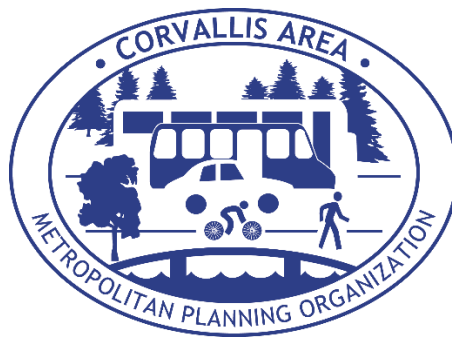


# **Title VI Nondiscrimination and Environmental Justice Plan**

**Adopted October 14, 2020**

## **Corvallis Area Metropolitan Planning Organization**

Compliance with Federal Requirements under 49 CFR Part 21  
and 23 CFR Part 200



**RESOLUTION No. 2020-02**  
**FOR THE PURPOSE OF ADOPTING THE CORVALLIS AREA**  
**METROPOLITAN PLANNING ORGANIZATION TITLE VI**  
**NONDISCRIMINATION PLAN**

**WHEREAS**, the Corvallis Area Metropolitan Planning Organization (CAMPO) has been designated by the State of Oregon as the official Metropolitan Planning Organization for the Corvallis area; and

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

**WHEREAS**, the development of a Title VI Nondiscrimination Plan that expresses CAMPO's commitment to ensure non-discrimination within all of its programs, projects and activities is a federal requirement; and


**WHEREAS**, CAMPO has developed a Title VI Nondiscrimination Plan in compliance with all applicable federal and state requirements; and

**WHEREAS**, the public has been notified and afforded reasonable opportunities to review and comment on the content of the CAMPO Title VI Nondiscrimination Plan;

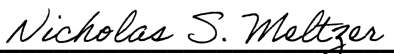
**NOW, THEREFORE, BE IT RESOLVED**, that the CAMPO Policy Board adopts the CAMPO Title VI Nondiscrimination Plan.

**Dated** this 14th day of October 2020

**APPROVED:**

**By:**   
**Barbara Bull, Chair**  
City of Corvallis

**ATTESTED:**

**By:**   
**Nicholas Meltzer, P.E., MPO Manager**  
Corvallis Area MPO

## **Corvallis Area Metropolitan Planning Organization Membership**

### **Policy Board**

Councilor Alan Rowe	City of Adair Village
Councilor Barbara Bull (Chair)	City of Corvallis
Mayor Eric Nieman	City of Philomath
Commissioner Pat Malone (Vice-Chair)	Benton County
Savannah Crawford	Oregon Department of Transportation

### **Technical Advisory Committee (TAC)**

Chris Workman	City of Philomath
Gary Stockhoff (Chair)	Benton County
Greg Gescher	City of Corvallis
James Feldman	Oregon Department of Transportation
Pat Hare	City of Adair Village
Rebecca Houghtaling	Oregon State University

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

Jasmine Harris	US Federal Highway Administration (FHWA) OR Division
Jeremey Borrego	US Federal Transit Administration (FTA), Region X
Oregon Department of Land Conservation and Development (DLCD)	
Oregon Department of Environmental Quality (DEQ)	
Oregon Division of State Lands (DSL)	

### **Staff**

Nick Meltzer	Transportation Manager
Steve Dobrinich	Transportation Planner
Emma Chavez	Executive Administrative Assistant
Katie Trebes	ADA Coordinator

### **Corvallis Area Metropolitan Planning Organization**

777 NW 9th Street, Suite 204C  
Corvallis OR, 97330  
(541) 758-1911  
<https://corvallisareampo.org/>

## Nondiscrimination Policy Statement

In accordance with Title VI of the Civil Rights Act of 1964 and related federal nondiscrimination directives, the Corvallis Area Metropolitan Planning Organization (CAMPO) assures that no person shall on the grounds of race, color, national origin, sex, age, disability or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any CAMPO sponsored program or activity.

CAMPO further assures 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. The definition of “programs or activities” was expanded by the Civil Rights Restoration Act of 1987 to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors/consultants, whether such programs and activities are federally assisted or not. CAMPO will share the Title VI Nondiscrimination Plan, both internally and externally, through the MPO website, written communications, training, outreach and email with those who have a need to understand it and are interested in learning that CAMPO is making it a policy to uphold federal nondiscrimination requirements.

CAMPO will develop a Limited English Proficiency Plan (LEP) in accordance with Executive Order 13166. LEP persons must be provided an equal opportunity to benefit from or have access to services that are normally provided in English.

In the event CAMPO distributes Federal aid funds to another governmental entity or subcontractor, CAMPO will include Title VI language in all written agreements.

Title VI compliance is a condition of receipt for Federal funds. The Corvallis Area Metropolitan Planning Organization staff and Title VI Coordinator are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of 23 Code of Federal Regulation (CFR) Part 200 and Title 49 CFR Part 21.



**Barbara Bull, CAMPO Policy Board Chair**

11/16/2020

**Date**

## **CAMPO Title VI Goals**

The Corvallis Area MPO recognizes the key role that transportation services provide to the community and is committed to preventing discrimination and fostering a just and equitable society. The Corvallis Area MPO establishes the following principles to serve as goals for implementing its Title VI program:

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

## Table of Contents

<b>Adopting Resolution.....</b>	<b>i</b>
<b>Corvallis Area Metropolitan Planning Organization Membership .....</b>	<b>ii</b>
<b>Nondiscrimination Policy Statement.....</b>	<b>iii</b>
<b>CAMPO Title VI Goals.....</b>	<b>iv</b>
<b>Chapter 1: Introduction .....</b>	<b>1</b>
What is an MPO? .....	1
What is the Corvallis Area Metropolitan Planning Organization (CAMPO)?.....	1
What is a Title VI Plan/ Program? .....	1
What is in this Document? .....	1
<b>Chapter 2: CAMPO Overview .....</b>	<b>2</b>
MPO Roles and Responsibilities .....	2
CAMPO Planning Area .....	3
CAMPO Organization and Governance .....	4
<b>Chapter 3: Title VI Nondiscrimination .....</b>	<b>5</b>
Authorities and Guidance .....	5
Title VI Requirements for MPOs in Oregon .....	6
Filing a Civil Rights Complaint.....	10
<b>Chapter 4: Environmental Justice .....</b>	<b>12</b>
Authorities and Guidance .....	12
Environmental Justice and Transportation Planning.....	12
The Relationship Between Environmental Justice and Title VI .....	13
<b>Chapter 5: CAMPO Area Demographic Profile .....</b>	<b>14</b>
Population Living Below the Poverty Level (Map 2).....	14
Minority Population (Map 3) .....	15
Senior Population (Map 4) .....	15
Persons with Disabilities (Map 5) .....	15
Limited English Proficiency (LEP) Population (Map 6).....	16
<b>Chapter 6: Implementation Strategies.....</b>	<b>22</b>
<b>Appendix A: Language Assistance Plan and Four Factor Analysis .....</b>	<b>A-1</b>
<b>Appendix B: CAMPO Title VI Complaint Procedures .....</b>	<b>B-1</b>
<b>Appendix C: CAMPO Title VI Complaint Form (Spanish &amp; English).....</b>	<b>C-1</b>
<b>Appendix D: Title VI Demographic Survey.....</b>	<b>D-1</b>
<b>Appendix E: Glossary of Terms.....</b>	<b>E-1</b>
<b>Appendix F: Title VI Plan Update Comments Received .....</b>	<b>F-1</b>

# Chapter 1: Introduction

## What is an MPO?

A Metropolitan Planning Organization (MPO) is an organization of local governments designated per 23 USC and 23 CFR 450 to provide transportation planning and programming in areas with a collective population of 50,000 or over, termed as an Urbanized Area. As a condition for receiving federal transportation dollars, MPOs must have a continuing, cooperative and comprehensive transportation planning process in cooperation with their state Department of Transportation.

## What is the Corvallis Area Metropolitan Planning Organization (CAMPO)?

The Corvallis Area Metropolitan Planning Organization (CAMPO) serves as the metropolitan planning organization (MPO) for the Corvallis Urbanized Area, as designated by the Oregon Governor in December 2002. CAMPO is comprised of the Cities of Adair Village, Corvallis, Philomath, parts of Benton County, and the Oregon Department of Transportation (ODOT). CAMPO is governed by a five-member Policy Board consisting of elected representatives from each city or county, as well as a staff person from ODOT. The Oregon Cascades West Council of Governments (OCWCOG), under a contract with the CAMPO Policy Board, provides administrative services and staffing to CAMPO.

## What is a Title VI Plan/ Program?

The Title VI Nondiscrimination and Environmental Justice Plan is a federally required document which reflects CAMPO's commitment to ensuring that no person shall – on the grounds of race, color, national origin, sex, age, disability or income status - be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity conducted by the MPO. This plan was developed to meet obligations under Title VI of the 1964 Civil Rights Act, the President's Executive Order on Environmental Justice (1994) and subsequent orders and enforcement regulations.

## What is in this Document?

The remainder of this plan is broken into chapters that address the requirements of a Title VI/Nondiscrimination Plan:

- **Chapter 2: CAMPO Overview**—Overview of CAMPO's role and responsibilities, governance, and membership.
- **Chapter 3: Title VI Nondiscrimination**—Introduces the legal requirements for non-discrimination in CAMPO's transportation planning practices and provides an overview of CAMPO's Title VI program.
- **Chapter 4: Environmental Justice**—Provides an overview of the executive orders that together create the best practices for Environmental Justice and discusses their relationship to CAMPO's transportation planning activities.
- **Chapter 5: CAMPO Area Demographic Profile**—Provides recent and statistically reliable information about areas of identified populations and population demographics. These population analyses and maps assist in assessing the needs of, and analyzing the potential impacts on and benefits to, Title VI and environmental justice protected populations in the CAMPO region.
- **Chapter 6: Implementation Strategies**—Summarizes the strategies CAMPO has identified in the plan, how CAMPO intends to move forward with them, and the overall timing of implementation.

## **Chapter 2: CAMPO Overview**

### **MPO Roles and Responsibilities**

Per USC 23, 123 & 450, a Metropolitan Planning Organization (MPO), must provide transportation planning and programming in Urbanized Areas (areas with a collective population of 50,000 or more.) MPOs facilitate continuing, cooperative and comprehensive transportation planning processes in partnership with their state Department of Transportation.

The Corvallis Area Metropolitan Planning Organization (CAMPO) serves as the MPO for the Corvallis Urbanized Area, as designated by the Oregon Governor in 2002. The region includes the cities of Adair Village, Corvallis, Philomath, and the County of Benton. CAMPO is governed by a five-member Policy Board consisting of elected representatives from each city or county, as well as a staff person from the Oregon Department of Transportation (ODOT). A Technical Advisory Committee (TAC) is made up of professional staff of the above entities, the ODOT Regional Planner, a representative from the Albany Transit System, and a representative of Oregon State University. The representatives of relevant federal and other state agencies have ex-officio status on the TAC. The TAC reviews technical material and provides recommendations to the Policy Board. The City of Corvallis is the owner of the Corvallis Transit System and their representation on the MPO Policy Board and TAC also represents the interests of the transit system. The Oregon Cascades West Council of Governments (OCWCOG), under a contract with the Policy Board, provides staffing including fiscal and administrative support to CAMPO.

In accordance with federal regulations, the functions and responsibilities of CAMPO include development of an annual Unified Planning Work Program (UPWP), an annual list of obligated projects, a 4-year Transportation Improvement Program (TIP), a long-range Regional Transportation Plan (RTP), and a Public Participation Plan (PPP). CAMPO must also demonstrate compliance with Title VI and other nondiscrimination requirements.

