



Walla Walla Valley Metropolitan and Sub-Regional Transportation Planning Organization

Title VI Plan

Title VI Coordinator:
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107 S 3rd Avenue, Walla Walla, WA 99362

<http://wwvmpo.org/plans--programs.html>

Final - January 3, 2024
Approved by the Policy Board

Acknowledgements

This report is the product of a study financed in part by the U.S. Department of Transportation (Federal Highway Administration and Federal Transit Administration), the Oregon and Washington State Departments of Transportation, and local government contributions.

The contents of this report reflect the views of the Walla Walla Valley Metropolitan Planning Organization/Sub Regional Transportation Planning Organization (WWVMPO/SRTPO), which is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect official views or policy of the U.S. Department of Transportation.

Approval of the report by federal or state agencies constitutes acceptance of the report as evidence of work performed, but does not imply endorsement of the report's findings or recommendations. This report does not constitute a standard, specification, or regulation.

Title VI Assurance

The Title VI notice is located at the WWVMPO website and office.

Title VI Notice to the Public - The WWVMPO/SRTPO hereby gives public notice that it is the organization's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which the WWVMPO/SRTPO receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the WWVMPO/SRTPO. Any such complaint must be in writing and filed with the WWVMPO/SRTPO Title VI Coordinator within one hundred and eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the WWVMPO/SRTPO Office, on the website at <https://wwwvmppo.org/plans--programs.html> at no cost to the complainant, by calling or faxing Andres Gomez at (509) 876-8002.

Notificación de Título VI - Por el presente anuncio, WWVMPO/SRTPO notifica al público que es la política de la Organización asegurar un estricto cumplimiento con Título VI de la Ley de Derechos Civiles de 1964, la Ley de Restauración de Derechos Civiles de 1987, y otros estatutos y regulaciones relacionados con los mismos en todos los programas y actividades. El Título VI exige que ninguna persona sea excluida de participar en, negada los beneficios de, o sujeta a discriminación, basándose en su raza, color, género, u origen nacional bajo cualquier programa de Ayuda Federal para Autopistas u otra actividad para la cual WWVMPO/SRTPO reciba ayuda financiera Federal.

Cualquier persona que haya sido ofendida por prácticas discriminatorias ilegales bajo el Título VI tiene el derecho de presentar una queja formal con WWVMPO/SRTPO. Cualquier queja de este tipo debe ser realizada por escrito y presentada al Coordinador del Título VI de WWVMPO/SRTPO dentro de un periodo de ciento ochenta (180) días después de dicho hecho discriminatorio. Los Formularios de Queja de Discriminación del Título VI pueden ser obtenidos en la Oficina de WWVMPO/SRTPO, en el siguiente sitio Web <https://wwwvmppo.org/plans--programs.html> sin costo alguno para quien presenta la queja, por llamar o enviar un fax a Andres Gomez al (509) 876-8002.

ADA Notice

ADA Policy - The WWVMPO/SRTPO is committed to providing equal access in its programs, services, and activities for persons with disabilities. Civil rights legislation requires that no qualified individuals with disabilities shall, solely on the basis of their disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any of the WWVMPO/SRTPO's programs, services, or activities, in accordance with:

- ◆ Americans with Disabilities Act of 1990 (ADA), as amended
- ◆ Section 504 and 508 of the Rehabilitation Act of 1973, as amended

It is the policy of the WWVMPO/SRTPO that, when viewed in their entirety, services, programs, facilities, and communications provided directly by the agency, or by a contracted service provider, are readily accessible to and usable by individuals with disabilities. This is achieved through maintaining an ADA-compliant Website; holding events in accessible spaces; and providing program materials in alternative formats on request.

The Washington State Relay 711 service is available, e.g., Persons who are deaf or hard of hearing may contact WWVMPO's ADA Coordinator through TTY Relay 711.

Política ADA- La WWVMPO/SRTPO está comprometida de proveer acceso equitativo en sus programas, servicios, y actividades para personas con discapacidades. La legislación de derechos civiles requiere que individuos calificados con discapacidades no sean, basados exclusivamente en sus discapacidades, excluidos de participar en, negados de los beneficios de, o sujetos a discriminación bajo cualquier programa, servicio, o actividad de la WWVMPO/SRTPO, de acuerdo con:

- La Ley sobre Estadounidenses con Discapacidades (ADA) de 1990, según enmendada
- Las Secciones 504 y 508 de la Ley de Rehabilitación de 1973, según enmendada

Es la política de la WWVMPO/SRTPO que, cuando vista en su totalidad, servicios, programas, instalaciones, y comunicaciones proveídas directamente por la agencia, o por un proveedor de servicio contratado por la agencia, sean fácilmente accesibles y usables por individuos con discapacidades. Esto se logra por medio de mantener una página Web que cumple con la ADA; tener eventos en lugares accesibles; y proveer los materiales del programa en formatos alternativos bajo solicitud.

El servicio de retransmisión 711 del estado de Washington está disponible; por ejemplo, las personas sordas o con problemas de audición pueden comunicarse con el coordinador de ADA de WWVMPO a través del TTY Relay 711.

Please Contact the WWVMPO/SRTPO for Questions, Concerns, or Comments:

107 South Third Avenue
Walla Walla, WA 99362
Phone 509-876-8001
wwwvmppo.org

Translation Services

Translation services in Spanish are available upon request by contacting Andres Gomez at 509-876-8002.

Servicios de Traducción en Español

Para servicios de traducción en español favor de contactar a Andres Gomez al 509 876-8002.

Walla Walla Valley Metropolitan Planning Organization and
Sub-Regional Transportation Planning Organization (WWVMPO/SRTPO)
A Resolution Adopting the Title VI Plan

RESOLUTION NO. 02-2024

WHEREAS, the Walla Walla Valley Metropolitan Planning Organization and Sub-Regional Transportation Planning Organization (WWVMPO/SRTPO) is the federally designated Metropolitan Planning Organization (MPO) as well as the state-designated Regional Transportation Planning Organization (RTPO) and as such has both the federal and state responsibility for facilitating the metropolitan and regional transportation planning process; and

WHEREAS Title VI of the Civil Rights Act of 1964 and U.S. Department of Transportation (USDOT) regulations to implement the law (49 CFR, Part 21) require all recipients and sub-recipients of Federal transportation funds such as the Walla Walla Valley MPO to establish and maintain a Title VI Program that carries out the regulations and integrates the activities and considerations outlined in the USDOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005) ; and

WHEREAS the Federal Transit Administration (FTA) issued Circular FTA 4702.1B, Title VI Requirements and Guidelines for FTA Recipients, on October 12, 2012 providing further guidance and instructions necessary to carry the USDOT Title VI regulations and policy guidance related to LEP persons; and

WHEREAS Walla Walla Valley MPO intends that no person shall, on the grounds of race, color, and/or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Walla Walla Valley MPO program or activity, regardless of funding source; and

WHEREAS Walla Walla Valley MPO intends that, any agencies or firms with whom the MPO contracts will comply with the Title VI Program as appropriate, and Walla Walla Valley MPO will take reasonable steps to ensure such compliance:

NOW, THEREFORE, BE IT RESOLVED that the Walla Walla Valley MPO as the designated Metropolitan Planning Organization (MPO) for the Walla Walla Metropolitan Area, approves the Title VI Plan dated January 3rd, 2024.

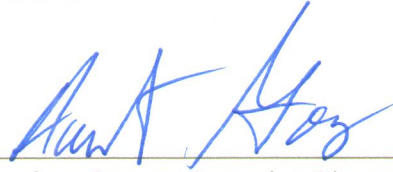
PASSED AND APPROVED this 3rd of January 2024.

Signed:



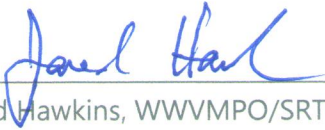
Angie Peters, Chair
WWVMPO/SRTPO Policy Board

Attested:



Andres Gomez, Executive Director
WWVMPO/SRTPO

Approved as to Form:



Jared Hawkins, WWVMPO/SRTPO Legal Counsel

Walla Walla Valley Metropolitan Planning Organization/Sub-Regional Transportation Planning Organization Membership & Committee Roster

Walla Walla Valley Metropolitan Planning Organization (WWVMPO) Member Agencies

City of College Place (WA) • City of Prescott (WA) • City of Waitsburg (WA) • City of Walla Walla (WA) • Umatilla County (OR) • Walla Walla County (WA) • Confederated Tribes of the Umatilla Indian Reservation (OR) • Port of Walla Walla (WA) • Valley Transit (WA) • Oregon Department of Transportation • Washington State Department of Transportation

Walla Walla Sub-Regional Transportation Planning Organization (SRTPO) Member Agencies

City of College Place (WA) • City of Prescott (WA) • City of Waitsburg (WA) • City of Walla Walla (WA) • Port of Walla Walla (WA) • Valley Transit (WA) • Walla Walla County (WA) • Washington State Department of Transportation

WWVMPO/SRTPO Policy Board (PB)

Voting:

Mike Rizzitiello, City Administrator, City of College Place
Douglas Venn, Council Member, City of Prescott
Randy Hinchliffe, City Administrator, City of Waitsburg
Brian Casey, Council Member, City of Walla Walla
Dan Dorran, County Commissioner, Umatilla County
Gunner Fulmer, County Commissioner, Walla Walla County
Dani Schulte, Transportation Planner, Confederated Tribes of the Umatilla Indian Reservation
Ron Dunning, Commissioner, Port of Walla Walla
Angie Peters, General Manager, Valley Transit
Kenneth Patterson, Region Manager, ODOT Region 5
Brian White, Regional Administrator, WSDOT South Central Region

Ex Officio:

Washington State District 16: Senator Perry Dozier; Representatives Mark Klicker and Skyler Rude
U.S. District 4/5: Senators Maria Cantwell and Patty Murray; Representatives Cathy McMorris Rodgers and Dan Newhouse

WWVMPO/SRTPO Technical Advisory Committee (TAC)

Robert McAndrews, Public Works Director, City of College Place
Douglas Venn, Council Member, City of Prescott
Randy Hinchliffe, City Administrator, City of Waitsburg
Neal Chavre, City Engineer, City of Walla Walla
Megan Davchevski, Planner/Transit Coordinator, Umatilla County
Tony Garcia, Public Works Director, Walla Walla County
J.D. Tovey, Planning Director, Confederated Tribes of the Umatilla Indian Reservation
Meagan Blair, Governmental Affairs/Community Outreach Specialist, Port of Walla Walla
Jesse Kinney, Deputy General Manager, Valley Transit
Teresa Penninger, Planning and Program Manager, ODOT
Paul Gonseth, Planning Engineer, WSDOT

Bi-State Coordination Workgroup

| | |
|--|----------------------------|
| Matthew Pahs, Federal Highway Administration | Paul Gonseth, WSDOT |
| Jasmine Harris, Federal Highway Administration | Angie Jones, ODOT Region 5 |
| Ned Conroy, Federal Transit Administration | Olivia Meza, WSDOT |
| Teresa Penninger, ODOT Region 5 | Kate Tollefson, WSDOT |

WWVMPO/SRTPO Staff

Andres Gomez, Executive Director
Mansee Chauhan, Transportation Planner

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Title VI Plan – WWVMPO/SRTPO

Policy Statement, Authorities and Citations

Title VI Policy Statement

It is the policy of the Walla Walla Valley MPO that no person shall on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the Walla Walla Valley MPO as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the Walla Walla Valley MPO, including its contractors and anyone who acts on behalf of the Walla Walla Valley MPO. This policy also applies to the operations of any department or agency to which the Walla Walla Valley MPO extends federal financial assistance. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly, neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of acts which may constitute prohibited discrimination, include when any of the following occur on the grounds of race, color, or national origin: Denial to an individual any service, financial aid, or other benefit; distinctions in the quality, quantity, or manner in which a benefit is provided; segregation or separate treatment; restriction in the enjoyment of any advantages, privileges, or other benefits provided; discrimination in any activities related to highway and infrastructure or facility built or repaired; and discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 USC § 2000d and related statutes, 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3 and 49 CFR part 21.

