (partial)

Environmental Justice Communities

Environmental Justice is the Federal policy, in all programs and activities assisted by Federal funds, to avoid, minimize and mitigate disproportionately high and adverse human health, environmental, social, and economic effects on low-income and minority populations. These principles were legally established in Title VI of the Civil Right Act of 1964. Federal policy was articulated in Executive Order 12898 (February 1994). Within the Department of Transportation, the policy was codified by DOT Order 5610.2 (April 1997) and by FHWA Order 6640.23.

U.S. DOT & FHWA EJ Guidance

FHWA Technical Advisory 6640.8A, DATED?, provides guidance on the documentation of potential social, economic, and environmental impacts to be considered in the selection and implementation of highway projects. This document is summarized in the December 16, 2011, US DOT memorandum "Information : Guidance on Environmental Justice." This was an advisory for FHWA offices on the process and documentation requirements to address environmental justice during NEPA review. Documentation must include explicit consideration of potential effects on minority and low-income populations. This requirement applies to all NEPA classes of action, as appropriate. An example of a determination of no adverse impact might read as follows: "No minority or low-income populations have been identified that would be adversely impacted by the proposed project as determined above. Therefore, in accordance with the provisions of E.O. 12898 and FHWA Order 6640.23, no further EJ analysis is required."

Identifying Existing Minority and Low-Income Populations

DOT and FHWA use U.S. Department of Health and Human Services poverty guidelines (<http://aspe.hhs.gov/poverty/>) to define low-income. Using local data at the most local level feasible and other relevant information sources can help locate any readily identifiable groups or clusters of minority or low-income persons in the EJ study area. NEPA documents should provide such demographic information, typically in the section regarding social and economic impacts. Social characteristics should include identification of ethnicity, age, mobility and

income level. This information is important to provide context for understanding area demographics.

When a study area has no minority or low-income population, no EJ analysis is required. When the agency determines, in consultation with the public and CEQ, that there will be no adverse effects on an EJ population, NEPA documents should reflect that determination. The FHWA guidance provides a protocol to use when there the study area has minority and low-income populations that may be adversely impacted. The steps below help in determining whether there is a disproportionately high and adverse impact on EJ populations and communities.

Step 1: **Explain Coordination, Access to Information and Participation**: The NEPA document should include a discussion of major proactive efforts to ensure meaningful opportunities for public participation, including activities to increase participation by low-income and minority populations. The views of the affected population(s) about the project and any proposed mitigation should also be included. The document should describe, as well, steps taken to resolve any controversy and provide documentation regarding the degree of participation by affected groups in the decision-making process related to the alternative selection, impact analysis and mitigation.

Step 2: **Identify Disproportionately High and Adverse Effects**: Disproportionate means adverse effects that are predominantly borne by EJ population or are appreciably more severe or of greater magnitude than for other community residents.

- EJ considerations are typically summarized in the social-economic portion of the environmental consequences section of NEPA documents. Beneficial and adverse effects on the overall pop and on EJ pop should be addressed under applicable topics—air; noise; water pollution; hazardous waste; aesthetic values; community cohesion; economic vitality; employment effects; displacement of persons or businesses; farms; accessibility; traffic congestion; relocation impacts; safety; and construction/temporary impacts. How do impacts on the EJ population compare to impacts on the overall population of project area? The desired outcome is fair distribution of beneficial and adverse effects of the proposed action.
- Under NEPA, consideration must be given to mitigation (as defined in 40 CFR 1508.20) for all adverse effects, regardless of the type of population affected. NEPA documents include discussions of what measures are being considered for alternatives to avoid or mitigate adverse effects. The protocol is avoidance first, then minimization, and finally measures to offset or rectify. Using opportunities to enhance and increase sustainability in communities and neighborhoods is desirable. Any activity that demonstrates sensitivity to special needs should be highlighted, such as accommodations for transit

dependent populations and/or addressing the need for translators to community members with limited English proficiency.

- If the effects remain adverse after mitigation is considered, then a determination must be made whether the impacts are disproportionately high and adverse for the EJ population. If there are no disproportionate EJ impacts and benefits are considered, the determination should be stated in the document and the EJ evaluation is complete. If the effects are disproportionate, even with mitigation and when benefits to the EJ population are taken into account, the process continues to the next step.

Step 3: Proceeding When There Are Disproportionately High and Adverse Effects:

NEPA documents must evaluate where there is a further practicable mitigation measure or practicable alternative that would avoid or reduce the disproportionate effects. FHWA will approve the proposed action only if it determined no such practicable measures exist. The FHWA determination should be stated in the document.

NEPA documents should also describe how EJ populations/communities were involved in the decision-making process. Documents also need to identify what practicable mitigation commitments have been made.

If the affected population is a minority population protected under Title VI, FHWA will not approve the proposed action unless it determines: (a) there is a substantial need for the project, based on the overall public interest; (b) alternatives that would have less adverse effects on protected pops have either adverse social, economic, environmental, or human health impacts that are more severe; or would involve increased costs of any extraordinary magnitude. Where appropriate, NEPA documents must include both of these evaluations and contain the FHWA determination on the explicit issues required within the evaluations.

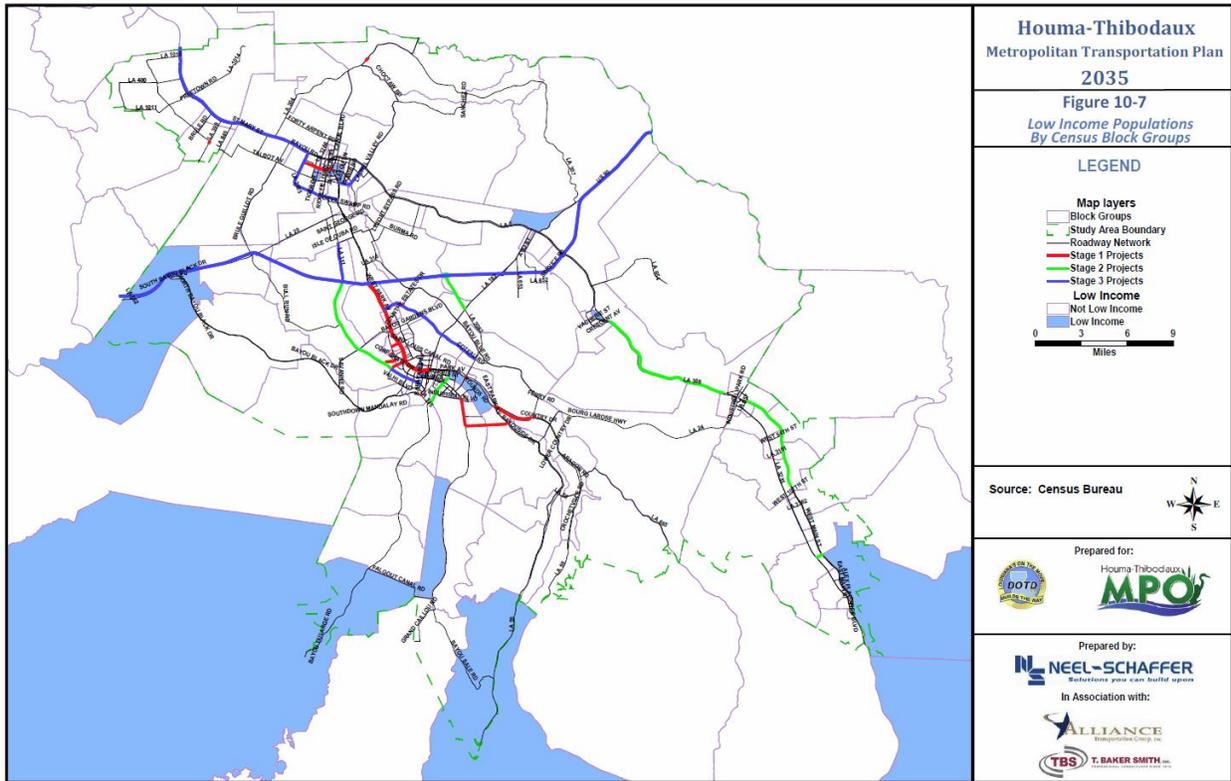
Judicial Review

EO 12898 and US DOT Order 5610.2 and FHWA Order 6640.23 are limited to improving internal management of the Federal Government and are not to be construed as creating any right of judicial review for compliance or non-compliance.

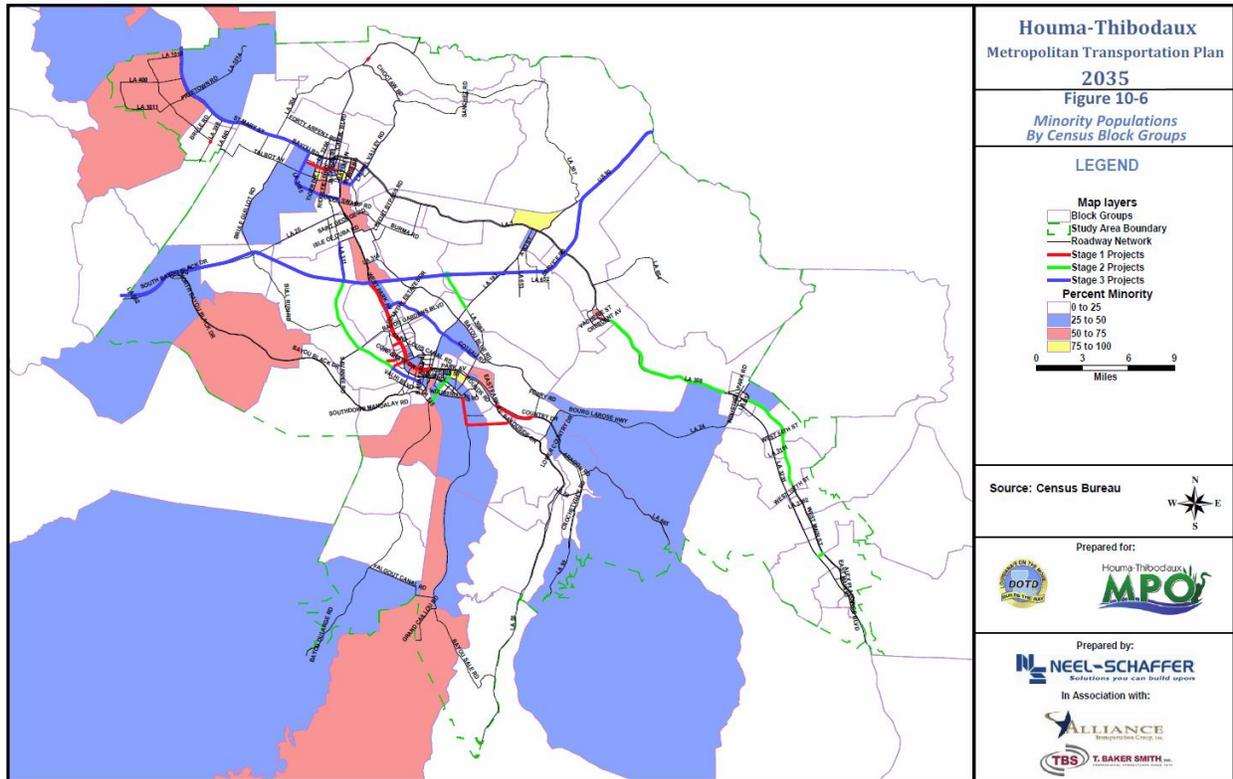
Title VI

While a person or persons cannot bring a legal claim under any of the EJ orders, such a person or persons can bring a claim under Title VI of the Civil Rights Act of 1964.

Map 25: Percent of Households Below the Poverty Line by Census Block Group



Map 26: Concentration of Minority Population by Census Block



HTMPO'S TITLE VI NOTICE (LONG FORM)

South Central Planning and Development Commission (SCPDC) and the HTMPO hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 and all related acts and statutes which protect individuals and groups from discrimination on the basis of their race, color, and national origin in programs and activities that receive Federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding SCPDC services has a right to file in writing a formal complaint with the SCPDC within one hundred eighty (180) days following the date of the alleged occurrence.

In addition, complaints may be made to the Federal Highway Administration (FHWA) or the Federal Transit Administration (FTA). These federal agencies are responsible for investigating complaints of discrimination based on race, color, national origin, disability/handicap, sex, age, or income level in the use of federal transportation funds.

Any such complaints may be directed to those listed below. Alternatively, complaints may be made via our online form at <http://htmpo.org/ContactUS.aspx>

Kevin P. Belanger
SCPDC
P.O. Box 1870
Gray, LA 70359
(985) 851-2900

FHWA - Louisiana Division
Civil Rights Specialist
5304 Flanders Drive, Suite A
Baton Rouge, LA 70808
(225) 757-7621

FTA - Region 6
Office of Civil Rights
819 Taylor Street
Fort Worth, TX 76102
(817) 978-0550

HTMPO'S CIVIL RIGHTS AND ACCESSIBILITY COMPLIANCE PAGE ON
WWW.HTMPO.ORG

Title VI of the Civil Rights Act of 1964 is the Federal law that protects individuals and groups from discrimination on the basis of their race, color, and national origin in programs and activities that receive Federal financial assistance. However, Federal Highway Administration's (FHWA) reference to Title VI includes other civil rights provisions of Federal statutes and related authorities to the extent that they prohibit discrimination in programs and activities receiving Federal financial assistance.

Therefore, South Central Planning and Development Commission (SCPDC) hereby gives public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964 and all related acts and statutes. Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding SCPDC services has a right to file in writing a formal complaint with the SCPDC within one hundred eighty (180) days following the date of the alleged occurrence.

In addition, complaints may be made to the Federal Highway Administration (FHWA) or the Federal Transit Administration (FTA). These federal agencies are responsible for investigating complaints of discrimination based on race, color, national origin, disability/handicap, sex, age, or income level in the use of federal transportation funds.

Any such complaints may be directed to those listed below. Alternatively, complaints may be made via our online form. (<http://htmpo.org/ContactUS.aspx>)

Kevin P. Belanger
SCPDC
P.O. Box 1870
Gray, LA 70359
(985) 851-2900

FHWA - Louisiana Division
Civil Rights Specialist
5304 Flanders Drive, Suite A
Baton Rouge, LA 70808
(225) 757-7621

FTA - Region 6
Office of Civil Rights
819 Taylor Street
Fort Worth, TX 76102
(817) 978-0550

Relevant Documents:

- FHWA Title VI Brochure
(http://www.htmpo.org/Documents/TitleVI_Brochure.pdf)
- Environmental Justice Concerns Relative to the Metropolitan Transportation Plan
(http://www.htmpo.org/2035MTPUpdate/FinalReport/12_Chapter10.pdf)
- Public Participation Plan
(http://www.htmpo.org/Documents/2011_PPP.pdf)
- Citizens Guide to Transportation Planning
(http://www.htmpo.org/documents/2012_July_HTMPO%20Citizen%20Guide.pdf)

Demographic Analysis:

- Assumption Parish (http://www.htmpo.org/TitleVI/2010_Assumption_FactFinderData.pdf)
- Lafourche Parish (http://www.htmpo.org/TitleVI/2010_Lafourche_FactFinderData.pdf)
- Terrebonne Parish (http://www.htmpo.org/TitleVI/2010_Terrebonne_FactFinderData.pdf)

DOTD'S TITLE VI COMPLIANCE QUESTIONNAIRE FOR PLANNING ORGANIZATIONS

HOUMA-THIBODAUX MPO

JUNE 13, 2014



LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

In accordance with Title VI of the Civil Rights Act of 1964 and 49 CFR 21, this is the **Annual Title VI Review for Planning Organizations**. Please provide yes/no answers with a brief explanation, any updates, changes, and/or additions to the agencies Title VI responsibilities/activities should also be noted on this form. It is not necessary to send the referenced material such as; plans, policies, and procedures at this time. This information will be audited during your agencies on-site review that will be performed on a three year rotation.

Name of Planning Organization: Houma Thibodaux Metropolitan Planning Organization

I. Administration

A. Staff Composition and Program Administration

1. Provide breakdown of the administrative staff by race, color, national origin, and gender. List their positions.

Houma Thibodaux Metropolitan Planning Organization (HTMPO) Staff

Leo Marretta – MPO Administrator

RACE: Caucasian

COLOR: White

GENDER: Male

NATIONAL ORIGIN: American

Josh Manning - Transportation Planner II

RACE: Caucasian

COLOR: White

GENDER: Male

NATIONAL ORIGIN: American

Adam Tatar – Transit Planner

RACE: Caucasian

COLOR: White

GENDER: Male

NATIONAL ORIGIN: American

Cassie Parker – Transportation Planner I

RACE: Caucasian

COLOR: White

GENDER: Female
 NATIONAL ORIGIN: American

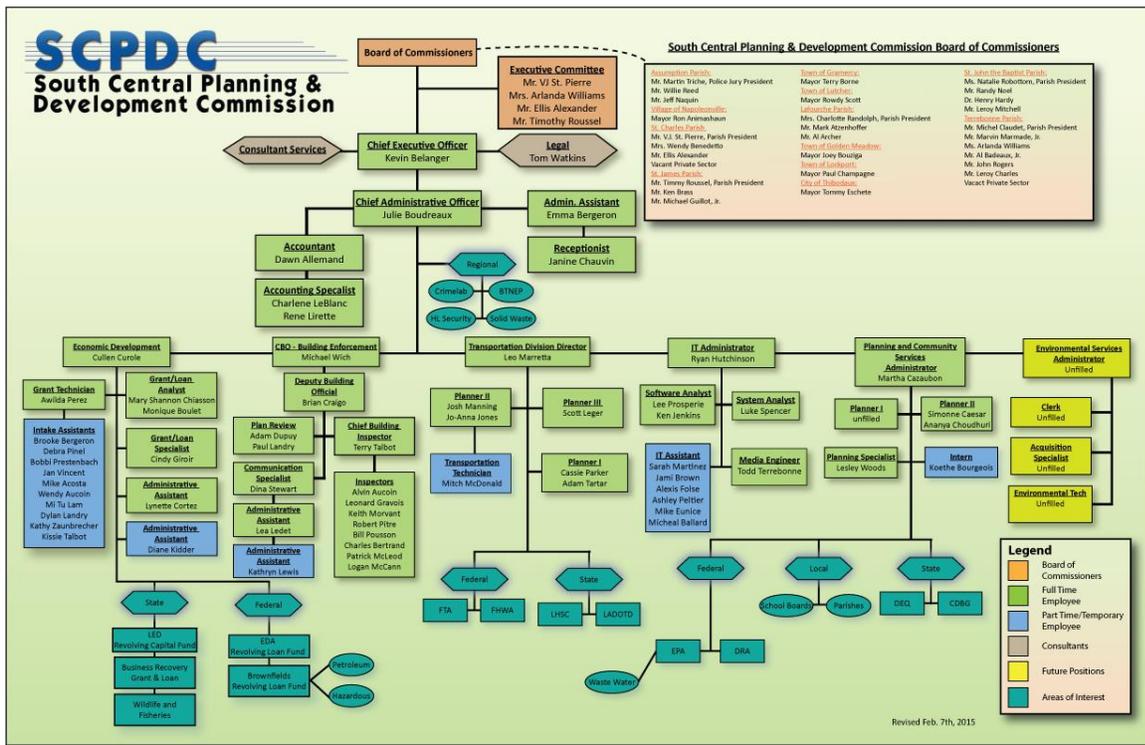
Scott Leger – GIS Coordinator
 RACE: Caucasian
 COLOR: White
 GENDER: Male
 NATIONAL ORIGIN: American