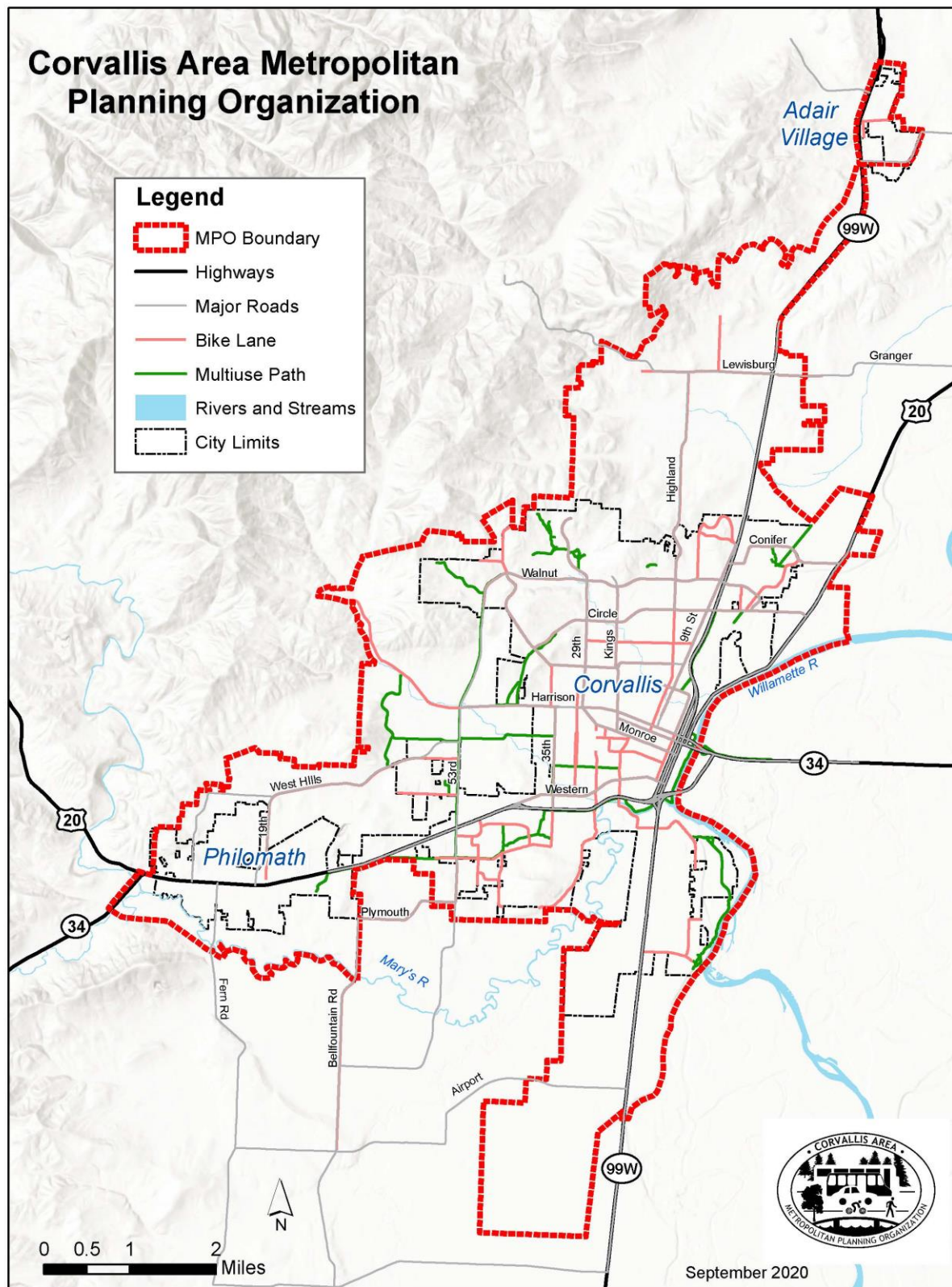
The Corvallis Area MPO is a recipient of federal funding and, as such, is subject to the provisions of various nondiscrimination laws and regulations including Title VI and environmental justice policies. MPO's serve a unique regional role that brings together members of local cities, counties, and the DOT to aid in the development of local transportation plans and programs that address the metropolitan area's needs. In this role, MPOs can help local public officials understand how Title VI and environmental justice requirements improve planning and decision-making.

The purpose of this document is to provide the needed assurances, regulations, and frameworks that MPOs must follow, and clarify roles, responsibilities, and procedures for assuming compliance with Title VI of the Civil Rights Act of 1964 and related regulations and directives.



## CAMPO Planning Area

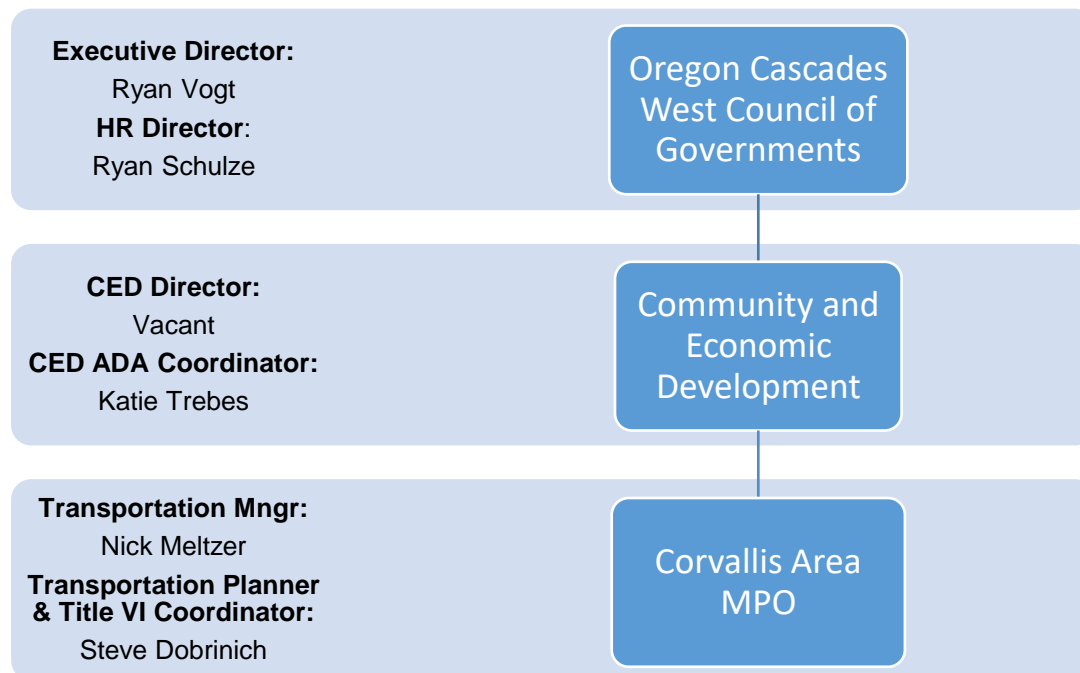
Map 1: CAMPO Planning Area



## CAMPO Organization and Governance

CAMPO is governed by a five-member Policy Board consisting of elected representatives from the cities of Adair Village, Corvallis, Philomath, and the County of Benton, as well as a staff person from the Oregon Department of Transportation (ODOT). CAMPO's staffing --including administrative, bookkeeping, and computer services-- are performed by the Oregon Cascades West Council of Governments (OCWCOG) under a contract with the Policy Board. OCWCOG staff dedicated to CAMPO activities are located in the Community and Economic Development Department (CED). CAMPO is governed independently of OCWCOG through the Policy Board.

**Figure 1: Organization Chart**



## Chapter 3: Title VI Nondiscrimination

### Authorities and Guidance

This section provides a compilation of the legal regulations, statutes and orders that together create the legal requirements for non-discrimination in CAMPO's transportation planning practices. Title VI of the Civil Rights Act of 1964 provides the primary basis for the civil rights protections addressed in this plan. Other regulations, statutes, and orders listed below expand on those requirements.

- **Title VI of the Civil Rights Act of 1964:** "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (23 CFR 200.9 and 49 CFR Part 21) (Nondiscrimination)
- **Federal Aid Highway Act of 1973:** Stipulates that no person *on the basis of sex*, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance. (23 USC 324)
- **Age Discrimination Act of 1975:** Provides that no person shall, *on the basis age*, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. (42 USC 6101)
- **Civil Rights Restoration Act of 1987:** Broadens the scope of Title VI by expanding the definitions of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors, regardless of whether the programs and activities are federally assisted. (Public Law No. 100-259)
- **Americans with Disabilities Act of 1990** (42 USC 12101 et seq. and 49 CFR Parts 27, 37 and 38) and the **Rehabilitation Act of 1973, Section 504**, (29 USC 794) extend the protections under Title VI of the Civil Rights Act of 1964 to prohibit discrimination of persons with disabilities; and requires that public transit be accessible to persons with disabilities. The ADA Act of 1990 states that all new transit vehicles must be made accessible to persons with disabilities, and that paratransit can be used to complement existing fixed-route service.
- **FHWA and FTA Memorandum on Title VI Requirements** (October 7, 1999) clarifies Title VI requirements in metropolitan and statewide planning. The memorandum provides FHWA and FTA staff a list of proposed review questions to assess Title VI capability and provides guidance in assessing Title VI capability. Failure to be in compliance can lead to a corrective action being issued by FTA and/or FHWA, and failure to address the corrective action can affect continued federal funding.
- **Executive Order 12250** (28 CFR Part 41) requires consistent and effective implementation of various laws prohibiting discriminatory practices in programs receiving federal funding assistance, including Title VI of the Civil Rights Act of 1964.
- **Administrative Regulations, 23 CFR 200 and 49 CFR 21** from Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) set requirements for state transportation departments to implement Title VI policies and procedures at the state and local levels.
- **USDOT Planning Assistance and Standards** for metropolitan planning require MPOs to seek out and consider "the needs of those traditionally underserved by existing transportation systems, such as low income and minority households, who may face challenges accessing employment and other services" (23 CFR 450.316). Additional staff guidance from FHWA and

FTA provides direction for assessing an MPO's level of compliance with Title VI, and establishes a corrective process that can affect federal funding.

- **FTA Circulars 4702.1 & 4702.1B** provides recipients and sub-recipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out the USDOT Title VI regulations (49 CFR part 21).
- **Oregon Revised Statutes** contain protections against discrimination in employment, accommodations and real property transactions based on race, color, religion, gender, sexual orientation, national origin, marital status, age, disability or family status.

## **Title VI Requirements for MPOs in Oregon**

The U.S. Department of Transportation (USDOT) enables the Oregon Department of Transportation (ODOT) to enforce Federal rules at the state level. As a sub-recipient of federal funds, CAMPO must comply with the following Title VI requirements administered by ODOT:

### **1. *Appoint a Title VI coordinator.***

CAMPO is staffed by the Oregon Cascades West Council of Governments (OCWCOG), and the OCWCOG Executive Director is ultimately responsible for implementation of the Title VI Program. The current CAMPO Coordinator shall serve as the Title VI Coordinator and shall be responsible for initiating, monitoring, and ensuring compliance with Title VI requirements. Compliance includes addressing civil rights complaints, engaging in public outreach and ensuring meaningful participation for protected populations in the transportation decision making process, preparing annual Title VI reports, providing support and information to the region as requested, and collecting and maintaining up-to-date data to support ongoing nondiscrimination activities including updating and implementing this plan. Additional responsibilities include obtaining adequate training and other support for CAMPO staff involved in Title VI compliance, and ensuring that no person is denied access to or participation in MPO programs.

In addition, the COG also has a certified ADA Coordinator, Katie Trebes, who has completed the ADA Coordinator Certification Program through the University of Missouri and the Great Plains ADA Center. Katie has been a resource for the CAMPO Title VI program and will continue to provide guidance, support, and resources moving forward.

The CAMPO Coordinator and ADA Coordinator will also work with the OCWCOG Community and Economic Development (CED) Director and OCWCOG Executive Director to implement the Title VI Plan.

<b><u>CAMPO Coordinator:</u></b>	Steve Dobrinich <a href="mailto:sdobrinich@ocwcog.org">sdobrinich@ocwcog.org</a> / (541) 223-7040
<b><u>CED ADA Coordinator:</u></b>	Katie Trebes <a href="mailto:ktrebes@ocwcog.org">ktrebes@ocwcog.org</a> / (541) 812-2004
<b><u>CED Director:</u></b>	Vacant
<b><u>OCWCOG HR Manager:</u></b>	Ryan Schulze <a href="mailto:rschulze@ocwcog.org">rschulze@ocwcog.org</a> / (541) 812-2000
<b><u>OCWCOG Executive Director:</u></b>	Ryan Vogt <a href="mailto:rvogt@ocwcog.org">rvogt@ocwcog.org</a> / (541) 924-8465

### **2. *Obtain Title VI training for coordinator and other key staff.***

Corvallis Area MPO staff shall attend applicable USDOT or Oregon Department of Transportation (ODOT) Title VI trainings when available. The ADA Coordinator maintains certification through continuing education credits.

