

# Exhibit B

# Title VI Plan

*Prepared by*

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Metropolitan  
Planning  
Organization**

Lafayette Consolidated Government  
Traffic & Transportation Department



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<sup>1</sup> This plan is based upon the Baton Rouge Area Capitol Region Planning Commission, FY2010, Title VI Plan, Adopted July 14th, 2009 by CRPC Transportation Policy Committee.

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## **1.0 Title VI Policy Statement and Authorities**

### **1.1 Policy Statement**

The Lafayette Metropolitan Planning Organization (MPO) assures that no person shall, on the grounds of race, color, national origin, income, gender, age, and disability, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

More specifically, the Lafayette MPO assures that efforts will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. Additionally, the Lafayette MPO will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

Lafayette MPO's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports, and other MPO responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

This statement of policy is acknowledged by the presiding officer of the Lafayette MPO Policy Board, the Chairman of the Lafayette City-Parish Council, in the letter of transmittal from the Lafayette MPO to the Louisiana Department of Transportation and Development (DOTD). The first page of this document is the letter of transmittal.

### **1.2 Authorities**

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

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

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

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On February 11, 1994, President Clinton signed Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. This executive order directed Federal agencies to make Environmental Justice part of its mission by indentifying and addressing programs, policies and activities that affect human health or the environment so as to identify and avoid disproportionately high and adverse effects on minority populations and low-income populations.

Rather than being reactive, Federal, State, local and tribal agencies must be proactive when it comes to determining better methods to serve the public, who rely on transportation systems and services to increase their quality of life.

In April 1997, as a reinforcement to Executive Order 12898, The United States Department of Transportation (DOT) issued an Order on Environmental Justice (DOT Order 5610.2), which summarized and expanded upon the requirements of Executive Order 12898 to include policies, programs and other activities that are undertaken, funded or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA) or other U.S. DOT components.

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

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

## **2.0 What is the Lafayette MPO?**

The Lafayette Metropolitan Planning Organization (MPO) is a division of Lafayette City-Parish Government (LCG), responsible for planning transportation facilities and services in Lafayette Parish and portions of the Acadia, Vermilion, Iberia, and Saint Martin Parishes. The same division also provides for the comprehensive planning of LCG.

Through its professional staff of planners, architects, engineers, urban designers, comprehensive local government planners, transportation modeling specialist, and demographers and cartographers, the Lafayette MPO provides services related to several inter-related program areas:

- 1) Communications & Public Participation
- 2) Transportation Planning & Programming of Roadways
- 3) Environmental Affairs

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- 4) Consultant Contracts
  - 5) Education and Training

The Lafayette MPO has three advisory committees. The Citizen's Advisory Committee (CAC) first reviews matters to be studied by the MPO. It sends its recommendations for consideration to the Transportation Technical Committee (TTC), comprised of professional transportation planners, engineers, and budgetary specialists. The TTC reports to the Transportation Policy Committee (TPC), which is comprised of elected officials or their designees. Once a proposition, plan, or initiative has been reviewed by three advisory committees, the measure is reviewed by the Lafayette City-Parish Planning Commission, primarily for conformity with the comprehensive plan and the capital expenditure planning. The planning commission then sends the measure to the Lafayette City-Parish Council, the local government elected assembly which acts as the legislative body for City of Lafayette and the unincorporated areas of Lafayette Parish. Additionally, the council acts as the policy review board of the MPO. The council reviews the measure and votes on its implementation as a MPO resolution. The titular head of the MPO is the chairman of the city-parish council, who selects one of their members to preside over their deliberations.

If the measure is to have the force of law, then the resolution's language would be converted to an ordinance for any political jurisdiction within the MPO area. The local government would implement the ordinance within their jurisdiction.

is again presented to the council as a resolution and if approved, then signed by the City-Parish President at which time the measure is enforceable as law within Lafayette Parish. There are other municipalities and portions of Parishes in the 2000 MPO Study Area. These other local governments may consider the measure as resolutions and/or ordinances.

## **2.1 MPO Planning Committees**

As stated above, there are three advisory committees in the MPO process. Each committee plays a vital role in the community outreach and public education process.

These three committees are: Citizen Advisory Committee (CAC) for the general public with an interest in transportation planning; the Transportation Technical Committee (TTC) for transportation professionals selected based on their positions in local and state government; and Transportation Policy Committee (TPC) for elected officials or their designees. Although the TTC and TPC are required under current FHWA requirements, the CAC is a local committee constituted to increase the participation of citizens and residents in transportation planning.

Membership on these committees varies according to their role. Members for the CAC are selected from a list compiled by a widely disseminated call for nominees. The nominees are evaluated and selected by the Lafayette Parish City-Parish Council, the

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Lafayette Parish City-Parish President, as well as mayors from Breaux Bridge, Broussard, Duson, Maurice, Scott, and Youngsville. The TTC is based on positions identified in the transportation planning process that are key to decision making. The TPC are chosen from elected officials or their designee from of the municipalities in the parish. These municipalities are from the following cities, towns, and villages in the MPO planning process: Breaux Bridge, Broussard, Carencro, Duson, Maurice, Scott, and Youngsville as well as the following parish governments: Lafayette, Acadia, Vermilion, Iberia, and Saint Martin. The membership of the committees is listed in Appendix G.

## **2.2 Coterie Committees and the Lafayette in a Century (LINC)**

“LINC” is the chief acronym taken from the Lafayette Consolidated Government's Comprehensive Master Plan for the next 100 years. The letters stand for Lafayette IN a Century. When a neighborhood is designated as “LINC,” then the neighborhood has been identified in the context of the LINC Comprehensive Master Plan.

LINC-designated neighborhoods signify a partnership between the neighborhood residents, businesses, institutions, and the city government. The organizational structure of a LINC-designated neighborhood seeks to engage involved parties in the development of neighborhood plans that are community-lead. As outlined in the LINC Comprehensive Master Plan, some neighborhood-planning goals are achieved on a parish wide basis, while other goals are achieved on a neighborhood level.

When city planners determine the boundaries of a neighborhood, they often look at distinguishing physical features that cover the neighborhood. Perhaps the neighborhood should end at railroad tracks or at a nearby coulee. By contrast, the neighborhood residents may have time-honored boundaries, based on community relations. For example, residents might consider their neighborhood ending at “Mr. Smith’s place.” LINC-designated neighborhoods are not necessarily binding to either the planning department rationale, or the neighborhood residential rationale. No enclosed line exists when deciding which neighborhoods are to be LINC-designated. Undoubtedly, neighborhood boundaries are indeed physical and social and can be determined once a neighborhood coterie is in a decision-making position.

Initially, three distressed-targeted areas for reinvestment have received the LINC-designated neighborhood label and one area with a high percentage of low to moderate income apartment dwellers along with suburban subdivisions. The urban core is an area officially designated by Lafayette City- Parish Planning Commission. Within that urban core are three LINC designated neighborhoods: Freetown-Port Rico; and McComb-Veasey and Le Centre. The LINC neighborhood outside of the urban core is the Northeast LINC Neighborhood.

Eventually, urban areas in Lafayette will be designated and hopefully implement self-sustaining projects in their neighborhoods, too.

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A simple definition of a coterie in Lafayette would be “a democratically selected group of neighbors who join together to create plans and solve challenges that benefit the neighborhood.” The establishment of coterie in LINC-designated neighborhoods is key to city government because neighborhood perspective on planning issues is of immense value. The coterie includes the official elected representatives for the LINC-designated neighborhood.

Throughout the year, the coterie manages the neighborhood plan implementation. Neighborhood institutions like schools, churches, and community centers advise the coterie during the implementation process. The advice is helpful because these neighborhood entities are recipients of the community-lead projects being coordinated by the coterie. Other advisement may come from coterie-created subcommittees who would aid in the advancement of neighborhood plan goals and objectives. Ultimately, the coterie coordinates plan adoption and implementation through the Lafayette City-Parish Commission.

The coterie's membership is comprised of property owners, residents, and business owners from the LINC designated neighborhood. To emphasize, the neighbors elect the members of the coterie based on a neighborhood wide direct mail call for elections each year at a special meeting.

The Lafayette City-Parish Planning Commission will formally consider decisions made by the LINC-designated neighborhood coterie. The Commission may issue resolutions calling for plan changes specific to the LINC-designated neighborhood or the parish as a whole or for implementation of plans recommended by the coterie. Implementation is generally through the approval and support of the local government having jurisdiction or multiple governments as appropriate and necessary.

The Planning Commission also may send formal request of a coterie request for review to the Citizen's Committee, which reviews policies related to the comprehensive plan. The Citizen's Committee then sends its recommendations to the City-Parish Council and Administration. If the plan is accepted by both the council and the administration, then it is sent to an Implementation Committee, composed of key staff in LCG responsible for the operation of government services and facilities.

If local governments do not implement the coterie recommendations that have been approved by the Planning Commission, then the coterie may formally appeal to the city-parish or municipal council.

In some cases, the Planning Commission forwards the local government the recommendations from LINC-designated neighborhoods. The City-Parish's or a local municipality's council then approves the recommendations by resolution. A resolution does not carry the force of law, but rather calls for the implementation, given certain conditions. Under this scenario, the LINC-designated neighborhood coterie may appeal to the local council for implementation of a recommendation. The council may or may not

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respond to this appeal. The coterie may then appeal decisions of the LCG Council to any other government agency or elected official, but no formal status is given to such an appeal.

Yet another scenario: a recommendation by the LINC-designated neighborhood may have been sent to the Planning Commission and then to the council that approved an ordinance for implementation. If the recommendation and the ordinance are not implemented, then the coterie may appeal to the local council for action on their neighborhood initiative. If the council does not respond to this appeal, then the coterie may seek redress in the courts for relief.

This appeal process is established by state law for the operation of planning commissions and the implementation of their comprehensive plans.

### **2.3 The North Lafayette Plan Coordinating Team**

The Lafayette North Plan Coordinating Team was appointed by the Planning Commission to review recommendations made in the public hearings and formulate a Plan for North Lafayette Parish. The Lafayette City-Parish Planning Commission plans to consider adoption of the Lafayette North Plan as part of the Lafayette IN a Century (LINC) Comprehensive Master Plan for the parish. The Upper Lafayette Plan provides specialized services in an area with many pockets of minorities and low to moderate-income persons reside and do business. The membership of the Lafayette North Plan Coordinating Team is in part based on Afro-American community leaders from churches, schools, professions (legal and medical), and the business community.

The Lafayette City-Parish Planning Commission held a series of public meeting in 2005 to 2008 for the purpose of initiating preparation of a Lafayette North Plan as part of the Lafayette IN a Century (LINC) Comprehensive Plan. The purpose of the meeting was to identify community, human, and other resources available to help guide the formal preparation and adoption of a comprehensive plan for Lafayette North.

Participants were asked to identify current and long term needs, problems and visioning for the specific geographic area bordered on the north by Gloria Switch Road, west and south by University Avenue and east by the Parish Line. The area is occupied by a number of low to moderate income neighborhoods. There were a number of plans, studies and proposals prepared over the years and a couple of new pending studies involving the area. New ideas were also evaluated.

Participants in the planning process involved a wide range of institutions serving low to moderate income neighborhoods, commercial developments, apartment complexes, and the municipal government of the City of Carencro.