South Central Planning and Development Commission
 (Administrative and Support Staff to the Houma Thibodaux Metropolitan Planning Organization)

<u>EMPLOYEE</u>	<u>POSITION</u>	<u>CLASSIFICATION</u>	<u>RACE</u>	<u>SEX</u>
Kevin P. Belanger	CEO	Full-Time Permanent	W	M
Julie D. Boudreaux	CAO	Full-Time Permanent	W	F
Dawn Allemand	Accountant	Full-Time Permanent	W	F
Emma Bergeron	Admin. Assistant	Full-Time Permanent	W	F
Charlene Wallis- LeBlanc	Accounting/Office Assistant	Full-Time Permanent	W	F
Janine Chauvin	Receptionist	Full-Time Temporary	W	F
Martha Cazaubon	Plan. & Comm. Dev. Administrator	Full-Time Permanent	W	F
Simonne Caesar	Planner & Grant Coordinator	Full-Time Permanent	B	F
Lesley Woods	Grant Coordinator	Full-Time Permanent	B	F
Ryan Hutchinson	IT Administrator	Full-Time Permanent	W	M
Lee Prosperie	Software Analyst	Full-Time Permanent	W	M
Kenyon Jenkins	Software Analyst	Full-Time Permanent	B	M

Luke Spencer	System Analyst	Full-Time Permanent	W	M
Leo Marretta	Regional Transportation Director	Full-Time Permanent	W	M
Scott Leger	GIS Coordinator	Full-Time Permanent	W	M
Joshua Manning	Planner	Full-Time Permanent	W	M
Mitch McDonald	Traffic Surveyor	Part-Time Permanent	W	M
Michael Wich	CBO	Full-Time Permanent	W	M
Dina Stewart	Communications Specialist	Full-Time Permanent	W	F
Kathryn Lewis	Receptionist	Full-Time Permanent	W	F
Brian Craigo	Senior Plans Examiner	Full-Time Permanent	W	M
Carl "Bo" Dupre	Plans Examiner	Full-Time Permanent	W	M
Terry Talbot	Chief Building Inspector	Full-Time Permanent	W	M
Tony Breaux	Inspector	Full-Time Permanent	W	M
Keith Morvant	Inspector	Full-Time Permanent	W	M
Joseph "JY" Delcambre	Inspector	Full-Time Permanent	W	M
Robert Pitre	Inspector	Full-Time Permanent	W	M
Leonard Gravios	Inspector Inspector	Full-Time Permanent Full-Time	W W	M M

Alvin "Mike" Aucoin		Permanent		
Cullen Curole	Economic Dev. Administrator	Full-Time Permanent	W	M
Cynthia Girior	Grant/Loan Specialist	Full-Time Permanent	W	F
Lynette Cortez	Admin. Assistant	Full-Time Permanent	W	F
Henry Touns	Underwriter	Part-Time Permanent	W	M
Brooke Bergeron	Intake Assistant	Part-Time Temporary	W	F
Awilda Perez	Grant Technician	Part-Time Temporary	H	F
Michelle Wich	Intake Assistant	Part-Time Temporary	W	F



2. List the Board of Directors by race, color, national origin, and gender. Identify the voting members.

Houma Thibodaux Metropolitan Planning Organization (HTMPO):

The HTMPO has no Board of Directors, however we have a *Policy Committee* which is made up of elected officials from each of the jurisdictions within the MPO's area. The Policy Committee has twelve (12) voting members and one (1) non-voting member and serves as the official decision making body for the MPO. The Policy Committee oversees how federal transportation dollars are spent in the transportation study area. The Policy Committee's responsibilities include the review and approval of all plans, programs, and projects.

HTMPO's By-Laws state that:

- The highest elected officials in the Parishes of Assumption, Lafourche and Terrebonne will be automatically appointed to the Policy Committee.
- The highest elected officials of the Town of Lockport and the City of Thibodaux and the Village of Napoleonville will automatically be appointed to the Policy Committee.
- The Terrebonne Parish Council will appoint four (4) members from their respective council, which their district is a part of the Urbanized Area.
- The Lafourche Parish Council will appoint one (1) member from their respective council, which their district is part of the Urbanized Area.
- The Louisiana Department of Transportation will appoint a member to the Policy Committee.
- The Federal Highway Administration will appoint a non-voting member to the Policy Committee.

HTMPO Policy Committee VOTING MEMBERS:

Dirk Guidry - MPO Policy Committee Chairman - Councilman, Terrebonne Parish Consolidated Government

RACE: Caucasian

COLOR: White

GENDER: Male

NATIONAL ORIGIN: American

Tommy Eschete - MPO Policy Committee Vice-Chairman - Mayor, City of Thibodaux

RACE: Caucasian

COLOR: White

GENDER: Male

NATIONAL ORIGIN: American

Christa Duplantis-Prather Councilwoman, Terrebonne Parish Consolidated Government

RACE: Caucasian

COLOR: White
GENDER: Female
NATIONAL ORIGIN: American

Paul Champagne – Mayor, Town of Lockport
RACE: Caucasian
COLOR: White
GENDER: Male
NATIONAL ORIGIN: American

Gordon Dove - President, Terrebonne Parish
RACE: Caucasian
COLOR: White
GENDER: Male
NATIONAL ORIGIN: American

Arlanda Williams - Councilwoman, Terrebonne Parish Consolidated Government
RACE: African American
COLOR: Black
GENDER: Female
NATIONAL ORIGIN: American

Jimmy Cantrelle, President Lafourche Parish
RACE: Caucasian
COLOR: White
GENDER: Male
NATIONAL ORIGIN: American

Martin Triche – Police Jury President, Assumption Parish
RACE: Caucasian
COLOR: White
GENDER: Male
NATIONAL ORIGIN: American

Christopher Morvant - District 02 Administrator, LADOTD
RACE: Caucasian
COLOR: White
GENDER: Male
NATIONAL ORIGIN: American

Al Marmande, Terrebonne Councilman
RACE: Caucasian
COLOR: White
GENDER: Male
NATIONAL ORIGIN: American

Ron Animashaun – Mayor, Village of Napoleonville
RACE: African American
COLOR: Black
GENDER: Male
NATIONAL ORIGIN: American

Corey Perrillioux, Lafourche Councilman
RACE: Caucasian
COLOR: White
GENDER: Male
NATIONAL ORIGIN: American

HTMPO Policy Committee NON-VOTING MEMBER:

Chandra Bondzie - Federal Highway Administration
RACE: American Indian
COLOR: White
GENDER: Female
NATIONAL ORIGIN: American

3. How are Citizen Advisory Committee Members selected? How long is their term? Provide list of committee members indicating race, color, national origin, gender, and positions.

HTMPO does not currently seat a Citizen Advisory Committee. However, the MPO is housed and is co-mingled with South Central Planning & Development Commission, which is a *Quasi-Governmental Agency* made up of local business and minority representatives. As such, SCPDC is also a Statewide Clearing House (Single Point of Contact) for all environmental and land-use issues within their Region, which encompasses the HTMPO study area. SCPDC has direct contact with all local jurisdictions for all land-use issues that are related to transportation. Therefore, all improvements are collaborated with SCPDC.

4. Describe the various programs administered by the agency and their funding sources.

The Houma-Thibodaux Metropolitan Planning Organization (MPO) is responsible for comprehensive transportation planning in the Houma-Thibodaux region. The Federally prescribed planning process is financed by means of: Federal Highway Administration - MPO Planning Grant; a Federal Transit Administration - Section 5303 MPO Planning Grant; and the required 20% match from our local member jurisdictions – Assumption, Lafourche and Terrebonne Parishes, the Town of Lockport, the City of Thibodaux.

This planning process is guided by the three following documents, which can be found on our website www.HTMPO.org

The Unified Planning Work Program (UPWP) is an annual contractual document that discusses the planning priorities in the Houma-Thibodaux Metropolitan Area and describes planning activities to be performed by the MPO. These planning activities are the joint responsibility of the Louisiana Department of Transportation and Development (LADOTD) and the Houma-Thibodaux Metropolitan Planning Organization.

The Transportation Master Plan is a long-term (25-year) plan for the transportation system. The Transportation Master Plan includes both short-range and long-range strategies and actions that lead to the development of an integrated, intermodal transportation system that facilitates the efficient movement of people and goods.

The Transportation Improvement Program (TIP) is the short term (4-year) plan developed as a product of the UPWP and the Transportation Master Plan. The TIP is a programming document for actual construction and improvement projects consistent with the needs identified through the development of the Transportation Master Plan. The TIP includes all highway and transit projects to be implemented within the upcoming four years. The TIP is the link between the planning and the programming of urban transportation projects.

In addition to the Planning Grant funds received by HTMPO to carry out the above activities several other grants are used to fund the following programs:

LADOTD Transit Division Grant - Coordinated Human Services Transportation Plan
(www.HTMPO.org)

As a condition for receiving formula funding under certain FTA programs, proposed projects must be derived from a locally developed public transit human services transportation plan. The plan must have been developed through a process that included representatives of public, private and nonprofit transportation and human services providers as well as the public. In December 2006, the LA DOTD Rural Transit Department with FTA called for the development of a regional public transportation coordination plan. HTMPO participated in a collaborative effort, preparing a public transit human service transportation plan for our area. The plan examined ways to more effectively coordinate services. Stakeholders were identified and invited to participate in the planning process, working together to build a base from which to promote more coordination activities in the future. The project included an evaluation of coordinated transit and human service transportation on a regional scale throughout the HTMPO region. The resulting plan submitted to LA DOTD Rural Transit and the FTA outlines current resources, service providers, and initiatives for implementing an action plan designed to maximize improvements to the system.

LADOTD Highway Safety Grant - Regional Highway Safety Plan Implementation
(www.HTMPO.org)

The South Central Regional Transportation Safety Plan (SCRTSP) is a data-driven action plan developed by the South Central Planning & Development Commission (SCPDC) through the highway safety coalition, the South Central Safe Community Partnership (SCSCP). The SCSCP and its multidisciplinary partners collaborate to implement highway safety projects in our region. Funded by the Louisiana Department of Transportation and Development (LADOTD), this living document follows through the same goals and strategies set by the statewide Strategic Highway Safety Plan (SHSP) whose mission is Destination Zero Deaths. It primarily seeks to implement road safety projects at the regional and local levels. Just like SHSP, the SCRTSP's measurable goal is to reduce the number of roadway fatalities in the region by 50% in 2030. This plan is also supported by the Federal Highway Safety Administration (FHWA), Louisiana Highway Safety Commission (LHSC), the Houma-Thibodaux Metropolitan Planning Organization (HTMPO) and the parish/city jurisdictions in the South Central Region. Non-infrastructure and infrastructure efforts will be undertaken in four emphasis areas, namely: Occupant Protection, Alcohol Related Driving, Crashes Involving Young Drivers, and Infrastructure & Operations. The 4E's (education, enforcement, engineering and emergency medical services) will be done through regional systemic approach and constant collaboration between federal, state and local partners.

5. Has the agency designated a Title VI Coordinator? Provide the following information:

Name Kevin Belanger, CEO
Phone and Fax Numbers p. 985-851-2900 f. 985-851-4472
E-Mail Address Kevin@scpdc.org
How long in this position? 17 years

6. Does the agency have a Title VI Plan, including Policy and Assurances in place? Describe public dissemination of your Title VI Plan.

Yes. Public dissemination is described within the Title VI Plan and the Public Participation Plan both of which are included in the appendix section of this document.

B. Complaint Procedure

1. Does the agency have a formal Title VI Complaint Procedure and Title VI Complaint Form for external discrimination complaints? Describe public dissemination of your Title VI Complaint Procedure.

Yes. Information on the Title VI Policy is disseminated to SCPDC board members, employees, contractors, and beneficiaries, as well as to the public via the SCPDC website. Our Title VI Plan can be found in the appendix of this document. This information is also available online, and Title VI complaints can be made online through our website at www.htmp.org/civil-rights/

2. Has the agency received any Title VI related complaints during the past two years? If so, what were the outcomes? Were the Title VI complaints lodged by beneficiaries or participants and what were the issues involved.

There have been no Title VI related complaints during the past two years about either SCPDC or the MPO as evidenced by the attached letter from the Federal Transit Administration stating their approval of our Title VI Program. Please see Appendix "C" for SCPDC's Title VI Compliance Attestation and FTA's Approval Letter.

3. Does the agency have a Title VI Notice to the Public? Describe public dissemination of your Title VI Notice to the Public.

Yes. Information on the Title VI Policy is disseminated to SCPDC board members, employees, contractors, and beneficiaries, as well as to the public via the SCPDC website at <http://www.scpdc.org/> and the MPO's website www.HTMPO.org

C. Training

1. Has the agency's staff received any training (formal or informal) regarding Title VI?

LA-DOTD Annual Title VI Review of HTMPO & SCPDC
2009-2016

Louisiana Transportation Conference
Feb 28 – March 2, 2016, Baton Rouge, LA

Triennial Review Workshop
December 14 – 15, 2015, Baton Rouge, LA

Louisiana Public Transit Conference
November 17-19, 2015, Baton Rouge, LA

DOTD/RPC ADA Workshop
November 12-13, 2015 NOLA

FTA Triennial Review of SCPDC
2009, 2012, 2015

Triennial Review Workshop
Nov 6 & 7, 2014 Ft Worth, TX

21st National Conference on Rural Public and Intercity Bus Transportation
October 26-29, 2014

STARRS Training
Sept 23, 2015 at SCPDC

Reimagining the Delta Workforce: A Summit on Workforce Development in Louisiana
September 18, 2014

NHI Course No. 142005 - NEPA and Transportation Decisionmaking
May 28-30, 2014

SCPDC Triennial Review Site Visit
April 27, 2014

DOTD Transit Coordination Training
July 23 & 24, 2013

MPO ADA Course Training
April 15 & 16, 2013

2013 Louisiana Transportation Conference (LTC)
Feb 18 & 19, 2013

DOTD's 2012 Public Transportation Conference

Nov 28 – 30, 2012

DOTD Compliance Review of RPTA
April 24, 2012

NEPA and Transportation Decision Making Class
April 10 -12, 2012

RPTA FTA Triennial Review
March 6 & 7, 2012

LADOTD Annual Title VI Review
Jan 18, 2012

FTA's Financial Management Oversight (FMO) seminar
January 10 – 11, 2012

Triennial Review Workshop
Nov 17 & 18, 2011 Ft Worth, TX

Louisiana Public Transportation Conference
Nov 14 – 16, 2011

Title VI and Environmental Justice Proposed Circulars webinar
Oct 24, 2011

American Public Transportation Association Conference
Oct 2 – 4, 2011 NOLA

DOTD Cost Allocation Workshop
Sept 20, 2011

Transportation Coordination Workshop
July 12 & 13, 2011

STTARS Training
June 21, 2011

Federal Transit Administration's Title VI Webinar, DBE and TEAM DBE Reporting Module
Training Webinar
May 12, 2011

Federal Transit Administration's EEO Webinar
May 11, 2011

FHWA Louisiana Division
ADA/Section 504 Training Agenda
April 14, 2011

FHWA Compliance Review and Certification of HTMPO
March 3, 2011

SWTA Conference
Feb 28 – March 3, 2011

FHWA Resource Center Civil Rights Technical Service Team
Title VI Nondiscrimination in the Federal-aid Program
July 20 & 22, 2010

FHWA Louisiana Division and DOTD Office of Multimodal Programming
HTMPO Planning and Compliance Review
July 2010

2. Is the agency considering scheduling Title VI training sometime soon? If so, when and who will present it?

In the past years, a representative from LADOTD discusses Title VI at one of our meetings. We also participate in webinars offered by FHWA and FTA, or their agents, with regards to Title VI compliance issues.

II. Planning Activities

A. Public Involvement – Meetings and Hearings

1. Does the agency have a public involvement plan? If not, to what extent are minority members (inclusive of all groups), people with Limited English Proficiency (LEP), or people with disabilities in the community, invited to participate?

Yes, the Title VI Plan and the Public Participation Plan are included with this document.

2. Does the agency have an Environmental Justice Policy?

Yes, it can be found within the Title VI Plan and the Public Participation Plan both of which are included in the appendix section of this document.

3. Does the agency have a Limited English Proficiency (LEP) Guideline or Policy?

Yes, it can be found within the Title VI Plan and the Public Participation Plan both of which are included in the appendix section of this document.

4. Are Public Meetings held in an accessible location (geographically and structurally)? Are the times of the meetings in accordance with the community's needs?

Yes, monthly and quarterly meetings are held at South Central Planning and Development Commission's offices in Gray, LA. at convenient times to the general public. The SCPDC facility is handicap accessible and ADA compliant.

5. Is the Hearing Coordinator keeping records of attendance? If so, what information is collected and how is it utilized to identify persons covered under Title VI? Is this

information compared to the demographic data collected for the affected communities? Were any special provisions provided, such as interpreters, sign language, ADA accommodations?

Sign-in sheets are provided at all meetings, and occasionally photographs are taken of the attendees informally. This information has not been compared to demographic data of affected communities; however, an analysis could be commissioned if needed. To date, no requests have been made for special accommodations.

6. Have planning manuals, directives, guidelines, and policies been reviewed for Title VI compliance purposes?

Yes. Our most recent review was the 2015 Federal Transit Administration Triennial Review of SCPDC where no Title VI deficiencies found. We also participated in a Triennial Review in 2015, as well as DOTD Annual Title IV Reviews in 2012, 2013, 2014 and 2015.

B. Advertisement and Procurement of Contracts

1. How are Request for Proposals (RFP) and/or bids solicited, and what are the requirements for submitting a proposal and/or bid?

The MPO does not currently go out to bid for and goods or services. If required to in the future all Federal and State laws will be complied with as appropriate.

2. Are Title VI assurances and provisions included in advertisements and contracts?

Yes, an example contract is attached to this document.