Training courses CAMPO is considering for future continuing education include:

- *Title VI and Public Transit, National Transit Institute*
- *National Environmental Justice Conference & Training Program, Washington D.C.*
- *Introduction to Environmental Justice, National Transit Institute*
- *Diversity and Inclusion Training Series, American Planning Association*

**3. *Proactively prevent discrimination as defined in Title VI and related authorities; Disseminate Title VI program information to the public.***

The Corvallis Area MPO updates plans frequently (every 1-5 years), and each time looks for ways to increase defenses against discrimination and adverse environmental justice impacts. CAMPO includes required language on meeting agendas, plans and policies, and on the website to ensure the public has easy access to documents, or has the opportunity to access them through a special accommodation. CAMPO also follows all public comment protocol and actively works to engage the public in planning efforts.

CAMPO has a Public Participation Plan (PPP) that addresses the need to communicate with communities that may be traditionally underserved, such as people with disabilities, seniors, low-income residents, racial and ethnic minorities, and those of Limited English Proficiency (LEP). As part of this effort, CAMPO maintains an “interested parties” distribution list for all MPO meeting agendas. This list includes individuals that may fall into one or more of these population categories, or represent those that do. The forthcoming CAMPO PPP (in development at the time this Plan was adopted) will include an appendix documenting key local organizations for outreach efforts. Several of the organizations on this list work with or represent traditionally underserved populations in the CAMPO planning area. This list is used to solicit comments and request involvement on plan update efforts from both the entity and individuals they serve.

The CAMPO PPP is designed to:

- Encourage citizen participation
- Reach out to all jurisdictions within the MPO area to encourage participation
- Specifically encourage involvement of stakeholders and disadvantaged communities
- Address physical accessibility, language barriers and other accommodations to ensure participation by Title VI protected groups and individuals

**4. *Include Title VI compliant language in all contracts to second tier sub-recipients.***

CAMPO will work to ensure that all contracts and IGAs with sub-contracting entities use language that requires compliance with nondiscrimination regulations and best practices in environmental justice. CAMPO staff will work with OCWCOG’s contract procurement staff to ensure this language is included in all agreements and contracts.

**5. *Obtain and maintain data on race, ethnicity, age, gender, disability, limited English proficiency, and income of populations in service area.***

In order to measure the effectiveness of its outreach, CAMPO gathers and maintains statistical data on race, ethnicity, and sex of participants in, and beneficiaries of, federally funded

programs. For example, CAMPO maintains and reports on the composition and demographics of its policy board and technical advisory committee members, as well as staff involved in MPO projects. Additionally, CAMPO submits an Annual Accomplishments Report that outlines the demographic profile of the CAMPO planning area using the most recent and appropriate statistical information available on income, race and ethnicity, age, persons with disabilities and other pertinent data.

In developing a Language Assistance Plan, CAMPO collects data to identify populations in the MPO area who may speak languages other than English at home and those who speak English less than well or not at all. Those who speak English less than “very well” or not at all are classified as Limited English Proficient or “LEP”. This data is used to help identify any potential impacts and benefits of proposed projects on minority and low-income neighborhoods and to inform the development and implementation of CAMPO’s Public Participation Plan, and other outreach strategies. CAMPO’s full Language Assistance Plan and Four-Factor Analysis can be found in Appendix A.

Data is gathered from the decennial U.S. Census and American Community Survey. Data may also be gathered from school districts, religious and/or community organizations, and other state and local government agencies. Data will be represented in tables, charts, and maps and made available on the CAMPO website. Additionally, CAMPO may utilize a voluntary public involvement survey at public meetings to gauge participation by protected populations and those of Limited English Proficiency.

This plan includes a four-factor analysis identifying the following reasonable steps to ensure access:

- Keep on file a list of OCWCOG staff members who speak languages other than English. These individuals may be called upon to assist in working with community members who have limited English proficiency.
- Utilize professional translation and interpretation services.
- Place notices and announcements in appropriate community media, in applicable language(s) when issues or actions may affect areas or neighborhoods with significant LEP populations.
- Include the Nondiscrimination Policy Statement (see page iii) on the CAMPO website as well as in the MPO’s Regional Transportation Plan (RTP), Transportation Improvement Program (TIP), Unified Planning Work Program(UPWP), Public Participation Plan (PPP) and other planning and programming documents as appropriate.
- Include on all meeting agendas a statement regarding accessibility of CAMPO meeting locations. The statement will also provide a number to call at least 48 hours prior to the meeting if special accommodations are needed to participate, such as interpretation and translation services. If interpretation or translation services are needed, OCWCOG staff will first be asked to provide the requested services. If OCWCOG staff are unavailable or unable to provide the requested services, a translation service company will be contacted.
- Consider requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.

**6. *Proactively include traditionally under-represented populations (hard to reach through traditional notification process) in public involvement and informational processes.***

CAMPO's Nondiscrimination Policy Statement (see page iii) is posted on the CAMPO website, and will be incorporated into the MPO's Regional Transportation Plan, Transportation Improvement Program, Unified Planning Work Program, and other planning and programming documents as appropriate. All agendas for CAMPO meetings will also include a statement regarding ADA accessibility of meeting locations and a number to call for special accommodations, including interpretation and translation services.

**7. *Analyze the benefits and burdens of activities and projects on the service area Title VI protected population.***

CAMPO will develop an Annual Accomplishments Report for Title VI requirements including demographic information about the region used to review and monitor populations covered under Title VI requirements. Part of this task includes analyzing the potential benefits and burdens to Title VI protected populations living in the CAMPO planning area. The Annual Accomplishments Report will also include an assessment of performance as well as goals and objectives for the upcoming year.

**8. *Perform periodic self-assessments for Title VI compliance.***

CAMPO will review Title VI and Environmental Justice compliance when developing new plans and programs; updating existing plans; and compiling data for the Unified Planning Work Program and Annual Accomplishments Report. CAMPO will review and, as appropriate, update its Title VI Nondiscrimination and Environmental Justice Plan every three years.

**9. *Develop annual Title VI reports and respond to periodic Title VI reviews by ODOT.***

An Annual Title VI Work Plan will be included in CAMPO's annual Unified Planning Work Program. This work plan will outline Title VI monitoring and review activities planned for the coming year and will provide a target completion date for each activity.

The Corvallis Area MPO shall complete the following required Title VI reports:

- a. An Annual Accomplishment Report describing major Title VI activities. This report will include Title VI compliance activities occurring during the preceding fiscal year. The Report shall be submitted to the ODOT Office of Civil Rights, Title VI Team for inclusion in ODOT's Annual Report to FHWA. A copy should also be provided to ODOT Region Planning staff upon their request. The report will provide an overall review of the efficacy of CAMPO's Title VI/Nondiscrimination procedures, with specific information including:
  - Summary of any approved changes to the Title VI Plan during the reporting period. If changes occurred, a signed copy of the revised document shall be included.
  - A description of the Title VI reporting structure, including the Title VI Coordinator, MPO Manager and any support staff. This may include a listing of race, ethnicity, and gender for each staff person.
  - List any Title VI complaints received during the reporting period, including the basis for the complaint (ethnicity, gender, etc.) and summarize the outcome or resolution.
  - A summary of CAMPO's planning, programming activities and a listing of Title VI activities occurring during those activities.



- A summary of any consulting contracts and Title VI activities occurring during the RFP process and implementation of the contract. This includes efforts made to utilize DBE consultants.
  - A listing of Title VI / Nondiscrimination trainings which MPO staff participated in.
  - Goals and objectives for the upcoming year.
- b. Annual Title VI Certifications and Assurances, for submission with the annual Unified Planning Work Program.

CAMPO also complies with, and participates in, periodic reviews by the Oregon Department of Transportation's Office of Civil Rights. Most recently, the Office of Civil Rights performed a "Sub-recipient Title VI Program Review" for CAMPO on July 7, 2020. As part of this review, ODOT looked at CAMPO's 2011 Title VI Plan, website, and a survey questionnaire to develop a scorecard for the agency and, ultimately, provided CAMPO with a report detailing observations, scores, accomplishments, and recommendations.

#### **10. Correct any deficiencies identified through a review or complaint.**

As mentioned in the section above, ODOT's Office of Civil Rights performed a "Sub-recipient Title VI Program Review" for CAMPO on July 7, 2020. As part of this review, ODOT looked at CAMPO's 2011 Title VI Plan, website, and a survey questionnaire to develop a scorecard for the agency and, ultimately, provided CAMPO with a report detailing observations, scores, accomplishments, and recommendations. CAMPO staff incorporated recommendations from the Title VI review into this document to the extent that was practicable. This Plan serves as the foundation for CAMPO's Title VI Program which means recommended actions incorporated during the Title VI review process will be implemented going forward.

### **Filing a Civil Rights Complaint**

CAMPO has a Title VI complaint procedure in place. The process is available on the CAMPO website and provided in Appendix B of this document. The Title VI complaint form can be found in both English and Spanish in Appendix C. The procedures cover complaints filed under Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 against any program or activity administered by CAMPO.

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

CAMPO will make every effort to obtain early resolution of complaints at the lowest level possible, and accept both formal and informal complaints regarding its compliance with Title VI and related regulations. Informal complaints are those that have not been made in writing and have not gone through the formal complaint process described in the Appendix B. Informal complaints may be addressed and resolved directly by the MPO even if the MPO is identified in the incident.

CAMPO will institute and publish a formal public complaint and investigation process as outlined in Appendix B. Information about the complaint process, including the complaint form, will be available on the CAMPO website. Significant Title VI issues shall be reported directly to the CED Director.

Complaints must be filed (either in person or in writing) within 180 days of the alleged discriminatory event or practice.



**Complaints may be submitted:**

By Mail: Corvallis Area MPO  
1400 Queen Ave SE, Suite 205  
Albany, OR 97322

By Email: [sdobrinich@ocwcog.org](mailto:sdobrinich@ocwcog.org), [ktrebes@ocwcog.org](mailto:ktrebes@ocwcog.org), or [echavez@ocwcog.org](mailto:echavez@ocwcog.org)

By Phone: (541) 758-1911

The Title VI Coordinator will maintain a log of all complaints, including any complaints or concerns raised to the MPO outside of the formal written complaint process. The log shall also include up-to-date information regarding any investigations or lawsuits. The log will be maintained at the CAMPO/OCWCOG administrative offices: 1400 Queen Ave SE, Suite 205, Albany, OR 97322. Records and investigative working files will be retained for four years internally.

## Chapter 4: Environmental Justice

### Authorities and Guidance

This section provides an overview of the executive orders that together create the best practices for Environmental Justice. It is important to note that consideration of environmental justice across federal programs and activities is not mandated in statute, like Title VI federal law (protecting persons based on race, color, or national origin). The executive order on environmental justice (E.O. 12898) more generally directs agencies to integrate environmental justice into their respective missions to “the greatest extent practicable and permitted by law.” Executive Order 12898 provides the primary basis for best practices in Environmental Justice, other orders listed below expand on those practices.

- **Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations:** “Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” (Environmental Justice)
- **Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency:** Prohibits recipients of Federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to individuals who are Limited English Proficiency (LEP). This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English. According to FHWA, a limited English proficient person is an individual who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. (Best Practice in Environmental Justice)
- **USDOT Order on Environmental Justice** (DOT Order 5610.2) describes how the principles in the Executive Order are to be incorporated into programs and activities. The DOT order states that the DOT will not carry out any program, policy or activity that will have a disproportionately high and adverse effect on minority or low-income populations unless mitigation measures or alternatives that would avoid the adverse impacts are not practicable. Like Executive Order 12898, the DOT order does not create a new set of requirements for state and local agencies, but is intended to reinforce considerations already embodied in existing law, such as NEPA and Title VI. (Best Practice in Environmental Justice)
- **(USDOT) Order 6640.23** contains policies and procedures for the FHWA to use in complying with E.O. 12898. (Best Practice in Environmental Justice)

### Environmental Justice and Transportation Planning

In 1994, President Clinton issued **Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations**. The Executive Order focused attention on Title VI by providing that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” As noted at the beginning of this chapter, consideration of environmental justice across federal programs and activities is not mandated in statute, like Title VI federal law (protecting persons based on race, color, or national origin). The executive order on environmental justice more generally directs agencies to integrate environmental justice into their respective missions to “the greatest extent practicable and permitted by law’.

There are three fundamental environmental justice principles summarized from Executive Order 12898 and related USDOT and FHWA orders:

1. To avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Consideration of environmental justice is important during all phases of the transportation planning process. Areas of focus include **public participation** (to ensure that protected populations have real and equitable opportunities to influence decision) and **analysis** (to assess the distribution of benefits and impacts on protected populations.) Environmental justice issues arise most frequently when:

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

## **The Relationship Between Environmental Justice and Title VI**

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

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

Below is a list of examples from an FHWA/FTA memo outlining MPO actions that support Title VI compliance and environmental justice goals:

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

## Chapter 5: CAMPO Area Demographic Profile

The purpose of this chapter is to serve as a resource for transportation planning in the CAMPO area by providing recent and statistically reliable information about areas of identified populations and population demographics. The maps and analysis in this chapter assist in assessing the needs of, and analyzing the potential impacts on and benefits to, Title VI and environmental justice protected populations in the CAMPO region.