### **2.4 Evangeline Thruway Advisory Team and I-49 Action Plan**

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The Corridor Preservation and Management Action Plan to Preserve the I-49 Alignment, as approved by the Federal Highway Administration, has three mitigation areas, which will be impacted by the I-49 Corridor. The three mitigation areas (Area Level 1, 2 and 3) are laid out in relation to their proximity to the I-49 Corridor with Area 1 being in the right of way and Area 3 being the neighborhood-like boundary. The mitigation plan is being developed by the Evangeline Thruway Redevelopment Team.

The plan was developed with direct mail and a series of charettes with affected residents and property owners located in the urban core. Many of these residents are low to moderate income individuals as well as minorities.

The Corridor Preservation Ordinance<sup>2</sup> was submitted for consideration to the Lafayette Parish-City Council in January, 2001 and was adopted on March 6, 2001. The document constitutes the “Council’s Plan” which seeks to preserve and prepare the Interstate 49 Connector Corridor for future use. The purpose of this document is to present and develop an “Action Plan” which implements the Council’s Plan in terms of specific tasks and activities.<sup>3</sup> The Action Plan is being written in response to the FHWA request for a more detailed schedule of the Council’s Plan.

#### **2.4.1 Provisions and Themes**

The Corridor Preservation Ordinance has sections or paragraphs differentiated into 7 main groups based on the similarity of tasks and activities. Each of these groups of paragraphs can be thought of as themes containing similar elements which can be discussed together. These themes are:

- 1) Design Principles
- 2) Administrative Tasks
- 3) Expenditures and Budgeting
- 4) Public Information Activities
- 5) Mapping Projects
- 6) Supplementary Plans

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<sup>2</sup> The official designation of the ordinance is “An Ordinance of the Lafayette City -Parish Council Directing the Department of Traffic and Transportation to Formulate the Interstate 49 Connector Corridor Preservation and Management Plan and to Generally Provide Therefore” (Ordinance No. 0-043-2001). A resolution with many of the same provisions was approved on July 5, 2000 being named and numbered as “A Resolution of the Lafayette City - Parish Council Directing the Director of the Department of Traffic and Transportation to Implement Certain Policies, Procedures and Mechanisms for the Protection and Preservation of the Interstate 49 South Connector Corridor and to Generally Provide Thereof” (Resolution No. R-037-2000).

<sup>3</sup> We are following the proposal that a plan to be effective should represent the views of the elected officials of local government. See T.J. Kent, Jr. **The Urban General Plan** San Francisco: Chandler Publishing Co. 1964. Hereinafter, references to the “Plan” refers to the Action Plan while particular references to the Council Plan will be made by its particular name.

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## 7) Discretionary Powers

### **2.4.2 Membership of Evangeline Thruway Redevelopment Team**

The group proposed to develop these themes into a plan is the Evangeline Thruway Redevelopment Team which is composed of:

1. Two members appointed by the City-Parish President;
2. Four members appointed by the City-Parish Council;
3. One member appointed by the Lafayette Parish Downtown Development Authority;
4. One member appointed by the Lafayette Parish Bayou Vermilion District; and
5. One member appointed by Lafayette North Plan Coordinating Team.

### **2.4.3 Powers of Evangeline Thruway Redevelopment Team**

The Evangeline Thruway Redevelopment Team has the following powers and obligations:

1. Elect from its members a Chairman who leads the Team;
2. Elect from its members a Secretary who keep records of the Team's activities and meetings;
3. Report from time to time to the City-Parish President and Council;
4. Serve at the discretion and pleasure of the City-Parish President and a majority of the City-Parish Council;
5. Serve without compensation;
6. Reside in Lafayette Parish for the duration of their term;
7. Request the considered advice from the Volunteer Technical Advisory Panel;
8. Call public meetings and charettes to consider opinions and needs of citizens related to the Corridor;
9. Request support from and work constructively through the City-Parish Council with the Lafayette Parish delegation to the State Legislature in seeking state funds for the Corridor;
10. Request support from and work constructively through the City-Parish Council with the Louisiana delegation to the US Congress in seeking federal funds for the Corridor;
11. Request support from and work constructively with the Lafayette Economic Development Authority and the Lafayette Bayou Vermilion District in producing plans which serve their mutual interest;
12. Request staff time for the formalization of the Redevelopment Economic Plan and its integration with other supplementary plans available to the Director of Department of Traffic and Transportation;
13. Monitor the implementation of their strategic plan by LCG Staff and modify its components in order to improve its efficiency; and

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#### 14. Advise the Lafayette City-Parish Council on the expenditure of local funds.

In the Fall of 2010, a mitigation plan was completed after meeting more than two years on a monthly and occasionally biweekly basis. The plan contains specific recommendations on the reinvestment of public services in the I-49 Target Area (being Area Level 3). The plan was then sent to the council for review and consideration as part of a TIF district to fund reinvestment in the urban core and in the I-49 Corridor. The TIF ordinances are expected to be considered by the Council in November, 2010.

### **3.0 Purpose of This Document**

The purpose of this document is to communicate the Lafayette MPO plan for addressing the Federal and state non-discrimination requirements under Title VI, Federal Executive Order 12898 and other related regulations and statutes. This document has a companion document of equal importance: the Lafayette MPO's Citizen Information and Participation Program (CIPP). These two documents, together, describe the Lafayette MPO's plan and approach for addressing the requirements of Title VI. Although they are separate topics, Environmental Justice and Public Participation are closely intertwined issues and complement one another in ensuring fair and equitable distribution of transportation services and facilities.

In addition, the follow sections deal with public participation with the MPO Planning area and in particular in the central core of the City of Lafayette:

- 2.1 MPO Planning Committees
- 2.2 Coterie Committees and the Lafayette in a Century (LINC)
- 2.3 The North Lafayette Plan Coordinating Team
- 2.4 Evangeline Thruway Advisory Team and I-49 Action Plan

Public participation is essential to the success of any public planning program or project. Without the involvement of local citizens, it is difficult to design a program that meets the needs of the public or to gauge the project's success. Effective public participation not only provides transportation officials with new ideas, but it also alerts them to potential environmental justice concerns during the planning stage of a project. Perhaps the most important element of public participation is to engender a sense of ownership among the people, especially among those who are often at the mercy of their surroundings.

### **3.1 Objectives**

- 1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations.

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2. 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.
  3. Provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects or policies of Lafayette MPO.
  4. Ensure full and fair participation by potentially affected communities in the transportation decision-making process.
  5. Inform and educate citizens and other interested parties about ongoing MPO planning activities and their potential role in those activities.

#### **4.0 Organization and Staffing of MPO**

The MPO staff is responsible for transportation planning and coordination as part of the Traffic and Transportation Department.

#### **4.0 Organization and Staffing of MPO**

The Lafayette MPO has a diverse staff reflective of the diverse community in its service area.

The staff is responsible for transportation planning and coordination as part of the Traffic and Transportation Department.

The current staff is listed in Appendix J, Organization and Staffing of MPO, as of the date of this plan.

#### **5.0 General Responsibilities of the Title VI Coordinator under Title VI**

The Title VI Coordinator works within a complex local government<sup>4</sup> in which compliance with Title VI guidelines is distributed within the Department of Traffic and Transportation as well as a number of other departments.

However, the Title VI coordinator shall act as a champion for removing obstacles both to the letter as well as to the spirit of Title VI.

The coordinator shall advocate compliance and report on the status of that compliance both to the local government department head in charge of compliance within their departments, to the executive administration of the chief elected official, to the chairperson of the Lafayette City-Parish Council, and to the public.

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<sup>4</sup> See Section 2.0 What is the Lafayette MPO?.

## **5.1 General Title VI Program Responsibilities**

The Title VI Coordinator is responsible for ensuring these elements of the plan are appropriately implemented, and maintained:

### **5.1.1 Data collection**

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

### **5.1.2 Annual Title VI Report**

An Annual Title VI Report is to be submitted by the end of October each year, to DOTD's Compliance Programs Director, the Federal Highway Administration (FHWA), and the Federal Transit Authority (FTA). The document is to include:

- 1) Title VI complaint procedures (complaints will be submitted to/filed with DOTD; the MPO will not process complaints.);
- 2) Record of Title VI investigations, complaints or lawsuits (investigations will be conducted by DOTD with the MPO in a supporting role);
- 3) Plan to involve persons with Limited English Proficiency (LEP);
- 4) Title VI notice to the public; and
- 5) A summary of public outreach and involvement activities and a description of steps taken to ensure that minority and disadvantaged persons had meaningful access to these activities.

A DOTD questionnaire is sent to LCG each May and is to be submitted each year as of June 15.

### **5.1.3 Annual Review of Title VI program**

Each year, in preparing for the Annual Title VI Report, the Title VI Coordinator will review MPO's Title VI program to assure compliance with Title VI. In addition, the Coordinator will review agency operational guidelines and publications, including those for contractors, to ensure that Title VI language and provisions are incorporated, as appropriate.

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The Title VI Plan and associated Appendices will be revised every five years or as appropriate, as policies and procedures change.

#### **5.1.4 Dissemination of Information Related to the Title VI program**

Information on the agency's Title VI program is to be disseminated to MPO employees, contractors, and beneficiaries, as well as to the public, as described in the Program Area Responsibilities section of this document, and in other languages when required.

#### **5.1.5 Assist DOTD with Resolution of Complaints**

Any individual may exercise his or her right to file a complaint about the MPO policies, plans or practices, if that person believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination, in their receipt of benefits/services or on the grounds of race, color, national origin, income, gender, age, and disability. The MPO will work diligently in a supportive role to DOTD's Title VI Compliance Team to resolve complaints using the DOTD's Complaint Processing Procedures. The Title VI complaint process and Title VI Discrimination Complaint Form are presented in Appendix H.

### **5.2 General Responsibilities of the Title VI Coordinator**

The Title VI Coordinator is responsible for advocating the required action in implementing, monitoring, and reporting on MPO's compliance with Title VI regulations. In support of this, the Title VI Coordinator will:

- 1) Be a Title VI champion and advocate the identification, investigation, and elimination of discrimination when found to exist.
- 2) Investigate complainants with assistance from DOTD's Compliance team. The Coordinator will supply phone numbers and email addresses to complainants for contacting the proper DOTD authorities adhering to the timeframes in the complaint process.<sup>5</sup>
- 3) Meet with other MPO staff, as needed, to train, monitor and discuss progress, implementation, and compliance issues.
- 4) Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.

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<sup>5</sup> A complaint must be filed no later than 180 days after the alleged discrimination.

- 5) Work with other MPO staff to develop and submit the Annual Title VI Report to DOTD, FHWA, and FTA by the end of October each year and complete a DOTD Title VI questionnaire sent in May for completion as of June 15 of each year.
- 6) Contact consultants who are under contract to MPO to report and inquire on the status of compliance with Title VI.
- 7) Identify the deficiency status and develop a remedial action plan if necessary when a consultant under contract to MPO is found to not be in compliance with Title VI.
- 8) Review important Title VI-related issues with the advisory committees of the Lafayette MPO and the MPO policy board, the Lafayette City-Parish Council as well as the Administration.
- 9) Assess communications and public involvement strategies to determine the participation of impacted Title VI protected groups and address additional language needs, as appropriate.
- 10) Identify and report on the status of communications and public participation efforts to comply with Title VI.