3. If the agency is receiving over \$250,000 in contracting dollars, the agency must have a DBE program. Does the agency have a DBE program? If so, are DBE goals being included in contract/awards? If, so are they being achieved? If not, how does the agency promote the participation of certified DBE firms?

N/A

4. How does the agency monitor consultant/contractor adherence with Title VI requirements? DBE requirements?

N/A, no consultant/contractor relationships exist.

5. Have advertisements, bids, contracts/awards, manuals, directives, guidelines, and policies been reviewed for Title VI language and assurance? DBE language and assurance?

N/A

The Advertisement and Procurement of Contracts section of this document does not apply in that we do not and have not solicited any contracting help.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

PLAN STATEMENT

This document explains the Limited English Proficiency (LEP) “Four-Factor Analysis” prescribed by Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” and undertaken by the Houma Thibodaux MPO (HTMPO) using SCPDC staff. It outlines the evaluation procedures used and consequentially the agency’s compliance and adherence to the Executive Order 13166 directives to develop and implement a system to provide required services so LEP persons can have meaningful access to federally funded programs and projects. HTMPO pledges to make all reasonable efforts to provide or arrange for language assistance for LEP persons who may need to communicate about transit planning matters with the MPO and/or transit operation matters with Good Earth Transit (GET), the local transit system operated by Terrebonne Parish Consolidated Government (TPCG).

PURPOSE

The purpose of this limited English Proficiency plan is:

- Identify the LEP requirements of HTMPO as a grantee of Federal Transit Administration (FTA) funding and/or any other applicable Federal funding sources;
- Assist HTMPO in fulfilling its responsibility to Limited English Proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964; and
- To ensure that HTMPO makes prudent and responsible determinations with regard any steps taken in the effort to provide meaningful access to the transit system by LEP persons.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

HTMPO shall take reasonable steps to ensure that limited English proficiency (LEP) persons receive the language assistance necessary to afford them meaningful access to services that the HTMPO provides through its SCPDC staff and through the region’s fixed route provider GET.

The following four factors shall be used to identify what constitutes reasonable steps:

1. Demography: The number or proportion of LEP persons in the MPO’s area eligible to be serviced or likely to be encountered;
2. Frequency of Contact: The frequency with and major points of contact where LEP persons come into contact with GET, HTMPO and SCPDC;
3. Importance: The nature and importance of the service provided; and
4. Resources: The agency’s available resources and cost of the service.

FOUR-FACTOR ANALYSIS

1) Demography

(The number or proportion of LEP persons in the MPO's area eligible to be serviced or likely to be encountered)

HTMPO and GET both serve the Houma/Thibodaux urbanized area. GET is a part of the Public Works Department of the Terrebonne Parish Consolidated Government. It provides fixed route general public transit service and paratransit which serves the Houma/Thibodaux urbanized area. The transit system operates five bus routes which cover the City of Houma and the City of Thibodaux.

While HTMPO does not operate a transit system, SCPDC staff do provide transportation planning services for MPO's parishes - Assumption, Lafourche and Terrebonne, including transit planning. In support of these services the MPO facilitates the Regional Transit Committee (RTC) to promote Coordinated Human Services Transportation Planning (CHSTP).

The most recent demographic information for our region was obtained from the US Census data set: 2008-2012 American Community Survey. The demographic statistics analyzed reveal that the area the MPO serves does not contain an LEP population in any given language that amounts to 3.00% or more of the total population.

The demographic data reveals that while 31,443 persons or 14.62% of the total number of residents speak a language other than English, only 6,379 persons or 2.97% of the total number of residents speak English less than "very well".

The three main language populations that do not speak English "very well" are Spanish at 2,676 persons or 1.24%, other Indo-European languages, most commonly French in this area, at 3,192 persons or 1.48%, and Asian and Pacific Islander languages, mostly Chinese and Vietnamese at 466 persons or 0.22% of the area's population.

Language Spoken At Home	POP Estimate	% of total POP
Population 5 years and over	215,130	100%
English only	183,687	85%
Language other than English	31,443	15%
Speak English less than "very well"	6,379	3%
Spanish	6,726	3%
Speak English less than "very well"	2,676	1%
Other Indo-European languages	22,899	11%
Speak English less than "very well"	3,192	1%
Asian and Pacific Islander languages	1,402	1%
Speak English less than "very well"	466	0%
Other languages	416	0%
Speak English less than "very well"	45	0%

2) Frequency of Contact

(The frequency with and major points of contact where LEP persons come into contact with GET, HTMPO and SCPDC)

In 2007 the MPO facilitated the establishment of the Regional Transit Committee (RTC) to support and promote Coordinated Human Services Transportation Planning. The MPO staff at SCPDC hosts the RTC's quarterly public meetings and organizes the development and implementation of our region's Coordinated Human Services Transportation Plan (CHSTP). The CHSTP document and minutes from all RTC meetings are published on line at the MPO's website (www.htmppo.org). There you will also find our "Citizens Guide to Transportation Planning", (which incidentally contains a Title VI Public Notice), our "Public Participation Plan", our "Civil Rights and Accessibility Compliance" statement, documents, contacts and complaint procedures. The CHSTP regularly facilitates efforts by representatives of public, private, non-profit transportation and human service providers, and the public for continual coordination and improvement of our region's transit offerings.

As part of these efforts in 2011 a survey of GET and SCPDC employees as well as other related transit personnel was conducted to determine the number and proportion of LEP persons actually served by the GET system. Another similar survey of riders and staff is currently underway in conjunction with HTMPO's MTP 2040 Update (the MPO's long range plan) which is due to be completed by May of 2015.

The 2011 survey data indicate that the primary LEP languages encountered by our employees are Spanish, Vietnamese, French and Korean. Analysis of the data showed that there were only +/- 60 times that a LEP person was encountered during the course of their transit work in 2011. Bus operators accounted for about 88% of the public transit system reported LEP interactions. About 80% of the bus operators as a group interacted LEP persons during the course of their work on at least one occasion.

The frequency of LEP contacts reported by language from the survey conducted is summarized in the table below:

Spanish	41	68.3%
French	3	5.0%
Vietnamese	7	11.7%
Korean	4	6.7%
Unknown	5	8.3%
Total	60	100.0%

Spanish is the most common spoken language that is being used by LEP persons who use the GET system. The Spanish LEP contacts account for about 68% of the total contacts. Bus operators encountered languages other than Spanish, including French and Vietnamese in much lower numbers.

As a result of insights gained from the 2011 survey GET began publishing their brochures in English and Spanish. Also both HTMPO and GET have added the ability to translate information provided on their websites. These seem to be providing effective basic information explaining how to interact with the MPO and how to use the GET service.

To date interaction between transit operators and riders with LEP at the point of entry into the system when purchasing of fare tickets or transfer passes continues to reflect the infrequent contact reported in the survey of the GET system. Further evidence of effective communication with the small number of persons in our region who have LEP is that SCPDC and GET staff have had no requests for language interpreters although accommodations are offered in all our meeting and informational notices. Additionally, there have been no requests for translation of additional documents or requests for information in other languages.

3) Importance

(The nature and importance of the service provided)

While the MPO's "Public Participation Plan" provides an overall framework for general transportation planning public outreach in this document, our LEP Plan, the HTMPO wishes to reiterate our process for reaching out to traditionally underserved populations – people with LEP, minorities, seniors, the disabled, the impoverished, etc. with regards to the planning for and provision of public transportation. The provision of public transportation is a vital service in that it provides mobility for those who may be without access to personal vehicles due to these and other circumstances. Through the public participation process described herein it is our intent to identify and meet the specific transportation needs of such groups that the MPO regularly reaches out to and attempts to engage in the transit planning process. To date the most prevalent important transit related issues that have risen to the top of our attention through our public participation process with regards to LEP and other traditionally underserved populations include:

Expansion upon and continued provision of a meaningful local fixed route service by GET that facilitates mobility for traditionally underserved populations. This would include continued transit service to and from Nicholls State University (NSU) and the City of Thibodaux, adding weekend and evening service, on time arrivals and reasonable average headways, insuring that vehicles that are equipped with adequate air-conditioning systems, appropriate placement of an adequate number of stops along fixed routes, covered bus stops to protect riders from the elements, ADA accessible restrooms at strategic locations as well as at the Downtown Transit Terminal facility and appropriately located Park and Ride facilities to provide better access to the transit system.

Expansion upon and continued provision of meaningful, local paratransit services associated with the fixed route system for those LEP and other traditionally underserved populations who require it.

Expansion upon and continued provision of a meaningful, local service for advocacy organizations working on behalf of targeted populations to provide transportation services that facilitate mobility for traditionally underserved populations. These would include not for profit organizations and government agencies that administer transportation services associated with health, employment, or other support programs such as Councils on Aging, ARCs, Special Education Districts, and others.

4) Resources

(The agency's available resources and cost of the service)

As stated earlier as a result of previous outreach efforts GET has begun publishing their brochures in English and Spanish. Also, both HTMPO and GET have added the ability to translate all information provided on their websites (including transit information) by means of Google's free online language translation service which instantly translates text and web pages into your language of choice. These seem to be providing effective basic information explaining how to interact with the MPO and how to use the GET service.

Because of their relationships with SCPDC both the MPO and GET have access to SCPDC staff members who speak more than one language and are available to act as translators for any LEP situation that presents itself. Currently we have staff members who can reliably translate Spanish and French into English and vice versa.

Furthermore, there are several translation provider services (CTS Language Link, Teleguage, Communicaid, Inc.) operate in our area and have been identified in the event that an LEP person calls by telephone or comes into our office to request information. Typical services offered by these companies include Telephonic Interpretation, Video Remote Interpretation, On-Site Interpretation and Translation of Written Documents. These telephone translation services can translate all the known LEP languages in our area. To date there have been no occasions that have required the use of these company's services.

Foremost in our outreach efforts is our longstanding Regional Transit Committee (RTC), formed to support and promote our Coordinated Human Services Transportation Plan (CHSTP). The RTC's quarterly public meetings are advertised, promoted, open to all and regularly facilitate efforts by representatives of our transit community for the continual coordination and improvement of our region's transit offerings. Here we identify what services are the most important, assessing proposed transit related programs and projects to ensure we are providing meaningful access to all, including our LEP population.

The RTC conducts quarterly public meetings at which it facilitates the development and implementation of our region's Coordinated Human Services Transportation Plan (CHSTP). The CHSTP document and minutes from all RTC meetings are published on line at the MPO's website (www.htmppo.org). There you will also find our "Citizens Guide to Transportation Planning", (which incidentally contains a Title VI Public Notice), our "Public Participation Plan", our "Civil Rights and Accessibility Compliance" statement, documents, contacts and complaint procedures.

HTMPO's Public Participation Plan's Chapter 3 "Traditionally Underserved Populations" discusses how the MPO utilizes the latest U.S. Census data and American Community Survey data to identify special target populations at the block group level. Prior to the implementation of any special transit planning outreach efforts, HTMPO staff uses several methods to identify where traditionally underserved populations are likely to live and work. Locational information regarding special needs populations provide a region-wide snapshot of socio-economic characteristics of communities within the HTMPO

planning area. Examples of such studies are found above in our Title VI Plan (of which this LEP plan is a part), in our MTP 2030 (our long range transportation plan) and the results of which are illustrated a little later in this document.

Enhanced outreach methods are employed using a variety of techniques including publication and communication of draft plans and processes using audience appropriate methods through print, public meetings, on websites of the local jurisdiction and the MPO and the various community support agencies such as the Bayou Interfaith Shared Community Organizing (BISCO) group and others. Formal public comment for the record is accepted at the MPO's Policy Committee meetings, as well as other formal local government council meetings. Special public meetings and workshops are crafted for specific needs. These public meetings and workshops are held in ADA accessible facilities at locations that offer the greatest opportunity for those interested to participate. HTMPO complies with the Louisiana Public Records Act (also known as Louisiana Sunshine Law), publishes Official Notices, conducts Public Hearings, hosts special Public Meetings periodically, and makes all Plans and Documents available to the public.

The following are additional methods HTMPO has identified in its Public Participation Plan and uses to reach out to special populations on an as needed basis:

- HTMPO will use visualization methods (maps, displays, charts, and other static and interactive engagements) to make the topic relevant to the target audience. The extensive use of maps, aerial photographs and simple charts allow for greater participation and understanding by those that may be more visually oriented and will allow for greater interaction by participants;
- If meetings are to be held in areas where there is a predominance of non-English speaking populations, HTMPO will have people available to help translate questions and responses;
- When appropriate, HTMPO will use community-based TV, radio stations, and websites to target messages and solicit input from specific population segments.
- Using "Language Communication Cards" or "I speak cards" which invite the LEP person to identify his or her language needs to staff. When needed these cards can be downloaded at <http://www.usdoj.gov/crt/cor/13166.htm>.

In the past both HTMPO and GET have used these and other methods to gauge the most effective means to provide language assistance to the LEP population in our area. Unfortunately, those who need transit the most are often the ones who have the most trouble accessing it so our efforts to reach these populations tends to go beyond customary means of public outreach experienced in our other MPO work.

All that being said, there have been occasions when extra efforts have been made to accommodate persons in our region who most need access to transit services, examples include:

- As reported earlier a survey of transit employees at GET and HTMPO transit planning personnel at SCPDC was conducted in 2011 which led to the publishing of transit brochures in both English and Spanish. Additionally, both HTMPO and GET have since added the ability to translate information provided on their websites. The positive effects of these accommodations were discussed earlier in this document.

- Another change was made to GET's bus brochure that was designed to assist the LEP community was the revision of the Route Names for the transit routes operated by the transit system. The route name now includes a numeric designation. This was done to assist those individuals who had a limited ability to associate the route maps with the route names regardless of the language that they speak.
- GET's transit vehicles are equipped with bilingual passenger information. All permanent passenger information including emergency instructions affixed to the transit vehicles have been translated into Spanish, and the Spanish interpretation is affixed to the vehicle adjacent to the English version of the information. The cost of these translations has made a contractual obligation for bidders on new transit vehicles to be purchased.
- In 2011, there was an unofficial community action coalition building around providing for the transit needs of the residents of a portion of Terrebonne Parish known as Levytown. These residents had to walk a half mile or more to get to the nearest stop on an established GET route and wanted easier access. At GET's request the MPO directed SCPDC staff to conduct population, socio-economic and demographic GIS analysis of the area. Concentrations of one and no car households were plotted against the existing bus routes. This GIS analysis work and public outreach resulted in the presentation of several potential alternative routes and projected costs of each as well as a Council On Ageing support option. The MPO provided staff support for several of the public meetings that were held at the Parish in conjunction with these efforts. Successful resolution resulted in the extension of one of GET's regular routes to include Levytown.
- GET together with HTMPO staff held public hearings in support of another proposed route change in June of 2012. The newly opened Main Campus of Fletcher Community College had not previously been served by transit and the State and Parish requested that GET consider a route that would allow students to access the facility. Demographic and demographic GIS analyses similar to ones in the Levytown example were conducted by SCPDC resulting in transit service being provided to the college.
- Since 2007 SCPDC had been working with the City of Thibodaux, which is within our HTMPO area, to determine the feasibility of providing a transit system for its residents. In 2009 and 2010 SCPDC staff conducted a review of demographic data primarily obtained from the U.S. Census Bureau and by interviewing key stakeholders in the community that are aware of transportation needs. Key stakeholders included those that interact with populations of potential users. Social service agencies, medical facilities, schools, churches, employers, community leaders, etc. were interviewed to gain an understanding of the user population and the need for public transit. An estimate was made of the potential ridership population and their transportation needs based on this data. Stakeholders included social service agencies, Thibodaux Regional Medical Center, Nicholls State University, Louisiana Technical College, Lafourche Parish School Board, Thibodaux City Administration, major employers such as Walmart and John Deere, Chamber of Commerce, and the Bayou Interfaith Services Community Organization. To further identify trip generators

and attractors key stakeholders in the community were interviewed helping to identify not only trip generators and attractors but trip purposes which confirmed that trip purposes are primarily for work, medical, shopping, and social activity reasons. GIS analyses determined the locations of and the size of the potential user population, the locations of trip generators and attractors and were used to propose several route alternatives. Eventually, in 2013, the city signed a two-year agreement with Terrebonne Parish and GET to run a circulator route around the City of Thibodaux. GET provided the vehicles, drivers, fuel and maintenance for the buses. The buses now run from 6 a.m. to 6 p.m. on weekdays. Passengers pay a \$1 fare, and passengers with disabilities pay 50 cents.

- In conjunction with HTMPO's MTP 2040 Update (the MPO's long range plan) a survey of GET, SCPDC and HTMPO staff is under way. An On Board Survey of GET's ridership will also be conducted. Information about LEP system users will be collected as well as all the other data one would expect in such an effort. MTP 2040 Update is due to be completed by May of 2015.
- SCPDC staff is currently working with GET to create a personalized mobile transit app for use by their ridership on their cell phones, mobile devices and home computers. Its immediate intent is to provide real time bus tracking and arrival times for the public and eventually may be able to report on bus conditions such as estimated arrival time to specific destinations, how many seats are free and where or not the bike racks are full. Ticketing on the phone and trip planning services are also anticipated. This system will also be able to report out to the transit agency information like passenger count on various routes at any given time, location tracking of assets in the field, regularly scheduled maintenance and service tracking, etc. Data gathered will be able to be analyzed for ways to better target service provision. Examples of anticipated analyses include boardings and departures studies and low to moderate income and/or carless status data overlays on top of bus stop locations. Urban versus rural determinations for the demand response side of the system will be readily available in real time as well as in-route work order tracking and on the fly modifications to pick up schedules.

As they struggle to meet their educational, employment, health, shopping, and social needs without adequate transportation, we at GET, SCPDC and the MPO see how important public transit service is to the residents of our area, especially the traditionally underserved members of our community. However, with today's limited budgets, our Parish government may not consider transit as important as some other governmental services in the community such as police and fire protection or hospital and emergency medical services. Therefore, GET has provided LEP accommodations based upon a cost benefit analysis undertaken to determine which documents and languages should be translated.

As a result the transit system has translated the Route Map and Schedule brochure into Spanish, printing one side in English and the other side in Spanish. The marginal cost for this LEP implementation is \$600.00 per 5000 brochures printed. A 5000 brochure supply normally lasts about 12 months. This is the only document GET translates and prints on a regular basis. The reason GET has decided to print in this language is because it is the most frequently encountered foreign language in our system and would have the most impact for the cost. The transit system has adjusted its annual budget to allow the

publishing of bus schedule in English and Spanish and now routinely budgets for this printing. The Spanish and English versions of the brochure are posted at the public transit bus station.