Andres Gomez

Andres Gomez, Executive Director, and
WWVMPO/SRTPO Title VI Coordinator

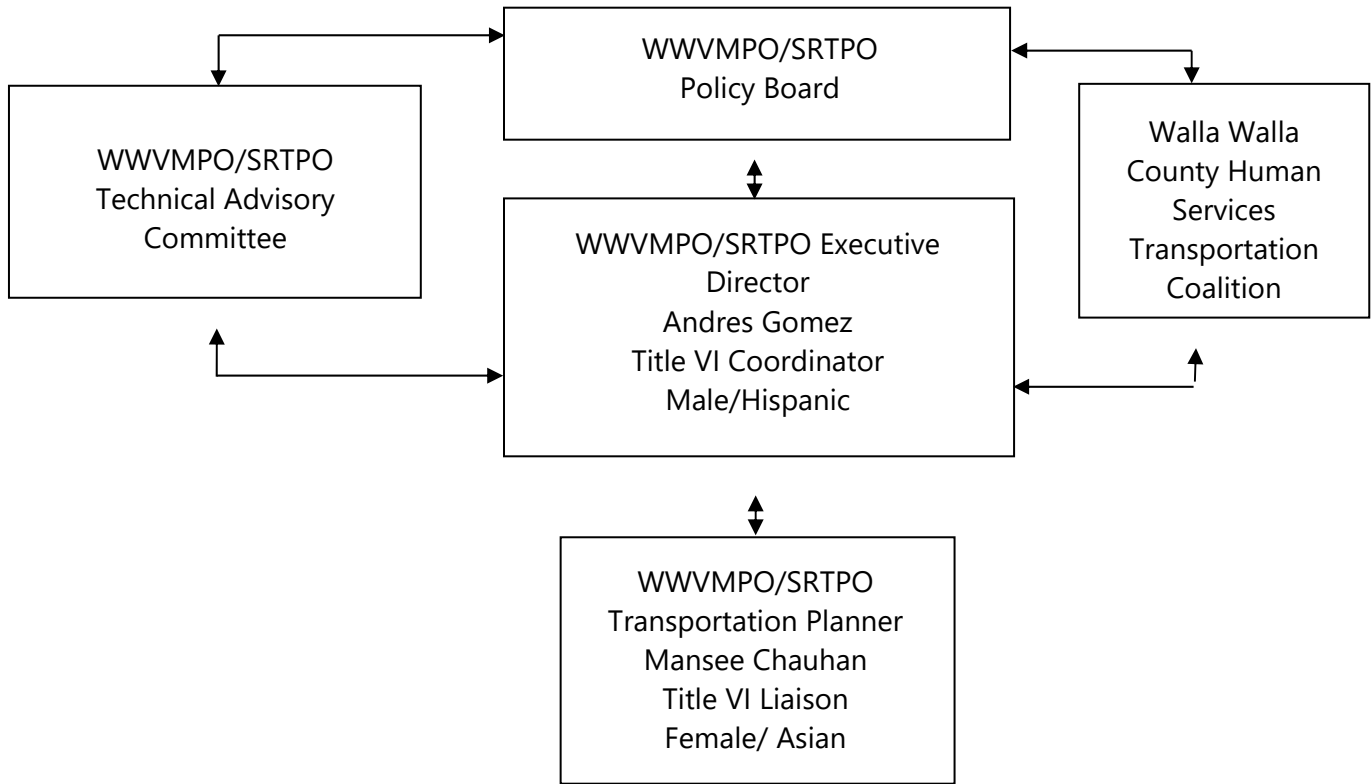
January 3, 2024

Date

II. Organization, Staffing and Structure

Pursuant to 23 CFR 200, WWVMPO/SRTPO has appointed a Title VI Coordinator who is responsible for maintaining the Organization Chart below, which describes the hierarchy and placement of Title VI responsibilities for WWVMPO/SRTPO's Title VI Program.

A. Organizational Chart – Reporting Relationships



B. Staffing and Structure

WWVMPO/SRTPO Policy Board & Title VI Coordinator

The Agency Administrator (WWVMPO/SRTPO Policy Board or Policy Board or Organization) is authorized to ensure compliance with provisions of the Organization's policy of non-discrimination and with the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21. The Organization's grants compliance function and Title VI coordination shall be performed under the authority of the Policy Board.

The WWVMPO/SRTPO Policy Board has designated the Executive Director to perform the duties of the Title VI Coordinator and ensure implementation of the Organization's Title VI Federally Funded Transportation Program. The Executive Director has other duties and responsibilities in addition to Title VI. Since the Policy Board provides direction to the Executive Director in all Organization functions, the Title VI Coordinator position shall have a direct reporting relationship and access to the Policy Board.

Title VI Liaisons

Additionally, the Organization has designated Title VI Liaisons (Liaisons) in special emphasis program areas. The Liaisons, designated below, shall work in concert with the Title VI Coordinator. These key program areas are subject to receiving Federal assistance through grants or other types of transportation related funding or are responsible for implementing Organization directives and policies to ensure civil rights compliance and equal opportunity. The Liaisons will work with the Coordinator to ensure their respective programs comply with Title VI regulations and assurances, meet the objectives of the Title VI Plan, meet Federal and state reporting requirements, and provide adequate training opportunities for applicable staff.

Title VI Liaisons will work with the Coordinator to ascertain Title VI compliance by contractors, subcontractors, consultants, suppliers and other sub-recipients under Federally funded projects or programs. Liaisons will ensure applicable Title VI provisions and requirements are included in contractual agreements to prime contractors and sub-recipients. Liaisons will work with the Coordinator to obtain statistical data on race, color, national origin, handicap/disability, and of participants in, and beneficiaries of Federally funded WWVMPO/SRTPO transportation programs. Each of the Liaisons will maintain data relative to their respective special emphasis program area, designated below. The Coordinator shall use the data to complete annual Title VI reports and for other administrative needs.

List of Title VI Liaisons by their Official Job Title

- Transportation Planner

III. Title VI Plan Implementation and Program Administration

Title VI Coordinator's Responsibilities and Program Administration

As authorized by the Policy Board, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring WWVMPO/SRTPO's compliance with Title VI requirements as follows:

A. Program Administration

Administer the Title VI program and coordinate implementation of the plan. Ensure compliance with the assurances, policy, and program objectives. Perform Title VI program reviews to assess administrative procedures, staffing, and resources; provide recommendations as required to the Policy Board.

B. Complaints

Review written Title VI complaints that may be received by WWVMPO/SRTPO following the adopted procedural guidelines and forward the complaint through the hierarchy up to Federal Highways Administration Headquarters Office of Civil Rights for their consideration.

C. Data Collection

Review the statistical data gathering process performed by Title VI Liaisons periodically to ensure sufficiency of data for meeting the requirements of Title VI program administration. (See Section VII - Special Emphasis Program Areas).

D. Environmental Impact Statements

Ensure that available census data are included as a part of all Environmental Impact Statements/Assessments (EIS/EIA) conducted by WWVMPO/SRTPO member jurisdictions and agencies for projects receiving Federal Highway Administration or other Federal assistance.

E. Training Programs

Conduct or facilitate training programs on Title VI issues and regulations for Organization employees; and facilitate Title VI training for appropriate staff, contractors and sub-recipients. A summary of training conducted will be reported in the annual update.

F. Public Dissemination

Work with Organization staff to develop and disseminate Title VI program information to Organization employees and sub-recipients, including contractors, subcontractors, consultants, and sub-consultants and beneficiaries, as well as the general public. Public dissemination may include postings of official statements, inclusion of Title VI language in contracts or other agreements, website postings, and annual publication of the Organization's Title VI Policy Statement in newspaper(s) having a general circulation, and informational brochures. Ensure public service announcements or notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards, in newspapers or other media reaching the affected community. Ensure the full utilization of available minority publications or media; and, where appropriate, provide written or verbal information in languages other than English.

I. Elimination of Discrimination

Work with all WWVMPO/SRTPO member jurisdictions and agencies to establish procedures for promptly resolving deficiencies, as needed. Recommend procedures to identify and eliminate discrimination that may be discovered in any Organization processes.

J. Maintain Legislative and Procedural Information

Federal laws, rules and regulations, WSDOT and ODOT guidelines, this revised WWVMPO/SRTPO Title VI Plan, Annual Accomplishment Reports, and other resource information pertaining to the implementation and administration of the Organization's Title VI program will be maintained and updated by the Coordinator. Information will be made available to other WWVMPO/SRTPO member jurisdictions and agencies or the public as requested or required.

IV. NHI Education and Title VI Training

In keeping with adopted WWVMPO/SRTPO policy of non-discrimination, departmental procedures will be established or followed for Organization employees to have equal access to applicable educational and training opportunities. Organization staff will maintain program administration documentation and data necessary for preparation of annual Title VI reports and will routinely supply the necessary data to the Title VI Coordinator.

A. National Highway Institute (NHI) Education

The Coordinator will be notified when training for the National Highway Institute courses or workshops become available to Organization employees. The Executive Director will establish policy for the selection of participants interested in taking part in the National Highway Institute Training workshops to ensure that no one is denied participation or subjected to discrimination

on the basis of race, color, and national origin. A report will be completed and forwarded to the Coordinator upon completion of each educational seminar or course throughout the course of the year, which shall include the name of each participant, their title, and ethnicity for use in completing the annual Title VI accomplishment report.

B. Title VI Training

The Coordinator is responsible for overall Title VI related training and staff development for Title VI Liaisons and other Organization employees. The Coordinator will organize or conduct a minimum of one internal Title VI training session annually. The Coordinator will organize and facilitate the provision of Title VI training sessions for consultants, contractors, and subcontractors periodically. WSDOT's Office of Equity and Civil Rights Internal and External Civil Rights Branch and the Contract Compliance Office and/or ODOT's Office of Civil Rights may be asked to provide applicable training.