## **6.0 Program Area Responsibilities**

The Lafayette MPO has the following program areas in which Title VI effects the delivery of public services as indexed by their major section numbers:

- 6.1 Communications & Public Participation
- 6.2 Transportation Planning & Programming of Roadways
- 6.3 Environmental Affairs
- 6.4 Consultant Contracts
- 6.5 Educational Services

### **6.1 Communications & Public Participation**

The goal of the Lafayette MPO's communications and public participation program is to ensure early and continuous public notification about, and participation in, major actions and decisions by the MPO. In seeking public comment and review, the MPO makes a concerted effort to reach segments of the population, including people from minority and low-income communities, and organizations representing these and other protected classes.<sup>6</sup>

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<sup>6</sup> The Communications & Public Participation Program Area applies to and affects the MPO work program as a whole, particularly agency efforts and responsibilities related to the Planning & Programming and Environmental Affairs Program Areas. It has been treated as a separate program area for purposes of

The Lafayette MPO utilizes a broad range of public information and participation opportunities, including dissemination of proposals and alternatives, process for written comments, public meetings after effective notice, settings for open discussion, communication programs, information services, and consideration of and response to public comments.

### **6.1.1 Operational Guidelines**

The Lafayette MPO has a Public Participation Plan and a Limited English Proficiency (LEP) Policy which guides the implementation of the Title VI Plan.

### **6.1.2 Principles of MPO's Communications & Public Participation Program**

The principles of the MPO's Communications & Public Participation Program can be stated as follows:

- 1) Equal access is an essential part of the public participation process.
- 2) No major public policy decision is reached or large project implemented without significantly affecting someone.
- 3) Professionals do not have a monopoly on good solutions.
- 4) Even if a project or policy decision is sensible and beneficial, it must be arrived at properly to be acceptable.
- 5) People are much more willing to live with a decision that affects different interests unequally if the decision-making process is open, objective, and considers viewpoints.
- 6) If project or policy staff doesn't provide relevant information necessary for an informed decision, the public will rely on and trust others.
- 7) Interacting with an official representative of an organization or group is no substitute for interacting directly with the members of organization, group, or neighborhood.
- 8) Effective public notification and participation takes time and effort, and can be expensive, yet is essential to sound decision-making.

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clarity. (See the Lafayette MPO's Public Participation Plan for more details.) Additional details of the work of the MPO and public participation can be found in the following sections: 2.1 MPO Planning Committees; 2.2 Coterie Committees and the Lafayette in a Century (LINC); 2.3 The North Lafayette Plan Coordinating Team; and 2.4 Evangeline Thruway Advisory Team and I-49 Action Plan.

### **6.1.3 Elements of MPO's Communications & Public Participation Program**

This section deals with the following subsections:

#### 6.1.3.1 Web Site

#### 6.1.3.2 Civic Functions and Information Request

#### 6.1.3.3 Opportunities for Public Comments

#### 6.1.3.4 Strategies for Engaging Title VI Protected Groups

#### 6.1.3.5 Limited English Proficiency and Language Distribution in Lafayette Parish

#### **6.1.3.1 Web Sites**

The Lafayette MPO maintains a website<sup>7</sup>, which is updated frequently to keep the public informed. The site contains information on the agenda, membership and operation of advisory committees. Additionally, the website has the following major sections:

- 1) MPO Committees
  - a. Transportation Planning Process
  - b. Citizen Advisory Committee (CAC)
  - c. Transportation Technical Committee (TTC)
  - d. Transportation Policy Committee (TPC)
  - e. Planning Commission
  - f. Metropolitan Planning Organization (MPO) Board
  - g. Subcommittees
- 2) Plans
  - a. Adopted Plans
  - b. Proposed Plans
- 3) Technical Data
  - a. Census Data
  - b. Traffic Counts
  - c. Demographics
  - d. Travel Demand Model
- 4) Projects (A – Z)
  - a. Individual Projects<sup>8</sup>
- 5) Public Transit Website (Separate site linked to MPO Site)
  - a. Accessibility Features

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<sup>7</sup> <http://mpo.lafayettela.gov/>

<sup>8</sup> There are 43 projects listed in the current web site. The list may be revised as changes to the plan are made.

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- b. Cyclists Information
  - c. General Information and Tips
  - d. Online Bus Tracking
  - e. Daytime Routes
  - f. Night Service
- 6) Lafayette in a Century (LINC) Web (Separate Site linked to MPO Website)
- a. Public Meeting and Agendas
  - b. LINC Elements
  - c. Designated Neighborhoods
  - d. Committees
  - e. Staff
  - f. Resources
  - g. Search
  - h. Adopted Plans
  - i. Planning Documents

LCG has a robust internet presence through operating five additional web sites. The Lafayette in a Century (LINC) website<sup>9</sup> is operated by the same division as the MPO division. The website is organized by elements of the comprehensive plan. LCG also operates the general website<sup>10</sup> for a broad range of city services organized by LCG operating department. Lafayette Utility System (LUS), as a division of LCG, provides a website<sup>11</sup> for customer services. The site is organized residential services, commercial services, community services, and environmental services. LUS also operates a website for its communication company, LUS Fiber<sup>12</sup>, which provides fiber optic communication to the homes of residents in the City of Lafayette. The site is organized by telephone, internet, and television services. LCG operates an website<sup>13</sup> for communications within its organization for its employees. The site is organized by personnel, civil services, group insurance, fire and police civil services, human resources, risk management and budgeting. All of these sites are available to the public.

The Title VI Plan and complaint procedures (via links to DOTD) will be posted upon approval of the plan by the DOTD and the Lafayette City-Parish Council as well as executed by the City-Parish President, and coded and uploaded by the internet staff to central area on the MPO website. The central Title VI area on the MPO website will be the central location for the Title VI and ADA communications. Links from the five additional LCG websites discussed above and footnoted below will be provided to the MPO Title VI and ADA Title VI area.

The provisional web site address of the Title VI and ADA area is:

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<sup>9</sup> <http://lafayettelinc.net/>

<sup>10</sup> <http://www.lafayettela.gov/>

<sup>11</sup> <http://www.lus.org/site.php>

<sup>12</sup> <http://www.lusfiber.com/>

<sup>13</sup> <http://lcgweb/>

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<http://mpo.lafayettela.gov/>

The user may also contact members of the staff on specific topics of interest either by phone or by email.

The notices to be posted on the website are found in Appendix C, Sections C.1.0 General Title VI Notice to the Public and C.2.0 Abbreviated Title VI Notice to the Public; and in Appendix D, Section D.5.0 Limited English Proficiency (LEP) Policy and Plan and the French and Spanish notices listed in Section D.9.0 Outreach Techniques.

### **6.1.3.2 Civic Functions and Information Request**

The Lafayette MPO staff regularly answers questions and respond to requests for information from citizens, businesses, and staff from cities, agencies, and organizations throughout the rural and urbanized regions.

MPO accommodate persons of limited English proficiency (LEP). Appendix D contains MPO's LEP Plan and Policy.

All MPO board and committee meetings are open to the public. Time for citizen comments is reserved at meetings and announced by the meeting chair. Meeting dates and times are posted well in advance on the MPO's website and in frequent MPO emails to which any citizen may subscribe.

All meeting agendas will contain the following statement upon approval of the plan by the DOTD and the Lafayette City-Parish Council as well as executed by the chairman of the City-Parish Council, and integrated in the clerical processes of the MPO's staff.

*ADA Notice: For special accommodations for this meeting, contact MPO's ADA Coordinator via XXX-XXX-XXXX at least 72 hours in advance.*<sup>14</sup>

The Lafayette MPO routinely provides opportunities for public comment, and continues to work to find new and innovative ways to solicit public comments and involve segments of the population within its region. Comments are accepted by phone, fax, email, US mail, Internet, and in person at any of their meetings. Additionally, the Lafayette MPO organizes neighborhoods in the urban central core for discussion and advice on the implementation of the transportation element of the LINC comprehensive plan. Moreover, the MPO sends out direct mail to persons being effected by transportation projects and hold meetings with persons effected by corridor projects including I-49 Corridor, I-10 Corridor, Johnston Street Redevelopment, and Ambassador Caffery Parkway South and North.

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<sup>14</sup> The notice will be updated with the current contact phone number from the ADA and Title VI Coordinator as listed in Appendix J of this document.

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Civic functions such as public meetings, public hearings, workshops and forums are held as needed for large transportation projects affecting the public.

The Lafayette MPO holds public hearings during major updates to the region's adopted transportation plans and the adopted regional growth and transportation strategy. Minor plan updates takes place several times a year. Major plan updates occurs less so. The MPO Policy Board is the Lafayette City-Parish Council, which reviews transportation projects based on the MPO advisory committees' comments. Public hearings are held when the MPO acts on MPO actions, both in the form of resolutions when policy and plans are approved and ordinances when funds are allocated for projects. At that time, the public often comments on plans, policies and allocation of funds.

### **6.1.3.3 Opportunities for Public Comments**

MPO routinely offers four different ways for people to comment on activities, programs, and decisions made at the agency.

- 1) Comments are accepted via phone, fax, email, U.S. mail, and in person at any board or committee meeting. Contact information for staff is provided on the agency website. The Lafayette MPO policy board and the MPO staff responds to comments received.
- 2) All MPO board and committee meetings are open to the public. The Lafayette MPO staff attends and presents at over 50 meetings per year. The meeting dates are posted well in advance on the agency's web site in compliance with state law requirements and in the MPO's frequent emails. Time for citizen comments is included on meeting agendas, and the meeting chair requests citizen comments at least once in every meeting. No advance notice is required to speak during the citizen comment period at any of the meetings. Public comments and responses made during these times are kept on record in the official meeting summaries. The MPO maintains a mailing list; anyone can request to be added to the mailing list. The MPO uses voluntary Attendance/Sign-in Forms at agency meetings open to the public.
- 3) Formal public comment and review periods are used to solicit comments on major planning and programming activities, for example, major amendments to the Transportation Improvement Program (TIP), changes to important MPO policies (such as the Public Participation Plan), and major updates to the UPWP. Generally, information is reviewed by advisory committees at a monthly meeting for a formal public comment period. The comment period is included in the MPO public notices of the proposed meeting agenda and on the website. Comments can be made in person at any MPO meeting, using a comment form on the agency's website, by email, by US mail, fax, or telephone. The MPO responds to comments received, and forwards comments to other agencies for a response as appropriate.

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Comments continue to be accepted until the close of the comment period, which is generally no less than two weeks prior to the item's schedule for action. comments and responses received throughout the comment period are reviewed and considered, prior to action by the MPO board, the Lafayette City-Parish Council.

- 4) The MPO staff solicits the residents of neighborhoods in the urban core through the Lafayette in a Century (LINC) comprehensive planning process. There are three distinct neighborhood organizations, known locally as coteries, which participate in decision making related to transportation issues as well as other city planning issues. Additionally, the LINC planning process has a group of citizen on the Citizens Advisory Committee as part of the LINC process, which studies issues with the staff and then completes policy statements which are studied by the MPO Board, the Lafayette City-Parish Council, the Lafayette City- Parish Administration, and the heads of agencies who are charged with implementation of the LINC plan.

#### **6.1.3.4 Strategies for Engaging Title VI Protected Groups**

The Lafayette MPO uses postal and electronic mailing lists to disseminate information and give notice for public comment opportunities. Title VI groups are added to the agency's postal and electronic mailing lists regularly, as they are identified. Both mailing lists include community groups that represent Title VI protected groups throughout the region.