The HTMPO reaches out to the traditionally underserved members of our community in the course of our daily transportation planning activities as described in this and other documents including our region's Coordinated Human Services Transportation Plan (CHSTP), our "Citizens Guide to Transportation Planning", our "Public Participation Plan", our "Civil Rights and Accessibility Compliance" statement and other MPO documents. Our Regional Transit Committee's quarterly public meetings facilitate the development and implementation of the CHSTP document. This group includes not for profit organizations and government agencies that administer transportation services associated with health, employment, or other support programs such as Councils on Aging, ARCs, Special Education Districts, and others, as well as our fixed route provider GET. The MPO's CHSTP document, minutes from all RTC meetings and all other MPO documents are published on line and made available in any language at the MPO's website (www.htmppo.org).

Through our long range planning process the 5 year update cycle for the Metropolitan Transportation Plan provides us the opportunity to monitor census and other demographic changes in our area. SCPDC staff utilizes our daily work with the MPO's transportation planning program to respond to these changes by providing our transit providers with information regarding best practices and recommendations for ways to assure that LEP persons in our area receive the language assistance necessary to afford them meaningful access to services that the HTMPO provides through its SCPDC staff, our special population transit providers and the region's fixed route provider GET.

You can see the results of our efforts to date reflected in the previous section of this document. Future efforts to identify what services are the most important to all transit users, including our LEP population are also documented. Proposed transit related programs and projects in conjunction with the MPO's update of its MTP 2040 will be evaluated, proposed and implemented to ensure we are providing meaningful access to our region's transit system.

SCPDC will reach out to our LEP population by continuing to offer language assistance using a variety of techniques including in person or telephonic interpretation and translation of documents as requested. Publication and communication of draft plans and processes using audience appropriate methods will be accomplished through print, public meetings and on the websites of the MPO, our local jurisdictions and the various community support agencies with which we work. Formal public comment for the record is accepted at the MPO's Policy Committee meetings, as well as other formal local government council meetings. Special public meetings and workshops are crafted for specific needs. These and all public meetings and workshops are held in ADA accessible facilities at locations that offer the greatest opportunity for those interested to participate. HTMPO complies with the Louisiana Public Records Act (also known as Louisiana Sunshine Law), publishes Official Notices, conducts Public Hearings, hosts special Public Meetings periodically, and makes all Plans and Documents available to the public.

LANGUAGE ASSISTANCE

Language assistance methods that HTMPO and GET may provide to individuals are as follows:

- a) Translation, which means converting written documents into another document written in another language that conveys the same meaning as the original.
- b) Interpretation, which means the process of facilitating oral or spoken communication from one language to another.
- c) Pictograph, which means a picture resembling a word or an idea.
- d) "I speak cards" which invite the LEP person to identify his or her language needs to staff

TRANSLATION OF DOCUMENTS

Data from HTMPO staff, GET's bus operators and other transit employees is used to determine which if any language translations should be made for our documents. The prevalence of difficult communications with Spanish speaking persons lead us to believe that this may be the only language for which translation of information would be necessary and appropriate.

Both HTMPO and GET will continue to provide and encourage on its website the use of translated information by LEP persons. This will be the main source of translated information in other languages besides Spanish.

INTERPRETERS INFORMAL and OTHER RESOURCES

If available, a representative from an organization that interprets or translates languages, a family member, friend, guardian, service representative or advocate will be contacted to provide interpretation services, for matters not handled through website information, or through document translations.

An LEP individual may use an informal interpreter of his or her desire and at his or her expense. Both HTMPO and GET will make an interpreter available if requested by an LEP individual. HTMPO and GET reserve the right to have a formal interpreter present if an LEP individual uses their own informal interpreter.

MONITORING AND PLAN REVISIONS

The HTMPO and SCPDC's LEP Plan will be reviewed for effectiveness and revised when needed, or at least every five years.

The LEP Plan review should include:

- 1) Assessment of the number of LEP persons requesting interpreters;

Since the implementation of our LEP plan there have been no requests for interpreters.

- 2) Assessment of current language needs to determine if additional services or translated materials should be provided;

There have been no requests for further translation of any transit materials over and above those materials available on the websites and the translated brochures.

Due to the cost of printed route maps and timetables on high-quality media and the high rate of brochure consumption, we are currently evaluating other methods of disseminating route and schedule information to the public. Currently under consideration is the implementation of a voice, and SMS text messaging system for next bus arrival times on the GET system. The cost of implementing multilingual voice messaging will be considered as part of the evaluation process.

Also, HTMPO is seeking preliminary information on the current state of technology for voice to voice electronic translation. When technology becomes more accurate, available, and cost effective, this has great capability to assist transit systems meet the needs of LEP populations who board transit vehicles.

- 3) Analysis of staff requests for contact interpreters: number of requests, languages requested, costs, etc.

Since the implementation of our LEP plan there have been no requests made for interpreters.

- 4) Feedback from the LEP communities in the Houma Thibodaux Urbanized Area

Since the implementation of our LEP plan there has been no feedback from LEP communities within the area served by GET and/or HTMPO through telephone, personal, or written communication means.

IX LEP PLAN DISTRIBUTION AND TRAINING

Employees who have contact with the general public attend recurring training on communication with LEP persons. LEP training is mandatorily given to new hires and is part of the initial training regimen for GET employees.

At the time of the training, employees who may come in contact with the general public or transit passengers are given a survey whereby they learn to how to fill the survey and estimate their number of LEP contacts. Employees are instructed to call the office to request further assistance from a supervisor if they believe they are unable to sufficiently provide the LEP person with information.

HTMPO and GET use these surveys to help to understand the frequency and needs of the transit system's LEP contacts. Where the need is perceived to be great enough to warrant action further measures may be implemented to assist our local LEP populations meet their transportation needs.

Copies of this LEP Plan are available for distribution by SCPDC staff at our HTMPO public meetings and whenever requested at any time. Provisions will be made to translate it and/or any other relevant document into whichever language is requested as per the LEP user's needs. Each advertisement of all public meetings, be it newspaper or email, contain a statement that special accommodations are available by calling HTMPO staff prior to the meeting. If notified, SCPDC will provide translation services on an as needed basis. All MPO meeting announcements, planning documents and related information is made readily available on the MPO's website (WWW.HTMPO.ORG) which offers a translation option.

HOUMA-THIBODAUX METROPOLITAN PLANNING ORGANIZATION

Serving urbanized areas of

CITY OF THIBODAUX

TOWN OF LOCKPORT

ASSUMPTION PARISH

LAFOURCHE PARISH

TERREBONNE PARISH

Public Participation Plan

Adopted January 27, 2011 by HTMPO Policy Committee



Houma-Thibodaux Metropolitan Planning Organization (HTMPO)

(Equal Employment Opportunity Employer)



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Prepared by the Houma-Thibodaux Metropolitan Planning Organization

Adopted by the Policy Committee of the HOUMA-THIBODAUX METROPOLITAN PLANNING ORGANIZATION. Prepared in cooperation with the Technical Advisory Committee, Louisiana Department of Transportation and Development, Federal Highways Administration, and the Federal Transit Administration.

The HTMPO does not discriminate on the basis of age, race, sex, color, national origin, religion or disability in access to, or operation of its programs, services, activities or in its hiring or employment practices. ADA and Title VI inquiries should be forwarded to: 333 North 19th Street, P.O. Box 3355, Baton Rouge, Louisiana 70821, (225)383-5203.

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Executive Summary

This summary of the Houma-Thibodaux Metropolitan Planning Organization's (HTMPO) Public Participation Plan (PPP) is provided as a reference for specific public participation procedures which are further described in the body of the Plan.

Section 1. Introduction

The introduction provides an overview of the HTMPO and its major products and expectations for public participation in the transportation planning process.

Highlights:

HTMPO is responsible for three major planning products for the urbanized planning area: the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), and the Unified Planning Work Program (UPWP). In compliance with current federal transportation legislation (SAFETEA-LU), HTMPO has developed this Public Participation Plan to provide a framework for the public participation process which will be applied to the development of the Long Range Transportation Plan (Metropolitan Transportation Plan), the Transportation Improvement Program (TIP), the Unified Planning Work Program, the Coordinated Human Services Transportation Plan, and other appropriate transportation plans and projects.

Section 2. Public Participation Techniques

This section provides an overview of various techniques and methods that may be used by HTMPO to carry out its public participation process.

Highlights:

HTMPO will use a variety of techniques including publication of draft plans and processes through print, public meetings, and its website. HTMPO will seek public input through its formal Technical Advisory Committee (TAC) Meetings and Policy Committee Meetings, other formal local government commission meetings, and special public meetings and workshops.

Section 3. Traditionally Underserved Populations

This section presents an overview of how HTMPO will ensure that its public participation process is compliant with Title VI of the Civil Rights Act of 1964, Environmental Justice, and the Americans with Disabilities Act (ADA) of 1990.

Highlights:

HTMPO is dedicated to identifying traditionally underserved populations (e.g., low-income, minority, non-or-limited English proficiency, transportation disadvantaged populations, etc.) HTMPO will ensure that special populations are well represented in the public participation process and that plans and processes are communicated using audience appropriate methods.

Title VI

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under and program or activity receiving federal financial assistance.

As such, HTMPO is subject to the requirements of Title VI and the information reporting requirements established by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) to evaluate the level of compliance concerning the provision of transportation and transit services and related benefits. The HTMPO assures that no person shall, on the ground of race, color, sex, age, disability, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. The HTMPO assures that every effort will be made to ensure nondiscrimination in all of its programs or activities.

The HTMPO will ensure the following:

Title VI language will be include in all HTMPO written agreements and monitored for compliance.

Title VI Coordinator is responsible for initiating and monitoring Title VI activities, required reporting, and other responsibilities under 23 CFR 200 and 49 CFR 21.

Title VI Coordinator is responsible for implementation and oversight of the Title VI Plan.

Environmental Justice

Executive Order 12898 requires each Federal agency, to the greatest extent practicable and permitted by law, to achieve environmental justice by identifying and addressing disproportionately high and adverse human health or environmental effects, including interrelated social and economic effects, of its programs, policies, and activities on minority populations and low-income populations in the United States.

Americans with Disabilities Act

Title II of the Americans with Disabilities Act of 1990 prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. In accordance with these requirements the HTMPO will not discriminate against qualified individuals with disabilities on the basis of disability in HTMPO's services, programs or activities.

Public meetings and workshops will be held in ADA accessible facilities locations that offer the greatest opportunity for those interested to participate. As much as possible, HTMPO will hold meetings and workshops in public places.

Section 4. Public Outreach Activities

This section presents an overview of how HTMPO will consult with key stakeholders in the development and adoption of major MPO products.

Highlights:

HTMPO will consult with interested parties in the development and adoption of the MTP, TIP, and Public Participation Plan (PPP) by requesting that those individuals or agencies indicate their interest in and preference for input and information sharing. Interested parties may include representatives of public transportation employees or customers, freight shippers, providers of freight transportation services, private providers of transportation services, representatives of users of bicycle and pedestrian facilities, representatives of the

disabled, and other organizations or individuals with an interest in the transportation planning process.

HTMPO will consult with other federal, state, and local agencies that have an influence on or are affected by local and regional transportation planning decisions. Specifically, HTMPO will share draft plans and documents with those groups, and participate in meetings and on committees as appropriate to coordinate regional planning activities.

Section 5. Public Participation Policy

This section provides specific guidelines for how HTMPO will comply with the Louisiana Public Records Act (also known as Louisiana Sunshine Law), publish Official Notices, conduct Public Hearings, host special Public Meetings periodically, and make all Plans and Documents available to the public.

Highlights:

Louisiana Public Records Act - Any person of the age of majority can examine public records in the state. Penalties were set for government officials who failed to comply with the law.

Official Notices – HTMPO will provide notice of public meetings, public hearings, and public comment periods for plans and programs in newspapers our official record for our member jurisdictions around the Houma-Thibodaux region at least seven days prior.

Public Meetings – The TAC and Policy Committee shall hold public meetings periodically to solicit public comments on all of its plans, programs, and projects to be placed in the TIP. The date for the meetings shall be published as open meetings.

Availability of Plans and Documents – HTMPO will make all relevant plans and documents available at its office, on its website (www.htmppo.org).

Section 6. Plan Specific Guidelines

This section provides specific guidelines as to when HTMPO will encourage the public and interested parties to participate in the development, adoption, amendment, and review of major MPO plans.

Highlights:

HTMPO staff, under guidance from the Technical Advisory Committee, is responsible for the preparation of each draft document. After the TAC and Policy Committee have endorsed the draft, copies are placed in local libraries and an official notice is made to solicit public review and comment. The Policy Committee will consider each plan for adoption at a public hearing after all comments are received, documented, evaluated, and addressed.

1.0 Introduction

1.1 Houma-Thibodaux Metropolitan Planning Organization

Professional staff for the Houma-Thibodaux Metropolitan Planning Organization (HTMPO) is housed under the parent organization of the South Central Planning and Development Organization (SCPDC). SCPDC is a public, nonprofit organization serving municipalities and public service agencies in the following Louisiana parishes: Assumption, Lafourche, Terrebonne, St. John the Baptist, St. James, and St. Charles (hereafter termed the "South Central Region"). Through its professional staff of planners, cartographers, economic development specialist and others, SCPDC offers a range of services in the following areas:

- Transportation and land use planning and programming
- Planning and Community Services
- Economic and community development
- Mapping and aerial photography
- IT services
- Building inspection and permitting

SCPDC strengthens local government by establishing unity in dealing with federal state and agencies and legislative bodies. It has provided technical assistance to local governments on regional concerns such as air, water, and transportation priorities and goals. It has, throughout its tenure, produced studies or plans in the areas of transportation, community facilities, and socio-economic trends.

The HTMPO focuses on meeting federal and state requirements for the metropolitan planning process for the parishes of Terrebonne, Lafourche, and Assumption. Also included in the process are the City of Thibodaux and the Town of Lockport.

1.2 MPO Plans

In 2005, the U.S. Congress passed and the President signed into law the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). SAFETEA-LU requires the HTMPO to focus efforts on implementing and updating a regional long range transportation plan). The work, which is called Metropolitan Transportation Plan (MTP), takes the form of studies, data collection and

analysis, the use of management systems, forecasts of future travel based on future land use, and prioritization of projects for funding and implementation

SAFETEA-LU also requires HTMPO to produce and oversee a Transportation Improvement Program (TIP), the region's short term transportation investment plan. The TIP prioritizes the region's transportation related projects within the constraints of federal, state and local funding that the region can reasonably expect to receive within the next four years. Projects that are included in the TIP must be selected from or be consistent with an approved MTP. In order to develop plans that are derived from public sentiment, there must be adequate public participation in the development of both the MTP and the TIP.

The following sections present a brief discussion of HTMPO's major transportation and planning products for the Houma-Thibodaux Urbanized Area. All are available to the public and interested parties at HTMPO's website (www.htmppo.org) and at the office located at 5058 W. Main Street, Houma, LA 70360. An appointment is suggested so that HTMPO staff is available to answer questions; HTMPO can be reached at (985) 851-2900.

Metropolitan Transportation Plan (MTP)

The MTP is a long range (25-year) multimodal strategy and capital improvement program developed to guide the effective investment of public funds in transportation facilities. The MTP is updated every five years and may be amended as a result of changes in projected federal, state, and local funding; major investment studies; congestion management system plans; interstate interchange justification studies; and environmental impact studies.

Transportation Improvement Program (TIP)

The TIP is a four-year program that lists all regionally significant and federally funded projects and services in the MPO planning area such as highway and street projects, public transit projects, and bicycle/pedestrian enhancements. Projects that are included in the TIP must be consistent with, or be selected from an approved MTP. Additionally, the TIP must be fiscally constrained or have funding mechanisms already in place for all projects and strategies. The TIP can be amended as a result of changes in funding or need. Administrative modifications to the TIP do not require a specific public participation plan, but these modifications are discussed in public meetings where comments are accepted. The TIP is updated every 2 years.

Unified Planning Work Program (UPWP)

The UPWP is a one-year plan developed by HTMPO staff to focus work efforts and planning funds anticipated in the upcoming fiscal year. All federally funded planning activities are required to be in the UPWP and have to be developed through required planning factors. The UPWP is reviewed and discussed at the regularly scheduled TAC and Policy Committee meetings.

1.3 Public Participation in the Planning Process

HTMPO encourages active participation by the public and other interested parties in the development of all transportation plans and programs, particularly the major products. HTMPO believes that the distribution of information regarding regional transportation planning and decision-making needs to be inclusive of as many in the public as can reasonably be reached. Interested parties and other federal, state, and local agencies are given a fair opportunity to participate in the planning process.

It is the policy of HTMPO to take all public and stakeholder comments into account in the development and adoption of plans and programs. The processes outlined in this document form the basis for providing the opportunity for the general public and key stakeholders to participate in the transportation planning process. This Public Participation Plan (PPP) has been developed to meet federal requirements outlined by SAFETEA-LU, Title VI of the Civil Rights Act of 1964, Environmental Justice, and the Americans with Disabilities Act (ADA) of 1990.

Public Participation Planning Goals

The goals of the HTMPO Public Participation Plan are based on the following fundamental environmental justice principles:

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

To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.

To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Education

To explain HTMPO plans and activities in a concise and straightforward manner through the website.

To explain how transportation plans are affected by federal mandates by providing links to the mandates.

Outreach

To increase awareness of and interest in transportation plans and the transportation planning process using innovative approaches. HTMPO will give timely public notice; provide complete information; give reasonable public access to key decisions; and support early and continuing involvement of the public in the development of plans and TIPs. There will be opportunities for interested parties including citizens, affected public agencies, and representatives of transportation agency employees, users of the systems and the private providers of transportation to be included in the early stages of the plan development/update process. The HTMPO will include a statement in all public notices for Transportation Improvement Program (TIP) as follows:

“This public notice of public participation activities and the thirty-day time period established for public review and comment on the TIP will satisfy the program-of-projects (POP) requirements of Urbanized Area Formula Program.”

Participation

To provide frequent opportunities for interested parties from the private business community, public officials, neighborhood organizations, the physically challenged and other groups impacted by transportation plans to participate in the development of HTMPO transportation plans and to encourage public participation in

transportation planning activities at every level.

2.0 Public Participation Techniques

This section provides a description of the various techniques that will be used to carry out HTMPO’s public participation process. Opportunities for public input are not limited to those contained in this section. Given the significance of the MTP, TIP, and UPWP, other public participation techniques may be employed to increase awareness of and provide ample opportunities for public participation in the development of HTMPO products. A set of guidelines as to when the public will have an opportunity to review and comment on specific HTMPO products is provided in Section 6.0.