C. Selection of Instructors

The Coordinator will follow the Organization's Procurement and Purchase Procedures to ensure Organization policy is followed in the selection of instructors for WWVMPO/SRTPO training courses/ workshops, and ensure equal opportunity in the selection process for all training contracts. Per adopted policy, the Organization will provide accessibility to Minority/Women/Disadvantage Business Enterprise consulting and training firms to compete for training contracts.

V. Sub-Recipient Review and Remedial Action Procedures

A. Title VI Review of Sub-recipients of Federal-Aid Highway Funds

Liaisons and the Coordinator will assist WSDOT and ODOT to periodically conduct Title VI compliance reviews. WWVMPO/SRTPO staff will review select recipients of Federal-aid highway or other Federal funds, to ensure adherence to Title VI requirements (see Section VII). The WWVMPO/SRTPO jurisdictions and agencies will work cooperatively to periodically confirm operational guidelines provided to consultants, contractors, and sub-recipients, including Title VI language, provisions, and related requirements, as applicable.

B. Post-Grant Reviews

The Coordinator will collaborate with WWVMPO/SRTPO member organization staff to conduct periodic post grant reviews of select recipients of Federal highway funds or other Federal funds, for roads, sidewalks, bridges, municipal construction, etc. to ensure adherence to Title VI requirements (see Section VII). Appropriate staff will periodically confirm that operational guidelines provided to consultants, contractors and sub-recipients include Title VI language and provisions and related requirements, where applicable.

C. Remedial Action

When irregularities occur in the administration of Federal-aid highway programs at either the MPO/SRTPO or sub-recipient levels, corrective action will be taken to resolve identified Title VI issues. WWVMPO/SRTPO will seek the cooperation of the consultant, contractor or other sub-recipient in correcting deficiencies found during periodic reviews. WWVMPO/SRTPO will provide technical assistance and guidance, upon request, to support voluntarily compliance by the sub-recipient. When conducting Title VI compliance reviews, the Organization will reduce to writing any recommended

remedial action agreed upon by the WWVMPO/SRTPO and sub-recipient, and provide a copy of the letter within a period not to exceed 45 days. Sub-recipients placed in a deficiency status will be given a reasonable time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies. When a sub-recipient fails or refuses to voluntarily comply with requirements within the allotted time frame, WWVMPO/SRTPO will submit to WSDOT, ODOT, and FHWA copies of the case file and a recommendation that the sub-recipient be found in noncompliance. A follow-up review will be conducted within 180 days of the initial review to ascertain if the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, WWVMPO/SRTPO, ODOT, and WSDOT may, with FHWA's concurrence, initiate sanctions per 49 CFR 21.

VI. Complaint Procedures – Allegations of Discrimination in Federally Assisted Programs or Activities

A. Overview

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Section 504 of the Rehabilitation Act of 1973 and Civil Rights Restoration Act of 1987, relating to any program or activity administered by WWVMPO/SRTPO, as well as to sub-recipients, consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or Federal agencies or to seek private counsel for complaints alleging discrimination.

B. Discrimination Complaint Procedure for Walla Walla Valley MPO

Federal law prohibits discrimination on the basis of race, color, or national origin in any WWVMPO program, service, or activity. This prohibition applies to all branches of WWVMPO, its contractors, consultants, and anyone else who acts on behalf of WWVMPO.

Complaints related to the Federal-aid programs may be filed with WWVMPO and will be forwarded to Washington State Department of Transportation – Office of Equity and Civil Rights. If you need assistance to file your complaint or need interpretation services, please contact WWVMPO Title VI Coordinator.

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program, service, or activity because of their race, color, or national origin may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

How do you file a complaint?

Complaints must be filed no later than 180 days from the last date of the alleged discrimination. Contact WWVMPO Title VI Coordinator if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact WWVMPO Title VI Coordinator.

Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. If a complainant phones WWVMPO with allegations, the allegations of the complaint will be transcribed as provided by phone and then the written complaint will be sent to the complainant for correction and signature.

A complaint should contain the following information:

- The complainant's contact information, including, if available: full name, mailing address, phone number (and best time to call), and email address (if available);
- The basis of the complaint (e.g., race, color, national origin);
- The names of specific person(s) and/or agencies/organizations alleged to have discriminated;
- A description of the alleged discriminatory actions, meaning sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

All Title VI complaints are logged. The Complaint log must contain the following information for each complaint filed:

- The name and address of the person filing the complaint.
- The date of the complaint.
- The basis of the complaint.
- The disposition of the complaint.
- The status of the complaint.

The Complaint Log and documentation are destroyed six years after the end of the fiscal year in which the case is closed.

WWVMPO then forwards complaints to WSDOT-Office of Equity and Civil Rights for processing by FHWA. [WSDOT investigates complaints only if delegated by FHWA after acceptance of a complaint.] FHWA is responsible for all determinations regarding whether to accept, dismiss, or transfer the complaint and finding no violation or failure to comply.

Complainants have the right to file a complaint directly with the federal funding agency. The following address is where Title VI complaints may be filed directly with FHWA:

Federal Highway Administration
U.S. Department of Transportation Office of Civil Rights
8th Floor E81-105
1200 New Jersey Avenue, SE
Washington, DC 20590

CivilRights.FHWA@dot.gov

What happens after a complaint is filed?

If your complaint is forwarded to another agency, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

FHWA will render final decisions in all cases including those investigated by WSDOT. There are no administrative appeal forums in Title VI complaints. Once FHWA issues its final agency decision, a complaint is closed.

There is no prohibition against a complainant filing a Title VI complaint simultaneously with an LPA, WSDOT, and FHWA.

List of Title VI Investigations, Complaints, and Lawsuits

As a recipient of federal funding, WWVMPO is required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by FTA and entities other than FTA, lawsuits, and complaints naming WWVMPO.

The WWVMPO has not had any investigations, lawsuits, or complaints to report.

What remedy are you seeking for the alleged discrimination? Please note that this process will not result in the payment of punitive damages or financial compensation.

List any other persons that we should contact for additional information in support of your complaint. Please list their names, phone numbers, address, email address below.

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____

Status (pending, resolved, etc.) _____ Result, if known _____

Complaint number, if known _____

Do you have an attorney in this matter? _____

Name (print) _____

Phone _____ Address _____ City _____ Zip _____

Signed _____ Date _____

¿Qué remedio busca por la supuesta discriminación? Tenga en cuenta que este proceso no dará lugar al pago de daños punitivos ni a una compensación financiera.

Enumere cualquier otra persona con la que debamos comunicarnos para obtener información adicional en apoyo de su queja. Indique sus nombres, números de teléfono, dirección y dirección de correo electrónico a continuación.

¿Ha presentado su queja, queja o demanda ante alguna otra agencia o tribunal?

Quien _____ Cuando _____

Estado (pendiente, resuelto, etc.) _____ Resultado, si se conoce _____

Número de queja, si se conoce _____

¿Tienes un abogado en este asunto? _____

Nombre (imprimir) _____

Teléfono _____ Dirección _____ Ciudad _____ Código postal _____

Firmado _____ Fecha _____

VII. Title VI Implementation Activities in Special Emphasis Program Areas

A. Planning & Location Activities

1. Planning Process - The WWVMPO/SRTPO has responsibility for providing long-range planning (through service agreements with WSDOT, ODOT, and Benton-Franklin Council of Governments), program development, and capital programming necessary to provide efficient transportation services to Organization citizens. The Organization annually updates and coordinates WWVMPO/SRTPO's four-year plan for transportation improvement programs and projects. The update also informs other WWVMPO/SRTPO jurisdictions and agencies of the current planning direction for transportation needs. Projects included in the update are the result of evaluation and prioritization of needs in various transportation areas. The evaluation process includes input from WWVMPO/SRTPO staff, cities, local jurisdictions and organizations, citizen groups, and private individuals. All member jurisdictions' and agencies' six-year plans must be consistent with the adopted Comprehensive Plan approved under the State's Growth Management Act.
2. Authorities - 23 CFR 450; RCW 35.77; RCW 36; RCW 47.06 Statewide Transportation Planning; RCW 47.80 Regional Transportation Planning Organization (RTPO).
3. Public Involvement in Planning Activities & Title VI
 - a) Invite participation of a cross section of the populace from social, economic, and ethnic groups in the planning process by disseminating written program information to minority media and ethnic organizations, and providing public service announcements for all local media, when forming citizen advisory committees or planning board, and requesting involvement.
 - b) WWVMPO/SRTPO staff will obtain demographic statistics at applicable community meetings and public hearings involving transportation planning sessions. Data will be gathered through use of a voluntary self-reporting form which includes race, gender, and national origin. Copies of the completed forms will be provided to Title VI Coordinator after each meeting.
 - c) To ensure access to public meetings, evening meetings will be conducted in a variety of community buildings throughout the WWVMPO/SRTPO planning region, including those along transit routes, ensure translation services are available if anticipated, and ensure public meetings are held in predominantly minority communities when transportation projects will specifically impact those communities.
 - d) The following planning activities include Title VI elements:
 - 1) Data Collection

Census data on race, color, national origin, income level, language spoken, and gender of participants in, and beneficiaries of, federally funded programs is to be gathered and maintained by each Title VI Liaison for her or his program area, as described in the "Program Area Responsibilities" section of this document. The data gathering process will be reviewed periodically to ensure sufficiency of the data in meeting the requirements of the Title VI program.

2) Annual Review of the Title VI Program

Each year, as preparation for authoring the Title VI Report and Update, the Title VI Coordinator and Liaison(s) will review WWVMPO/SRTPO's Title VI program to assure compliance with Title VI. Additionally, WWVMPO/SRTPO's operational guidelines and publications, including contracts with consultants, will be reviewed to ensure Title VI language and provisions are incorporated as appropriate.

3) Dissemination of Information Related to the Title VI Program

Information on WWVMPO/SRTPO's Title VI program is to be disseminated to organization employees, contractors and consultants, beneficiaries, and the general public as described in the "Program Area Responsibilities" section of this document.

4) Metropolitan and Regional Transportation Improvement Program (M/RTIP)

The Metropolitan and Regional Transportation Improvement Program aids in the coordination of transportation investments throughout the region. The program provides the public, elected officials, state and local staff, transit providers, tribes, and other interested parties the opportunity to submit and then review projects for consistency with regional, local, and state plans and their goals and policies. The M/RTIP requires approval by the WWVMPO/SRTPO Policy Board, the Federal Highway Administration and Federal Transit Administration, the State Department of Transportation and the State Governor's Office. The approved M/RTIP is then included in the Statewide Transportation Improvement Program (STIP).

Citizens and interested parties are provided an opportunity to comment on the draft M/RTIP. The public review and comment period for the re-adoption of the M/RTIP is for a duration of two weeks. Furthermore, taking time to hear public comments conducted as part of the regular Policy Board meeting provide an additional opportunity to obtain the views of the public on the proposed projects.

Public notices announcing the availability of the document are published in the newspaper of record and on the WWVMPO/SRTPO website. A copy of the M/RTIP is available for public viewing at three locations in Walla Walla County: Walla Walla Library, Waitsburg City Hall, and the WWVMPO/SRTPO office. An electronic copy is posted on the agency's website at <https://wwwvmppo.org/public-participation.html>. All public comments related to the M/RTIP is included in Appendix J of the final document.