The MPO also issues press statements through ongoing relationships with the press who publish weekly and daily newspapers, read by Title VI protected groups.

As described in the next section, the MPO routinely assesses the need for providing information in languages other than English. The MPO also evaluates the effectiveness of communications and public participation efforts and makes appropriate adjustments to its communication strategy.

#### **6.1.3.5 Limited English Proficiency and Language Distribution in Lafayette Parish**

According to the Dept of Justice guidance, the MPO should consider providing materials in a different language if over 5% of the affected population speaks that language at home or 1,000 speakers of languages other than English exist. The next three tables contain a discussion of the absolute number of speakers and percentage of speakers other than English. The implication of these statistics is a statement of policies outlined in Appendix D, Subsection 5.0 which can be summarized as translators will be provided for French, Spanish and Vietnamese speakers, who request those services.

The Lafayette MPO is composed of primarily Lafayette Parish, comprising roughly 85% of the total MPO parish population with the remaining 15% distributed between Acadia, Vermilion, Iberia, and St. Martin Parishes.

The policy as defined in this document is to provide translators for monolingual speakers of languages other than English. The Title VI Coordinator can communicate effectively with speakers of Cajun, Creole, and Standard French and renders services to speakers requesting these languages. Spanish, Vietnamese, and American Sign Language (ASL) can be requested if notice is given by the speaker or by an interested party within 24 hours of a request for public services or before a public meeting. For languages other than French, Spanish, Vietnamese and ASL, services should be requested three full days before a public meeting so that a translator in that community can be identified and their competence evaluated.

These policies and the statistical distribution of speakers of languages within the Lafayette MPO is based on an analysis of speakers in Louisiana of languages other than English and their absolute numbers as summarized in the three tables below based on upon 2008 Census Bureau figures for spoken language, 1995 Census Bureau figures for American Sign Language, and the 2000 Census figures by census blocks.

As can be seen, a large number of speakers in Louisiana speak French and related dialects, of which 17.42 percent are monolingual speakers.

<b>Language</b>	<b>Number of Speakers</b>	<b>Percent of Monolingual Speakers</b>
French- Louisiana and Standard	144,358	17.42
Spanish	117,240	43.06
Vietnamese	22,995	56.52
Deaf <sup>15</sup>	15,590	52.00
Arabic	6,935	32.83
Chinese	6,247	56.55

The next table compares the number of Spanish speakers by age to other groups of languages including Indio-European, Asian, and other languages in Lafayette parish. The parish only contains 2.07% Spanish-speaking and 1.05% Non-English speakers from Asia or the Pacific Islands. However, Lafayette Parish does have a large population of speakers of other Indo-European languages to 18.51%. The largest proportion of these speakers are speakers of French and its Louisiana variations of Cajun, Creole, and Patois,

<sup>15</sup> Estimates based on a study in 1995. See [http://library.gallaudet.edu/Library/Deaf\\_Research\\_Help/Frequently\\_Asked\\_Questions\\_\(FAQs\)/Statistics\\_on\\_Deafness/Deaf\\_Population\\_of\\_Individual\\_States\\_Territories\\_and\\_Localities.html](http://library.gallaudet.edu/Library/Deaf_Research_Help/Frequently_Asked_Questions_(FAQs)/Statistics_on_Deafness/Deaf_Population_of_Individual_States_Territories_and_Localities.html)

taken together who comprise 14.76% of the total population as shown on Table 6.1.3.5–C.

<b>Other Languages Spoken</b>	<b>Age</b>	<b>Speak Other Language; Speak English very well</b>	<b>Speak Other Language; Speak English well</b>	<b>Speak Other Language; Speak English not well</b>	<b>Speak Other Language; Speak English not at</b>	<b>Total Speak A Listed Language</b>	<b>Speak Only English in Age Group</b>	<b>Percent total</b>
Spanish	5 to 17	456	108	44	0	608	38237	1.59
Spanish	18 to 64	1471	447	287	87	2292	99536	2.30
Spanish	65 Plus	91	15	23	24	153	9585	1.60
<b>Subtotal Spanish</b>		<b>2018</b>	<b>570</b>	<b>354</b>	<b>111</b>	<b>3053</b>	<b>147358</b>	<b>2.07</b>
Other European Languages	5 to 17	1444	324	200	12	1980	38237	5.18
Other European Languages	18 to 64	13994	2023	873	30	16920	99536	17.00
Other European Languages	65 Plus	5977	1828	374	56	8235	9585	85.92
<b>Subtotal Other European Languages</b>		<b>21415</b>	<b>4175</b>	<b>1447</b>	<b>98</b>	<b>27135</b>	<b>147358</b>	<b>18.41</b>
Asian Languages	5 to 17	158	105	25	0	288	38237	0.75
Asian Languages	18 to 64	680	325	180	32	1217	99536	1.22
Asian Languages	65 Plus	28	14	7	0	49	9585	0.51
<b>Subtotal Asian Lang.</b>		<b>866</b>	<b>444</b>	<b>212</b>	<b>32</b>	<b>1554</b>	<b>147358</b>	<b>1.05</b>
All Other Languages	5 to 17	59	5	19	0	83	38237	0.22
All Other Languages	18 to 64	369	122	0	7	498	99536	0.50
All Other Languages	65 Plus	31	15	0	6	52	9585	0.54
<b>Subtotal Other Lang.</b>		<b>459</b>	<b>142</b>	<b>19</b>	<b>13</b>	<b>633</b>	<b>147358</b>	<b>0.43</b>
		24758	5331	2032	254	32375	147358	21.97

Table 6.1.3.5–C shows the number of speakers of languages in Lafayette Parish between the over the age of 5 years old. The distribution shows that only French is higher than 5% of the population speaking another language other than French.

<b>Language</b>	<b>Number of speakers</b>	<b>Percent Total (%)</b>
English only	144,400	81.93
French & Related Louisiana Dialects	26,010	14.76
Spanish	3,055	1.73
Vietnamese	650	0.37
Arabic	430	0.24
German	300	0.17
Chinese	160	0.09
<b>Total</b>	<b>175,005</b>	<b>99.30</b>

Further discussion of language is found in Section Appendix D - Policy and Plan for Limited English Proficiency (LEP).

#### **6.1.4 Responsibilities of the Title VI Coordinator for Public Communications**

The Responsibilities of the Title VI Coordinator for Public Communications are:

- 1) Be a Title VI champion and advocate the development and distribution of information on Title VI and agency programs to the general public.
- 2) Provide information in languages other than English, as needed.
- 3) Disseminate information to minority media and ethnic/gender related organizations, to help ensure social, economic, and ethnic interest groups in the region are represented in the planning process.
- 4) Include the abbreviated Title VI Notice to the Public (see Appendix C) in press releases and on the website which includes a meeting schedule.
- 5) Notify affected, protected groups of public hearings regarding proposed actions, and make the hearings accessible to residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified.

## **6.2 Transportation Planning & Programming of Roadways**

The Lafayette MPO is responsible for developing long- and short-range transportation plans to provide efficient transportation services to the region. A comprehensive transportation planning process is used, which entails the monitoring and collection of data related to transportation issues. The MPO coordinates with DOTD, cities, parishes, and transportation providers, seeks public participation, and provides technical support when needed.

### **6.2.1 Key Planning and Programming Activities**

The MPO is mandated by state and federal law to maintain the region's transportation plans. The Consolidated Thoroughfare Plan (CTP) is a plan along with the Functional Classification Plan (FCP) that outlines the location, probable route, and width of roadways anticipated to be built in the study area for the for-seeable future. The 2030 Financially Constrained Transportation Plan (FCTP) is a subset of the CTP of which are only those roadways which are currently funded. The Regional Transportation Improvement Program (TIP) is a four-year program of federally funded projects in the region. In addition, the Lafayette MPO provides planning for the local Capital Improvement Program (CIP) for roadways that will be constructed in the coming year.

Moreover, the Lafayette MPO conducts and supports numerous state and federal planning, compliance, and certification programs, which enable parishes, cities, a transit agency, and DOTD to obtain state and federal funding.

### **6.2.2 Major Programs**

The Lafayette MPO has seven major programs.

#### **6.2.2.1 Regional Transportation Improvement Program (TIP)**

The Lafayette MPO maintains a Regional TIP that incorporates projects using federal funds, including funds managed by MPO and the state and regionally significant projects, regardless of funding source; conduct ongoing analyses related to plan consistency, air quality, and financing; and provide training and assistance to agencies in the region.

#### **6.2.2.2 Transportation Management Systems**

The Lafayette MPO develops the Travel Demand Management, which will probably be required by federal transportation law to monitor existing transportation system performance problems and identify potential solutions to guide decisions on use of federal transportation funds and air quality.

#### **6.2.2.3 Policy, Plan, and Project Review**

The Lafayette MPO ensures that local, regional, and state planning efforts are compatible and mutually reinforcing, and work with local governments, parish-wide growth management planning groups, and state agencies in the review of policies, plans, and projects for consistency with state and regional planning goals.

#### **6.2.2.4 Technical Services and Regional System Data**

The Lafayette MPO provides demographic, economic, travel, and geographic data to member jurisdictions, other agencies, businesses, and the public; assist in planning activities of member jurisdictions; collect, analyze, maintain, and improve data; and identify, monitor, and forecast trends. The demographic, economic, and transportation network are modeled to provide prediction on the size and need of future roadways.

#### **6.2.2.5 Communications and Information Services**

The Lafayette MPO develops and provides a information materials on agency activities and services. Assist agency staff in reaching out to, involving, and meeting the needs of other agencies, businesses, community organizations, and the public.

#### **6.2.2.6 Safety Planning**

The Lafayette MPO provides significant safety planning for the MPO service area in the form of building relationships with stakeholders who administer programmatic functions to reduce fatalities and crashes.

#### **6.2.2.7 Grant Management Services**

The Lafayette MPO provides grant management services to the Lafayette Consolidated City-Parish Government for the funding the activities listed in this section. LCG provides matching funds for the MPO activities.

### **6.2.3 Title VI Coordinator's Responsibilities for Transportation Planning**

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the agency's planning process. In addition, the Coordinator seeks to:

- 1) Be a Title VI champion and advocate the identification of Title VI issues involved in the planning and programming process.
- 2) Report on the status Title VI issues involved in the planning and programming process.

- 3) Prepare and update a demographic profile of the region using the current and appropriate statistical information available on race, income, and other pertinent data.<sup>16</sup>
- 4) Develop a process for assessing the distributional effects of transportation investments in the region as part of actions on plan and programming documents.

### **6.3 Environmental Affairs**

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Within the context of regional transportation planning, environmental justice considers the relative distribution of costs and benefits from transportation investment strategies and policies among different segments of society.

When MPO adopts new planning documents, or substantively amends existing documents, the agency is required to comply with federal environmental justice requirements. When this occurs, a systematic process is used to study and evaluate necessary environmental aspects of the proposed action(s). Depending on the scope, complexity, and impacts of the project, the agency's Title VI Coordinator oversees the process, and ensures federal and state requirements are met, and that the public has been involved as appropriate.<sup>17</sup>

#### **6.3.1 Title VI Coordinator's Responsibilities for Environmental Affairs**

The Title VI Coordinator is responsible for Title VI environmental justice compliance in aspects of MPO's work that triggers environmental review requirements. The Coordinator seeks to:

- 1) Be a Title VI champion and advocate the identification and report on the status Title VI issues involved in the environmental planning process.
- 2) Participate in the drafting of Title VI environmental justice compliance of Environmental Impact Statements (EIS) and Environmental Assessments (EA) prepared by MPO and/or MPO consultants.