The CAMPO Planning Area includes the cities of Adair Village, Corvallis, and Philomath, as well as Benton County. It is important to understand the demographic profile of this area in order to ensure that all persons have an equal opportunity to benefit from or have access to the activities of the MPO and to avoid any disproportionate impacts from those activities. The demographic profile outlined below utilizes 2014-2018 5-Year American Community Survey (ACS) data at the Census Block Group level, when available, and at the Census Tract level otherwise. The following population characteristics were evaluated as part of the analysis: **low income populations, minority populations, seniors, persons with disabilities, and Limited English Proficiency (LEP) populations.** In some locations within the CAMPO planning area, percentages of protected populations are higher than the average for the urbanized area as a whole. These higher concentrations of subject populations are illustrated in the maps contained in the following pages. This information was used to identify potential communities of concern.

### Population Living Below the Poverty Level (Map 2)

The U.S. Census Bureau uses a set of dollar value thresholds that varies by family size and composition to determine those in poverty. For 2018, the poverty threshold for a family of two adults and two children was an annual household income of \$25,465. Within the CAMPO urbanized area, approximately 24.9% of the population (families and people) had income in the past 12 months falling below the poverty level during the 2014-2018 5-Year ACS time period.

As illustrated in the table below, the poverty rate in the CAMPO urbanized area is considerably higher than the state and national averages. One possible explanation for the high local poverty rate is the large number of college aged students living in Corvallis while attending Oregon State University and Linn Benton Community College. Newly independent young adults, and full time students, are likely to have lower than average incomes and may drag down the overall region average.

**Map 2** illustrates that the areas with the highest percentage of the population living below the poverty level are located near Oregon State University (OSU), downtown Corvallis, and the Census Block Groups immediately north of the OSU campus.

% of Population Living Below the Poverty Line	
U.S.	14.1%
Oregon	14.1%
Albany Urbanized Area	13.3%
Corvallis Urbanized Area	24.9%

*Source: 2014-2018 5-Year ACS, Table C17002*

### Minority Population (Map 3)

For the purpose of this plan, minority is defined as all persons who identified themselves as something other than “White-alone, not Hispanic or Latino” in their choices of race and ethnicity in the ACS survey. The minority population percentage for the CAMPO area is 22.9% which is lower than Oregon’s statewide number (23.9%). Both the Corvallis Urbanized Area and Oregon have significantly smaller minority populations than the national average. The minority population percentage for the U.S. is 38.9%.

**Map 3** indicates that minorities in the CAMPO planning area make up the greatest share of the population on and around the Oregon State University campus and the Census Block Group immediately south of campus which sits between the Mary’s River and Hwy 99W. Other notable clusters of minority residents include the area around the intersection of NW 9<sup>th</sup> Street and Circle Boulevard and the neighborhoods west of the OSU campus.

Minority Population	
U.S.	38.9%
Oregon	23.9%
Albany Urbanized Area	18.3%
Corvallis Urbanized Area	22.9%

*Source: 2014-2018 5-Year ACS, Table B03002*

### Senior Population (Map 4)

The senior population is defined as persons age 65 and older. According to 2014-2018 5-Year ACS data, seniors make up 12.5% of the population in the CAMPO planning area, which falls below the state and national percentages. This is likely due to the large number of college aged students living in Corvallis while attending Oregon State University and Linn Benton Community College. **Map 4** clearly demonstrates that the senior population is most commonly found in outlying neighborhoods on the periphery of the CAMPO planning area.

% of Population Age 65+	
U.S.	15.7%
Oregon	16.7%
Albany Urbanized Area	15.4%
Corvallis Urbanized Area	12.5%

*Source: 2014-2018 5-Year ACS, Table B01001*

### Persons with Disabilities (Map 5)

According to 2014-2018 5-Year ACS data, 10.5% of the population living in Benton County identify as having a disability. For this analysis, Disabled is defined as all civilian, non-institutionalized persons, 5 years and older that identified as having one or more of six disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and/or independent living difficulty. The percentage of the population with a disability in the CAMPO area is slightly lower than the state and national percentages.

Similar to the region's senior population, persons with disabilities are most heavily concentrated in neighborhoods on the edge of the CAMPO planning area. **Map 5** shows that northeast Corvallis, Adair Village, Philomath and sections of South Corvallis have the highest proportion of residents with disabilities.

% of Population with Disabilities	
U.S.	12.6%
Oregon	14.5%
Albany Urbanized Area	16.2%
Corvallis Urbanized Area	10.5%

Source: 2014-2018 5-Year ACS, Table DP02

### Limited English Proficiency (LEP) Population (Map 6)

The term Limited English Proficiency or "LEP" refers to individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. The data on ability to speak English represents the person's own perception about his or her own ability or, because survey questionnaires are usually completed by one household member, the responses may represent the perception of another household member. For purposes of this analysis, a LEP person is defined as any individual (age 5 and older) who speaks English less than 'Very Well'.

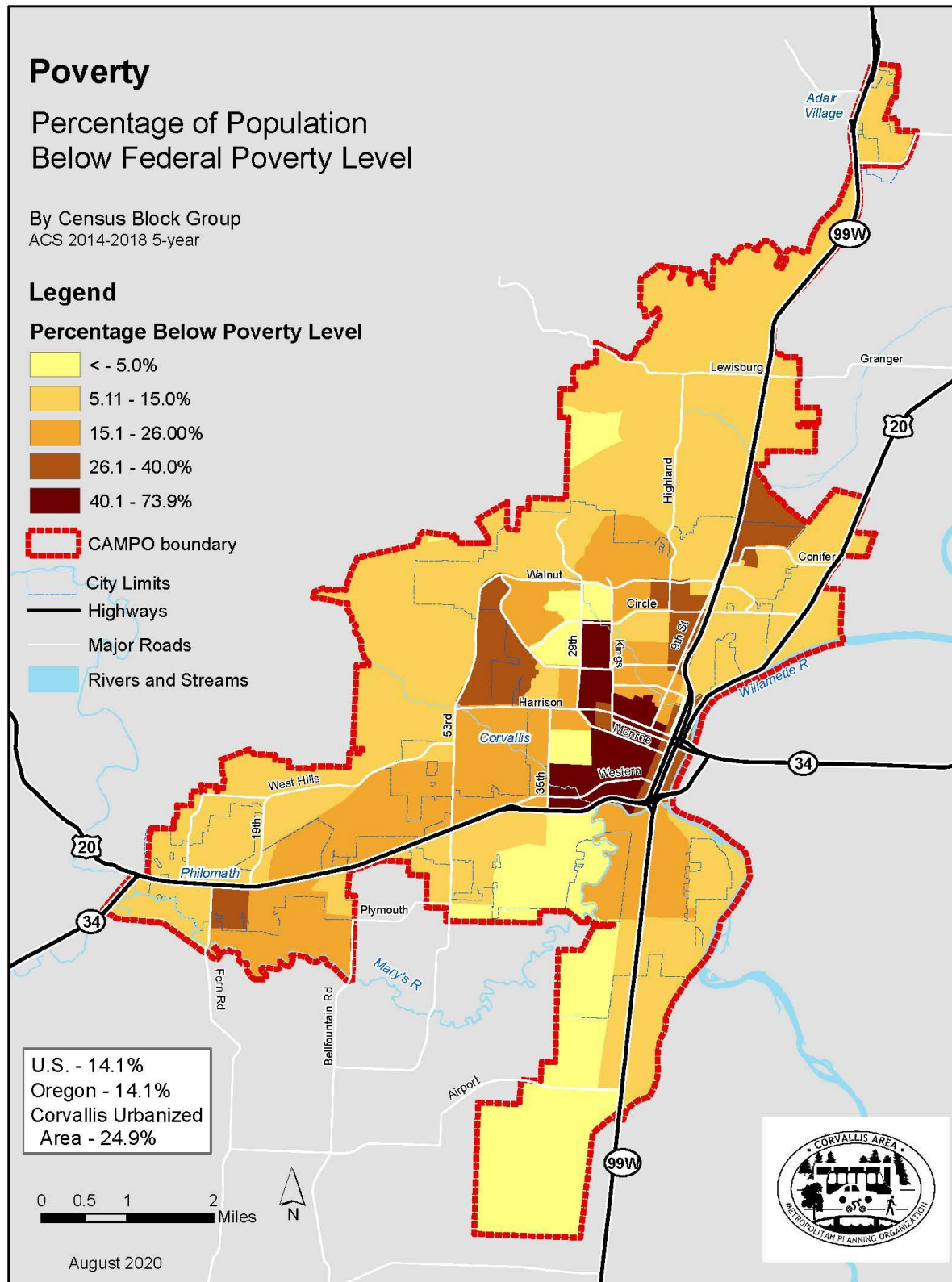
For the CAMPO area, 5.9% percent of the population reported less than 'Very Well' English speaking ability. This is in line with the statewide percentage for Oregon (5.8%) but considerably lower than the national percentage (8.5%).

**Map 6** illustrates that the region's LEP population is located in several small clusters throughout the CAMPO planning area. The neighborhood adjacent to the intersection of NW 9<sup>th</sup> Street and Circle Boulevard represents one cluster. Others include the area northwest of the OSU campus, the southern edge of downtown Corvallis, and the City of Philomath.

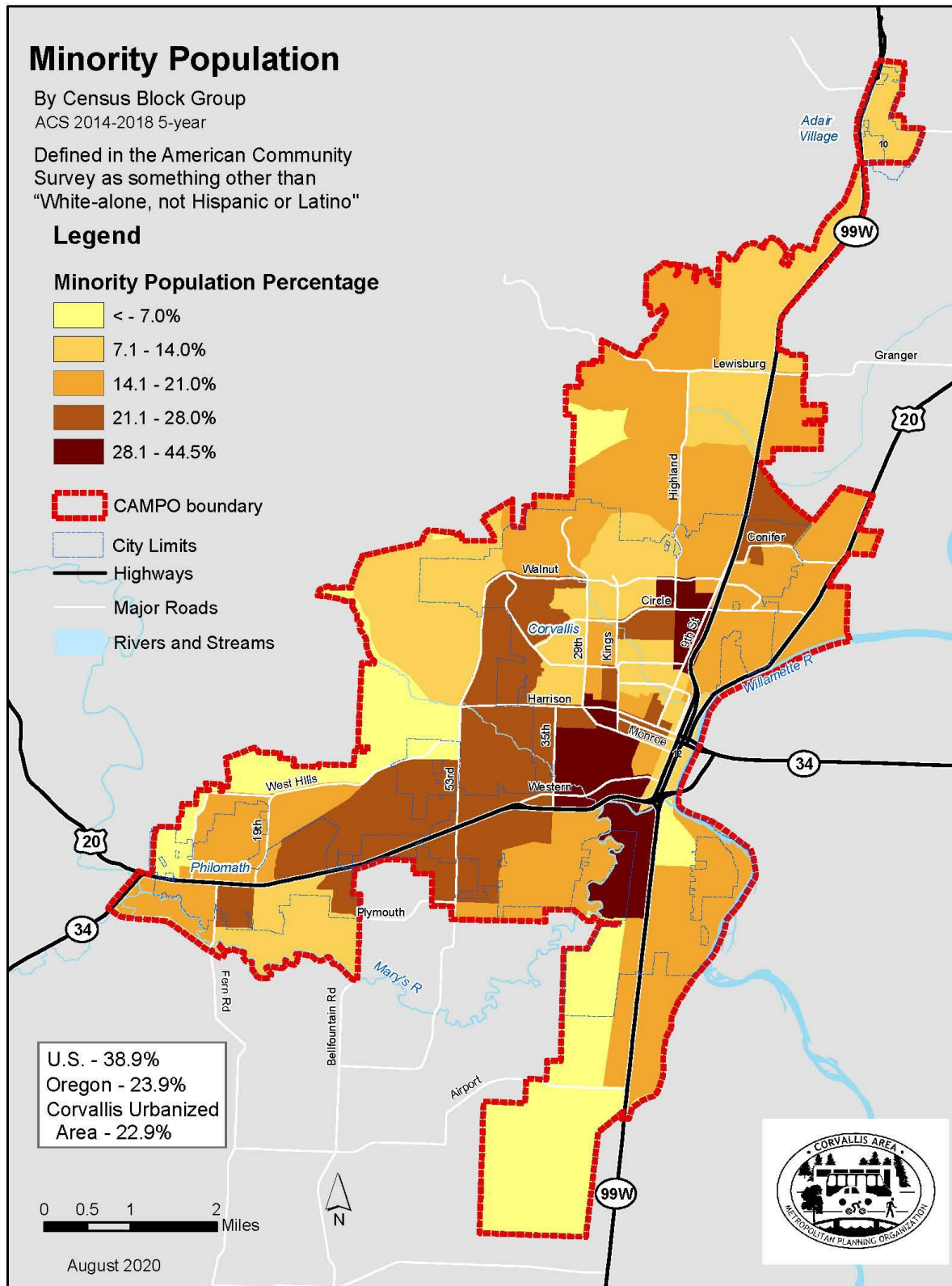
% of Population Speaking English Less Than "Very Well"	
U.S.	8.5%
Oregon	5.8%
Albany Urbanized Area	2.8%
Corvallis Urbanized Area	5.9%