5) Public Participation Plan (PPP)

The fundamental objective of the Public Participation Plan is to ensure that the concerns and issues of everyone with a stake in transportation are identified and considered in the regional planning and decision-making process. In order to accomplish the PPP objective and best reach out to the citizens and communities in the Walla Walla Valley, the WWVMPO/SRTPO uses a variety of engagement strategies and tools, which are listed below.

- WWVMPO/SRTPO Meetings
- MPO/SRTPO Website
- Surveys

- Public Notice and Call for Public Comments
- Press Releases and Media Outreach
- Mailing Lists
- Technical Coordination with Tribal Government
- Regional Meetings, Community Events, and Venues

The full public participation plan is available at <https://wwwmpo.org>

6) Metropolitan and Regional Transportation Plan (M/RTP)

In close collaboration with its member entities comprised of states, counties, cities, a port authority, regional tribal representatives, and transit providers, and guided by stakeholder and public feedback, the WWVMPO/SRTPO develops the Metropolitan and Regional Transportation Plan every five years. The plan seeks to ensure that federal, state, and local investments into pedestrian, bicycle, public transit, roadway, and freight transportation will enhance the movement of all people and goods efficiently and safely.

7) Coordinated Human Services Transportation Plan (HSTP)

The Coordinated Public Transit - Human Services Transportation Plan (CPT-HSTP) identifies public transportation needs for people with disabilities, seniors, young people, individuals with lower incomes, and others who depend on public transportation services. The plan's goal is to improve transportation services by enhancing access, minimizing duplication of services, encouraging cost-effective coordination, and highlighting priority needs that require additional attention.

The CPT-HSTP is developed in close coordination with users, human services agencies, and providers of transit and transportation services, and it establishes the regional agencies' eligibility for Consolidated Grant opportunities, which are administered by the WSDOT.

VIII. Limited English Proficiency Plan

WWVMPO provides the following vital documents translated into Spanish: ADA policy, Title VI notice, and Title VI complaint form and procedures.

Four-Factor Analysis

The Walla Walla Valley Metropolitan Planning Organization and Sub-Regional Transportation Planning Organization (WWVMPO/SRTPO) conducted a Four-Factor Analysis to meet the requirements under Title VI of the Civil Rights Act of 1964. This analysis assists the WWVMPO/SRTPO in taking reasonable steps to provide meaningful access to persons with limited English proficiency (LEP), who may otherwise encounter barriers in accessing important benefits or services, understanding and exercising important rights, or understanding other information provided by federally funded programs and activities.

The U.S. Department of Transportation (USDOT) published Limited English Proficiency Guidance for recipients of USDOT Federal financial assistance. The guidance is based on the prohibition against national origin discrimination as it affects limited English proficient persons. In order to assist with the assessment of reasonable and meaningful access, the LEP guidance sets forth an individualized evaluation through a four-factor analysis:

- ◆ The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- ◆ The frequency with which LEP individuals come in contact with the program.
- ◆ The nature and importance of the program, activity, or service provided by the recipient to people’s lives.
- ◆ The resources available to the recipient and costs.

The "reasonableness" standard is meant to be flexible and fact-dependent. It is also intended to balance the need to ensure meaningful access by LEP persons to critical services, while not imposing undue financial burdens on small businesses, small local governments, or small nonprofit organizations. Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. After completing the four-factor analysis, recipients can determine the appropriate "mix" of LEP services required.

Factor 1 - The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee

Utilizing the 2010-2014 American Community Survey (ACS) data from the U.S. Census, the following data was compiled for Umatilla County, OR and Walla Walla County, WA, which encompass the combined WWVMPO/SRTPO study area.

LANGUAGE SPOKEN AT HOME – Walla Walla County, WA

| Subject | Walla Walla County, Washington | | |
|-------------------------------------|--------------------------------|--|-------------------------------------|
| | Total | Percent of specified language speakers | |
| | | Speak English "very well" | Speak English less than "very well" |
| | Estimate | Estimate | Estimate |
| Population 5 years and over | 55,874 | 90.4% | 9.6% |
| Speak only English | 80.2% | (X) | (X) |
| Speak a language other than English | 19.8% | 51.6% | 48.4% |
| Spanish or Spanish Creole | 16.5% | 49.4% | 50.6% |
| Other Indo-European languages | 1.5% | 83.6% | 16.4% |
| Asian and Pacific Island languages | 1.5% | 48.2% | 51.8% |
| Other languages | 0.3% | 28.1% | 71.9% |

Source: 2010-2014 American Community Survey 5-Year Estimates

LANGUAGE SPOKEN AT HOME – Umatilla County, OR

| Subject | Umatilla County, Oregon | | |
|-------------------------------------|-------------------------|--|-------------------------------------|
| | Total | Percent of specified language speakers | |
| | | Speak English "very well" | Speak English less than "very well" |
| | Estimate | Estimate | Estimate |
| Population 5 years and over | 71,077 | 90.9% | 9.1% |
| Speak only English | 79.1% | (X) | (X) |
| Speak a language other than English | 20.9% | 56.2% | 43.8% |
| Spanish or Spanish Creole | 19.3% | 54.8% | 45.2% |
| Other Indo-European languages | 0.6% | 86.2% | 13.8% |
| Asian and Pacific Island languages | 0.6% | 51.8% | 48.2% |
| Other languages | 0.3% | 99.5% | 0.5% |

Source: 2010-2014 American Community Survey 5-Year Estimates

Within the last year, no visits from LEP persons were received at the WWVMPO/SRTPO office and no LEP person has attended committee or public meetings hosted by the agency. In order to broaden outreach, the WWVMPO/SRTPO is currently compiling a list of potential community partner agencies that serve populations with limited English proficiency. This list will be used to gather additional LEP data, as well as establish a stronger connection to the LEP population present within the study area.

Factor 2 - The frequency with which LEP individuals come in contact with the program

The WWVMPO/SRTPO is the federal-designated Metropolitan Planning Organization and state-designated Regional Transportation Planning Organization and has the responsibility for developing and adopting short- and long-range transportation planning documents for each organization. The WWVMPO/SRTPO is largely an association of local jurisdictions and serves as a forum for developing policies and making decisions on metropolitan and regional transportation planning issues and investments.

Consistent with federal and state mandates, and with the WWVMPO/SRTPO Interlocal Agreement, Public Participation Plan, and other operating procedures, the WWVMPO/SRTPO works with the public, local, state, and federal jurisdictions, and resource agencies in a continuing, cooperative, and comprehensive planning process.

Although the WWVMPO/SRTPO authors metropolitan and regional transportation planning documents, the agency does not provide direct services to the public. It is therefore estimated that the frequency and extent with which LEP persons come into contact with WWVMPO/SRTPO plans and programs is relatively low.

Factor 3 - The nature and importance of the program, activity, or service provided by the recipient to people's lives

The WWVMPO/SRTPO's most critical service is the provision of short- and long-term metropolitan and regional transportation planning, which impacts the economic vitality and quality of life within the Walla Walla Valley.

While essential to community development, transportation planning may not be as important to LEP persons as employment, health care, social services, etc. Nonetheless, the WWVMPO/SRTPO promotes opportunities to increase public participation on transportation decision making.

Factor 4 - The resources available to the recipient and costs

WWVMPO is committed to providing translation services to people who request them and translating its vital documents as needed to the region's Spanish LEP population. WWVMPO will seek creative, low-cost measures to assist LEP individuals and provide translation services when needed, particularly when WWVMPO is engaged in Title VI or Environmental Justice outreach as part of its major plan updates. WWVMPO will continue to monitor all requests for translation services and flexibly respond to such requests as they occur. WWVMPO will log and analyze all requests for translation services to more accurately budget for those services in subsequent LEP plans.

IX. Environmental Justice

Walla Walla Valley MPO is committed to continuing efforts to enhance the analytical capability for assessing impact distributions of transportation programs, policies, and projects in its transportation plans and the TIP. The object of Executive Order 12898 on Environmental Justice is to ensure that Federal agencies and programs that receive Federal funding promote and enforce nondiscrimination as one way of achieving the overarching objective of environmental justice. This section provides a brief overview of the process that Walla Walla Valley MPO will be following to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

An equity or environmental justice (EJ) analysis will be conducted for the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP). This includes a qualitative analysis in which planned or programmed roadway, transit, and bicycle projects are overlaid or superimposed on a map highlighting the areas with concentrations of minority populations and low-income populations to determine the extent to which these areas are negatively or positively impacted by projects.

All Environmental Justice covered programs are required to engage in stakeholder consultation and ensure that community stakeholders are meaningfully involved in determining program benefits. The Environmental Justice Screening and Mapping Tool¹ (EJScreen) maintained by the Environmental Protection Agency can be used to identify various demographic variables, including people of color, low income, linguistically isolated, less than high school education, under age 5, over age 64.

Walla Walla Valley Environmental Justice Analysis

Census data is available for two specific Environmental Justice populations at the census block group and tract level: minority and low-income populations. Walla Walla County's population is 28.1% minority and Umatilla County's population is 33.6% minority. For the purpose of this analysis, if a block group has more than 50% minority population, it is considered a minority block group.

Based on 2014-2018 American Community Survey (ACS) data, 53 Census block groups (or portions thereof) make up the WWVMPO/ SRTPO study area. None of these block groups have a minority population greater than 50%, though it is important to note that six are between 25 and 50% minority. The Environmental Justice analysis took those six block groups into account.

The region relies on Census computations of the households that have been “at or below the poverty threshold” in the past 12 months. For the purpose this analysis, tracts are considered low-income, if 15% or more of the households are low-income. Based on 2014-2018 ACS data, the median household income in Walla Walla County is \$56,533 and 13.9% of households are at or below the poverty threshold. In Umatilla County, the median household income is \$51,887 and 17.3% of households are at or below the poverty threshold. Based on a 15% benchmark, four of Walla Walla County’s 12 tracts are low-income, Environmental Justice areas. Umatilla County has two tracts within the Walla Walla Valley and one of them is a low-income, Environmental Justice area.

The minority and low-income Environmental Justice populations are concentrated in the urbanized portion of the study area, which follows spatial patterns common to the majority of other U.S. cities. Furthermore, based on the systemwide analysis, the anticipated impacts of the 2045 Plan projects have been identified as neither disproportionate nor adverse.