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<sup>16</sup> The coordinator makes the document available to the public and member agencies on MPO's website and in the Information Center. Appendix A contains an abbreviated Environmental Justice demographic profile for the region.

<sup>17</sup> The reader should refer to Section 6.1. for a description of how interaction with the public is handled in regards to this Environmental affairs and within MPO in general.

- 3) Participate in the analysis of transportation projects regarding the population affected by the action.
- 4) Participate in the analysis of transportation projects regarding the impacts on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.
- 5) Disseminate information to the public in accordance with agency public participation procedures. This includes the use of public comment periods and public hearings, interpreters, and materials in other languages, as needed.

## **6.4 Consultant Contracts**

The Lafayette MPO is responsible for selection, negotiation, and administration of its consultant contracts. The MPO operates under its internal contract procedures and relevant federal and state laws.

### **6.4.1 Contract Procedures**

The Lafayette MPO seeks to follow the following procedures:

- 1) Title VI text is included in MPO Requests for Proposals (RFP) and contracts.
- 2) The Disadvantaged Business Enterprises (DBE) Program is referenced in contract documents.
- 3) The Lafayette MPO includes DBE text in RFPs and contracts with consultants and notes its DBE policy on the MPO website.
- 4) The Lafayette MPO provides links to DOTD's list of certified DBEs on its website.

### **6.4.2 Title VI Coordinator's Responsibilities**

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the agency's consultant contracts process. The Coordinator seeks to include Title VI language in contracts and Requests for Proposals (RFP) so as to :

- 1) Be a Title VI champion and advocate compliance with Title VI guidelines and collaborate with the agencies and individuals responsible for the inclusion of the appropriate text in Appendix B and F in agency contracts.
- 2) Notify contractors that the text in Appendix B and F should be included in subcontracts.

- 3) Advocate and report on the status of the inclusion of the Title VI Notice to the Public is included in MPO RFPs.
- 4) Advocate and report on the status of the inclusion of the abbreviated Title VI Notice to the Public in published announcements of the Lafayette MPO's RFPs (such as those published in newspapers).
- 5) Advocate and report on the status of the inclusion text in the Title VI Assurances (Appendix B) is included in MPO RFPs.
- 6) Work with the Lafayette Consolidated Government Purchasing Department so that the Disadvantaged Business Enterprise (DBE) Program continues to:
  - a) Monitor, update, and maintain the agency's DBE Program.
  - b) Submit annual reports on DBE activities in the Title VI Annual Report.
  - c) Advocate and collaborate with the administrators of the DBE program to modify the program, as appropriate to comply with Title VI guidelines.
  - d) Review and evaluate DBE participation annually, and continue efforts to create a level playing field for DBE and non-DBE consultants.

#### **6.4.2.1 Remedial Action Related to Consultant Reviews**

The Lafayette MPO actively pursues the prevention of Title VI deficiencies and violations and takes the necessary steps to ensure compliance with this Title VI program, both within MPO and with MPO's contractors. In conducting reviews of sub recipients, if a sub recipient is found to not be compliance with Title VI, the Title VI coordinator will work with the sub recipient to resolve the identified issues.

If the issues cannot be resolved, the Lafayette MPO will issue a notification of deficiency status and remedial action for the sub recipient, as agreed upon by the MPO and DOTD, within a period not to exceed 90 calendar days. The MPO will seek the cooperation of the sub recipient in correcting deficiencies, and will provide the technical assistance and guidance needed for the sub recipient to comply voluntarily. Sub recipients placed in a deficiency status will be given a reasonable time, not to exceed 90 calendar days after receipt of the deficiency letter and remedial action, to voluntarily correct deficiencies. If a sub recipient fails or refuses to voluntarily comply with requirements within the allotted time frame, the MPO will submit to DOTD, FHWA, and FTA two copies of the case file and a recommendation that the sub recipient be found in noncompliance.

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A follow-up review will be conducted within 180 days of the initial review to ensure the sub recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the sub recipient refuses to comply, the MPO may with DOTD's, FHWA's, and FTA's concurrence initiate sanctions per 49 CFR 21.<sup>18</sup>

## **6.5 Education & Training**

Minorities, women, individuals with a disability, and other individuals protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunity and fair treatment in employment-related decisions, including opportunities for education and training. See Appendix I for examples.

### **6.5.1 Employees Encouraged to Participate in Training**

All MPO employees are encouraged to participate in professional development and training. Materials received by the agency on training and education opportunities are made available to employees, which includes information on federally funded training, such as courses provided by the National Highway Institute (NHI), the National Transit Institute (NTI), the American Planning Institute of Certified Planner (AICP), the American Planning Association (APA), the American Institute of Architects (AIA), and the American Society of Civil Engineers (ASCE), the Department of Transportation and Development (DOTD), and the Federal Highway Administration (FHWA). In addition, the MPO provide opportunity and training with in house power users and third part developers for training in the use of software such as ARC Map, and AutoCAD. Moreover, the staff participates in a series of conversations sponsored by these professional associations so as to increase their professional development.

### **6.5.2 Title VI Coordinator's Responsibilities**

The Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in aspects of the education and training program. DOTD will provide information on training opportunities open to MPO staff and sub recipients, including information on training provided by NHI and NTI. The Coordinator seeks to:

- 1) Assist DOTD in the distribution of information to MPO staff on training programs regarding Title VI and related statutes.
- 2) Advocate equal access and participation of MPO employees and interested public participant in the planning process in courses sponsored by the National Highway Institute (NHI, National Transportation Institute (NTI), American Planning

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<sup>18</sup> Part 21 -- Nondiscrimination In Federally-Assisted Programs of The Department of Transportation -- Effectuation of Title Vi of The Civil Rights Act Of 1964 as posted on the website: <http://www.fhwa.dot.gov/hep/49cfr21.htm> as of the date of this plan.

Association (APA), ethics courses sponsored by the Louisiana Chapter of the APA, and American Institute of Certified Planners (AICP).

## **7.0 Questions**

For questions on LCG's or MPO's Title VI Plan, ADA Plan, the LEP Plan or any related policies and procedures, please contact LCG's and the MPO's Title VI and ADA Coordinator using the contact information listed in Appendix J of this document.

For information on MPO's work program or publications, including reports, data forecasting, maps, or other information available for use, contact MPO Coordinator using the contact information listed in Appendix J of this document.

For information on any of the above, including current public comment periods and meetings open to the public, visit MPO's website at <http://mpo.lafayettela.gov/>

## **APPENDICES**

Appendix A - Title VI Methodology for Identification of Target Populations

Appendix B - Title VI Assurances

Appendix C- Title VI Public Notice

Appendix D - Policy and Plan for Limited English Proficiency (LEP)

Appendix E - ADA Notices

Appendix F - DBE Policy

Appendix G - Committee Notification Lists

Appendix H - Discrimination Complaint Process and Form

Appendix I - Title VI Training Opportunities

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## **APPENDIX A - TITLE VI METHODOLOGY FOR IDENTIFICATION OF TARGET POPULATIONS & SPATIAL CONCENTRATIONS OF TARGETED POPULATIONS**

### **A.1.0 Introduction**

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

MPO identifies seven relevant groups for Title VI analysis as described below.

- 1) Low-income;
- 2) Federal Assistance Recipients;
- 3) Minority;
- 4) Elderly;
- 5) Limited English Proficiency (LEP) or English spoken as a second language;
- 6) Disabled populations; and
- 7) Zero car households.

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

### **A.2.0 Target Groups**

For the purposes of mapping, the following definitions are used:

**Low Income** – a person whose household income (or in the case of a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines. Persons living in group quarters are not included within this category.<sup>19</sup>

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<sup>19</sup> The national poverty guidelines are issued annually by the Department of Health and Human Services. <http://aspe.hhs.gov/poverty/poverty.shtml>. National poverty guidelines vary based on family size and increases each year due to the Consumer Price Index. <http://www.bls.gov/new.release/cip.toc.htm>. The Consumer Price Index is a measure of the average change over time in the prices paid by urban consumers for a market basket of consumer goods and services.

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

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

**Black** - Persons having origins in any of the black racial groups of Africa.

**Hispanic** - Persons of Mexican, Puerto Rican, Cuban Central or South American or other Spanish culture or origin, regardless of race.

**Asian American** - Persons having origins in the Far East, Southeast Asia or the Indian subcontinent.

**American Indian and Alaskan Native** – Person having origins in North America and who maintains cultural identification through tribal affiliation or community recognition.

**Elderly** – Persons over the age of 65.

**Limited English Proficiency (LEP)** – Households with a primary or home language other than English.<sup>20</sup>

**People with Disabilities** – Persons who have mobility and/or self-care limitations as defined by the Census.<sup>21</sup>

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

### **A.3.0 Monitoring**

One technique used to minimize the potential adverse effects on affected populations is to identify and then create demographic profile maps of low-income and minority populations for the MPO area. These maps aid planners in understanding which

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<sup>20</sup> This is an indirect measure of group of persons whose ability to read, write and speak English and compute and solve problems has not reached levels of proficiency necessary to function on the job and in society, to achieve one's goals and develop one's knowledge and potential.

<sup>21</sup> The disability may be physical or mental (people with a health condition that lasts six or more months that make it difficult to go outside the home alone or difficult to take care of their own person needs). The geographic unit of analysis may not be census blocks due to data collection procedures used by the Census Bureau. See <http://www.census.gov/hhes/www/disability/microdata.html>

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communities are prone to environmental justice infractions. Once planners have an understanding where communities are located, future transportation plans and projects can include these communities in the planning process.

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

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

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## Appendix B - Assurances

### B.1-0 Title VI Assurances

The Lafayette Metropolitan Planning Organization (MPO) (hereinafter referred to as the Recipient), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d—42 USC 2000d—4 (hereinafter referred to as the Act), and requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, income, gender, age, and disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(1) of the Regulations.

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

1. That the Recipient agrees that each program and each facility, as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a program) conducted or will be (with regard to a facility) operated in compliance with requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program, and in adapted form in proposals for negotiated agreements:  
The Lafayette Metropolitan Planning Organization (MPO), in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d—42 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21: Nondiscrimination in Federally Assisted Programs of the Department of Transportation Issued Pursuant to Such Act, hereby notifies bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, national origin, income, gender, age, and disability in consideration for an award.
3. That the Recipient shall insert the clauses of Part 1 of this Assurance in every contract subject to the Act and the Regulations.

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4. That the Recipient shall insert the clauses of Part 2 of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
  5. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.
  6. That where the Recipient received federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over, or under such property.
  7. That the Recipient shall include the appropriate clauses set forth in Part 3 of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements acquired or improved under the Federal Aid Highway Program; and (b) for the construction or use of, or access to space on, over, or under, real property acquired or improved under the Federal Aid Highway Program.
  8. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.
  9. The Recipient shall provide for such methods of administration for the program, as are found by the State Secretary of Transportation or the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with requirements imposed or pursuant to the Act, the Regulations, and this Assurance.
  10. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance. THIS ASSURANCE is given in consideration of, and for the purpose of obtaining, any and federal grants, loans, contracts, property, discounts, or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway Program and is binding on it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Recipient.