2.1 Media

Press Releases and Public Service Announcements

In order to broaden the participation in transportation planning decisions, HTMPO will use media press releases and public service announcements to announce opportunities for the public to participate in the development of upcoming plans and products.

Registered news media and organizations (such as major neighborhood organizations and minority organizations) on HTMPO’s email list will receive all press releases. Public Service Announcements will be distributed to the appropriate media.

Newspapers

Notices of all meetings, public hearings, and public comment periods are published in the following newspapers: The Houma Courier, The Daily Comet and The Bayou Journal.

2.2 Presentations / Meetings / Workshops

Formal Meetings

Formal meetings, such as the Policy Committee meeting and TAC meetings, will be held in ADA-accessible facilities. HTMPO will select the location, size, and setup of meeting facilities based on the specific characteristics of the audience and the type of information to be presented.

Public meetings and workshops will be held in ADA-accessible facilities that offer the greatest opportunity for those interested to participate. As much as possible, HTMPO will hold meetings and workshops in public places that are accessible to all members of the community. For all public meetings, HTMPO will seek to increase participation by creating a welcoming and inviting environment. All meeting announcements contain the following statement:

ADA Notice: For special accommodations for this meeting, contact the MPO Administrator via phone (985) 851-2900 at least one week in advance.

Tagon Meetings

At various times, the HTMPO staff may request to appear on the agendas of local planning commission, town/city council, parish council, or other public meetings to communicate the purpose and need for HTMPO and its planning process. This method can be an effective way to encourage discussion about the effects that local land use zoning and sub-division decisions can have on region-wide planning efforts.

In addition, special presentations may be made to inform the public about specific times and locations where input can be given on the MTP, the TIP and the annual UPWP.

2.3 Other Tools

HTMPO Website

Many people use the internet as their main source of data and information. The physically disabled are especially able to use this source to both receive input and provide feedback, while not being required to physically attend meetings.

The HTMPO website (www.htmppo.org) provides a comprehensive resource to people wanting information about MPO products or activities. Public notices of meetings, public hearings, and public comment periods for the MTP, TIP, and UPWP and other plans are posted to the website. The site also contains electronic versions of MPO products, a public comment form, and links to MPO member jurisdictions.

In addition, the website is a clearing-house of sorts for all information pertaining to the MPO. Traffic count data, information on various projects and studies, a calendar of events, contact information for MPO staff, links to area traffic camera and to sign up for road closure text messages, and links to member jurisdictions websites are all accessible online.

Mailing Lists

HTMPO has a comprehensive e-mail list of citizens, businesses, agencies, and other individuals with an interest in the transportation planning process. Upon request, HTMPO will add the email addresses of interested parties to this list.

Meeting notices, agenda items, and links to all documents will be distributed to all interested parties prior to any action being taken on them.

Public Libraries

Each of the main libraries in each of the three parishes within the urbanized region will receive copies of the draft MPO products for public review and comment. A list of the main libraries within the urbanized is located in Appendix A.

3.0 Traditionally Underserved Populations

Title VI of the Civil Rights Act of 1964 protects persons from discrimination based on race, color, or national origin in programs and activities that receive federal financial assistance. President Clinton's Executive Order 12898 provides further guidance to federal assistance programs to ensure that low-income and minority populations are not discriminated against by Federal, state or local agencies receiving Federal monies. Specifically, the Federal Executive Order directive requires federal programs:

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

To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process, and

To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and/ or low-income populations.

Because of the extreme importance of an all-inclusive outreach program that ensures compliance with Title VI and the Americans with Disabilities Act of 1990, HTMPO will place emphasis on efforts to reach out to traditionally underserved or underrepresented segments of the region's population including:

Low Income

Federal Assistance Recipients

Minority

Elderly

Limited English Proficiency (LEP) or English spoken as a second language

Disabled Populations

Zero Car Households

Single Parent Families

School-Aged Children

Identification of Special Populations

HTMPO utilizes the latest U.S. Census data and American Community Survey data to identify target populations at the block group level. Prior to the implementation of special outreach efforts, HTMPO staff will use several methods to identify where special populations are likely to live and work. HTMPO has already identified many of these communities and areas within the three-parish region for use in development of future plans.

As the 2010 Census data becomes available, it will be used to update the location of special needs populations and to provide a region-wide update of racial and socio-economic characteristics of communities within the HTMPO planning area.

Enhanced Outreach Methods

When appropriate for project-specific meetings, HTMPO will use enhanced public outreach and communications methods for hard-to-reach or traditionally underserved populations.

Meetings and workshops will be held at locations that are ADA accessible, convenient, and most effective in encouraging turnout and input.

Following are additional methods HTMPO may use to reach out to special populations:

HTMPO will use visualization methods (maps, displays, charts, and other static and interactive engagements) to make the topic relevant to the target audience. The extensive use of maps, aerial photographs and simple charts allow for greater participation and understanding by those that may be more visually oriented and will allow for greater interaction by participants;

If meetings are to be held in areas where there is a predominance of non-English speaking populations, HTMPO will have people available to help translate questions and responses;

When appropriate, HTMPO will use community-based TV, radio stations, and websites to target messages and solicit input from specific population segments.

4.0 Public Outreach Activities

HTMPO will utilize a variety of mechanisms which will be selected as appropriate for the scope, needs and allocated resources of the various plans to be created.

The HTMPO hosts public meetings to discuss topics and projects of interest with the public and makes presentations as requested at civic meetings and to other public agencies. When hosting public meetings, HTMPO provides adequate notice to the public and follows all federally prescribed guidelines regarding public comment periods for documents such as the MTP, TIP, and UPWP. HTMPO will work through a variety of means to ensure that a good-faith effort has been made to notify the general public, such as posting in work places when appropriate and hosting meetings at times that are convenient for those most impacted by the plan or project at hand.

5.0 Public Participation Policy

5.1 Open Public Meeting Act

Every meeting of any public body shall be open to the public unless closed pursuant to R.S. 42:6, R.S. 42:6.1, or R.S. 42:6.2. - §5. A., Louisiana Open Meetings Law.

After notifying the general public, including traditionally underserved populations, the public shall be afforded the opportunity to comment on current agenda items at the beginning of every meeting of the HTMPO Policy Committee members. The chair of HTMPO Policy Committee shall determine the time to be allotted to each speaker. For those who choose not to speak or are limited by disability, language or other barrier to speaking, or for those who are not able to attend an open meeting, comments may be submitted to HTMPO staff for consideration during the meeting. Comments received outside of the regular meeting should be submitted by letter, email, fax, website or other written format to be provided to HTMPO Policy Committee.

5.2 Responsibilities

It is the intent of the HTMPO Policy Committee to pursue the active involvement of key individuals and groups with an interest in transportation planning projects in the review, design and the development of its plans and to develop transportation plans that reflect the needs of the region. Groups that will be targeted for participation in particular include private alternative transportation providers, transportation enforcement agencies, local port authorities, local toll authorities, community and neighborhood organizations, local elected officials, transportation and environmental interest groups and groups representing the elderly and the disabled. To these ends, the HTMPO will undertake the following responsibilities:

To conduct public meetings for the development and the review of the Transportation Improvement Program, the Long-Range Plan, Unified Planning Work Program and any other significant transportation plans developed through HTMPO.

To provide a forum for the review and discussion of significant amendments to adopted plans and actively solicit input from the public in the design and the development of its plans.

To provide adequate notice and publicity regarding public meetings to develop and amend its transportation and related air quality plans.

To involve key individuals and groups with an interest in transportation and related air quality issues in the development and review of its plans.

To solicit the participation of and establish a dialogue with groups which have traditionally had limited involvement such as civic and neighborhood organizations.

To increase availability of and access to planning documents and HTMPO informational materials.

To periodically evaluate the transportation needs of the community through meetings or surveys.

To continue to develop educational materials for the general public regarding transportation planning issues.

6.0 Plan Specific Guidelines

6.1 Public Participation Plan

The Public Participation Plan (PPP) shall be assessed periodically based on changes in local, state, or federal legislation, in response to periodic evaluations of the effectiveness of public participation techniques (Section 2.0) that are used by HTMPO.

Following the adoption of an update to the MTP, an assessment shall be made of the types of public participation techniques that were used, especially public input meetings and public hearings.

PPP shall be assessed and updated regularly, following the schedule of the MTP update. Additionally, if substantial changes occur to local, state, or federal legislation, the PPP shall be evaluated for compliance with the new legislation.

When an update to the PPP is made, the public participation process shall follow that of the TIP (section 6.3) with the exception that the public review period shall be forty-five (45) days and relevant state and federal agencies shall be informed and provided with an opportunity to comment.

HTMPO will consult with interested parties in the development of the PPP. Interested parties include those individuals, associations, organizations, agencies, and/or businesses that are included in HTMPO contact list or that have been identified as representing some interest in the transportation system or transportation disadvantaged populations (sections 3.0 and 4.0). HTMPO will notify those parties informing them of the purpose for, and process to update the PPP. Interested parties will be asked to identify their preferred methods of participation and information sharing with the MPO. MPO contacts also will be given an opportunity to indicate their interest in receiving periodic updates about particular MPO products, or elements of HTMPO planning process. All parties will be given the HTMPO contact to receive the instruction on how to access and comment on the draft PPP.

6.2 Metropolitan Transportation Plan

At the periodic public meetings the Policy Committee shall review the planning assumptions and development process for the Metropolitan Transportation Plan (MTP) and obtain comments from the public on the validity of the MTP. Any person desiring to attend the meeting and make a comment, and who needs special consideration such as a sign-language interpreter, can contact HTMPO at least seven days in advance, at the number listed on the published notice, to make special accommodations. Comments may also be provided to the HTMPO staff prior to the public meeting. These comments may be in the form of a letter, email, fax or comment submitted to the HTMPO website.

Public review and comment opportunities shall be provided when the plan is originally adopted or amended. HTMPO will determine the appropriate mix of public participation techniques (identified in section 2.0) as part of the early development of the MTP. Public outreach and involvement efforts will be clearly communicated to the public and interested parties using, at a minimum, the guidelines for official notices provided in section 5.2 of this plan.

The Technical Advisory Committee (TAC) shall guide the preparation of the MTP for the MPO. HTMPO will search for appropriate consultation from State and local

agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the MTP. The consultation shall involve, as appropriate (1) comparison of MTPs with State conservation plans or maps, if available, or (2) comparison of MTPs with inventories of natural or historic resources, if available.

The TAC shall review and endorse the draft MTP for consideration by the Policy Committee. The Policy Committee shall then review, amend if necessary, and concur with the draft MTP for public review and comment.

After concurrence by the Policy Committee, the HTMPO shall publish the draft MTP and place copies in selected public libraries in the region (Appendix B). These copies will be distributed to the libraries a minimum of thirty (30) days prior to final consideration by the Policy Committee. Additionally, an electronic version of the draft will be placed on the HTMPO website.

An official notice stating that the Policy Committee has endorsed a draft MTP for public review and comment shall be placed in the newspaper (The Courier and The Daily Comet) at least 30 days prior to consideration by the Policy Committee. The notice shall invite the public to review and comment on the draft MTP. The notice shall specify the date, time, and location of the public hearings. Press releases announcing the meetings will be furnished to all news organizations registered with HTMPO and on their email lists.

HTMPO shall hold two public hearings during the public review period. The first hearing should be held by the TAC during the review process. Comments received at the first public hearing shall be provided to the Policy Committee prior to the second public hearing. The second and final public hearing should

occur at the end of the 30-day review period. At the Policy Committee meeting, the MPO Administrator shall report all comments received from all sources prior to the Policy Committee meeting.

The public shall be given the opportunity to provide comment at the public hearings. The Policy Committee may establish reasonable time limits for each presentation, considering the time constraints of the meeting and complexity of the issue. Any person desiring to attend the meeting and make a comment and who needs special consideration such as a sign-language interpreter, may contact HTMPO at least seven days beforehand at the number listed on the published notice to work with the HTMPO staff to make special accommodations.

In the event the Policy Committee determines there are significant unresolved comments on the MTP, it may defer the adoption of the plan until a subsequent meeting. MPO staff will then produce a written summary and an analysis of comments which may lead to amendments to the draft plan. Should those amendments be significant, or if the final plan differs significantly from the draft presented to the public, an additional 30-day review period shall be allowed. A summary and analysis of the disposition of public comments will be incorporated into the final.

The Policy Committee must close the final public hearing prior to a Committee vote on the MTP.

Amendments to the MTP must follow the same process and procedure. HTMPO has adopted MTP Adjustment Procedures which allows very specific changes to the MTP. Appendix C provides the process and procedures for such adjustments.

Opportunities for general public input are not limited to those contained in this section. Given the significance of the MTP, other public participation techniques may

be employed to increase awareness and provide ample opportunities for public participation (section 2.0).

6.3 Transportation Improvement Program

Public review and comment opportunities shall be provided when the Transportation Improvement Program (TIP) is being adopted or amended. HTMPO will determine the appropriate mix of public participation techniques (identified in section 2.0) as part of the early development of the TIP. Public outreach and involvement efforts will be clearly communicated to the public and interested parties using, at a minimum, the guidelines for official notices provided in section 5.2 of this plan.

HTMPO's Policy Committee will allow the public to suggest eligible transportation projects for inclusion in the TIP.

The MPO Administrator and the Technical Advisory Committee (TAC) shall review the input from the HTMPO Policy Committee meeting, input from the state, and input from the local MPO member jurisdictions in the creation of the TIP.

The TAC shall review and endorse the draft TIP for consideration by the Policy Committee. The Policy Committee shall then review, amend if necessary and concur with the draft TIP for public review and comment.

After concurrence by the Policy Committee of the draft TIP, the HTMPO staff shall publish the program and place copies in selected public libraries in the urbanized region (Appendix B). These copies must be distributed to the libraries a minimum of thirty (30) days prior to final consideration and adoption by the Policy Committee Meeting. Additionally, an electronic version of the draft will be placed on the HTMPO website.

A notice stating that the Policy Committee has endorsed a draft TIP for public review and comment shall be placed in the notice newspaper. The notice shall specify the dates, times and location of forthcoming public hearings. Similar press releases shall be furnished to all news organizations registered with the HTMPO staff. This notice and press release shall be published/mailed a minimum of thirty (30) days prior to the meeting at which the TIP will be considered by the Policy Committee.

A public hearing shall be held by the TAC following the Policy Committee's endorsement of the draft TIP. Comments received at this public hearing shall be provided to the Policy Committee prior to the final public hearing.

A final public hearing shall be held by the Policy Committee prior to voting on the Transportation Improvement Program.

At the public meetings, the MPO Administrator shall report to the Committee all comments received in writing prior to the meetings. These comments may be in the form of a letter, email, fax or comment submitted on HTMPO website.

The public shall be afforded the opportunity for comment at the public meetings. The Policy Committee may establish reasonable time limits for each presentation, considering the time constraints of the meeting and complexity of the issue. Any person desiring to attend the meeting and make a comment who needs special consideration such as a sign-language interpreter, can contact HTMPO at least seven days beforehand at the number listed on the published notice to make special accommodations.

In the event the Policy Committee determines there are significant unresolved comments on the TIP, it may defer the program until a subsequent meeting. MPO

staff will then produce a written summary and an analysis of comments which may lead to amendments to the draft program. Should those amendments be significant, or if the final TIP differs significantly from the draft presented to the public, an additional 30-day review period shall be allowed. A summary and analysis of the disposition of public comments will be incorporated into the final TIP.

The Policy Committee must close the final public hearing prior to a Committee vote on the TIP.

Major amendments to the TIP (those that involve the addition or deletion of projects) must follow the same process and procedure as provided in Paragraphs C to I above. Minor amendments (those that

involve a change in funding source, amount or timing) do not require a public input process and shall be administered through the approved TIP Adjustment Process and Procedures (Appendix D).

6.4 Unified Planning Work Program (UPWP)

Public review and comment opportunities shall be provided when the Unified Planning Work Program is adopted, or amended. HTMPO will determine the appropriate mix of public participation techniques (identified in Section 2.0) as part of the early development of the UPWP. Public review and comment periods will be clearly communicated to the public and interested parties using, at a minimum, the guidelines for official notices provided in Section 5.2 of this plan.

The Technical Advisory Committee (TAC) shall recommend UPWP for public review and comment. A notice to that effect shall be placed in the notice newspapers listed in Section 2, subsections A & B.

The notice shall state that copies of the draft UPWP, as endorsed by the TAC, are available in selected public libraries throughout the urbanized region for public review and comment. The notice shall specify the dates, times, and location of forthcoming public hearings. Press releases shall also be furnished to all other news organizations registered with HTMPO.

The notice and press release shall be published/mailed a minimum of thirty (30) days prior to the next scheduled TAC meeting at which time a public hearing shall be held. Comments received at this public hearing shall be provided to the Policy Committee prior to the second public hearing. Copies of the draft shall also be distributed to selected area libraries a minimum of thirty (30) days prior to this meeting.

A second public hearing shall be held by the Policy Committee prior to voting on the UPWP.

At each public hearing, the MPO Administrator shall report to the Board all comments received in writing prior to the meetings. These comments may be in the form of a letter, email, fax or comment submitted on HTMPO website.

The public shall be given the opportunity for comment at each public hearing. The Policy Committee may establish reasonable time limits for each presentation, considering the time constraints of the meeting and complexity of the issue. Any person desiring to attend the meeting and make a comment and who needs special consideration such as a sign-language interpreter, can contact HTMPO at least seven days beforehand at the number listed on the published notice to request special accommodations.

In the event the Policy Committee determines there are significant unresolved comments on the UPWP, it may defer the program until a subsequent meeting. MPO staff will then produce a written summary and an analysis of comments which may lead to amendments to the draft program. Should those amendments be significant, or if the final UPWP differs significantly from the draft presented to the public, an additional 30-day review period shall be allowed. A summary and analysis of the disposition of public comments will be incorporated into the final UPWP.

The Policy Committee must close the final public hearing prior to a vote on the UPWP.

Amendments to the UPWP (those that involve the addition or deletion of funds alter the scope of work tasks or add/delete a work task) must follow the same process and procedure outlined above with the exception that only one (1) public hearing shall be conducted. The public hearing shall be held by the Policy Committee prior to voting on the UPWP. Adjustments, changes that do not involve a change in scope and/or adjustment funding amounts by no more than 15%, do not require a public input process.

All tasks and studies in the work program shall be designed to allow the public reasonable opportunity for input as the study progresses. The project's scope of work shall outline the public input process used for the task. For planning efforts such as sub-area or corridor studies, bikeway and pedestrian plans, and corridor studies, a minimum of two (2) public meetings shall be held, one by the TAC and one by the Policy Committee.