Source: 2014-2018 5-Year ACS, Table B16004

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

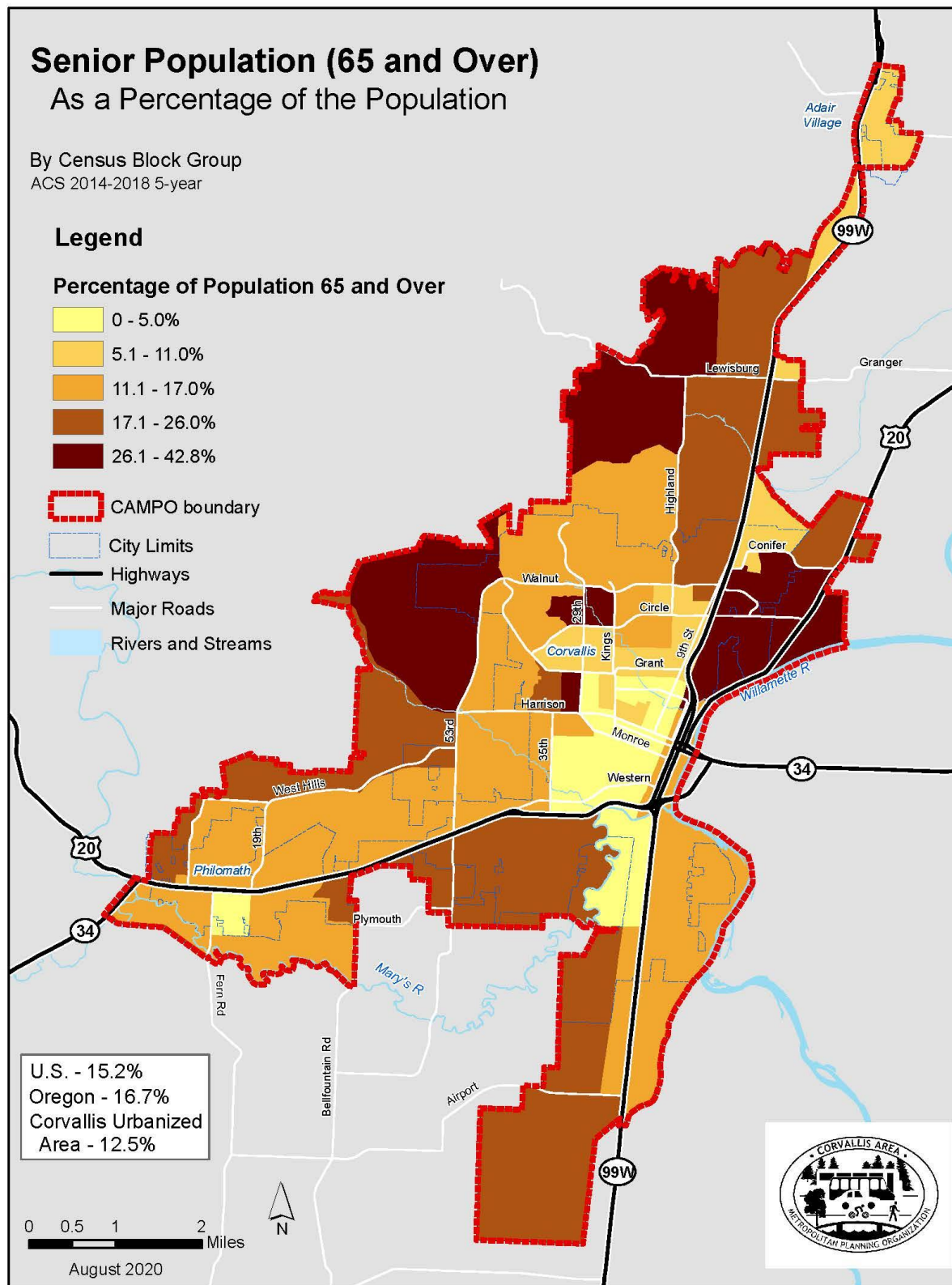


**Map 3: Minority Population**

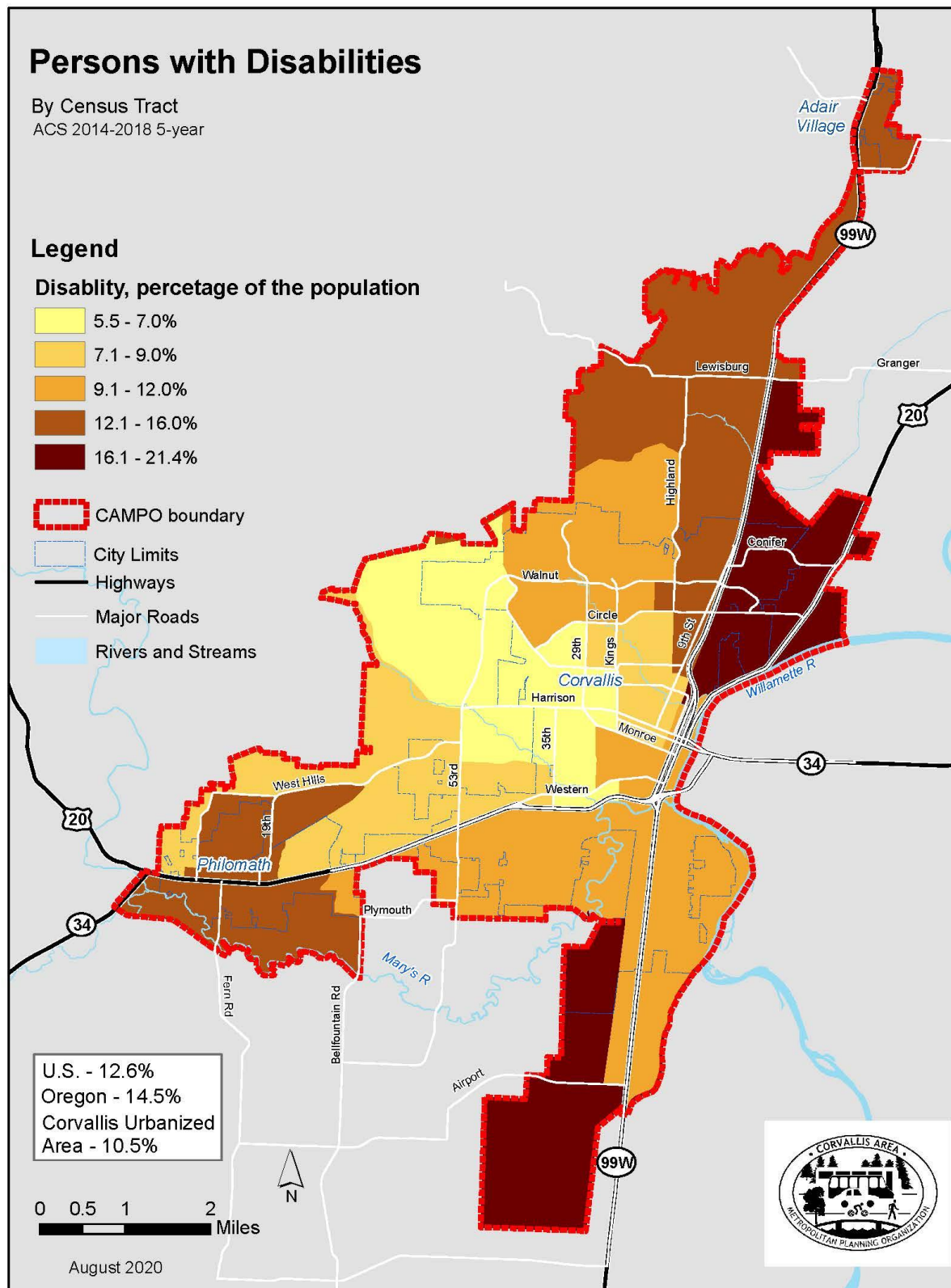




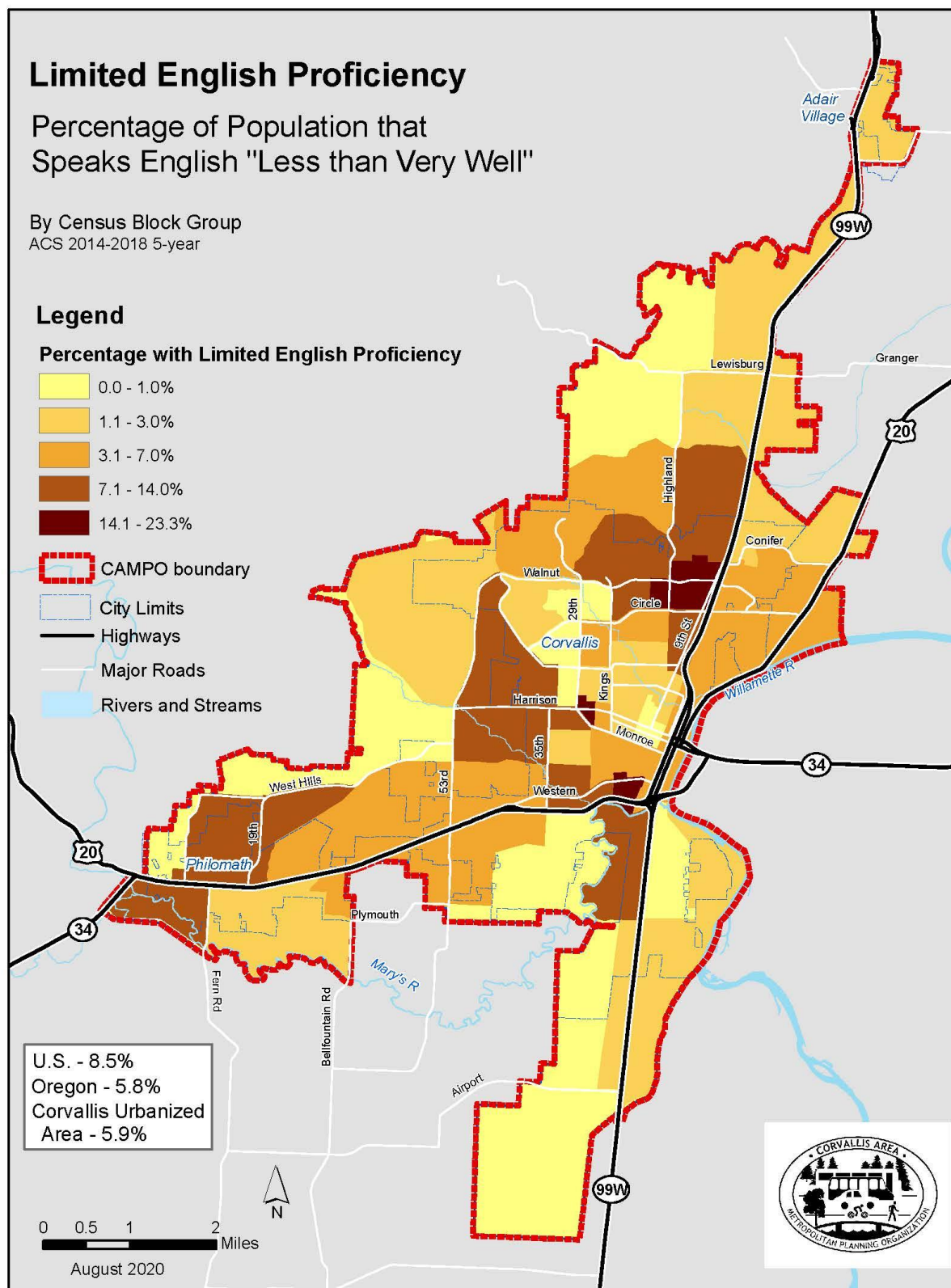
**Map 4: Senior Population**



**Map 5: Persons with Disabilities**



**Map 6: Limited English Proficiency (LEP) Population**



## Chapter 6: Implementation Strategies

### Implementation Strategies

CAMPO is working diligently towards a continuing, comprehensive, and cooperative planning process involving Title VI and Nondiscrimination policies. Moving into the future, CAMPO has identified several steps and strategies for implementing this vision. The table below provides a list of strategies identified in this plan, info on how CAMPO intends to move forward with them, expected deliverables, and the overall timing of implementation.