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This statement of policy is acknowledged by the presiding officer of the Lafayette MPO Policy Board, the Chairman of the Lafayette City-Parish Council, in the letter of transmittal from the Lafayette MPO to the Louisiana Department of Transportation and Development (DOTD). The first page of this document is the letter of transmittal.

## **B.2.0 Title VI Required Language**

### **B.2.1 Part 1 – Contractual Provisions**

The text below, in its entirety, is to be included in contracts entered into by LCG. The final section, entitled “Incorporation of Provisions,” should be included in contracts entered into by LCG consultants.

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the Contractor), agree as follows:

#### **1. Compliance With Regulations**

The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as DOT), Title 49, Code of Federal Regulations, part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

#### **2. Nondiscrimination**

The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, income, gender, age, and disability, in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

#### **3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment**

In solicitations either by competitive bidding or negotiations made by the Contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor’s obligations under this contract and the Regulations relative to nondiscrimination on the ground of race, color, national origin, income, gender, age, and disability,.

#### **4. Information and Reports**

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The Contractor shall provide information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Lafayette Metropolitan Planning Organization (MPO) or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the Lafayette Metropolitan Planning Organization (MPO), or the Federal Highway Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

#### 5. Sanctions for Noncompliance

In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, the Lafayette Metropolitan Planning Organization (MPO) shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:

Withholding of payments to the Contractor under the contract until the Contractor complies; and/or

Cancellation, termination, or suspension of the contract, in whole or in part.

#### 6. Incorporation of Provisions

The Contractor shall include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontractor or procurement as the Lafayette Metropolitan Planning Organization (MPO) or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request the Lafayette Metropolitan Planning Organization (MPO) enter into such litigation to protect the interests of the state and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

#### **B.2.2 Part 2 - Deeds**

The following clauses shall be included in any and deeds affecting or recording the transfer of real property, structures, or improvements thereon, or interest therein from the United States.

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### **B.2.2.1 Granting Clause**

NOW, THEREFORE, the Lafayette Metropolitan Planning Organization (MPO) (MPO)—as authorized by law, and upon the condition that the state of Louisiana will accept title to the lands and maintain the project constructed thereon, in accordance with and in compliance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways; the policies and procedures prescribed by the Federal Highway Administration of the Department of Transportation; and requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252: 42 USC 2000d to 2000d-4)—does hereby remise, release, quitclaim, and convey unto the state of Louisiana the right, title, and interest of the MPO in and to said land described in Exhibit A attached hereto and made a part thereof.

### **B.2.2.2 Habendum Clause**

TO HAVE AND TO HOLD said lands and interests therein unto the state of Louisiana and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which the federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the state of Louisiana, its successors, and assigns.

The state of Louisiana, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree, as a covenant running with the land for itself, its successors and assigns, that (1) no person shall, on the grounds of race, color, national origin, income, gender, age, and disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed, (2) that the state of Louisiana shall use the lands, and interests in lands so conveyed, in compliance with requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination of Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended, (3) that in the event of breach of any of the above mentioned nondiscrimination conditions, the agency shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in, and become the absolute property of, MPO and its assigns as such interest existed prior to this instruction.

### **B.2.3 Part 3 - Leases**

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The following clauses shall be included in deeds, licenses, leases, permits, or similar instruments entered into by MPO pursuant to the regulations cited in this document.

The LESSEE, for himself or herself, his or her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree as a covenant running with the land, that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this lease, for a purpose for which a MPO program or activity is extended, or for another purpose involving the provision of similar services or benefits, the LESSEE shall maintain and operate such facilities and services in compliance with other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to terminate the lease, and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

The following shall be included in deeds, licenses, leases, permits, or similar agreements entered into by MPO pursuant to the provisions of Assurance 7.

The LESSEE, for himself or herself, his or her personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant, and agree as a covenant running with the land, that (1) no person, on the grounds of race, color, national origin, income, gender, age, and disability, shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land and furnishing of services thereon, no person on the grounds of race, color, national origin, income, gender, age, and disability, shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the LESSEE shall use the premises in compliance with requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, the STATE shall have the right to terminate the lease and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

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## **APPENDIX C -- TITLE VI PUBLIC NOTICE**

The paragraph below will be inserted in significant publications that are distributed to the public, such as future versions and updates of the MPO's transportation plans and LCG's comprehensive plans.

The version below is the preferred text, but where space is limited or in publications where cost is an issue, the abbreviated version can be used in its place.

### **C.1.0 General Title VI Notice to the Public**

Title VI Notice: Lafayette Consolidated Government (LCG) and its operating agencies including the Lafayette Metropolitan Organization (MPO) and The Lafayette Utility System (LUS) fully comply with Title VI of the Civil Rights Act of 1964 and related statutes, executive orders, and regulations in programs and activities. LCG operates without regard to race, color, national origin, income, gender, age, and disability. Any person who believes him/herself or any specific class of persons, to be subjected to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the Louisiana Department of Transportation and Development (DOTD). DOTD's Title VI Program Manager may be reached via phone at XXX-XXX-XXX.<sup>22</sup> A complaint must be filed no later than 180 days after the date of the alleged discrimination.

Lafayette Consolidated Government (LCG) and its operating agencies including the Lafayette Metropolitan Organization (MPO) and The Lafayette Utility System (LUS) hold meetings, which are conducted in accessible locations and materials can be provided in accessible formats and in languages other than English. If you would like accessibility or language accommodation, please contact the Title VI Coordinator at XXX-XXX-XXXX (voice), YYY-YYY-YYYY (fax).<sup>23</sup> If you wish to attend an LCG, MPO or LUS function and require special accommodations, please give LCG at least 72 hours notice in advance.

### **C.2.0 Abbreviated Title VI Notice to the Public**

The following shortened version of the above paragraph can be used in publications where space or cost is an issue as in classified newspaper announcements with the appropriate phone number as listed in Appendix J of this document.

The Lafayette Metropolitan Planning Organization (MPO) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in programs and

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<sup>22</sup> In publications with this statement, the DOTD Title VI Compliance Manager's contact information will be listed as discussed in Appendix H of this document.

<sup>23</sup> In publications with this statement, the ADA and Title VI Coordinator's contact information will be listed as discussed in Appendix J of this document.

activities. For more information, or to obtain a Title VI Complaint Form, see <http://mpo.lafayettega.gov> or call our Title VI Coordinator at XXX-XXX-XXXX.<sup>24</sup>

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<sup>24</sup> In publications with this statement, the ADA and Title VI Coordinator's contact information will be listed as discussed in Appendix J of this document.

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## **APPENDIX D -- POLICY AND PLAN FOR ENGAGING INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

### **D.1.0 Limited English Proficiency Policy**

The Lafayette Metropolitan Planning Organization (MPO) policy for engaging individuals with limited English proficiency is to provide translation services to certain persons who requests them, if reasonable accommodation can be made.

Linguistic data of populations residing in Lafayette Parish is discussed in Section 6.1.3.5 Limited English Proficiency and Language Distribution in Lafayette Parish. The reader is directed to the tables in that section showing the number and percentages of individuals speaking languages other than English. The tables are discussed in the following sections. Additionally maps are provided for the distribution of linguistic groups.

### **D.2.0 Certification**

The Lafayette MPO followed U.S. Department of Justice guidance using a four-factor analysis process to determine the number and proportion of LEP individuals in the region and how to cost effectively provide information services to these individuals. The guidance also offers a safe harbor of 5% of the effected population or 1,000 people in the effected neighborhood.

The four-factor analysis process includes determining the number and proportion of LEP individuals within the population, the frequency with which LEP individuals will come in contact with the program, the importance of the program to people's lives, and the resources available to provide translation services.<sup>25</sup>

According to the Census 2000, the top two languages spoken at home are French and Spanish in the MPO Study area. Overall, French is spoken by 14.73% of population in Lafayette Parish while Spanish is spoken at home by 1.73 %. The maximum concentration of French in the Parish of Lafayette is 26.7% while Spanish is 5.3%. As to the MPO study area, the maximum concentration of French in 2000 census tracts is 41.5% while Spanish is 5.3%. See attached maps placed at end of this document.

The Lafayette MPO provides a neighborhood specific planning program for the I-49 Corridor with I-49 Action Plan. There are areas with French language concentrations of 20.9 % of the population as well as areas of Spanish language concentrations of 3.4 % of the population. See attached maps placed at end of this document.

The frequency and extent with which LEP individuals come into contact with MPO programs is estimated to be moderate. As an association of cities, towns, parishes, and

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<sup>25</sup> This language was taken directly from the U.S. Government's Limited English Proficiency Web site, <http://www.lep.gov/recipbroch.html>.

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state agencies that serves as a forum for developing policies and making decisions about regional growth and transportation issues, the MPO encourages public comment on its policies, programs, and funding cycles, and therefore would like to increase opportunities for public comment, particularly by historically underserved populations including LEP individuals.

MPO remains committed to providing translation services to people who request them and have come up with creative solutions to assist LEP individuals and show the agency's interest in providing translation services.

This statement of policy is acknowledged by the presiding officer of the Lafayette MPO Policy Board, the Chairman of the Lafayette City-Parish Council, in the letter of transmittal from the Lafayette MPO to the Louisiana Department of Transportation and Development (DOTD). The first page of this document is the letter of transmittal.

### **D.3.0 Limited English Proficiency Plan**

The LEP Plan is based on federal guidelines using a four factor test to identify areas in which a language policy should be implemented.

#### **D.3.1 Federal Guidelines**

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and; Executive Order 13166

Executive Order 13166 Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to federal agencies and programs and operations of entities that receive funding from the federal government, including state agencies, local

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agencies and governments such as the MPO, private and non-profit entities, and sub recipients.

### **D.3.2 Population Analysis: The Four Factor Test**

The Lafayette Metropolitan Planning Organization (MPO) has developed a Limited English Proficiency Plan (LEP) and Methodology to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

In developing the plan while determining the MPO' extent of obligation to provide LEP services, the MPO undertook the U.S. Department of Transportation four factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the MPO service area or likely to encounter a MPO program, activity, or service;
- 2) The frequency with which LEP individuals come in contact with MPO service;
- 3) The nature and importance of the program, activity or service provided by MPO to the LEP population; and
- 4) The resources available to MPO and overall costs to provide LEP assistance.

#### **D.3.2.1 Number and Proportion of LEP Persons**

In order to determine the number or proportion of LEP persons eligible to be served or likely to encounter a MPO program, activity, or service, the Lafayette MPO examined the US Census Bureau's data for the 2000 year census.

The table below shows the number of speakers of languages in Lafayette Parish over the age of 5 years old. The distribution shows that only French is higher than 5% of the population speaking another language other than French.

<b>Table D.3.2.1 Lafayette MPO Rank Order List of the Most Frequent Languages Spoken in Lafayette Parish from ages 5 to 65, Census 2000</b>		
<b>Language</b>	<b>Number of speakers</b>	<b>Percent Total (%)</b>
English only	144,400	81.93
French & Related Louisiana Dialects	26,010	14.76
Spanish	3,055	1.73
Vietnamese	650	0.37
Arabic	430	0.24
German	300	0.17
Chinese	160	0.09
<b>Total</b>	<b>175,005</b>	<b>99.30</b>

#### **D.3.2.2 Frequency of Contact with LEP individuals**

The frequency and extent with which LEP individuals come into contact with MPO programs is estimated to be moderate.