Appendix A

Public Library List

Terrebonne Parish

Main Branch

151 Library Drive

Houma, LA 70360

(985) 876-5861

Lafourche Parish

Thibodaux Branch

314 St. Mary Street

Thibodaux, LA 70301

(985) 447-4119

Lockport Branch

720 Crescent Ave.

Lockport, LA 70374

(985) 532-3158

Assumption Parish

Labadieville Branch

105 Cherry Street

Labadieville, LA 70372

(985) 526-7055

SOUTH CENTRAL PLANNING AND DEVELOPMENT COMMISSION

TITLE VI POLICY

Serving
ASSUMPTION PARISH * LAFOURCHE PARISH * ST CHARLES PARISH *
ST JAMES PARISH * ST JOHN THE BAPTIST * TERREBONNE PARISH

Adopted 04-18-2013 by

South Central Planning and Development Commission

Board of Directors

5058 W. Main Street, P.O. Box 1870, Gray, Louisiana 70359

Phone (985)851-2900 Fax (985)851-4472 www.scpdc.org

*Prepared by the
The South Central Planning and Development Commission*

South Central Planning and Development Commission is an Equal Employment Opportunity Employer
The SCPDC does not discriminate on the basis of race, color, national origin in access to, or operation of
its programs, services, activities or in its hiring or employment practices. ADA and Title VI inquiries
should be forwarded to Kevin P. Belanger, Chief Executive Officer.

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I. Policy Statement and Authorities

I. Policy Statement and Authorities

Policy Statement

The South Central Planning and Development Commission (SCPDC) assures that no person shall, on the grounds of race, color, national origin, income, gender, age, and disability, as provided by Title VI of the Civil Rights Act of 1964 as amended, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

More specifically, SCPDC assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations.

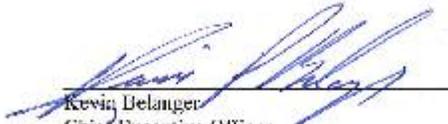
In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, and Section 504 of the Rehabilitation Act of 1973 the South Central Planning and Development Commission (SCPDC) will not discriminate against qualified individuals with disabilities on the basis of disability in the SCPDC's services, programs, or activities.

Additionally, SCPDC will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

It is the policy of the South Central Planning and Development Commission (SCPDC) that disadvantaged businesses shall have an opportunity to participate in the performance of SCPDC contracts in a nondiscriminatory environment. The objectives of SCPDC's Disadvantaged Business Enterprise (DBE) Program are to ensure non-discrimination in the award and administration of contracts, ensure firms fully meet eligibility standards, help remove barriers to participation, create a level playing field, assist in development of a firm so it can compete successfully outside of the program, provide flexibility, and ensure narrow tailoring of the program. This policy statement includes both DBE and Minority Business Enterprises/Women Owned Enterprises.

SCPDC further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

Title VI activities are coordinated under the direction of the Chief Executive Officer (CEO), who initiates and monitors Title VI activities. The CEO is assisted in the preparation of required reports, and other SCPDC responsibilities, by individual program administrators and others as delegated.


Kevin Belanger
Chief Executive Officer
South Central Planning and Development Commission


Date

Relevant Statutes and Federal Policies

Title VI of the Civil Rights Act of 1964 as amended. Section 42.104 of Title VI and related statutes require Federal agencies to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, national origin. This law created a foundation for future environmental justice regulations. Since the establishment of Title VI, environmental justice has been considered in local, state and federal transportation projects.

The National Environmental Policy Act of 1969 (NEPA) addresses both social and economic impacts of environmental justice. NEPA stressed the importance of providing for “all Americans safe, healthful, productive and aesthetically pleasing surroundings” and provides a requirement for taking a “systematic, interdisciplinary approach” to aid in considering environmental and community factors in decision making.

The Civil Rights Restoration Act of 1987 further expanded Title VI to include all programs and activities of Federal aid recipients, sub-recipients and contractors whether those programs and activities are federally funded or not.

On February 11, 1994, President Clinton signed Executive Order 12898 to address federal actions with regard to Environmental Justice in Minority Populations and Low-Income Populations. This piece of legislation directed every federal agency to make Environmental Justice part of its mission by identifying and addressing all programs, policies and activities that affect human health or the environment so as to identify and avoid disproportionately high and adverse effects on minority populations and low income populations.

In addition to the general federal and state guidance, various federal agencies have issued additional guidance to grantees to assist them in fulfilling their programmatic responsibilities with regard to Title VI. Because SCPDC is funded from a variety of state and federal sources, information specific to each grantor is included herein in appendices.

II. South Central Planning and Development Commission (SCPDC)

SCPDC is one of eight sub-state regional planning and economic development districts created by the Louisiana Legislature pursuant to Louisiana Revised Statutes 33:131 et seq and 33:140.61 et seq. The SCPDC covers the parishes of Assumption, Lafourche, St. Charles, St. James, St. John the Baptist and Terrebonne and six municipalities, Gramercy, Golden Meadow, Lockport, Lutcher, Napoleonville and Thibodaux. The mission of SCPDC is to help its member communities plan for the future. As such, the SCPDC is the Economic Development Administration’s designated economic development district in much the same fashion that is the designated Metropolitan Planning Organization for carrying out elements of transportation planning efforts in the Houma MSA. SCPDC is also the Local Development District designated as the partner to the Delta Regional Authority.

III. Introduction and Purpose of This Document

The purpose of this document is to communicate the SCPDC policy for addressing federal and state non-discrimination requirements under Title VI, Federal Executive Order 12898 and other related regulations and statutes. Appendices to this document and other agency documents, such as the MPO’s Public Participation Plan, and the agency’s Administrative and Personnel Manuals, may further elaborate the Commission’s policies with regard to Title VI.

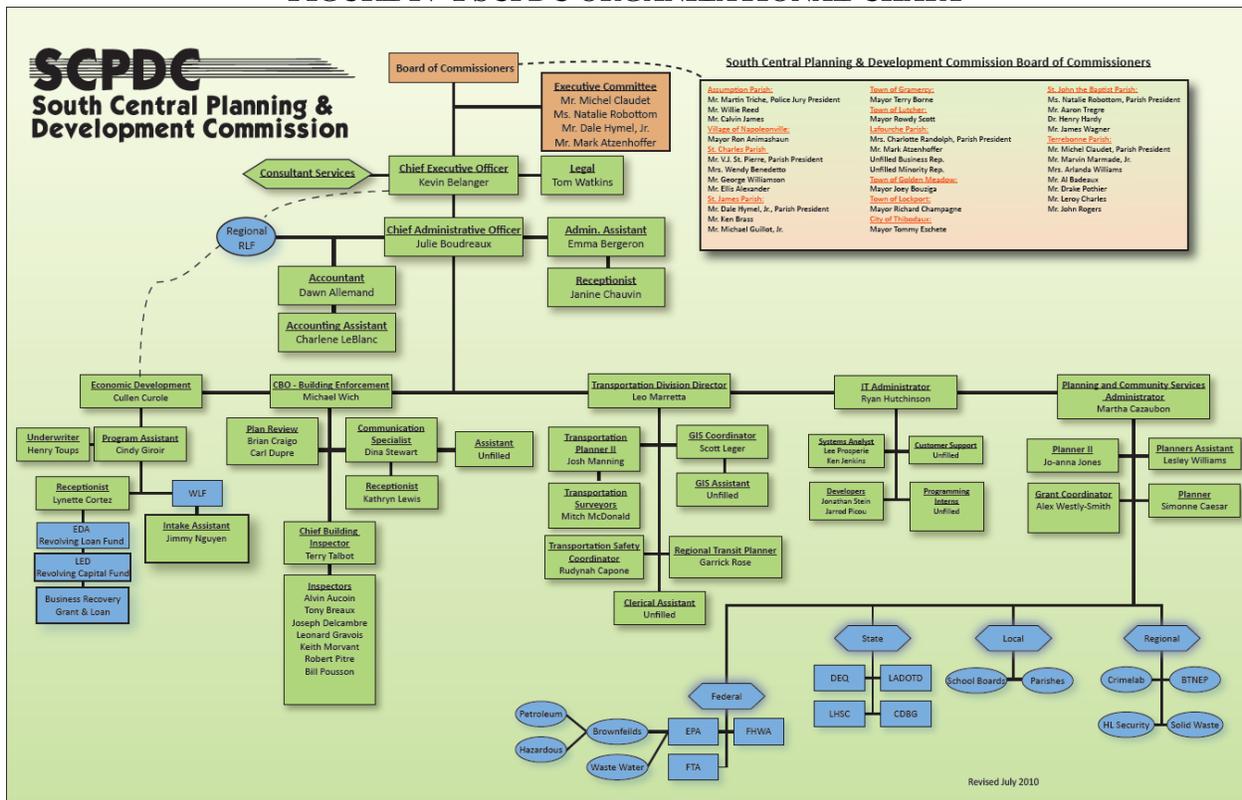
SPCDC is directly funded through various federal and state sources. Current ongoing sources include the Environmental Protection Agency (EPA), Economic Development Administration (EDA), Federal Transit Authority (FTA), Federal Highway Administration (FHWA), Delta Regional Authority (DRA), the Louisiana Department of Transportation and Highways (LaDOTD), the Louisiana Highway Safety Commission (LaHSC) and the Louisiana Division of Culture, Recreation and Tourism. Through contractual arrangements with various member parishes and municipalities, SCPDC is also administering Housing and Urban Development Community Development Block Grant (HUD CDBG), DRA and EDA project grants.

Each of these funding sources have published directions, some more detailed than others, on how best to achieve compliance with Title VI and related Civil Rights laws. While there are many commonalities, it is up to each SCPDC program division heads to monitor and advise the CEO of Title VI guidance related to the specific programs each manages.

IV. Organization and Staffing of SCPDC

Figure IV-1, an Organization Chart for SCPDC, is shown on the following page. The Chief Executive Officer of SCPDC is responsible for ensuring implementation of the Commission’s Title VI as its Title VI Coordinator. For an agency the size of SCPDC, this seems the most logical method, with various functions carried out by the CEO’s Executive Assistant, the Chief Administrative Officer, division directors, and each program/project manager.

FIGURE IV-1 SCPDC ORGANIZATIONAL CHART



V. General Responsibilities Under Title VI

General Title VI Responsibilities

Following are general Title VI responsibilities of SCPDC. Each program manager is responsible for ensuring efforts taken to achieve Title VI compliance are carefully and thoroughly documented in accordance with the requirements of the federal funding entity.

1. Data collection

Demographic data on race, age, color, national origin, income level, language spoken, and sex of the region's population is to be collected and maintained. This demographic data will be used to develop public outreach efforts and to conduct environmental justice analyses, as needed.

2. Annual Title VI Report

While most Title VI information is compiled in files and/or documents housed within the SCPDC offices, some grantors require Annual Title VI Reports. In such cases, these are to be prepared and submitted to the appropriate state and federal entities as required in an acceptable format and at the appropriate time by the respective program/project manager.

3. Title VI Policy Updates

This Title VI Policy will be periodically reviewed for compliance with federal and state requirements by each program manager. Staff will make recommendations to the CEO for review and a consensus will be reached as to which changes must be made across the board or which are programmatic in nature. Personnel and Administrative Manuals adopted by SCPDC are periodically reviewed by the CEO and staff to ensure compliance with a variety of federal and state laws including Title VI.

4. Dissemination of information related to the Title VI Policy

Information on the Title VI Policy is disseminated to SCPDC board members, employees, contractors, and beneficiaries, as well as to the public via the SCPDC website.

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint about SCPDC policies, plans or practices, if that person believes that she or he or any other program beneficiaries have been subjected to unequal treatment or discrimination, in their receipt of benefits and/or services or on the grounds of race, color, national origin. SCPDC will work diligently in a supportive role to resolve such complaints in accordance with the appropriate grievance procedures and funding agencies. SCPDC has a complaint process which is contained in Appendix A of this policy along with a Title VI Discrimination Complaint Form. In addition, individuals have the right to contact the appropriate program funder, and these are identified under specific topic headings in this document.

Responsibilities of the Title VI Coordinator

The CEO serves as the Title VI Coordinator is responsible for supervising all required action in implementing, monitoring, and reporting on SCPDC's compliance with Title VI regulations. However, individual program managers are required to ensure that activities carried out under their projects are in compliance with the relevant laws and guidance of the grantor.

In support of this, the CEO as the Title VI Coordinator will:

1. Identify, investigate, and eliminate discrimination when found to exist.

2. Immediately refer any complainants to the appropriate federal entity. The CEO or at his direction a member of the staff will supply phone numbers and email addresses to complainants for contacting the proper authorities adhering to the timeframes in the complaint process.
3. Maintain a brief description of any pending lawsuits against the recipient that allege discrimination prohibited by nondiscrimination regulations, reports of any compliance reviews conducted by any other agencies and a log of discrimination complaints that identifies the complaint, the date it was filed, the date the recipient's investigation was completed, the disposition and the date of disposition.
4. Meet with other SCPDC staff, as needed, to train, monitor and discuss progress, implementation, and compliance issues.
5. With the division directors, periodically review the Commission's Title VI Policy to assess the appropriateness and effectiveness of administrative procedures, staffing, and resources to ensure compliance.
6. With the division directors, ensure that program/project managers file all required Annual Title VI Reports in an appropriate and timely manner.
7. Require all contractors of the SCPDC to comply with Title VI.
8. Coordinate the development of communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs, as appropriate.
9. Periodically review the region's demographic data to determine if changes warrant changes in policies, strategies to reach minority, low income or LEP persons, diversity of board composition and to make the information available to the public at large via the agency website.
10. Assist project administrators in developing a process for assessing the distributional effects of public investments in the region as necessary for program compliance.
11. Ensure Title VI environmental justice compliance in conducting the NEPA review process on any projects prepared by or for SCPDC.
12. As necessary coordinate with the project administrator to analyze various projects regarding impacts on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.
13. Ensure that division directors, and project/program managers are developing outreach efforts and materials about contracting opportunities for distribution to qualified DBEs, and ensure that appropriate efforts are being made in accordance with each program.
14. Program managers will alert the CEO on training opportunities appropriate for staff persons within their programs.
15. Ensure that this Title VI Policy is available to the general public.

16. Ensure that the agency maintains a list of interpreters and transcription services that can make documents available in languages other than English in order to help program and project managers carry out their individual program responsibilities.
17. Assist program administrators in the dissemination of relevant information to minority and ethnic/gender related media and organizations to help ensure all social, economic, and ethnic interest groups in the region are appropriately represented.
18. Ensure that the Title VI notices are property posted, published and distributed.

VI. Title VI Implementation

1: Communications and Public Participation

The goal of SCPDC's communications and public participation policies are to ensure early and continuous public notification about, and participation in, major actions and decisions by SCPDC. In seeking public comment and review, SCPDC makes a concerted effort to reach all segments of the population, including people from minority and low to moderate income communities, and organizations representing these and other protected classes. Equal access is an essential part of the public participation process.

SCPDC utilizes a broad range of public information and participation opportunities, including dissemination of proposals and alternatives, process for written comments, public meetings, settings for open discussion, and consideration of and response to public comments.

The SCPDC DBE (MBE/WBE) Policy is provided in Appendix E of this document and the agency LEP Policy is provided in Appendix C. Additional guidance to assist in implementing the Title VI Policy can be found in the following SCPDC documents.

- The Houma Thibodaux Metropolitan Planning Organization "Public Participation Plan"
- The Houma Thibodaux Metropolitan Planning Organization "LEP Policy"
- ADA/504 Self Evaluation Report
- Personnel Policies
- Administrative Manual

Elements of SCPDC's Communications and Public Participation Program

SCPDC routinely provides opportunities for public comment, and continues to work to find new and innovative ways to solicit public comments and involve all segments of the population within its region in the development of regional plans and programs. Comments are accepted by telephone, facsimile, email, Postal Service mail, and in person at any of its meetings or its office.

The SCPDC staff is accessible in person, on the telephone, by mail, by facsimile, or by email. Contact information for all staff is provided on the SCPDC website. Direct mailings are sometimes used to keep the public informed of the Commission's programs, public comment periods, meetings, and publications. Events such as workshops and forums are periodically held for large projects affecting the public.

Formal public comment and review periods are used to solicit comments on major planning and programming activities, for example, major amendments to the Transportation Improvement Program (TIP), requests for proposals, development of comprehensive plans, etc. In such instances, SCPDC will provide announcements via local media, direct mailings and the agency website as appropriate. Announcements will include methods and deadlines for providing comments as appropriate to the

particular project/program. All such comments and responses received during the comment period are reviewed and considered, prior to final action.

SCPDC maintains a website, www.scpdc.org which is updated frequently to keep the public informed of new events and projects. The site contains information on responsibilities, programs, publications, and press releases; contact information for staff; a search function; the Title VI Policy, and complaint procedures.

SCPDC maintains a comprehensive library of local and regional planning documents. Any document(s) can be made available to the public, within three working days advance notice as required under Louisiana Public Records Law. SCPDC staff can be reached by telephone or email, and contact information is included in every publication produced by SCPDC. SCPDC employees regularly respond to requests for information from citizens, businesses, area communities, agencies, and organizations throughout the region.

Of the total 352,405 residents of the six parish region comprising South Central Louisiana only 2.39% population are identified as being “less than proficient in English” according to the 2005-2009 American Community Survey. Following is the breakdown from the Census Bureau.

Languages Spoken Less than Well From the 2005-2009 American Community Survey of the Census Bureau	Percent of Total Population
Spanish	0.86%
Other Indo-European	1.21%
Asian And Pacific Islander Languages	0.23%
Other	0.10%
Total LEP	2.39%

SCPDC will gladly accommodate persons of Limited English proficiency (LEP). Each year, SCPDC issues a multitude of publications, reports, and maps as part of the Commission’s work program, and responds to and processes a large number of data requests. The information is used by planning and public works departments throughout the region. Much of this may be accessed by the public through the SCPDC website. SCPDC will gladly accommodate persons of limited English proficiency (LEP) when it is requested and when it is reasonable to do so. SCPDC currently has on staff individuals proficient in Vietnamese, Spanish, and to a lesser degree, French. The agency also keeps a list of potential interpreters on hand in the event that a need for translation services other than that available through staff is needed. Press releases, when sent, will include the abbreviated Title VI and ADA Notices to the public and contact information for Commission staff for assistance.

Public meetings held by SCPDC are open to all. Time for citizen comments is reserved at all meetings and announced by the meeting chair. Meeting dates and times are posted well in advance on the Commission’s website, on the door of its facility, and in frequent SCPDC emails to which any citizen may subscribe. All meeting agendas contain the following statement:

SCPDC is an Equal Opportunity Employer. Anyone needing special assistance is requested to contact SCPDC at 985-851-2900 or via email at Kevin@scpdc.org at least three working days before the scheduled meeting date in order to obtain the assistance needed.