STRATEGY	CAMPO APPROACH	WORK PRODUCT/ DELIVERABLES	TIMING
<b>Data Collection</b>			
Collect data on race, gender, age, disability and language proficiency for planning and monitoring	Use American Community Survey, most up-to-date Census information, Portland State population estimates, and other relevant sources to identify, monitor, and plan for Title VI and EJ populations.	<ul style="list-style-type: none"> <li>Annual update of demographic info on the CAMPO Planning area</li> <li>Include data on Title VI and EJ populations in annual accomplishment report</li> </ul>	Annually
Collect demographic information on staff, Policy Board, and TAC members	Utilize CAMPO reporting form to collect demographic data from staff as well as Policy Board and TAC members. Update demographic data when new staff and committee members comes on board.	<ul style="list-style-type: none"> <li>Annual update of demographic information on Policy Board and TAC members as well as CAMPO staff and other committees</li> </ul>	Annually
Collect data on members of the public that participate in CAMPO projects, or attend CAMPO events	Continue to collect information about any public outreach events. Host an "Interested Parties" email list for members of the general public to receive MPO information.	<ul style="list-style-type: none"> <li>Continual update of information on public outreach events including contact information and other key pieces of data</li> </ul>	As Needed
<b>Complaint Process</b>			
Make Title VI complaint procedure available on the CAMPO website	Host a Title VI landing page that contains information about Title VI complaint process. Ensure this information is available in English and Spanish. A future project may be to create an online submission form.	<ul style="list-style-type: none"> <li>Bi-lingual Title VI complaint information on CAMPO website</li> </ul>	Current, future, updated as needed
Keep a log to track Title VI complaints	Maintain records of complaints, relevant materials, and corrective actions for any Title VI complaints.	<ul style="list-style-type: none"> <li>Maintain Title VI complaint log</li> </ul>	On-going
<b>Accessibility</b>			
Make meetings accessible	Meeting locations are accessible to persons with disabilities. Sign language, interpreter services, or other accommodations can be provided by contacting staff at least 48 hours prior to a meeting.	<ul style="list-style-type: none"> <li>Provision of language assistance during meetings as requested</li> <li>Continue hosting meetings in locations accessible to persons with disabilities</li> </ul>	Current and on-going

	Considers requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.		
Prepare Title VI and EJ information and make available to public	Ensure website is updated with current and relevant Title VI and EJ information including Nondiscrimination Policy Statement. Revise and prepare public noticing documents with Title VI and EJ issues and population in mind.	<ul style="list-style-type: none"> <li>Host relevant Title VI and Environmental Justice information on CAMPO website</li> </ul>	Current and on-going
Translate key materials to engage individuals with Limited English Proficiency	Identify key planning documents and other materials for translation. Work to translate materials into one or more languages.	<ul style="list-style-type: none"> <li>Develop and maintain bi-lingual information on key regional transportation planning documents</li> </ul>	Ongoing
Track staff members who speak languages other than English	Keep on file a list of OCWCOG staff members who speak languages other than English. These individuals may be called upon to assist in working with community members who have limited English proficiency. Utilize professional translation services as needed.	<ul style="list-style-type: none"> <li>Maintain list of staff members who speak languages other than English</li> </ul>	Ongoing
<b>Training</b>			
Attend and participate in trainings and activities related to Title VI and EJ	Include at least one training per year in the UPWP, in addition to a budget, if needed. Continue to research Title VI and EJ best practices and look for conferences and trainings that address these issues. Coordinate with ODOT's Title VI Officer to identify training opportunities.	<ul style="list-style-type: none"> <li>Attend applicable trainings on Title VI and Environmental Justice</li> </ul>	Annually
Ensure ADA coordinator maintains certification	Provide any support needed to maintain ADA coordinator certification and continuing education.	<ul style="list-style-type: none"> <li>Maintain certified ADA coordinator on staff</li> </ul>	Ongoing
<b>Public Participation</b>			
Investigate ways to target Title VI and EJ populations for better information dissemination and opinion gathering	<p>Techniques for public engagement should be researched periodically to include in Public Participation Plan to meet Title VI and EJ requirements. Formal or informal feedback from staff, boards and committees, or the public might trigger a review of the public involvement process.</p> <p>Place notices and announcements in appropriate community media, in applicable language(s) when issues or actions may affect areas or neighborhoods with significant LEP populations</p>	<ul style="list-style-type: none"> <li>Maintain pro-active and current Title VI Nondiscrimination Plan</li> <li>Utilize targeted outreach to reach Title VI and EJ populations, develop and distribute bi-lingual outreach materials when appropriate</li> </ul>	Current and on-going
Update Public Participation Plan regularly	Review, and update if needed, Public Participation Plan annually to ensure a relevant connection between methods for outreach and Title VI and EJ populations. An update will also be prepared when new local, state, or federal legislation changes are made.	<ul style="list-style-type: none"> <li>Maintain pro-active and current Public Participation Plan</li> </ul>	Annual review, update minimum every 3-years



<b>Evaluation</b>			
Evaluate effectiveness of communication efforts	Review communication procedures for public comment, website, meeting notification, and others annually for effectiveness.	<ul style="list-style-type: none"> <li>Review outreach procedures and evaluate for effectiveness</li> </ul>	Annually, as needed
Evaluate distribution of transportation projects, including benefits and burdens	Upon the development of new plans, or update of existing plans, perform an analysis of benefits and burdens of planned transportation projects on protected populations. Evaluate accessibility to jobs, schools, and other common destinations for protected populations by transit, bike, and walk modes.	<ul style="list-style-type: none"> <li>Develop procedure for analyzing benefits and burdens of planned transportation projects on protected populations</li> </ul>	Future, and ongoing
<b>Annual Reporting</b>			
Prepare Annual Accomplishments Report	Report is provided to the Oregon Department of Transportation Office of Civil Rights and includes demographic information for the region, policy board and TAC composition data, an assessment of performance on Title VI requirements, and goals and objectives for the upcoming year.	<ul style="list-style-type: none"> <li>Annual Accomplishments Report</li> </ul>	Annually
Include planned Title VI activities in UPWP	The Unified Planning Work Program is reviewed each year by state and federal partners, a component of which is updates to the Title VI plan and any corresponding activities.	<ul style="list-style-type: none"> <li>Include Title VI activities in UPWP</li> </ul>	Annually
<b>Program Development and Planning</b>			
Ensure all contracts and IGAs have needed Title VI language	Work with OCWCOG's contract procurement staff to ensure this language is included in all agreements and contracts.	<ul style="list-style-type: none"> <li>Contracts and IGAs with required Title VI language</li> </ul>	Current, and ongoing
Include Title VI and EJ evaluation criteria in STBG and RTP project selection	Bring to the TAC and Policy Board for consideration the inclusion of Title VI and EJ criteria into planning policies for STBG funding and RTP.	<ul style="list-style-type: none"> <li>Incorporate Title VI and EJ criteria into planning policies for STBG funding and RTP</li> </ul>	Future
<b>Environmental Justice</b>			
Public Involvement	Ensure methods for participation are inclusive: take into account the potential for limited internet access, inability to travel to meetings, inability to attend meetings due to timing, etc. Strive for an inclusive planning process that specifically works to engage known EJ populations –utilize the skills and relationships of existing agencies and organizations that might work with these populations already.	<ul style="list-style-type: none"> <li>Implement inclusive planning process which engages broad spectrum of the population including known Environmental Justice populations</li> </ul>	Ongoing
Mitigate and Avoid Adverse Effects	Conduct a benefits and burdens/gap analysis for current conditions. Look at the impact of proposed projects in future plans. Seek to avoid adverse effects such as increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community.	<ul style="list-style-type: none"> <li>Benefits and burdens/gap analysis</li> </ul>	Future

# **Title VI Nondiscrimination and Environmental Justice Plan**

## **Appendices**

### **Corvallis Area Metropolitan Planning Organization**



## **Appendices**

***Appendix A: Language Assistance Plan and Four Factor Analysis***

***Appendix B: CAMPO Title VI Complaint Procedures***

***Appendix C: CAMPO Title VI Complaint Form (Spanish & English)***

***Appendix D: Title VI Demographic Survey***

***Appendix E: Glossary of Terms***

***Appendix F: Title VI Plan Update Comments Received***



## Appendix A: Language Assistance Plan and Four Factor Analysis

As a recipient of federal funds, CAMPO must take reasonable steps to ensure that those of Limited English Proficiency (LEP) have meaningful access to the information and services the MPO provides. As stated in Federal Register, Volume 70, Number 239, there are four factors to consider when determining “reasonable steps.”

In developing a Language Assistance Plan, CAMPO collects data to identify populations in the MPO area who may speak languages other than English at home and those who speak English less than well or not at all. Those who speak English less than “very well” or not at all are classified as Limited English Proficient or “LEP”. This data is used to help identify potential impacts and benefits of proposed projects on minority and low-income neighborhoods and to inform the development and implementation of CAMPO’s Public Participation Plan, and other outreach strategies.

The following is a LEP needs assessment for CAMPO in relation to the transportation planning process:

***Factor 1: The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity or service.***

Demographic data on the number of LEP persons in the CAMPO Planning Area who are eligible to be served, likely to be served, or likely to be encountered by MPO programs or activities can be found in the table below. This data is derived from the U.S. Census Bureau’s 2014-2018 American Community Survey 5-year estimates. It shows the number and percent of LEP persons 5 years and over, in total and by ability to speak English in the Corvallis Urbanized Area.

The table shows that an estimated 5.9% of the population (aged 5 and over) in the Corvallis Urbanized Area speak English “less than very well.” Spanish is the language spoken at home for approximately 5.6% of households within the Corvallis Urbanized Area, and approximately 1.5% of households are both Spanish-speaking and speak English ‘less than very well’. Asian and Pacific Island languages are spoken at home in approximately 7.2% of households. Approximately 3.6% of households speak an Asian or Pacific Island language and speak English ‘less than very well.’

Language Spoken at Home	Estimate	Percent of Total
Population 5 years and over	62,516	
Speak English only	51,980	83.1%
Language other than English	10,536	16.9%
Speak English less than "very well"	3,705	5.9%
Spanish	3,532	5.6%
Speak English less than "very well"	935	1.5%
Other Indo-European languages	1,744	2.8%
Speak English less than "very well"	272	0.4%
Asian and Pacific Island languages	4,489	7.2%
Speak English less than "very well"	2,226	3.6%
Other languages	771	1.2%
Speak English less than "very well"	272	0.4%

Source: 2014-2018 5-Year ACS, Table S1601

The Department of Justice has established a safe harbor provision that MPOs can use to ensure compliance with the requirements to translate vital documents. A vital document is a document that, if not translated, would deny LEP individual(s) access to a service. For example, a Title VI complaint form. The safe harbor threshold for translating vital documents is when a population speaking a language other than English is:

- 5% of the total population affected or 1,000 persons of the total population affected- whichever is less.
- If there are fewer than 50 persons in a language group that reaches the 5% trigger, the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

**Factor 2: The frequency with which LEP individuals come in contact with MPO programs, activities or service.**

The data collected as part of this effort identified Spanish and Asian and Pacific languages as most commonly spoken by the LEP population in the Corvallis Urbanized Area. Since the Asian and Pacific Island languages category used by the U.S. Census Bureau includes a large number of distinct languages it is difficult to determine subpopulations within the larger group. Based on the fact that the Asian and Pacific Island language category includes multiple languages, it is likely that Spanish is the most commonly spoken language in the Corvallis Urbanized Area, aside from English.

The data collected as part of this analysis revealed there is no translation required, however, in an effort to expand outreach and improve community involvement, CAMPO will translate vital documents to Spanish.