Needs will always outnumber the means to provide for them. However, making transportation decisions that improve equity and strive to create equal opportunities for all is and will remain the ultimate goal. Environmental Justice helps address imbalances by making sure that project considerations are inclusive of all populations and selected investments do not significantly or adversely impact any one group.

| <i>Environmental Population</i> | <i>Assumption</i> | <i>Number of Projects</i> | <i>Pedestrian / Bicycle</i> | <i>Bridge</i> | <i>Intersection</i> | <i>New Construction</i> | <i>Paving</i> | <i>Reconstruction</i> | <i>Safety</i> | <i>Signalization / Technology</i> |
|--|------------------------------|---------------------------|-----------------------------|---------------|---------------------|-------------------------|---------------|-----------------------|---------------|-----------------------------------|
| <i>Minority Block Group (25% +)</i> | Through or directly adjacent | 8 | 2 | 1 | | | 2 | | | 3 |
| <i>Low-Income Tract (at/below poverty level)</i> | Through or directly adjacent | 32 | 9 | 2 | 2 | | 4 | 9 | | 6 |

X. Notice of Title VI Rights

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

WWVMPO/SRTPO hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which WWVMPO/SRTPO receives Federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with WWVMPO/SRTPO. Any such complaint must be in writing and filed with the WWVMPO/SRTPO Title VI Coordinator within one hundred, eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the WWVMPO/SRTPO Office, on the website at <http://wwwmpo.org/plans--programs.html> at no cost to the complainant.

To file a Title VI discrimination complaint, contact:

Walla Walla Valley MPO
107 South Third Avenue
Walla Walla, WA 99362
andy@wwwmpo.org
509-876-8002

Appendix A. USDOT Standard Title VI/ Non-Discrimination Assurances

The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination

Assurances

DOT Order No. 1050.2A

The (Walla Walla Valley Metropolitan Planning Organization) (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Washington State Department of Transportation (WSDOT), is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure that:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, for which the Recipient receives Federal financial assistance from DOT, including the Washington State Department of Transportation.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard

to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The (Walla Walla Valley Metropolitan Planning Organization), in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, 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 will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, [Walla Walla Valley Metropolitan Planning Organization] also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the **Washington State Department of Transportation** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the **Washington State Department of Transportation**. You must keep records, reports, and submit the material for review upon request to **Washington State Department of Transportation**, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

[Walla Walla Valley Metropolitan Planning Organization] gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration. This ASSURANCE is binding on Washington State Department of Transportation, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal-Aid Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Walla Walla Valley Metropolitan Planning Organization
(Name of Recipient)

by Andres Gomez
(Signature of Authorized Official)

DATED August 2, 2023

APPENDIX A

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

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Washington State Department of Transportation, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Washington State Department of Transportation to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Washington State Department of Transportation, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Washington State Department of Transportation may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment,

unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Washington State Department of Transportation may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the (Walla Walla Valley Metropolitan Planning Organization) will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code, the Regulations for the Administration of Washington State Department of Transportation, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the (Walla Walla Valley Metropolitan Planning Organization) all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto (Walla Walla Valley Metropolitan Planning Organization) 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 Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the (Walla Walla Valley Metropolitan Planning Organization), its successors and assigns.

The (Walla Walla Valley Metropolitan Planning Organization), 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 will on the grounds of race, color, or national origin, 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 [,] [and]* (2) that the (Walla Walla Valley Metropolitan Planning Organization) will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the (Walla Walla Valley Metropolitan Planning Organization) pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 - 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, (Walla Walla Valley Metropolitan Planning Organization) will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Walla Walla Valley Metropolitan Planning Organization will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the (Walla Walla Valley Metropolitan Planning Organization) and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by (Walla Walla Valley Metropolitan Planning Organization) pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, 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 the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, (Walla Walla Valley Metropolitan Planning Organization) will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, Walla Walla Valley Metropolitan Planning Organization will there upon revert to and vest in and become the absolute property of (Walla Walla Valley Metropolitan Planning Organization) and its assigns.*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

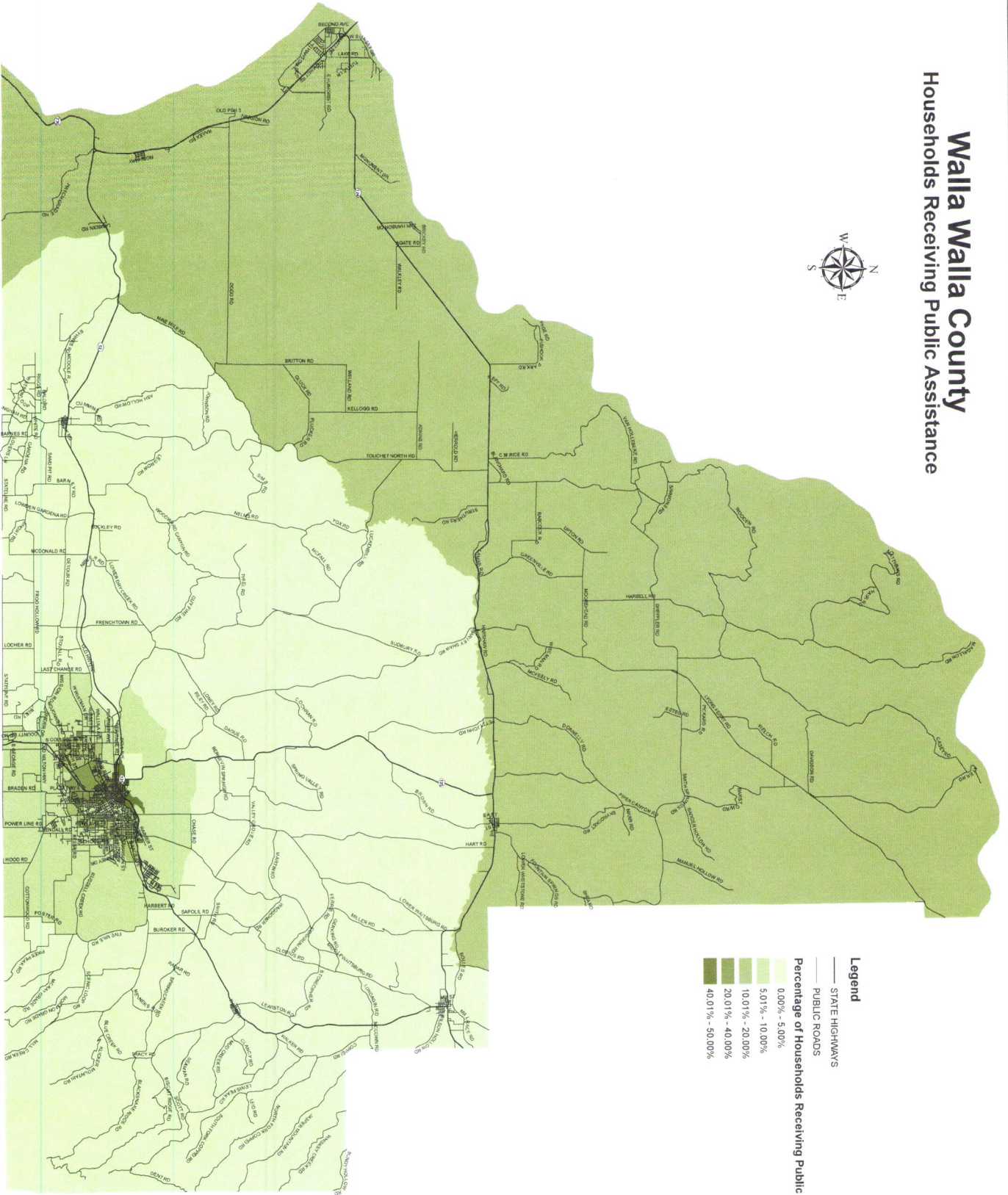
Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