#### **D.3.2.3 Nature and Importance of the Program**

While essential to the long-term livability and economic vitality of the region, long-range transportation and growth management planning may not be as important of a service to LEP individuals as health care, employment or financial assistance. However, any opportunity to increase public comment on long-range decision-making is a worthwhile investment.

#### **D.3.2.4 Resources and Overall Costs**

The Lafayette MPO may hire an otherwise qualified planner who may also speak a foreign language, especially French.

#### **D.4.0 Safe Harbor Stipulation**

Federal law provides a “safe harbor” stipulation so recipients of federal funding can ensure compliance with their obligation to provide written translations in languages other than English with greater certainty. A “safe harbor” means that as long as a recipient (the MPO) has created a plan for the provision of written translations under a specific set of

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circumstances, such action will be considered strong evidence of compliance with written translation obligations under Title VI.

However, failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides for recipients a guide for greater certainty of compliance in accordance with the four factor analysis.

Evidence of compliance with the recipient's written translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less of eligible persons served or likely to be affected. Translation can also be provided orally. This is particularly important for Louisiana French which is by and large unwritten language with most speakers not being able to read French.

The "safe harbor" provision applies to the translation of written document only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable to provide.

#### **D.5.0 Limited English Proficiency (LEP) Policy and Plan**

The Lafayette MPO has established the following policy for providing information to individuals with Limited English Proficiency (LEP):

The Lafayette MPO will obtain French, Spanish, and Vietnamese translators from within our community. Translations may provided by the staff of the Lafayette MPO, the University of Louisiana at Lafayette, Staff, the Diocese of Lafayette which has Spanish and Vietnamese translations, and Court Reporters possessing the needed language. Translations may also be volunteers from a language community or may be a paid professional.

The Lafayette MPO will first provide oral translations of English documents into the following languages (based upon the above statistical analysis): Vietnamese, Spanish and French.

The MPO, in order to provide a safe harbor, will also provide written translations of English documents to the persons who have previously requested oral translation in the following language (spoken by more than 5% of the population): French and its Louisiana dialects.

Notice of this service will be placed on the MPO website. Written procedures will be developed as needed to ensure consistent service delivery.

#### **D.6.0 Identification of a LEP Person**

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Listed below are tools to help identify persons who may need language assistance:

- 1) Examine record requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
- 2) When MPO sponsored workshops or conferences are held, set up a sign-in sheet table, a staff member greets and briefly speaks to each attendee. To informally gauge the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.

### **D.7.0 Language Assistance Measures**

When an interpreter is needed, in person or on the telephone, first determine what language is required. If MPO staff cannot provide verbal interpretation and if a formal interpretation is required, staff shall use the institutions listed in Section D.5.0 Limited English Proficiency (LEP) Policy and Plan or from a language community.

### **D.8.0 Staff Training**

All MPO staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new employees. Training questions are listed below:

- 1) What are Title VI LEP responsibilities?
- 2) What language assistance services are offered by the MPO?
- 3) How to access an interpreter?
- 4) What documentation of language assistance are required?
- 5) How does the MPO handle a LEP complaint?
- 6) How does the MPO providing Notice of Available Language Service to LEP Persons?
- 7) Where are signs posted that language assistance is available?

### **D.9.0 Outreach Techniques**

If staff know that they will be presenting a topic that could be of potential importance to a LEP person or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, the Lafayette MPO will have meeting

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notices, fliers, advertisements, and agendas printed in an alternative language, such as Spanish and French.<sup>26</sup>

When running a general public meeting notice, staff should insert the Spanish clause:

Si usted necesita la ayuda de un traductor del idioma español, por favor comuníquese con la XXXXXXXX al teléfono (YYY) YYY-YYY, cuando menos 72 horas antes de la junta.”

Similarly, when running a general public meeting notice, the staff should insert the French clause:

Si c'est nécessaire d'avoir quelqu'un qui parle le Français, téléphonez si vous plait à XXXXXXXX à téléphone (YYY) YYY-YYY plus que 72 heures avant le meeting.

The phrase translates generally that if it is necessary for Spanish or French language assistance, then the person should call and arrangements with the MPO more than 72 hours before the meeting.

#### **D.10.0 Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, MPO will follow the Title VI Program update schedule for the LEP Plan. Each update examines plan seeks to answer the follow questions:

- 1) How many LEP persons were encountered?
- 2) Were their needs met?
- 3) What is the current LEP population in the parishes comprising the urbanized area?
- 4) Has there been a change in the types of languages where translation services are needed?
- 5) Is there still a need for continued language assistance for previously identified MPO services?
- 6) Are there other programs that should be included?
- 7) Have the MPO's available resources, such as technology, staff, and financial costs changed?

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<sup>26</sup> The current ADA and Title VI Coordinator's name will be listed as X's and the phone number as Y's in the statements in Spanish and French below. The contact information of the current ADA and Title VI Coordinator is listed in Appendix J.

- 8) Has the MPO fulfilled the goals of the LEP Plan?
- 9) Were any complaints received (and forwarded/referred to DOTD) ?

**D.11. Dissemination of the MPO Limited English Proficiency Plan**

MPO will post the LEP Plan on its website at <http://mpo.lafayettela.gov/>.

Any person, including social service, non-profit, law enforcement agencies and other community members with internet access will be able to access the plan. For those without personal internet service, parish libraries offer free internet access. Copies of the LEP Plan will be provided to the any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the MPO Title VI Coordinator using the contact information in Appendix J.

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**APPENDIX E -- ADA NOTICES**  
**NOTICE OF NONDISCRIMINATION ON THE BASIS OF DISABILITY**  
**(AMERICANS WITH DISABILITIES ACT OF 1990)****E.1.0 Certification**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990, the Lafayette Metropolitan Planning Organization (MPO) will not discriminate against qualified individuals with disabilities on the basis of disability in the MPO's services, programs, or activities.

**E.2.0 Modifications to Policies & Procedures**

The Lafayette MPO will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to attend the MPO public meetings. For example, individuals with service animals are welcomed in MPO public meetings, even where animals are generally prohibited.

**E.2.1 Effective Communication**

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

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a MPO public meeting should contact the MPO's ADA Coordinator via phone as soon as possible but no later than 72 hours before a scheduled meeting.

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

Notification that a MPO meeting is not accessible to persons with disabilities should be directed to the current Title VI & ADA Coordinator listed in Appendix J.

**E.2.2 ADA Notice to Be Posted At the Bottom of MPO Meeting Notices**

For special accommodations for this meeting, contact our ADA Coordinator, XXXXXXXX, via phone (YYY-YYY-YYYY) <sup>27</sup> at least 72 hours in advance of the meeting.

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<sup>27</sup> The current ADA and Title VI Coordinator's name will be listed as X's and the phone number as Y's. The contact information of the current ADA and Title VI Coordinator is listed in Appendix J.

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**APPENDIX F - DBE POLICY PARTICIPATION BY DISADVANTAGED BUSINESS ENTERPRISES IN LAFAYETTE METROPOLITAN PLANNING ORGANIZATION (MPO) PROGRAMS**

It is the policy of the Lafayette Metropolitan Planning Organization (MPO) that disadvantaged businesses, as defined by 49 Code of Federal Regulations, Part 26, shall have an opportunity to participate in the performance of MPO contracts in a nondiscriminatory environment. The objectives of MPO's Disadvantaged Business Enterprise (DBE) Program are to ensure non-discrimination in the award and administration of contracts, ensure firms fully meet eligibility standards, help remove barriers to participation, create a level playing field, assist in development of a firm so it can compete successfully outside of the program, provide flexibility, and ensure narrow tailoring of the program.

The Lafayette MPO, its staff, and its consultants and sub consultants shall take necessary and reasonable steps to ensure that disadvantaged businesses have an opportunity to compete for and perform the contract work of the Lafayette Metropolitan Planning Organization (MPO) in a non-discriminatory environment.

The Lafayette MPO requires that its consultants not discriminate on the basis of race, color, national origin, income, gender, age, and disability in the award and performance of its contracts.

LCG participates in the Louisiana Unified Certification Program as administered by DOTD for Disadvantaged Business Enterprise (DBE) Program and as such complies with current applicable guidelines.

This statement of policy is acknowledged by the presiding officer of the Lafayette MPO Policy Board, the Chairman of the Lafayette City-Parish Council, in the letter of transmittal from the Lafayette MPO to the Louisiana Department of Transportation and Development (DOTD). The first page of this document is the letter of transmittal.

**F.1.0 DBE Clause to Be Included Within the Body of Future Contracts Issued by MPO**

Participation By Disadvantaged Business Enterprises In Lafayette Metropolitan Planning Organization (MPO) Programs - It is the policy of the Lafayette Metropolitan Planning Organization (MPO) (MPO) that disadvantaged businesses, as defined by 49 Code of Federal Regulations, Part 26, shall have an opportunity to participate in the performance of MPO contracts in a nondiscriminatory environment.

The contractor or subcontractor shall not discriminate on the basis of race, color, national origin, income, gender, age, and disability in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of USDOT/FTA assisted contracts. Failure by the contractor to carry out

these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as MPO deems appropriate.

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**APPENDIX G -- LAFAYETTE METROPOLITAN PLANNING ORGANIZATION  
(MPO) TRANSPORTATION ADVISORY COMMITTEE MEMBERS**

<b>Full Name</b>	<b>Committee</b>	<b>Race</b>	<b>Gender</b>	<b>National Origin</b>
Xiaoduan Sun	Transportation Technical Committee	Asian	Female	Chinese
Lynne Guy	Transportation Policy Committee	Black	Female	Afro-Am
Kerri Joseph	Transportation Policy Committee	Black	Female	Afro-Am
Pat Edmond	Transportation Policy Committee	Black	Male	Afro-Am
Elaine D. Abell	Citizen Advisory Council	White	Female	Anglo- Am
Norma Dugas	Transportation Technical Committee	White	Female	Franco-Am
Sara Gary	Transportation Technical Committee	White	Female	Anglo-Am
Leslee Haseltine	Citizen Advisory Council	White	Female	Anglo- Am
Mayor Purvis Morrison	Transportation Policy Committee	Black	Male	Afro-Am
Kevin Normand	Transportation Policy Committee	White	Female	Anglo- Am
Cathy Webre	Transportation Technical Committee	White	Female	Anglo- Am
Luther Arceneaux	Citizen Advisory Council	White	Male	Franco-Am
Ben Berthelot	Transportation Technical Committee	White	Male	Franco-Am
Alfred Boustany III	Citizen Advisory Council	White	Male	Arab-American
Mayor Glenn Brasseaux	Transportation Policy Committee	White	Male	Franco-Am
Brian Brennan	Citizen Advisory Council	White	Male	Anglo/Irish-Am
Dan Broussard	Transportation Technical Committee	White	Male	Franco-Am
Lucius Broussard	Transportation Technical Committee	White	Male	Franco-Am
Walter Campbell	Transportation Policy Committee	White	Male	Anglo-Am
Tom Carroll	Transportation Technical Committee	White	Male	Anglo- Am
Vernal Comeaux	Citizen Advisory Council	White	Male	Franc-Am
Bruce Conque	Transportation Technical Committee	White	Male	Franco-Am
Dewitt C. David	Citizen Advisory Council	White	Male	Franco-Am
Grover Dunphy	Citizen Advisory Council	White	Male	Anglo- Am
Brain P Fournet	Transportation Policy Committee	White	Male	Franco-Am
Gregg Gothreaux	Transportation Technical Committee	White	Male	Franco-Am
Lynn Guidry	Transportation Technical Committee	White	Male	Franco-Am
John Guilbeau	Citizen Advisory Council	White	Male	Franco-Am
Raymond LaLonde	Citizen Advisory Council	White	Male	Franco-Am