The LEP population will likely continue to increase and, as a result, future contact with CAMPO is more likely. To date, CAMPO has not received any formal requests by LEP individuals for language translation of any document or any requests for an interpreter at any public activity

**Factor 3: The nature and importance of the program, activity, or service provided by the MPO to LEP community.**

The Corvallis Area MPO recognizes that transportation planning and programming decisions made by the MPO affect all residents in the CAMPO planning area including LEP populations. CAMPO considers the potential impacts of proposed transportation investments on LEP populations during regular MPO activities especially the development of the Regional Transportation Plan (RTP), Transportation Improvement Program (TIP), and the development of special transportation studies.

CAMPO seeks to ensure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved in evaluation and planning processes leading to transportation investments. To encourage involvement, CAMPO reaches out to stakeholder groups representing LEP populations, maintains a public website and conducts other activities to build public understanding of the MPO and its activities. CAMPO also encourages public involvement throughout the transportation planning process. CAMPO is concerned with input from all stakeholders, and every effort is taken to make the transportation planning process as inclusive as possible.

**Factor 4: The resources available to the MPO and overall costs.**

Given the size of the LEP population in the MPO area and current financial constraints, full multi-language translations of large transportation planning documents and maps is not warranted at this

time. Upon request, however, CAMPO will translate written materials it produces and provide Spanish interpreter services for meetings or workshops. For outreach specific to traditionally underserved populations where LEP individuals are more likely be encountered, staff will arrange for print materials and surveys to be available in Spanish without the need for a request.

CAMPO will complete the actions listed below as part of its LEP outreach strategy:

- Maintain a list of staff members who speak languages other than English. These individuals may be called upon to assist in working with community members who have limited English proficiency.
- As necessary, utilize professional translation and interpretation services.
- Place notices and announcements in appropriate community media, in applicable language(s) when issues or actions may affect areas or neighborhoods with significant LEP populations. As identified in the 4-Factor analysis, the most prominent language spoken in the Corvallis Urbanized Area other than English is Spanish. Therefore, consideration should be given to translating notices and announcements into Spanish and placing the translated announcements in venues identified by representatives of the Spanish-speaking community.
- Include the Nondiscrimination Policy Statement (see page iii) on the CAMPO website as well as in the MPO's Regional Transportation Plan (RTP), Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), Public Participation Plan (PPP) and other planning and programming documents as appropriate.
- Include on all meeting agendas a statement regarding accessibility of CAMPO meeting locations. The statement will also provide a number to call at least 48 hours prior to the meeting if special accommodations are needed to participate, such as interpretation and translation services. If interpretation or translation services are needed, OCWCOG staff will first be asked to provide the requested services. If OCWCOG staff are unavailable or unable to provide the requested services, a translation service company will be contacted.
- Consider requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.

## **Appendix B: CAMPO Title VI Complaint Procedures**

### **Introduction**

The complaint procedures outlined here apply to discrimination complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990, and other nondiscrimination authorities.

Any person who feels that he or she has been excluded from participation in, denied benefits of, or been subjected to discrimination in any of CAMPO's programs, services, or activities, on the basis of race, color, national origin, disability, age, gender, or income status has the right to file a complaint. Any person who would like to file a complaint should follow the procedure described below. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination.

Intimidation or retaliation of any kind is prohibited by law.

### **Informal Complaints**

The Corvallis Area MPO will make every effort to obtain early resolution of complaints at the lowest level possible, and accepts both formal and informal complaints regarding its compliance with Title VI and related regulations. Informal complaints are those which have not been made in writing or through the formal complaint process. The option of informal mediation meeting(s) between the affected parties and CAMPO's Title VI Coordinator or MPO Manager may be utilized for resolution.

Informal complaints may be addressed and resolved directly by the MPO even if the MPO is identified in the incident.

### **Complaint Procedure**

1. Any person who believes they, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990, or any other nondiscrimination authority may file a complaint with the Corvallis Area Metropolitan Planning Organization (CAMPO). A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the CAMPO Title VI Coordinator for review and action.

A formal complaint must be submitted within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. A formal complaint must meet the following requirements:

- a. Complaints can be submitted in writing (hardcopy or via email) or verbally. Complaints made in writing shall be signed by the complainant(s) and/or the complainant's representative.

In the event a person makes a verbal complaint of discrimination to a CAMPO representative or staff, that person shall be interviewed by the CAMPO Title VI Coordinator. If necessary, the CAMPO Title VI Coordinator will assist in transcribing the complaint into writing. The written version of the complaint will be provided to the complainant for confirmation or revision before processing.

- b. Include the date of the alleged act of discrimination.

- c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the incident.
2. Complaints may be submitted to Steve Dobrinich, CAMPO Transportation Planner & Title VI Coordinator, through the following methods:

**By Email:** [sdobrinich@ocwcog.org](mailto:sdobrinich@ocwcog.org)

**By Mail:** Steve Dobrinich, Transportation Planner & Title VI Coordinator  
Corvallis Area MPO  
1400 Queen Ave SE, Suite 205  
Albany, OR 97322

**By Phone:** 541-223-7040

3. In order to be accepted, a formal complaint must meet the following criteria:
  - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
  - b. The allegation(s) must involve a protected class (e.g. race, color, national origin).
  - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, subrecipient, or contractor.
  - d. The complainant(s) allegation must be detailed to specify all issues and circumstances of the alleged discrimination.
4. Upon receipt of the formal complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. The Title VI Coordinator will acknowledge receipt of the allegations and advise ODOT and/or USDOT within 14 days of receiving the complaint.
5. A formal complaint shall be investigated unless:
  - a. The complaint is withdrawn.
  - b. The complainant fails to provide required information after repeated requests.
  - c. The complainant cannot be located after reasonable attempts.
6. Within 60 days, the CAMPO Title VI Coordinator will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the OCWCOG Transportation Manager and Community Economic Development (CED) Manager. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
7. Within 90 days of receipt of the complaint, the CAMPO Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with ODOT, or USDOT, if they are dissatisfied with the final decision rendered by CAMPO. The CAMPO Title VI Coordinator will also provide ODOT and/or USDOT with a copy of this decision and summary of findings upon completion of the investigation.

All complaints, whether by a recipient of CAMPO funds or against CAMPO after initial investigation and with recommendations(s) for resolution, will be forward to the ODOT Office of Civil Rights (OCR) Title VI Officer or to the FHWA OCR. All Title VI and Environmental Justice

Complaints are required to be submitted to FHWA for final determination where federal funding is utilized on projects.

8. Contact information for the state and federal Title VI administrative jurisdiction is as follows:

Oregon Department of Transportation

David Morrissey, Title VI/EJ/ADA Program Manager

OCR Title VI Officer

Oregon Department of Transportation, Office of Civil Rights

3930 Fairview Industrial Drive SE

Salem, Oregon 97302

Phone: 503-986-3870

Email: David.N.Morrissey@odot.state.or.us

Oregon Division, Federal Highway Administration

530 Center St. NE, Suite 240

Salem, OR 97301

Phone: (503) 399-5749

Federal Transit Administration

Attention: Title VI Program Coordinator

Office of Civil Rights

East Building, 5<sup>th</sup> Floor -TCR, 1200 New Jersey Ave, SE

Washington, DC 20590

## Appendix C: CAMPO Title VI Complaint Form (Spanish & English)

The Corvallis Area MPO, as a recipient of federal financial assistance, is required to ensure that all of its activities and any benefits from these activities are conducted in a manner consistent with Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that he or she has been subjected to discrimination under any of CAMPO's programs or activities based on their race, color, national origin, limited English proficiency, sex, income, age or disability may file a written complaint with the MPO.

### Complainant

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

### Person discriminated against (if other than the complainant)

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

### Were you discriminated against because of your:

- |  |                                       |
|--|---------------------------------------|
| <input type="checkbox"/> Race/Color      | <input type="checkbox"/> Age          |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Disability   |
| <input type="checkbox"/> Sex             | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Income          |                                       |

Date and Time of Alleged Incident: \_\_\_\_\_

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved and any MPO projects, plans or programs that may have led to the situation you are describing. Be sure to include the names and contact information of any persons with knowledge of the alleged discrimination. If more space is needed, please use additional pages.

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**Have you filed this complaint with any other federal, state or local agency or with any court?**

- ☐ Yes
- ☐ No

**If yes, check and identify all that apply:**

- ☐ Federal Agency \_\_\_\_\_
- ☐ Federal Court \_\_\_\_\_
- ☐ State Agency \_\_\_\_\_
- ☐ State Court \_\_\_\_\_
- ☐ Local Agency \_\_\_\_\_

**Please provide information for a contact person at the Agency or Court where the complaint was filed.**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

**Please sign below. You may attach any additional written materials or other information you believe is relevant to your complaint.**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Please submit this signed form to and any attachments to:**

Corvallis Area MPO Title VI Coordinator  
Oregon Cascades West Council of Governments  
1400 Queen Ave SE, Suite 205  
Albany OR 97322



## Titulo VI Formulario de queja de la Organización de Planificación Metropolitana de Corvallis

La Organización de Planificación Metropolitana del Area de Corvallis (CAMPO), como receptora de asistencia financiera federal, es obligada a garantizar que todas sus actividades y cualquier beneficio de estas actividades se lleven a cabo de manera compatible con el Título VI de la Ley de Derechos Civiles de 1964, en su forma enmendada. Cualquier persona que crea que ha sido discriminada/o bajo cualquiera de los programas o actividades de CAMPO basado en su raza, color, origen nacional, dominio limitado del inglés, sexo, ingresos, edad, o discapacidad puede presentar una queja por escrito a CAMPO.

### **Demandante**

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

Número Telefónico: \_\_\_\_\_

### **Persona Discriminada (si no es el demandante)**

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

Número Telefónico: \_\_\_\_\_

### **¿Fue discriminado/a por su:**

- ☐ Raza/Color
- ☐ Origen Nacional
- ☐ Sexo
- ☐ Ingresos

- ☐ Edad
- ☐ Discapacidad
- ☐ Otra Razón \_\_\_\_\_

Fecha y hora del supuesto incidente: \_\_\_\_\_

**Explique lo más claro posible lo que sucedió y cómo fue discriminado/a. Indique quién estuvo involucrado/a, nombre cualquier proyecto, plan o programa de CAMPO que pueda haber llevado a la situación que está describiendo. Asegúrese de incluir los nombres y la información de contacto de cualquier persona con conocimiento de la supuesta discriminación. Si se necesita más espacio, utilice páginas adicionales.**

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**¿Ha presentado esta queja ante cualquier otra agencia federal, estatal, o local o ante cualquier tribunal?**

- ☐ Si
- ☐ No

**Si la respuesta es sí, identifique y nombre las agencias:**

- ☐ Agencia Federal \_\_\_\_\_
- ☐ Tribunal Federal \_\_\_\_\_
- ☐ Agencia Estatal \_\_\_\_\_
- ☐ Tribunal Estatal \_\_\_\_\_
- ☐ Agencia Local \_\_\_\_\_

**Por favor proporcione información de contacto para la persona en la Agencia o Tribunal donde se presentó la queja.**

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

Número Telefónico: \_\_\_\_\_

**Por favor, firme abajo. Puede adjuntar cualquier material escrito adicional u otra información que crea que es relevante a su queja.**

Firma: \_\_\_\_\_ Fecha: \_\_\_\_\_

**Por favor envíe este formulario firmado y cualquier otro archivo al:**

Corvallis Area MPO Title VI Coordinator  
Oregon Cascades West Council of Governments  
1400 Queen Ave SE, Suite 205  
Albany OR 97322

## Appendix D: Title VI Demographic Survey

### Title VI Demographic Survey

This survey is gathering demographic information on the CAMPO Policy Board, Technical Advisory Committee (TAC), and staff for the MPO's Title VI Annual Accomplishment Report.

Completing this form is voluntary but encouraged. If you prefer not to answer any questions you may select "Prefer not to say." All information will be held anonymously and will be reported at the aggregate level only.

Please contact CAMPO Staff at 541-223-7040, or e-mail [sdobrinich@ocwcog.org](mailto:sdobrinich@ocwcog.org) if you have any questions or concerns regarding this form.

#### **Question 1: Which group are you a member of?**

- ☐ CAMPO Technical Advisory Committee (TAC)
- ☐ CAMPO Policy Board (PB)
- ☐ CAMPO Staff

#### **Question 2: What is your gender?**

- ☐ Female
- ☐ Male
- ☐ Prefer not to say
- ☐ Prefer to self describe (please specify below)
- ☐ Other: \_\_\_\_\_

#### **Question 3: Which race/ethnicity best describes you?**

- ☐ American Indian or Alaskan Native
- ☐ Asian/Pacific Islander
- ☐ Black and/or African American
- ☐ Hispanic
- ☐ White/Caucasian
- ☐ Prefer not to say
- ☐ Multiple ethnicity/other (please specify below)
- ☐ Other: \_\_\_\_\_

## Appendix E: Glossary of Terms

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

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

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

**Board of County Commissioners (BCC)** – Elected officials (three per county) who serve as the administrative and policy decision makers for Benton County.