Appendix B. Demographic Maps

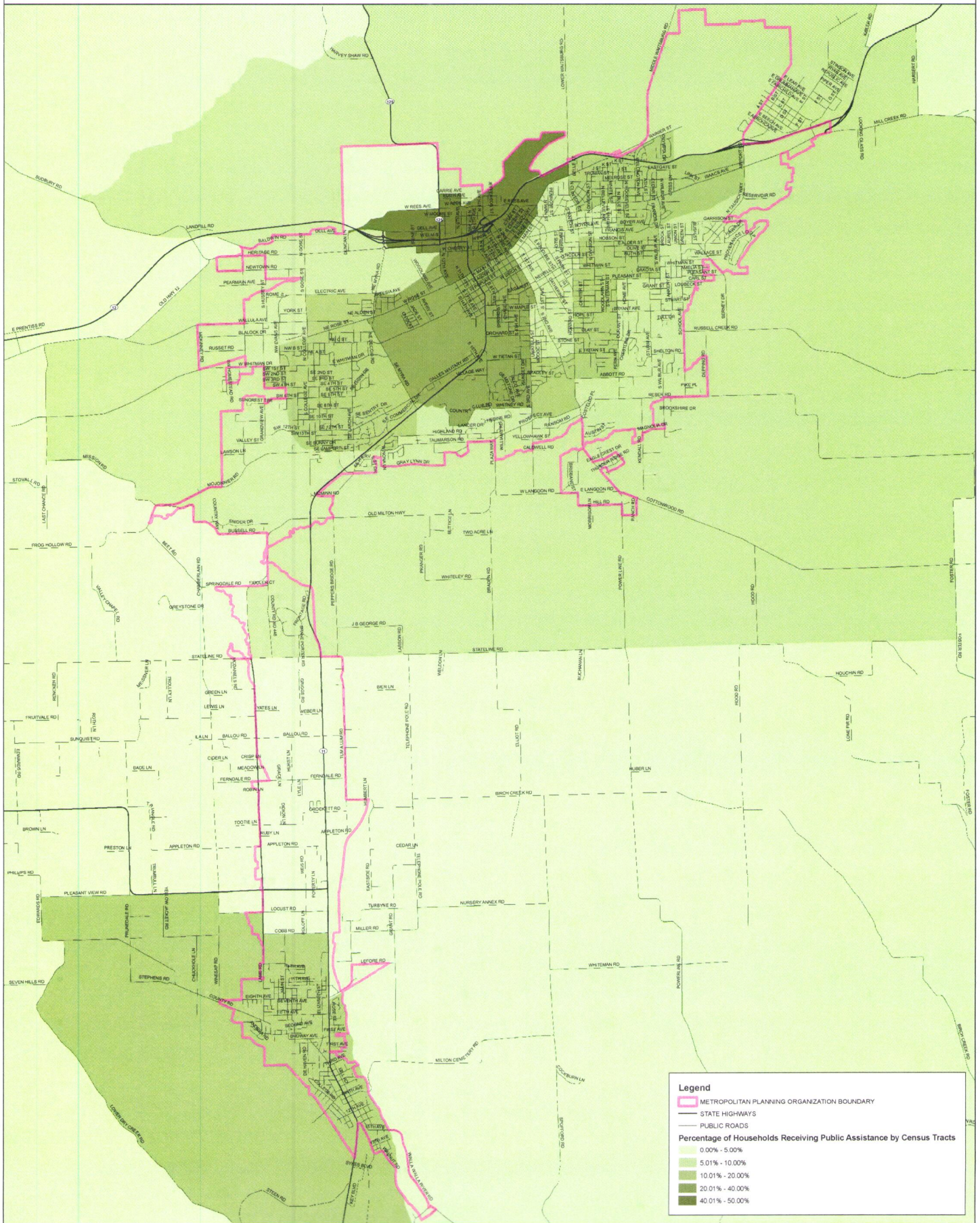
Walla Walla County

Households Receiving Public Assistance



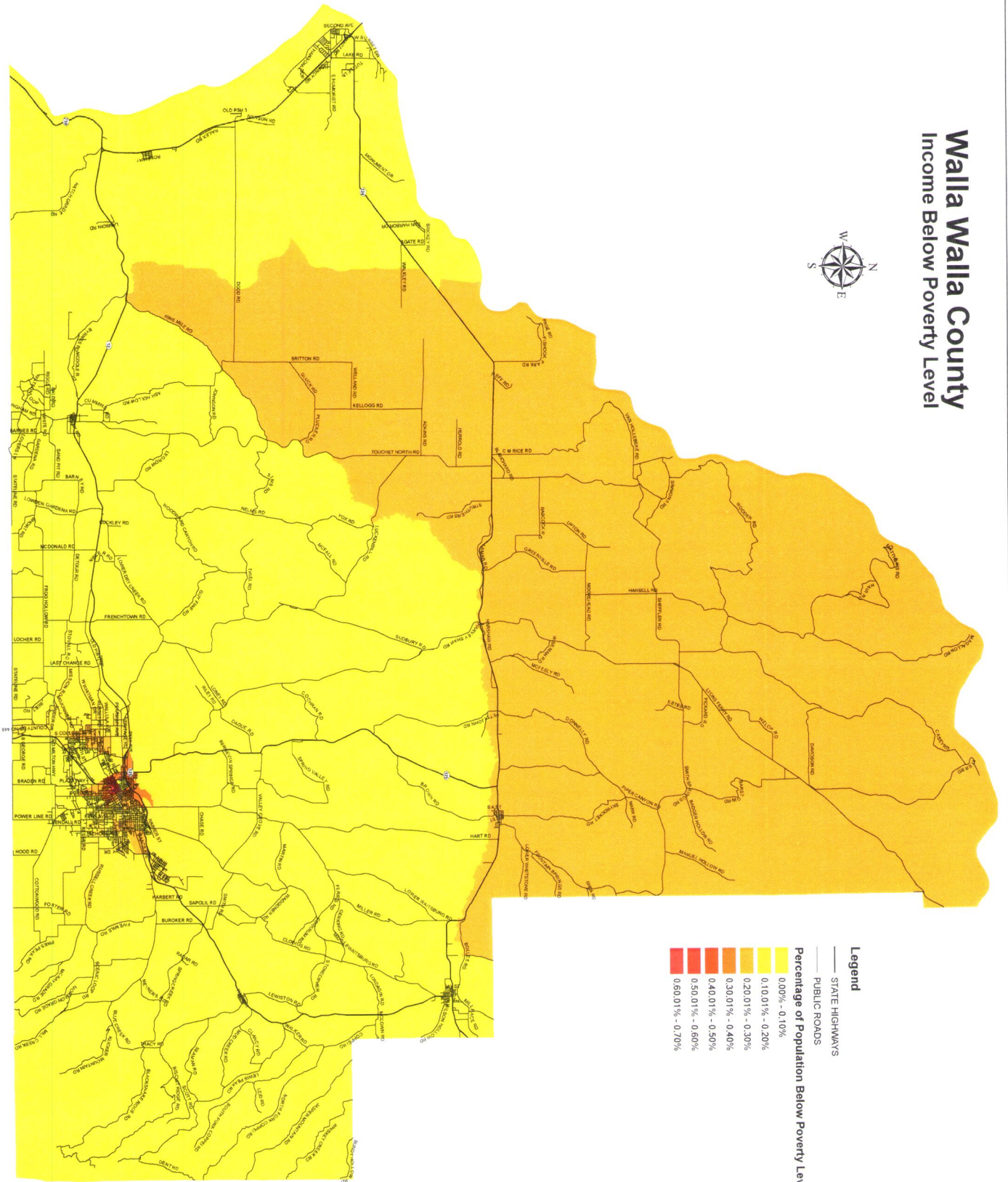


Walla Walla Valley Metropolitan Planning Organization Households Receiving Public Assistance



Walla Walla County

Income Below Poverty Level

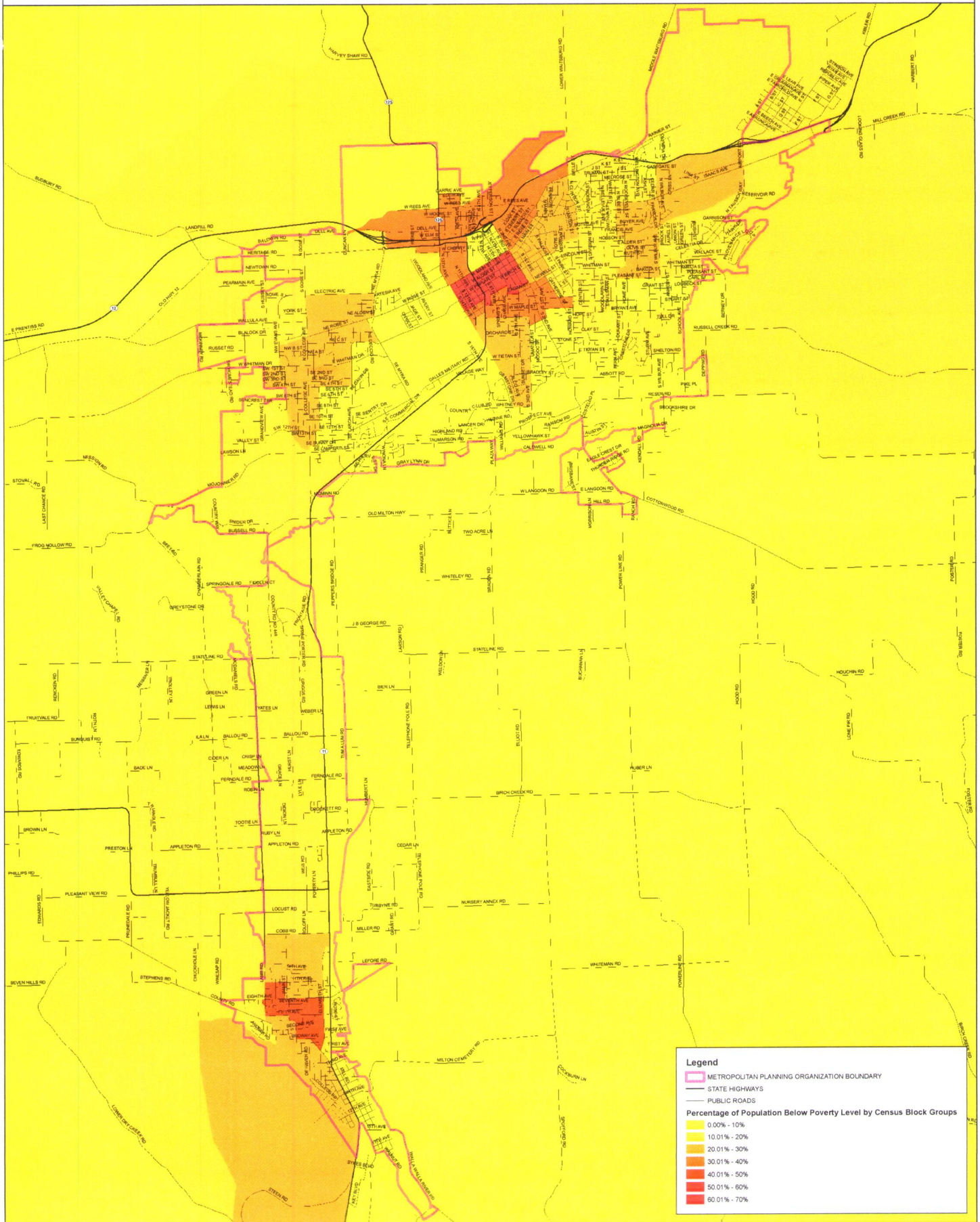


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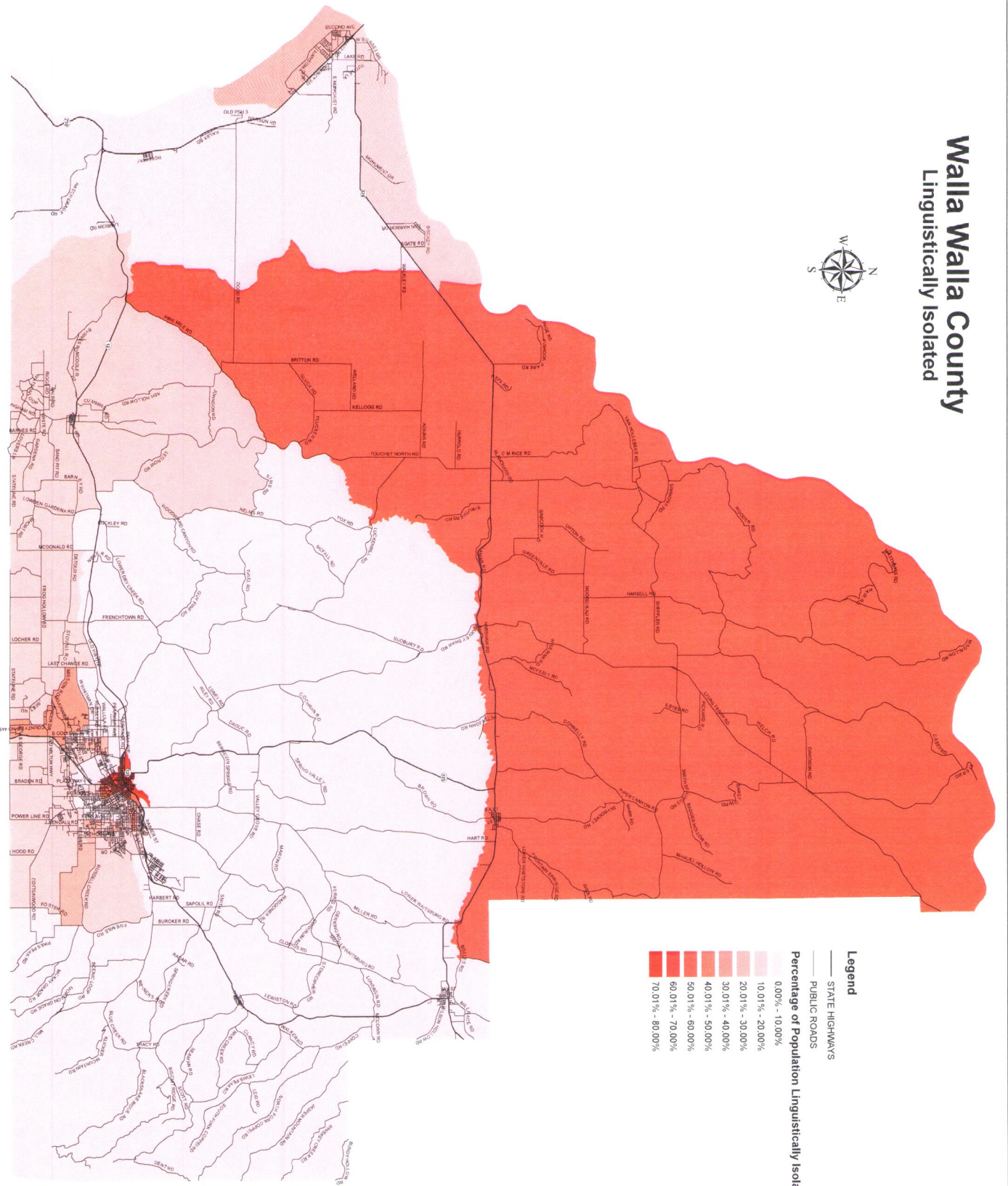
Walla Walla Valley Metropolitan Planning Organization