SCPDC uses U.S. and electronic mailing lists to disseminate information and give notice for public comment opportunities. Both mailing lists include community groups that represent Title VI protected

groups throughout the region. Groups representing Title VI populations are added to the Commission's U.S. and electronic mailing lists on an ongoing basis.

SCPDC routinely assesses the need for providing information in languages other than English. SCPDC evaluates the effectiveness of all communications and public participation efforts and makes appropriate adjustments to its communication strategy.

3: Environmental Considerations

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. SCPDC follows the NEPA process for all activities undertaken with federal funds. It is understood that each grantor may have a different process or steps involved in completing the environmental review process thus it is incumbent upon each project administrator or program manager to follow the guidance issued by the funding entity.

4: Professional Service and Other Contracts

SCPDC is responsible for selection, negotiation, and administration of consultant contracts under many programs, however, some funders, for example, LaDOTD, handle issuance of contracts. SCPDC is only setting the priority for how funds should be spent. SCPDC operates under its internal contract procedures and all relevant federal and state laws. SCPDC staff must follow the procurement policies outlined in the Louisiana Public Bid Law and those policies/procedures specific to the individual grant programs managed by staff.

Relevant Title VI text is included in all SCPDC Requests for Proposals (RFP) and contracts as required by the individual funder.

Minority Owned – Women Owned Enterprises (MBE/WBE) and Disadvantaged Business Enterprises (DBE) Program

Federal agencies differ on their policy for including small minority and women owned businesses in that some refer to both as DBEs and others identify these individually. For convenience this discussion refers to all as DBEs but realizes that the individual grantor's definitions and policies must be followed.

SCPDC is a member of the Louisiana Unified Certification Program (LUCP) maintained by the LaDOTD. Individuals who may be eligible for DBE status are referred to the LaDOTD website and offered the appropriate contact information. SCPDC includes appropriate DBE text in all Requests for proposals and/or qualifications and other contracting opportunities. SCPDC maintains a list of engineers and architects who include eligible MBE/WBEs, and all companies with relevant qualifications are included in notifications of contract opportunities. When requesting services of any kind, SCPDC refers to the list of eligible DBE contractors maintained by LaDOTD in the LUCP database for inclusion in the mailing lists and other notifications. DBE goals are established for individual projects based upon the overall program goals set forth by the granting agency. Sometimes there are separate goals for MBEs and WBEs and sometimes one goal for both. SCPDC will require all contractors to submit documentation of efforts to attain DBE goals and require each contractor to do the same with all subcontractors.

5: Education & Training

Individuals protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in all employment-related decisions, including opportunities for education and training.

All SCPDC employees are encouraged to participate in professional development and training as budget constraints allow. All materials received by the Commission on training and education opportunities are made available to all employees, which includes all information on both state and federally funded training.

VII. Questions

For questions on the SCPDC's Title VI Policy, ADA/504 Plan, the LEP Policy or any related policies and procedures, please contact SCPDC's CEO at (985) 851-2900. For information on SCPDC's work program or publications, including reports, data forecasting, maps, or other information available for use, contact SCPDC at (985) 851-2900. For information on all of the above, including current public comment periods and meetings open to the public, visit SCPDC's website at www.scpdc.org.

Appendices

Appendix A – SCPDC Title VI Grievance Policy

Grievance/Complaint Process

All written or verbal complaints of discrimination will be forwarded immediately to the SCPDC CEO and may also be directed to the Civil Rights Compliance Programs Office of program funder. In cases where the complainant is unable or incapable of providing a written statement, the complainant will be assisted in converting the verbal complaint into a written complaint. All complaints however must be signed by the complainant.

Complaints must be filed within 180 days of the alleged incident.

All Title VI and related statute complaints are considered formal as there is no informal process. Therefore, the complainant will be contacted according to the respective agency's formal complaint process. Complaints filed under Title VI against sub-recipients or contractors/consultants of SCPDC will be investigated by SCPDC's CEO and forwarded to the funded entity for further advice and action. SCPDC shall maintain a confidential log of complaints for the purpose of assisting federal entities in carry out their duties. The log will include the following information:

- a) Name of Complainant.
- b) Name of Respondent.
- c) Basis of Complaint (i.e., race, color, national origin)d) Date complaint received by the SCPDC.
- e) Date SCPDC forwarded the complaint to the appropriate Civil Rights Office.
- f) A statement of the complaint, including specific details, relevant facts and documentation.
- g) The final disposition of the complaint.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

The complainant may refer their grievance directly to the federal entity using the attached grievance form.

Time Frame for SCPDC and Most Federal Entities to respond Upon Receiving a Complaint

NOTE: The time frame may vary somewhat for different federal agencies.

- 1. 45 days to conduct an investigation,
- 2. 15 days to complete investigative report and submit to the administrative head, with copies to SCPDC.

Total time allotted: 60 days

A complaint must be filed no later than 180 days after the following:

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

**South Central Planning and Development Commission
Title VI Discrimination Complaint Form
Complaints must be filed within 180 days of the alleged incident.**

Your Name: _____

Your Mailing Address: _____

Your Telephone: _____

Your Email Address: _____

Person(s) Who Discriminated Against You

Name	Title/Position (If Known)
_____	_____
_____	_____

Incident Location: _____

Date of Alleged Incident: _____

Discrimination Because Of:

Race Color National Origin

Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved and witnessed the discrimination. Be sure to include how other persons were treated differently than you. Attach any written material pertaining to your case.

Your signature: _____ Date: _____

Please return this form to:

South Central Planning and Development Commission
Mailing Address: P. O. Box 1870 Gray LA 70359
Physical Address: 5251 Main Street Houma LA 70360
Telephone: 985-851-2900
Facsimile: 985-851-4472
Email: Kevin@scpdc.org

You may also contact the appropriate federal agency directly. Please see the attached list.

Federal and State Program Points of Contact for Grievances.

For EPA Funded Programs

US Environmental Protection Agency

Office of Civil Rights (1201A)

1200 Pennsylvania Ave., NW

Washington, DC 20460

(202) 564-7272 (voice)

(202) 565-0196 (fax)

For US Department of Transportation funded programs under the Federal Highway Administration

FHWA - Louisiana Division

Civil Rights Specialist

5304 Flanders Drive, Suite A

Baton Rouge, LA 70808

(225) 757-7621

For US Department of Transportation funded programs under the Federal Transit Administration

FTA - Region 6

Office of Civil Rights

819 Taylor Street

Fort Worth, TX 76102

(817) 978-0550

For Economic Development Administration funded programs

Appendix B – Title VI Notices

The following notices have been prepared for different purposes by the SCPDC in relation to Title VI.

Notice for meeting agendas and notices and agency stationary

The South Central Planning and Development Commission does not discriminate on the basis of race, color, national origin in any program or activity.

Title VI Notice

The paragraph below will be inserted in all significant publications that are distributed to the public. The will be posted on the agency's website. It will be posted in a conspicuous space with other statements of employee rights. The version below is the preferred text, but where space is limited or in publications where cost is an issue, the abbreviated version can be used in its place.

TITLE VI NOTICE

The South Central Planning and Development Commission (SCPDC) does fully comply with Title VI of the Civil Rights Act of 1964 and related statutes, executive orders, and regulations in all programs and activities. SCPDC operates without regard to race, color, national origin,. Any person who believes him/herself or any specific class of persons, to be subjected to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint to the Chief Executive Officer of SCPDC. A copy of the complaint/grievance procedure is on file with the CEO's office and is contained in its Title VI Policy Statement. In addition any person may also file a complaint/grievance with the appropriate federal entity funding the specific program. A list of contacts may be provided by the SCPDC and may also be found on its website in its Title VI Policy Statement.

SCPDC meetings are conducted in accessible locations and materials can be provided in accessible formats and in languages other than English as reasonable and appropriate. For accessibility or language accommodation, please contact SCPDC and indicate the meeting/material needed at 985-851-2900 (voice), 985-851-4472 (facsimile). If you wish to attend a SCPDC function and require special accommodations, please give SCPDC three working days notice in advance in order to obtain the special accommodation.

Shortened Title VI Notice

The following shortened version of the above paragraph can be used in publications where space or cost is an issue as in classified newspaper announcements.

SCPDC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Title VI Complaint Form, see www.scpdc.org or call our CEO at (985)851-2900.

Appendix C – South Central Planning and Development Commission’s Policy and Plan for Engaging Individuals with Limited English Proficiency (LEP)

Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination. The South Central Planning and Development Commission’s policy for engaging individuals with limited English proficiency is to provide translation services to anyone who requests them, as reasonable. SCPDC currently has staff members fluent in Spanish and Vietnamese and will provide other translation services on an as needed basis.

Background Information:

SCPDC followed U.S. Department of Justice guidance using a “four-factor analysis” process to determine the number and proportion of LEP individuals in the region and how to cost effectively provide information services to these individuals. In all, the SCPDC region has a total of 2.39% persons speaking English less than well, with the largest concentration being “Other Indo-European.” The same process may need to be followed on a project by project basis to determine need for providing translation services in specific project service areas.

The frequency and extent with which LEP individuals come into contact with SCPDC programs is estimated to be relatively low. As an association of parishes and municipalities, SCPDC serves as a forum for developing policies and making decisions about regional growth, economic development, transportation, public infrastructure and governance, the SCPDC provides limited direct projects or services to the population of the region. These include the SCPDC Revolving Loan Programs and the Regional Code Council. SCPDC encourages public comment on its policies, programs, and funding cycles, and therefore would like to increase opportunities for public comment, particularly by historically underserved populations including LEP individuals.

SCPDC remains committed to providing translation services to people who request such assistance.

Appendix D - ADA and Section 504 Compliance

Building and Facilities

The building housing most of SCPDC's activities was constructed in 2004 and built to the Uniform Federal Accessibility Standards of that date. The SCPDC Economic Development staff are housed in an area of a neighboring state building which has been renovated to meet current standards. The SCPDC is now planning to expand its facility and relocate the Economic Development staff in the new addition. When building plans are designed, efforts will be made to bring any noncompliant portions of the main building up to the new March 2012 standards.

SCPDC is now conducting a Self-Evaluation with regard to its employment policies and procedures and communications. Once complete, SCPDC will make all reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to attend all SCPDC public meetings. For example, individuals with service animals are welcomed in SCPDC public meetings, even where animals are generally prohibited.

SCPDC will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the SCPDC's public meetings.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a SCPDC public meeting should contact the SCPDC's CEO via phone (985-851-2900) as soon as possible but no later than three days before a scheduled meeting.

The ADA does not require the SCPDC to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden. SCPDC will strive to provide its services, programs and activities in the most accessible manner that is feasible.

Notification that a SCPDC meeting is not accessible to persons with disabilities should be directed to:

**Chief Executive Officer
South Central Planning and Development Commission
5058 West Main, Gray, LA. 70359
(985-851-2900)**

ADA Notice to Be Posted At the Bottom of All SCPDC Meeting Notices and Agendas

For special accommodations for this meeting, contact our SCPDC via phone (985-851-2900) at least three days in advance.

Appendix E - DBE Policy

The South Central Planning and Development Commission, and its consultants, sub-consultants and sub-grantees shall take all necessary and reasonable steps to ensure that disadvantaged businesses have an opportunity to compete for and perform the contract work of the South Central Planning and Development Commission in a non-discriminatory environment.

The agency's DBE policy also includes the definitions for Minority and Women Business Enterprises (MBE/WBE) as some federal agencies use this terminology.

SCPDC is a member of the Louisiana Unified Certification Program managed by LaDOTD. Through this program businesses can qualify for status as a Disadvantaged Business Enterprise. A database is maintained by LaDOTD and SCPDC staff can use this to identify potential contractors on a case by case basis. It is incumbent upon each program/project manager to determine the skills and qualifications necessary in the contract work and to utilize the database to identify contractors that should be included in direct mails notifying each of the contract opportunity.

Each grant/contract will have its own goals for participation by DBE or MBE/WBE and it is incumbent upon each program manger to document efforts to achieve these goals of inclusion and to determine the appropriate method based upon the directives of the granting agency.

Appendix F: U. S. Department of Transportation / SCPDC

Title VI of the **Civil Rights Act of 1964**; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration's (FTA) Circular 4702.1B, "**Title VI Program Guidelines for Federal Transit Administration Recipients**," effective October 1, 2012, requires the submission of this Title VI Program. Additionally there are many other DOT, FHWA, FTA and Executive Orders, circulars and memorandum which dictate policies to ensure protections with regard to environmental justice and civil rights. For example:

In April 1997, The United States Department of Transportation (DOT) issued an **Order on Environmental Justice (DOT Order 5610.2)**, which reinforced, summarized and expanded upon the requirements of the 1994 **Executive Order 12898** to include all policies, programs and other activities that are undertaken, funded or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA) or other U.S. DOT components make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

In December 1997, the FHWA issued the **FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (DOT Order 6640.23)**, which mandated the FHWA and all its subsidiaries to implement the principles of **Executive Order 12898** and **U.S. DOT Order 5610.2** into all of its programs, policies and activities.

On October 7, 1999, the FHWA and the FTA issued a memorandum **Implementing Title VI Requirements in Metropolitan and Statewide Planning**. This memorandum provides clarification for field offices on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally important during the planning stages as it is during the projects development stages.

U. S. DOT Title VI Methodology for Identification of Target Populations (Demographics) & Spatial Concentrations of Targeted Populations

The geographic basis for Title VI analysis is based on the latest U.S. Census data. For purposes of Title VI analysis, it is desirable to make the analysis on the smallest geographic unit available for which information is obtainable for all relevant groups.

Census data is available at different levels, including political jurisdictions, urban area, place, census tract, block group and block. The Census Bureau does not calculate all of its data on each of these areas. The smallest geographic area that the Census Bureau calculates the appropriate information on each relevant group is the block group level. Therefore, the block group was chosen to analyze Title VI issues. SCPDC further displays U.S. Census data by Traffic Analysis Zone (TAZ) for planning purposes.

SCPDC has identified seven relevant groups for Title VI analysis as described below.

- Low-income;
- Federal Assistance Recipients;
- Minority;
- Elderly;

- Limited English Proficiency (LEP) or English spoken as a second language;
- Disabled populations; and
- Zero car households

Following the identifications of the relevant groups for analysis, the next step undertaken was to identify the general distribution of each Title VI population group throughout the SCPDC region and then define where each group is most concentrated.

Target Groups

Low Income – a person whose household income (or in the case of a community or group, whose median household income) “is at or below the U.S. Department of Health and Human Services poverty guidelines.”

The national poverty guidelines are issued annually by the Department of Health and Humans Services. <http://aspe.hhs.gov/poverty/poverty.shtml>. National poverty guidelines vary based on family size and increases each year due to the Consumer Price Index. <http://www.bls.gov/new.release/cip.toc.htm>. “The Consumer Price Index is a measure of the average change over time in the prices paid by urban consumers for a market basket of consumer goods and services.”

*Persons not part of households are not included in the Total Populations; the US Census does not count individuals who reside in group living situations.

Federal Assistance Recipients – People who receive grants or federal funds. The assistance might be in the form of public housing, food stamps, support services or persons receiving Temporary Assistance for Needy Families (TANF) funds.

Minority Populations – Persons considered being minorities are identified in the census as people of African, Hispanic, Asian, American Indian or Alaskan Native origin (U.S. Census, STF301/Tb1008 and Tb1011; 1990). Executive Order 12898 and the DOT and FHWA Orders on Environmental Justice consider minority persons as persons to any of the following groups:

- **Black** - a person having origins in any of the black racial groups of Africa.
- **Hispanic** - a person of Mexican, Puerto Rican, Cuban Central or South American or other Spanish culture or origin, regardless of race.
- **Asian American** - a person having origins in the Far East, Southeast Asia or the Indian subcontinent.
- **American Indian and Alaskan Native** – a person having origins in North America and who maintains cultural identification through tribal affiliation or community recognition.

Elderly – Any persons over the age of 65.

Limited English Proficiency (LEP) – Any readily identifiable group of persons whose ability to read, write and speak English and compute and solve problems has not reached levels of proficiency necessary to function on the job and in society, to achieve one’s goals and develop one’s knowledge and potential.

Households with a primary or home language other than English, who must, due to limited fluency in English, communicate in that primary or home language.

People with Disabilities – Persons who have mobility and/or self-care limitations as defined by the Census. The disability may be physical or mental (people with a health condition that lasts six or more months that make it difficult to go outside the home alone or difficult to take care of their own person needs).

Zero car households – Households without cars or access to one.

Monitoring

One technique used to minimize the potential adverse effects on affected populations is to identify and then create demographic profile maps of low-income and minority populations for the SCPDC area. These maps aid planners in understanding which communities are prone to environmental justice infractions. Once planners have an understanding where communities are located, future transportation plans and projects can include these communities in the planning process.

Transportation planning studies utilize these maps and focus on the equitable distribution of transportation benefits and potentially adverse impacts caused by future projects. In addition to the benefits, such as added capacity, safety and mobility of a roadway along new rights-of-ways can often negatively impact certain populations because of increased noise, air pollution and reduced safety. Also, new road projects have a potential to split or isolate neighborhoods in whole or in part. Road projects along existing rights-of-ways are primarily reconstruction projects and not capacity expansions. Such projects do not tend to greatly increase noise or pollution, but do add safety to the facility and may feature enhanced passenger and freight transportation.

These same demographic profile maps can also be used to verify past compliance with Title VI. Identifying prior transportation projects and mapping them against demographic profile maps will help to determine if fair and equitable distribution of services, facilities and resources within the SCPDC area has been met.

U. S. DOT Title VI Assurances

The U. S. DOT has its own special assurances that SCPDC must periodically update. Following are the assurances as they were current at the time this document was prepared. However, it is up to each program manager to ensure the correct original assurance is signed, dated and maintained in the program files.

Sample DOT Grant Assurances

The South Central Planning and Development Commission (hereinafter referred to as the “Recipient”), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d—42 USC 2000d—4 (hereinafter referred to as the “Act”), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, , be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY

GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances to its Federal Aid Highway Program:

1. That the Recipient agrees that each “program” and each “facility”, as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a “program”) conducted or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.

2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program and in adapted form in all proposals for negotiated agreements:

“South Central Planning and Development Commission, in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d—42 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21: Nondiscrimination in Federally Assisted Programs of the Department of Transportation Issued Pursuant to Such Act, hereby notifies all bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, national origin, in consideration for an award.”

3. That the Recipient shall insert the clauses of Part 1 of this Assurance in every contract subject to the Act and the Regulations.

4. That the Recipient shall insert the clauses of Part 2 of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

5. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient received federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over, or under such property.