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Charles Langlinais	Transportation Technical Committee	White	Male	Franco-Am
Pat Logan	Transportation Technical Committee	White	Male	Anglo- Am
Corey Morgan	Transportation Technical Committee	White	Male	Anglo-Am
Lawrence Pellerin	Citizen Advisory Council	White	Male	Franco-Am
Greg Roberts	Transportation Technical Committee	White	Male	Anglo- Am
Tom Sammons	Transportation Policy Committee	White	Male	Anglo- Am
Jamie Setze	Transportation Policy Committee	White	Male	Anglo-Am
Scott Schilling	Transportation Policy Committee	White	Male	German- Am
Mayor Johnny Thibodeaux	Transportation Policy Committee	White	Male	Franco-Am
Larry Thibodeaux	Transportation Technical Committee	White	Male	Franco-Am
Gerald Trahan	Transportation Technical Committee	White	Male	Franco-Am
Tony Tramel	Transportation Technical Committee	White	Male	Anglo- Am
Ken Villemarette	Transportation Technical Committee	White	Male	Franco-Am

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## **APPENDIX H -- DISCRIMINATION COMPLAINT PROCESS AND FORM COMPLAINT PROCESS**

All written or verbal complaints of discrimination will be forwarded immediately to the Compliance Programs Office of DOTD for handling in accordance with 23 CFR 200.9 (b)(3). In cases where the complainant is unable or incapable of providing a written statement, the complainant will be assisted in converting the verbal complaint into a written complaint complaints however must be signed by the complainant.

All Title VI and related statute complaints are considered formal as there is no informal process. Therefore, the complainant will be contacted according to DOTD's formal complaint process. Complaints filed under Title VI against sub-recipients or contractors/consultants will be investigated by the Lafayette MPO with the assistance of DOTD's Title VI Program Manager. The MPO shall maintain a confidential log of complaints for the purpose of assisting DOTD.

### **H.1.0 Complaint Log**

The log will include the following information:

- a) Name of Complainant;
- b) Name of Respondent;
- c) Basis of Complaint: race, color, national origin, income, gender, age, and disability or retaliation;
- d) Date complaint received by the MPO;
- e) Date the MPO forwarded the complaint to DOTD's Title VI Program Manager;
- f) A statement of the complaint, including specific details, relevant facts and documentation; and
- g) The final disposition of the complaint.

### **H.2.0 Intimidation and Retaliation**

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

### **H.3.0 Time Frames**

There are different time frames depending on the agency and complainant.

### **H.3.1 DOTD Time Frames**

The time frames of that DOTD shall respond upon receiving a complaint are listed below:

1. 45 days to conduct an investigation;
2. 15 days to complete investigative report and submit to the administrative supervisor of DOTD Complaint Section with copies to FHWA, FTA and MPO.

The total time allotted is 60 days.

### **H.3.2 Complainant**

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

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

### **H.4. Contact Information for DOTD Title VI and ADA Compliance**

The current contact i

### **H.5. Title VI Discrimination Complain Form (on the next page)**

**Lafayette Metropolitan Planning Organization (MPO)<sup>28</sup>****Title VI Discrimination Complaint Form**

Your Name	Phone	Name of Person(s) who discriminated Against You
Your Address (Street No., P.O. Box, Etc.)		Location and Position of Person (if known)
Your City, State Zip		City, State, Zip of Alleged Incident
Discrimination Because of: __Race/Color __Sex __Disability __Age __National Origin __ Income Status __Retaliation		Date of Alleged Incident
Explain as briefly and clearly as possible what happened and how you were discriminated against. Indicate who was involved and witnessed the discrimination. Be sure to include how other persons were treated differently than you. Attach any written material pertaining to your case.		
Signature:		Date:
Please return this form to: Title VI & ADA Coordinator Lafayette Metropolitan Planning Organization PO Box 4017-C Lafayette, LA 70502		Ph : Fx :

<sup>28</sup> This form will be printed and distributed to reflect the name and contact information of the current Title VI & ADA Coordinator as listed in Appendix J of this plan.

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## **APPENDIX I - TITLE VI TRAINING OPPORTUNITIES**

### **I.1.1 One-Day Course**

National Title VI Forum developed by the Federal Highway Administration

[http://www.fhwa.dot.gov/resourcecenter/teams/civilrights/flyer\\_exp\\_081909.pdf](http://www.fhwa.dot.gov/resourcecenter/teams/civilrights/flyer_exp_081909.pdf)

Mike LeBlanc, Title VI and ADA Coordinator for LCG, completed the above training in Baton Rouge on July 20, 2010.

### **I.1.2 Two-Day Course**

Civil Rights Training Symposium developed by Southern Transportation Civil Rights Executive Council

[http://www.brgfl.com/BRG/Home/Entries/2009/4/20\\_2009\\_Southern\\_Transportation](http://www.brgfl.com/BRG/Home/Entries/2009/4/20_2009_Southern_Transportation)

### **I.1.3 Two-Day Course**

Transit Equity Considerations developed by National Transit Institute

<http://www.ntionline.com/CourseInfo.aspCourseNumber=TCR07>

### **I.1.4 Two-Day Course**

Fundamentals of Environmental Justice developed by FHWA and FTA -sponsored by National Highway Institute

[http://www.nhi.fhwa.dot.gov/training/train\\_catalog.aspx](http://www.nhi.fhwa.dot.gov/training/train_catalog.aspx)

### **I.1.5 Two-Day Course**

Title VI Training developed by LA Department of Transportation and Development

Contact: See the Title VI Programs Manager at DOTD as listed in Appendix H.

### **I.1.6 Online Training Materials**

US Department of Justice Civil Rights Division

<http://www.usdoj.gov/crt/cor/coord/train.php>

FHWA Resource Center for Training

<http://www.fhwa.dot.gov/resourcecenter/teams/civilrights/index.cfm>

## **I.2.0 Training Completed**

In January 2005, Lafayette Metropolitan Planning Organization (MPO) staff members attended a Department of Transportation and Development (DOTD) sponsored

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informational meeting on Title VI of the Civil Rights Act of 1964 for all of the planning commissions and their staffs for District 03.

Mike LeBlanc, Planning Manager, attended a Title VI workshop in New Orleans in December of 2009 as part of the Annual Lafayette Transit Planning Conference.

In the 2008, 2009, 2010 and 2011, the Louisiana Chapter of the American Planning association held mandatory meetings for members of the planning staff and for members of planning commissions. The meeting agendas covered ethical principles involved in the planning process. Among the material covered were three requirements from the Statement of Principles:

1. Strive to increase the opportunities for women and members of recognized minorities to become professional planners.
2. Respect the rights of all persons and do not discriminate against or harass others based on characteristics that are protected under civil rights laws and regulations.
3. Recognize the rights of citizens to participate in planning decisions.

Mike LeBlanc, as a member of the American Institute of Certified Planners is required to attend 1.5 hours of ethics training (cited above) and 1.5 hours of planning training each year to maintain certification.

Mike LeBlanc, Project Manager attended Title VI Nondiscrimination in the Federal Aid Program in Baton Rouge, on July 20, 2010.

Mike LeBlanc is scheduled to attend the FHWA Louisiana Division ADA/Section 504 Training on April 14, 2011 in Baton Rouge.

**APPENDIX J - CURRENT STAFF AND ORGANIZATION**

In Sections, J-1 and J-2 below, the staff and organization of the Lafayette MPO may change from time to time as need arises and personnel changes occur in order to respond to the needs of the service area population. In addition, DOTD may change the contact information for the Compliance Programs Section as shown in Section J-3-0.

The contact information for DOTD Compliance staff is listed in Section J-3 below.

**J-1-0 Title VI & ADA Coordinator**

Michael J. LeBlanc,  
Title VI & ADA Coordinator, Division 5901  
Lafayette Metropolitan Planning Organization (MPO)  
101 East Cypress Street,  
Lafayette, LA 70501

Title VI & ADA Coordinator  
Division 5901  
PO Box 4017-C  
Lafayette, LA 70502

Ph : 337-291-7179  
Fx : 337-291-8458

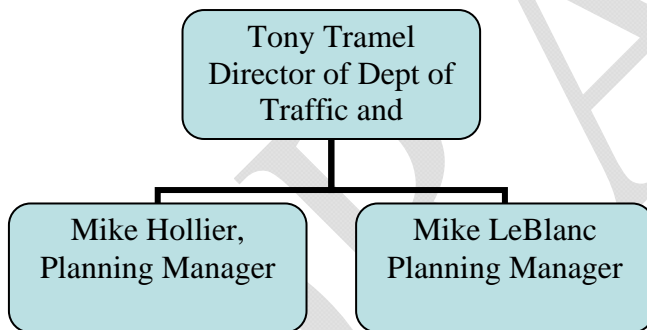
Email : mleblanc@lafayettela.gov

**J-2-0 Supervision, Position, Race, Gender and National Origin of Staff**

The supervision, position, race, gender and national original of MPO staff are listed in table below.

<b>Table J-2 Lafayette Metropolitan Planning Organization Supervision, Position, Race, Gender and National Origin of Staff</b>				
<b>Name</b>	<b>Position</b>	<b>Race</b>	<b>Gender</b>	<b>Nat origin</b>
Bill Spivey	Planner I	White	Male	Anglo-Am
Brenda Deshotel	Adm. Assist	White	Female	Franco-Am
Cathie Gilbert	Planner II	White	Female	Canada National
Cecilia Gayle	Planner II	White	Female	Franco-Am
Chris Cole	Engineer II	White	Male	Anglo-Am
Dan Branch	Architect	White	Male	Anglo-Am

Jennifer Seversen	Planner I	White	Female	Anglo-American
Joey Benoit	Planner II	White	Male	Franco-Am
John Vallot	Eng. Aid II	White	Male	Franco-Am
Johnny Orgeron	Planner II	White	Male	Franco-Am
Kirk Trahan	Plan. Facilit.	White	Male	Franco-Am
Laura Phillips	Planner II	White	Female	Anglo-American
Melanie Bordelon	Planner II	White	Female	Franco-Am
Mike Hollier	Manager	White	Male	Franco-Am
Mike LeBlanc	Manager	White	Male	Franco-Am
Neil LeBouef	Planner II	White	Male	Franco-Am
Nick Hernandez	Planner I	White	Male	Franco-Am
Rose Breaux	Eng Aid I	Black	Female	Afro-Am
Sanjay Kharod	Planner II	Asian	Male	India National
Tina Shelvin	Planner II	Black	Female	Afro-Am



**J-3-0 DOTD Compliance Staff**

Tanya St. Angelo, Title VI/ADA Programs Manager  
LA DOTD - Compliance Programs Section  
Title VI Unit - Room 305J  
P.O. Box 94245  
Baton Rouge, LA 70804-9245

Office (225)379-1361  
Fax (225)379-1865

Tanya.StAngelo@LA.GOV