Income Below Poverty Level



Walla Walla County

Linguistically Isolated



Legend

- STATE HIGHWAYS
- PUBLIC ROADS

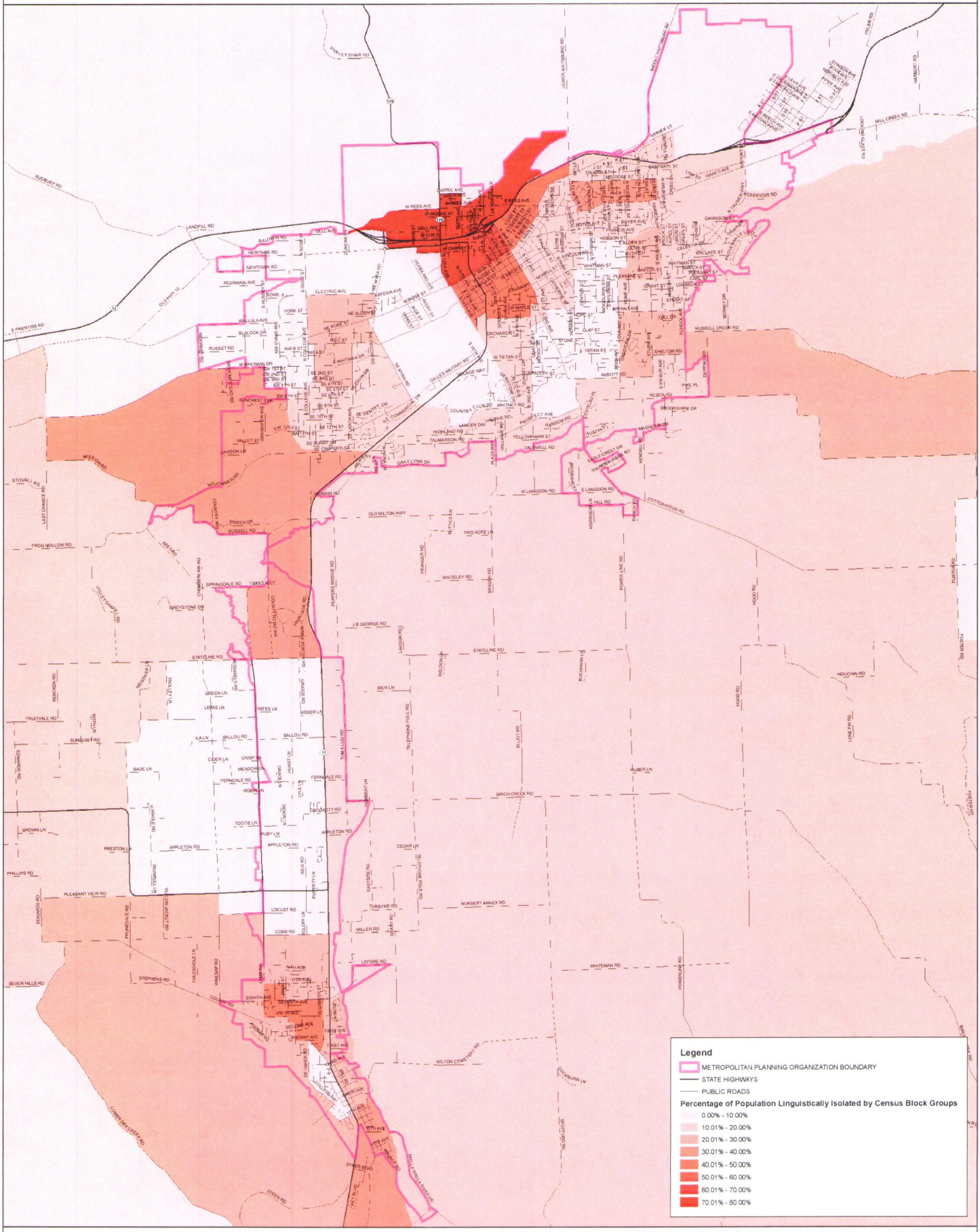
Percentage of Population Linguistically Isolated by Census Block Groups

- 0.00% - 10.00%
- 10.01% - 20.00%
- 20.01% - 30.00%
- 30.01% - 40.00%
- 40.01% - 50.00%
- 50.01% - 60.00%
- 60.01% - 70.00%
- 70.01% - 80.00%



Walla Walla Valley Metropolitan Planning Organization

Linguistically Isolated



Legend

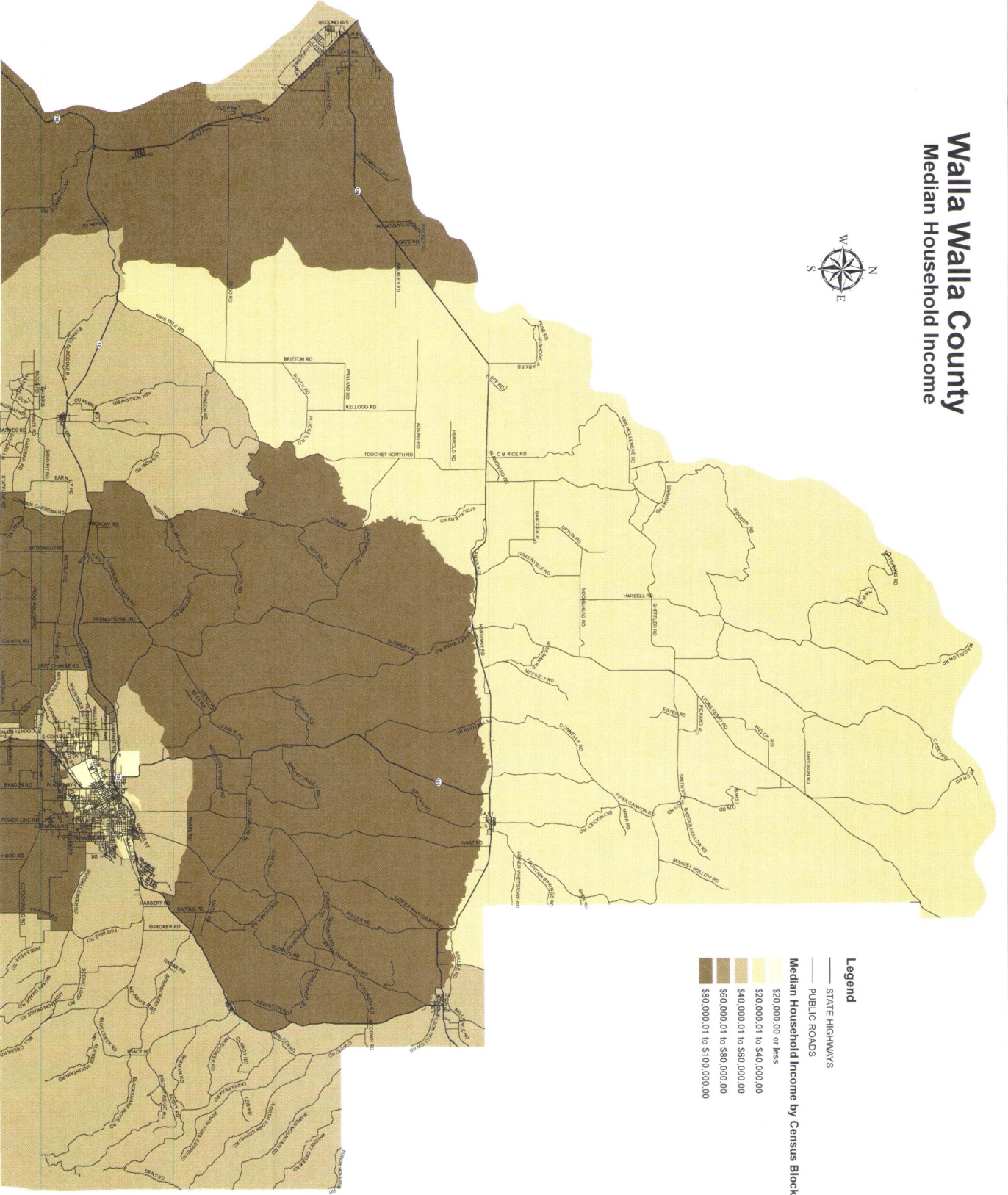
- METROPOLITAN PLANNING ORGANIZATION BOUNDARY
- STATE HIGHWAYS
- PUBLIC ROADS

Percentage of Population Linguistically Isolated by Census Block Groups

- 0.00% - 10.00%
- 10.01% - 20.00%
- 20.01% - 30.00%
- 30.01% - 40.00%
- 40.01% - 50.00%
- 50.01% - 60.00%
- 60.01% - 70.00%
- 70.01% - 80.00%