**Capital Improvement Program (CIP)** - A plan for future capital infrastructure and program expenditures which identifies each capital project, its anticipated start and completion, and allocates existing funds and known revenue sources for a given period of time. Each local government has a CIP.

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

**Comprehensive Plan** - An official document adopted by a local government that describes the general, long-range policies on how the community's future development should occur. A local comprehensive plan must be in compliance with Oregon state land use planning goals.

**Department of Land Conservation and Development (DLCD)** –The state department that administers Oregon's state-wide land use program. The Land Conservation and Development Commission (LCDC) is the appointed policy board that guides DLCD.

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

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

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

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

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

**Disproportionately High and Adverse Effect on Minority and Low-income Populations** - An adverse effect that: (1) is predominately borne by a minority population and/or a low-income population, or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low income population.

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

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

**Federal Highway Administration (FHWA)** - A branch of the US Department of Transportation that administers the federal-aid Highway Program, providing financial assistance to states to construct and improve highways, urban and rural roads, and bridges. The FHWA also administers the Federal Lands Highway Program, including survey, design, and construction of forest highway system roads, parkways and park roads, Indian reservation roads, defense access roads, and other Federal lands roads.

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

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

**Goal 12** - One of 19 statewide planning standards of Oregon that make up the state land use planning program. Goal 12 relates to transportation and reads: "To provide and encourage a safe, convenient and economic transportation system." See Transportation Planning Rule.

**Goals** - A desired result or purpose. In planning, a goal is a broad statement of philosophy that describes the hopes of the people of the community for the future of the community. A goal may never be completely attainable, but it is used as a point toward which the community may strive.

**Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)** - Legislative initiative by the US Congress that restructured funding for transportation programs; authorized an increased role for regional planning commissions/MPOs in funding decisions; and required comprehensive regional and statewide long-term transportation plans.

**Land Conservation and Development Commission (LCDC)** - A seven-member commission of volunteer citizens established by Senate Bill 100 in 1973 to develop and administer Oregon's statewide planning goals. The commission sets and guides policy for the administrative department, DLCD.

**Land Use** - Refers to the manner in which portions of land or the structures on them are used, i.e. commercial, residential, retail, industrial, etc.

**Land Use Board of Appeals (LUBA)** - A board established by the state legislature in 1979 to hear and decide on contested land-use cases

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

**Long-Range Transportation Plan (LRTP)** - See Regional Transportation Plan

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

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

**Moving Ahead for Progress in the 21<sup>st</sup> Century (MAP-21)** - Moving Ahead for Progress in the 21<sup>st</sup> Century Act is a multi-year federal transportation legislation, signed into law in 2012, that authorizes federal funds for surface transportation programs.

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

**Metropolitan Transportation Improvement Program (MTIP)** - See Transportation Improvement Program.

**Metropolitan Transportation Plan (MTP)** – See Regional Transportation Plan (RTP)

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

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

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

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

**Objective** - An attainable target that the community attempts to reach during the process of striving to meet a goal. An objective may also be considered as an intermediate point that will help fulfill the overall goal.

**Oregon Cascades West Council of Governments (OCWCOG)** – A voluntary association of local governments in Linn, Benton and Lincoln Counties, Oregon. Dedicated to solving area-wide problems, OCWCOG helps area cities, counties, ports, and member tribes reach their common goals.

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

**Oregon Transportation Commission (OTC)** - Establishes state transportation policy and guides the planning, development and management of a statewide integrated transportation network. The governor appoints five commissioners, ensuring that different geographic regions of the state are represented. One member must live east of the Cascade Range; no more than three can belong to one political party.

**Oregon Transportation Plan (OTP)** - The comprehensive, long-range plan for a multimodal transportation system for the state which encompasses economic efficiency, orderly economic development, safety and environmental quality.

**Paratransit** - Alternative known as "special or specialized" transportation which often includes flexibly scheduled and routed transportation services. These services use low capacity vehicles such as vans to operate within normal urban transit corridors or rural areas. Services usually cater to the needs of persons whom standard mass transit services would serve with difficulty, or not at all. Common patrons are the elderly and persons with disabilities.

**Performance Measures** - Indicators of how well the transportation system is performing with regard to such things as average speed, reliability of travel, and accident rates. Used as feedback in the decision-making process.

**Policy** - A statement adopted as part of a plan to provide a specific course of action moving the community towards attainment of its goals. Due to budget constraints and other activities, all policies cannot be implemented at the same time. Generally, those with metropolitan-wide implications should receive priority consideration.

**Policy Board** - An intergovernmental policy group that comprises representatives from Bend, Deschutes County, and the Oregon Department of Transportation. The Policy Board provides policy guidance on the transportation planning process in the MPO area.

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

**Public Hearing** - A formal event held prior to a decision that gathers community comments and positions from all interested parties for public record and input into decisions.

**Public Involvement Plan (PIP)** - A plan that describes the public involvement goals and objectives, and methods of involving the public in transportation decisions.

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

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

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

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

**Stakeholders**- Individuals and organizations involved in or affected by the transportation planning process. Include federal/state/local officials, MPOs, transit operators, freight companies, shippers, and the general public.

**State Infrastructure Bank (SIB)** - A revolving fund mechanism for financing a wide variety of highway and transit projects through loans and credit enhancement. SIBs are designed to complement traditional Federal-aid highway and transit grants by providing States increased flexibility for financing infrastructure investments.

**State Transportation Improvement Program (STIP)** - Prepared by ODOT, the STIP is a staged, multiyear listing of projects proposed for federal, state, and local funding encompassing the entire state. It is a compilation of the MTIPs prepared for the metropolitan areas, as well as project information for the non-metropolitan areas of the state and for transportation between cities. An MTIP must be incorporated into the STIP before MTIP projects can be funded by the State or the Federal Government.

**Statewide Transportation Improvement Fund (STIF)** – A State of Oregon program established by Section 122 of HB 2017 Transportation Funding Package which provides a dedicated source of funding for improving or expanding public transportation service.

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

**Surface Transportation Block Grant (STBG)** - The STBG Program is a multi-modal program which provides funds for a broad range of transportation uses and may be used for projects on any Federal-aid highway that is not functionally classified as a local or rural minor collector. STBG funding has the most flexible eligibilities among all Federal-aid highway programs, funds can be used for highway, transit, bicycle, pedestrian and other transportation options projects.

**Technical Advisory Committee (TAC)** - A committee of technical staff from the public works and planning departments of Adair Village, Corvallis, Philomath, Benton County, ODOT and Oregon State University. Ex-officio members of the TAC may include FHWA, FTA, Oregon Department of Land Conservation and Development (DLCD), Oregon Department of Environmental Quality (DEQ), and Oregon Division of State Lands (DSL). Provides technical expertise and recommendations to the Policy Board.

**Title VI** - Title VI of the Civil Rights Act of 1964. Prohibits discrimination based on race, color, or national origin (including limited English proficiency) in any program receiving federal assistance.

**Transportation Equity Act for the 21st Century (TEA-21)** - Authorized in 1998, TEA-21 authorized federal funding for transportation investment for fiscal 1998-2003. Approximately \$217 billion in funding was authorized, the largest amount in history, which is used for highway, transit, and other surface transportation programs.

**Transportation Improvement Program (TIP)** - A staged, multiyear (typically three to five years) listing of surface transportation projects proposed for federal, state and local funding within a metropolitan



area. MPOs are required to prepare a TIP as a short range programming document to complement its long-range Regional Transportation Plan (RTP). TIPs contain projects with committed or reasonably certain funds.

**Transportation Management Area (TMA)** – All urbanized areas over 200,000 in population, and any other area that requests such designation. The MPO is responsible for transportation planning within a TMA.

**Transportation Needs** - These are estimates of the movement of people and goods that are consistent with an acknowledged comprehensive plan and the requirements of the Transportation Planning Rule. Needs are typically based on projections of future travel demands resulting from a continuation of current trends as modified by policy objectives, including those expressed in Statewide Planning Goal 12 and the Transportation Rule, especially those for avoiding principal reliance on any one mode of transportation.

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

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

**Transportation System Management (TSM)** -The techniques for increasing the efficiency, safety, capacity or level of service of the existing transportation system without increasing its size. Examples include traffic signal improvements, traffic control devices including installing medians and parking removal, channelization, access management, ramp metering, and restriping for high occupancy vehicle (HOV) lanes.

**Transportation Systems Plan** - A plan for one or more transportation facilities that are planned, developed, operated and maintained in a coordinated manner to supply continuity of movement between modes, and within and between geographic and jurisdictional areas. Usually, a plan produced by a local government, e.g. City of Philomath, Benton County, etc.

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

**Urban Growth Boundary (UGB)** - A site-specific line in the Metro Plan that separates existing and future urban development from rural lands. Urban levels and densities of development, complete with urban levels of services, are planned within the UGB. A requirement of the state land use planning program.

**Urbanized Area** - Area that contains a city of 50,000 or more population plus incorporated surrounding areas meeting size or density criteria as defined by the US Census.

**Vehicle Miles of Travel (VMT)** - The sum of distances traveled by all motor vehicles in a specified region. A requirement of the state Transportation Planning Rule is reducing vehicle miles traveled per capita.

## Appendix F: Title VI Plan Update Comments Received

The purpose of this section is to provide an overview of comments received during the development of CAMPO's Title VI Nondiscrimination Plan. Comments received during CAMPO Policy Board and Technical Advisory Committee (TAC) meetings are not included here. Those comments can be found in the meeting minutes found on the CAMPO website. See minutes for Sept. 9 and Oct. 14 Policy Board meetings; Aug. 27 and Sept. 24 TAC meetings.

The sections below outline comments received from Federal, State, and local partners through email outreach as well as the general public during the 30-day comment period.

### Federal Comments

- **FHWA Oregon Division; Transportation Planner (10/6/20)** –“Thank you for passing along CAMPO's Title VI Plan. Due to a very quick glance of the plan, we have one suggestion separating Title VI (Law) and EJ (Executive Order) as it is confusing to the reader since they are not related. Also, I am assuming the appendices will be added at a later time.”

### State Comments

- **ODOT Region 2 Area 4; Senior Transportation Planner (9/1/20)** –“No comments on my part”
- **ODOT Office of Civil Rights; Title VI/EJ/ADA Program Manager (9/23/20)** –“In short, I think your draft plan is excellent. This new plan builds on the agency's past foundation in this work and is an impressive advancement from your 2011 plan. It also seems clearly aligned with OCR's Title VI review findings report. I also think your framing of the EJ issue as a best practice is very well handled. Other sections are equally strong, and the strategies summary grid at the close is innovative. You are on the right track and I look forward to receiving the final adopted document.”

### Local Comments

- **City of Corvallis (9/10/20)** –“P. 14, Population Living below the Poverty Level. I assume our statistic is heavily influenced by our university student population, and if so, perhaps we should state that as an explanation of why we are so far off state and national averages.”
- **Oregon State University (9/10/20)** –Add OSU representative, Rebecca Houghtaling to the list of TAC members. Additional OSU comments to be provided later this week or early next week.
- **Benton County (9/11/20)** –Update Community Economic Development (CED) Director position on page 4 and 7 to vacant.
- **Oregon State University (9/11/20)** –Text edits throughout the document to improve readability. Consider adding text about college age students impacting Population Living Below the Poverty Level statistic.
- **OCWCOG, ADA Coordinator (9/24/20)** –“page 23 the table of activities – under training 'Include at least one training per year then under timing it says 'as needed' perhaps update the frequency to annually to show the commitment to these trainings. The line below about Ensuring ADA Coordinator maintains certification – last box, should it be current and on-going instead of future?”

## **Public Comments**

All CAMPO Policy Board and Technical Advisory Committee (TAC) meetings are open to the public and include an agenda item dedicated to public comment. This includes all meetings during which the CAMPO Title VI Nondiscrimination Plan was discussed. A 30-day public comment period on the Title VI Nondiscrimination Plan was held from September 29 to October 28, 2020. Notification of the comment period was published in the Corvallis Gazette-Times and posted on the CAMPO website. CAMPO did not receive any additional input during the comment period.