7. That the Recipient shall include the appropriate clauses set forth in Part 3 of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements acquired or improved under the Federal Aid Highway Program; and (b) for the construction or use of, or access to space on, over, or under, real property acquired or improved under the Federal Aid Highway Program.

8. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

9. The Recipient shall provide for such methods of administration for the program, as are found by the State Secretary of Transportation or the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of, and for the purpose of obtaining, any and all federal grants, loans, contracts, property, discounts, or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway Program and is binding on it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Recipient.

Chief Executive Officer
South Central Planning and Development Commission

Date

Appendix G: U. S. Environmental Protection Agency

SCPDC is funded through the U. S. Environmental Protection Agency (EPA) for several ongoing. From time to time, the SCPDC has applied for and received other EPA assistance. Below is a summary of the current programs.

Brownfields Program

SCPDC is the recipient of several EPA awards. Most notably, SCPDC has operated a successful Brownfields Program within the six parish region for about 9 years. The program maximizes use of EPA grants to conduct Phase I and II Environmental Assessments on abandoned or underutilized sites that have real or perceived environmental problems. By assisting potential property owners in clearing older sites of potential environmental problems, regional economic development goals are fostered in several ways, properties are put back into the market fostering new uses in older neighborhoods or at older industrial sites, and it helps curb outward expansion from existing business centers. The project manager works with property owners to secure similar assistance through the Louisiana Department of Environmental Quality (LaDEQ) Targeted Brownfields Assistance (TBA) program and to identify other resources that may be used to clean up and return properties to a viable use. The program includes a revolving loan fund administered by the SCPDC specifically for use in cleaning up Brownfield sites.

Regional Wastewater Analyses

SCPDC has two grants through the EPA State and Tribal Assistance Grant Program. The grants are paying for regional wastewater analyses that will indicate priority of needs for wastewater treatment expansion and improvements. The two reports when complete, the Clean Water Action Plan (covering Assumption, Lafourche, Terrebonne and St. Mary Parishes) and the River Region Waste Water Analysis (covering the West Bank areas of St. James, St. John the Baptist and St. Charles Parishes) will guide the region's leaders in prioritizing waste water treatment needs, thereby maximizing financial funding opportunities. A small portion of each grant has been set aside for implementation of priority projects.

Title VI Considerations

Each contract issued under these grants will contain the appropriate Title VI, DBE and other clauses as directed by EPA. Each grant has its own set of MBE/WBE goals and annual reports documenting participation activities are provided to the EPA by the project managers.

In considering the EPA funded programs, the wastewater analysis/upgrade expansion project would probably result in minimal contact with individuals requiring ADA/LEP assistance. As a study for use by government agencies, the reports are a gathering and analyses of data on existing systems to help the region determine how best to prioritize funding opportunities. During implementation of projects under these grants, care must be taken to ensure that special populations are aware of the projects and communities are not discriminated against in implementation of such. The EPA NEPA process will be followed to ensure that environmental justice considerations are properly made and documented.

The Brownfield Program, especially through its revolving loan, may find more interaction with persons needing special assistance in understanding the program requirements. Therefore, SCPDC strives to keep ready a list of resources for translation services for LEP persons and the disabled.

Compliance Records

Compliance records shall be made available during normal working hours to both EPA and the general public as requested. Records of compliance activities must be maintained for three years after the close-out of the EPA grant or until the complaint is resolved if still open after the three years.

Appendix H: Economic Development Administration

SCPDC is a partner to the U. S. Economic Development Administration, an office of the U. S. Department of Commerce. SCPDC has an ongoing relationship as the regional economic development district.

Regional Economic Development District

Through funding assistance from the EDA, the SCPDC prepares a regional Comprehensive Economic Development Strategy (CEDS) for the six parish region. This is a strengths, weaknesses, opportunities and threats analysis based upon factors. The result is a five year strategy of goals and objectives to improve the economic conditions of the region. The CEDS is updated annually as conditions affecting local economies can change rapidly. The CEDS is composed by SCPDC staff with the assistance of a technical committee and the strategy is approved annually by the SCPDC Board of Directors. SCPDC uses these funds to provide technical assistance to member communities in implementing their individual economic goals while balancing these with the greater goals of the region. A component of this effort is assisting with EDA grant applications and implementation as requested. EDA also helps the region through additional technical assistance funds when disasters occur. This has helped SCPDC provide additional technical assistance needed when parishes and towns are dealing with recovery efforts.

Revolving Loan Fund

After Hurricane Andrew in 1994, SCPDC used EDA assistance to establish a revolving loan fund. This fund is now a small business, gap financing program. Small businesses that need capital assistance to start or expand but who cannot get financing through traditional methods are eligible to apply. Applications are screened by SCPDC staff and then presented to a Bank Board. The Bank Board provides technical expertise to help SCPDC analyze the business plans and financial statements applicants present. After this screening the application is then presented with recommendations to a Revolving Loan Board for review and approval.

EDA Title VI Requirements

The guidance from EDA for compliance with Title VI expired 11/30/02 and to the best of our knowledge has not been updated. The requirements identified below are based upon the 2002 guidance.

SCPDC Board

EDA promotes diversity in membership on the planning or advisory body, the SCPDC Board and the CEDS committee who assists in the drafting of the CEDS. Minority representation must reflect the population of the area served. SCPDC has flexibility in its appointment process, but EDA may review that process to ensure compliance with civil rights requirements.

Current membership on the SCPDC Board is provided in Figure IV. The 30 member board is composed of representatives from the geographic area SCPDC serves. This includes each parish president, each mayor, a minority member of the parish council, members from the private sector. One to four private sector members are nominated and appointed by each parish council. The number allotted to each parish is prorated by population. The membership is established by ordinances adopted by each parish and the SCPDC Board bylaws.

The board membership is composed of each parish president (6) and each mayor (6) and at least one appointment from each parish who may be a representative of business, labor, industry, minority groups, unemployed or underemployed groups. Each parish receives representation in proportion to the number of residents in the parish. Thus the remaining 18 board member is divided based upon a pro rate share of the region's population. The current membership list with information required by EDA for reporting purposes is maintained by the SCPDC CEO. The Board meetings are open to the public.

Periodic Reporting

The 2002 guidance indicated that SCPDC may be required to provide the following information in order for funding to be continued. While much of this information is no longer required to be submitted, the information is still maintained and is readily available to the EDA if so requested. The annual CEDS update and the GPRRA reporting which are required do often provide some of the items identified below, in particular items 1 and 8.

- (1) The total population and the total minority population of the area served by the organization;
- (2) A list of organizations in the area representing the interests of minorities, women, and people with disabilities;
- (3) A list of the membership of the governing board and Executive Committee indicating race, sex, national origin, and age. The list shall include those who voluntarily, self-identify as having disabilities;
- (4) A description of actions taken and methods used by the organization in its diversity efforts to reflect, as much as possible, the participation of all segments of the areas served;
- (5) Information regarding how organizations, including neighborhood associations representing the interests of minorities, women, people with disabilities and age were notified and provided opportunities to select their own representatives;
- (6) A list indicating race, sex, national origin, and age of employees on the staff by name, position title, salary, funding source and hiring date;
- (7) A summary indicating the progress made in the organization's diversity efforts. The summary should include a list by name, race, national origin, sex, and age, of all hires, promotions, terminations and composition of applicant pools since the last reporting period. The summary should also include the steps taken to ensure nondiscrimination and to provide equal employment opportunity; and
- (8) A brief summary of any economic development activities undertaken during the previous 12 months.

Revolving Loan Board

The same information must be maintained for the Revolving Loan Board members. The Revolving Loan Administrative Board consists of 19 members who are appointed by the Parish President.

Other information that must be maintained for the Revolving Loan include

- (1) Recipient's plans to openly market the RLF to prospective business borrowers by race, sex, age, and disability status; and
- (2) Recipient's monitoring plans for borrowers' compliance with civil rights requirements concerning employees or applicants for employment, and/or providers of goods and services.

The Revolving Loan Advisory Board is selected by contact through the business community with recommendations and it is composed of 13 members who were selected from a cross section of the region's banks by the Parish President.

Records

EDA requires SCPDC to retain and provide access to appropriate information for review by EDA about their employees, applicants for employment and project service benefits. Records must be kept on all employees and applicants for employment for a period of two years.

Reviews

EDA may conduct compliance reviews when complaints have arisen or EDA becomes aware of possible noncompliance. This may be a desk review, onsite review or both. As a result of the review, EDA may dictate corrective actions.

LEP

EDA requires a public information program media and community outreach activities when a significant number or proportion of the population to be served or likely to be directly affected by EDA funded programs. Demographic data is reviewed to determine which languages are spoken and the size and location of language groups. Recommendations may also be obtained from local community minority leaders or organizations and from local and State government offices to assist in determining if a second language outreach effort is appropriate.

APPENDIX I: DELTA REGIONAL AUTHORITY

DRA requires its grantees to take affirmative steps to assure that minority firms, women's business enterprises and labor surplus area firms are used when possible. The guidance implies that grantees should keep documentation of affirmative steps for each procurement undertaken with DRA funds. Steps include the following:

- Placing qualified small and minority businesses and women business enterprises on solicitation lists
- Assure MBE/WBE solicited when they are potential sources
- Divide total requirements when economically feasible into smaller tasks or quantities to permit participation by MBEs and WBEs
- Establish delivery schedules if requirements permit to encourage MBE/WBE participation
- Use the services and assistance of the Small Business Administration and Minority Business Development Agency of the Dept. of Commerce,
- Require prime contractor to take these same affirmative steps if there will be subcontractors.

APPENIX J: HUD FUNDED PROJECTS

SCPDC has contractual relations with many of its member communities to assist in the administration of their Community Development Block Grants, both the competitive LCDBG and the disaster recovery CDBG-DR programs. Both of these programs are handled through the Louisiana Division of Administration, Office of Community Development, and have similar Equal Opportunity Requirements for the grantee and contractors, such as SCPDC. These requirements are spelled out in contracts with each community. The language is applicable to all contracts and it is up to SCPDC to determine which requirements apply to it. Many of the requirements do not actually apply to SCPDC due to the nature of its programs and facility. Following is a summary of the applicable requirements related to Title VI placed upon SCPDC as a contractor under CDBG programs.

- Posting of nondiscrimination notices in conspicuous places for employees and applicants for employment.
- To include in all solicitations or advertisements for employees placed by or on behalf of SCPDC that all qualified applicants will receive consideration without regard to race, color religion or sex, or national origin.
- Compliance with Executive Order 11246—SCPDC does not have over 50 employees
- SCPDC may not maintain segregated facilities on the basis of race, color, religion or national origin.
- SCPDC must comply with the provisions of Title VI.
- Section 109 of the Housing and Community Development Act of 1974 prohibits exclusion from SCPDC programs and activities based upon race, color, national origin or sex.
- Section 3 of the HUD Act of 1968 requires steps be taken to include “Section 3” employees and businesses in programs funded by HUD. Section 3 is low and very low income persons, particularly those who are recipients of HUD housing assistance.
- Compliance with 503 of the Rehabilitation Act of 1973 prohibits discrimination in employment practices because of physical or mental handicap in regard to any position for which the employee or applicant for employment is otherwise qualified.
- SCPDC must post in conspicuous places its policy to employ and advance in employment qualified handicapped employees and applicants for employment along with the rights of applicants and employees.
- SCPDC must comply with Section 504 of the Rehabilitation Act of 1973 with regard to its facility, employment practices and communications.
- SCPDC must not discriminate on the basis of age.
- Records of documentation as required herein must be maintained for 5 years from the date of close-out of the grant to the State that funded the LCDBG or CDBG-DR project. Such records are to be made available to the State and HUD upon request.
- No person may be discriminated against due to their political affiliation or benefits.

Appendix K: SOUTH CENTRAL REGIONAL CODE COUNCIL

This is a program through which the SCPDC offers member communities an opportunity to participate in a shared code enforcement staff. The program is overseen by a regional code committee. The program began with start up money through a special award under Katrina Rita CDBG Disaster Recovery funds and is sustained through permit fees. Although the program is no longer funded with grant monies, SCPDC strives to continue to improve outreach efforts and ensure that the program is compliant with all ADA requirements regarding communications and employment.

Appendix L: SOUTH CENTRAL PLANNING AND DEVELOPMENT COMMISSION BOARD ADOPTION OF THE TITLE VI POLICY DOCUMENT

MINUTES

SOUTH CENTRAL PLANNING AND DEVELOPMENT COMMISSION BOARD OF COMMISSIONERS MEETING

Thursday, April 18, 2013

A regular meeting of the Board of Commissioners for South Central Planning & Development Commission was called to order at approximately 10:45 a.m. on Thursday, April 18, 2013 at the new Assumption Parish Community Center in Napoleonville, LA.

Chairman St. Pierre called the meeting to order and led the Board in the Pledge of Allegiance.

Members present or represented by proxy were: M. Triche, J. Naquin, W. Reed, R. Animashaun, M. Atzenhoffer, T. Eschete, V. J. St. Pierre, E. Alexander, R. Vincent representing N. Roboltom, R. Noel, L. Mitchell, H. Hardy, T. Roussel, D. Bourg representing M. Claudet, A. Williams, J. Rogers, A. Badeaux, Jr., and G. Crow. Staff members present were K. Belanger, J. Boudreaux, J. Jones, L. Marretta and E. Bergeron.

Members absent were: C. Randolph, A. Archer, P. Champagne, J. Bouziga, W. Bendetto, Ken Brass, M. Guillof, Jr., T. Borne, R. Scott, L. Charles, and M. Marmande, Jr.

Guests in attendance were: Atri Sen and Rebecca Hernandez of Dawberry, Michael Vince of LA DEQ.

First item on the agenda was the acceptance of minutes of January 17, 2013 regular meeting. It was motioned by T. Roussel seconded by M. Atzenhoffer to accept minutes of the January 17, 2013 regular meeting. There being no objections motion carried.

Next on the agenda was the acceptance of Management Committee Minutes of April 12, 2013. Due to a lack of a quorum the Management Committee was unable to hold their meeting.

A. Williams entered at this time.

The third item on the agenda was the review and approval of Financial Statement ending March 31, 2013. K. Belanger briefed the board on the Financial Statement. It was motioned by M. Atzenhoffer, seconded by E. Alexander to approve the Financial Statement ending March 31, 2013. There being no objections motion carried.

Upon the passing of agenda item three, A. Williams motioned to revisit agenda item one, seconded by E. Alexander. There being no objections motion carried. A. Williams pointed out page two was missing from the minutes. It was then motioned by A. Williams, seconded by E. Alexander to revisit the minutes of January 17, 2013 at the next regular SCPDC Board of Commissioners meeting, seconded by E. Alexander. There being no objections motion carried.

Item four on the agenda was the review and approval of FY13 Budget Adjustments. It was motioned by J. Naquin, seconded by M. Triche. There being no objections motion carried.

Next on the agenda was A PowerPoint presentation was given on the PM 2.5 Advance Program by M. Vince of LA DEQ. He briefly explained to the Commissioners what PM (Particular Matter) was and the importance for the Region to continue working proactively with one another to identify and implement programs which will result in cleaner air.

It was motioned by W. Reed, seconded by E. Alexander to approve SCPDC's letter of intent to join PM Advance Program. There being no objections motion carried.

The sixth item on the agenda was the resolution declaring various equipment as surplus property and authorizing the CEO to appropriately dispose of said equipment. It was motioned by M. Triche, seconded by A. Badeaux, Jr. to declare various equipment as surplus property and authorizing the CEO to appropriately dispose of said equipment. There being no objections motion carried.

A resolution setting the minimum acceptable bid for the sale of equipment declared as surplus was the seventh item on the agenda. It was motioned by A. Badeaux, Jr., seconded by E. Alexander setting the minimum acceptable bid for the sale of equipment declared as surplus. There being no objections motion carried.

Under item eight, Announcements, K. Belanger reminded the Commissioners of the DRA application process beginning. He also encouraged the Commissioners to become involved in supporting the I-49 South Coalition.

Agenda item nine, K. Belanger updated the Commissioners on the progress of SCPDC's building expansion; it should go out for public bid in July 2013.

It was then motioned by A. Williams, seconded by A. Badeaux to deviate from agenda to review agenda item twelve. There being no objections motion carried. K. Belanger briefed the Commissioners on the required Title VI Policy SCPDC needed to implement. It was motioned by R. Noel, seconded by W. Reed to accept the SCPDC Title VI Policy. There being no objections motion carried.

It was motioned by A. Badeaux, Jr., seconded by E. Alexander to return to agenda item ten. K. Belanger introduced Atri Sen of Dewberry. A. Sen introduced to the Commissioners the many areas in which Dewberry Engineers can assist the parishes with engineering projects. He briefly reviewed Dewberry's initiatives and pass projects in the Region. Discussion ensued.

Next on the agenda was the Agency Activity Report. Everyone agreed to read it at their leisure.

Next meeting date has been set for Thursday, June 20, 2013 location in Lafourche Parish yet to be determined. There being no other business to discuss, it was motioned by R. Noel, seconded by W. Reed to adjourn. Motion carried.



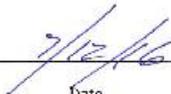
South Central Planning & Development Commission

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As Chief Executive Officer and Civil Right Liaison of South Central Planning and Development Commission, I Kevin Belanger hereby attest that SCPDC has had no projects involving facilities requiring Equity Analysis within the last 3 years.


Kevin P. Belanger, CEO


Date

Michel Claudet
CHAIRMAN
President
Terrebonne Parish Council

VJ St. Pierre
VICE CHAIRMAN
President
St. Charles Parish Council

Arlinda Williams
TREASURER
Ministry Representative
Terrebonne Parish Council

Ellis Alexander
SECRETARY
Ministry Representative
St. Charles Parish Council

Kevin Belanger
CHIEF EXECUTIVE OFFICER



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As Chief Executive Officer and Civil Right Liaison of South Central Planning and Development Commission, I Kevin Belanger hereby attest that, to date SCPDC has had no transit-related title VI investigations, complaints, or lawsuits that allege discrimination on the basis of race, color, or national origin.

Should this change SCPDC will prepare and maintain a list of all transit-related title VI investigations, complaints, or lawsuits that allege discrimination on the basis of race, color, or national origin.


Kevin P. Belanger, CEO
Date

Michel Claudet
CHAIRMAN
President
Terrebonne Parish Council

VI St. Pierre
VICE CHAIRMAN
President
St. Charles Parish Council

Arland Williams
TREASURER
Mayor Representative
Terrebonne Parish Council

Filis Alexander
SECRETARY
Mayor Representative
St. Charles Parish Council

Kevin Belanger
CHIEF EXECUTIVE OFFICER