Walla Walla County

Median Household Income



Legend

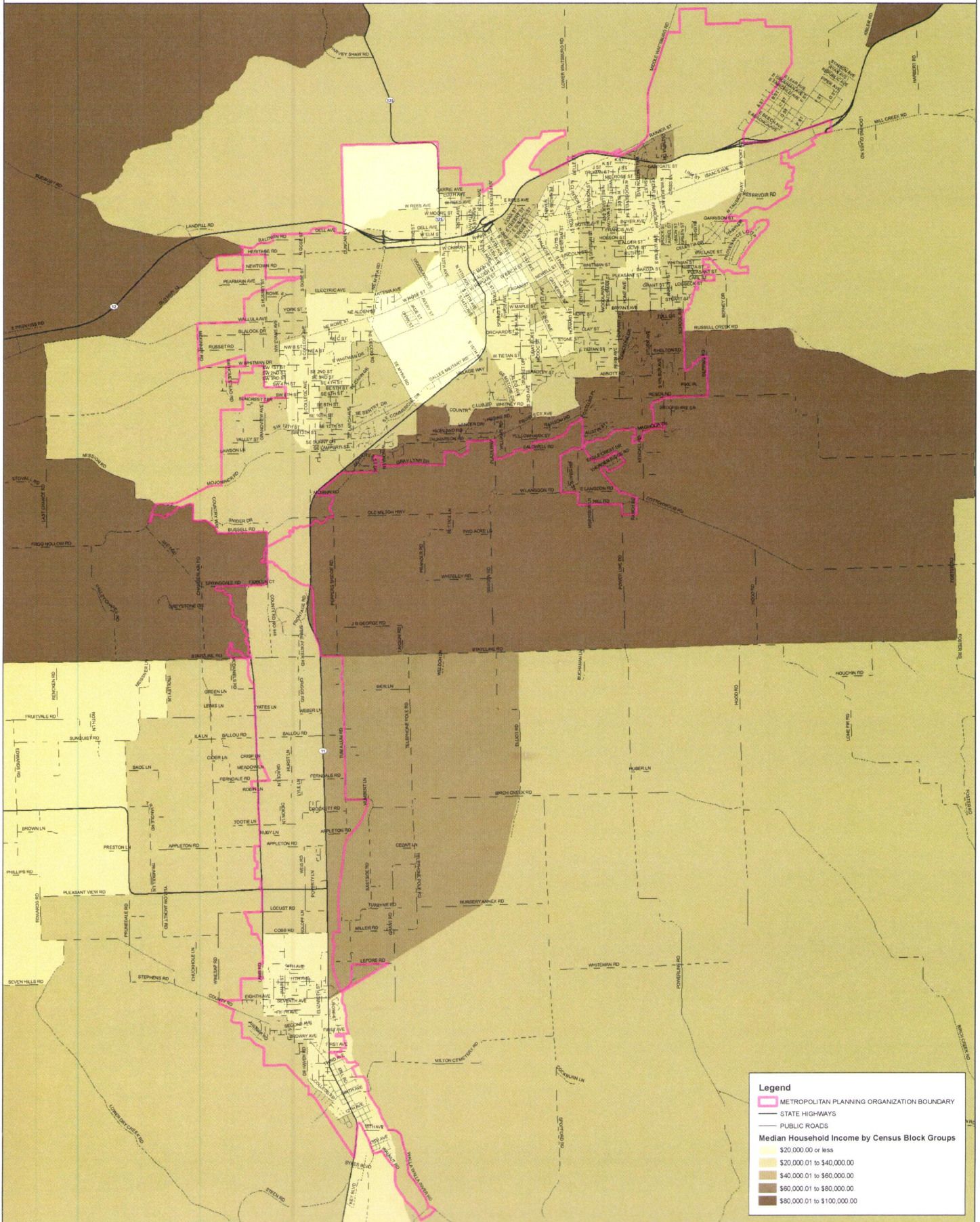
- STATE HIGHWAYS
- PUBLIC ROADS

Median Household Income by Census Block Groups

- \$20,000.00 or less
- \$20,000.01 to \$40,000.00
- \$40,000.01 to \$60,000.00
- \$60,000.01 to \$80,000.00
- \$80,000.01 to \$100,000.00



Walla Walla Valley Metropolitan Planning Organization Median Household Income



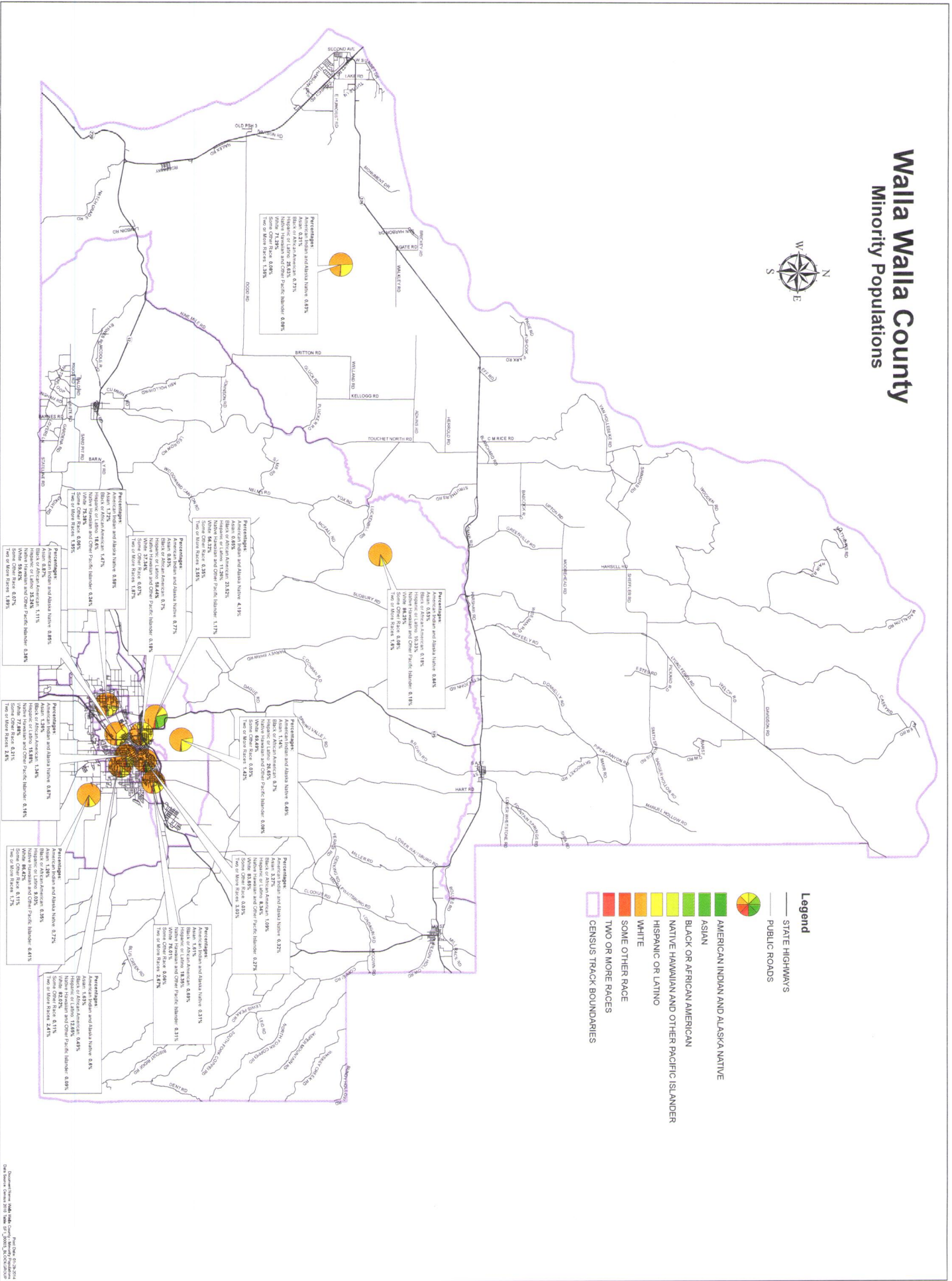
Legend

- METROPOLITAN PLANNING ORGANIZATION BOUNDARY
- STATE HIGHWAYS
- PUBLIC ROADS

Median Household Income by Census Block Groups

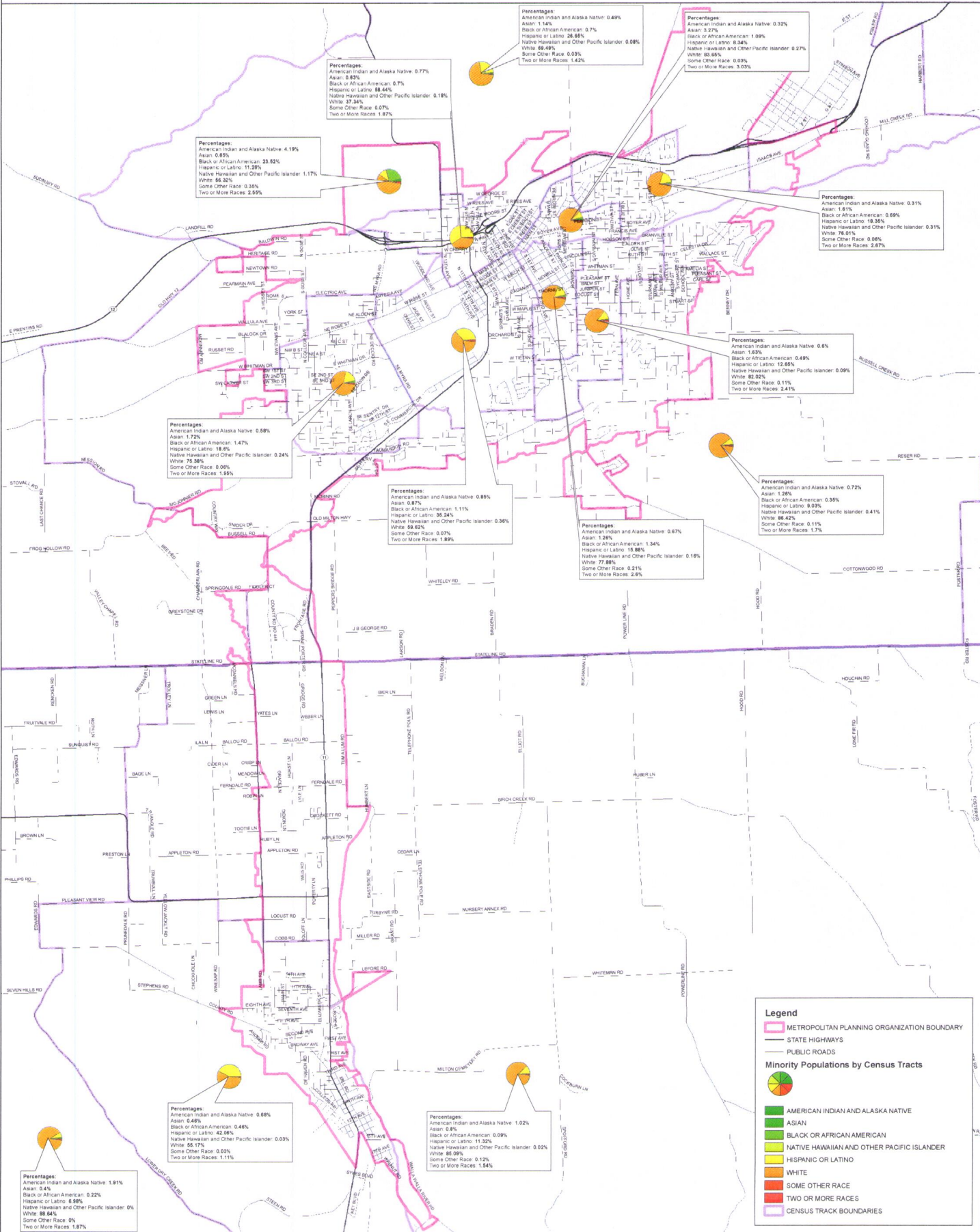
- \$20,000.00 or less
- \$20,000.01 to \$40,000.00
- \$40,000.01 to \$60,000.00
- \$60,000.01 to \$80,000.00
- \$80,000.01 to \$100,000.00

Walla Walla County Minority Populations



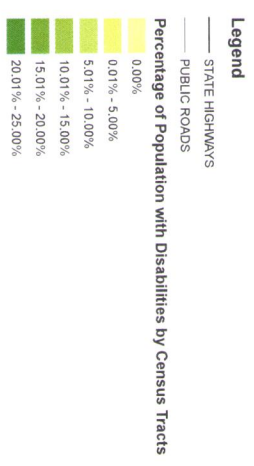
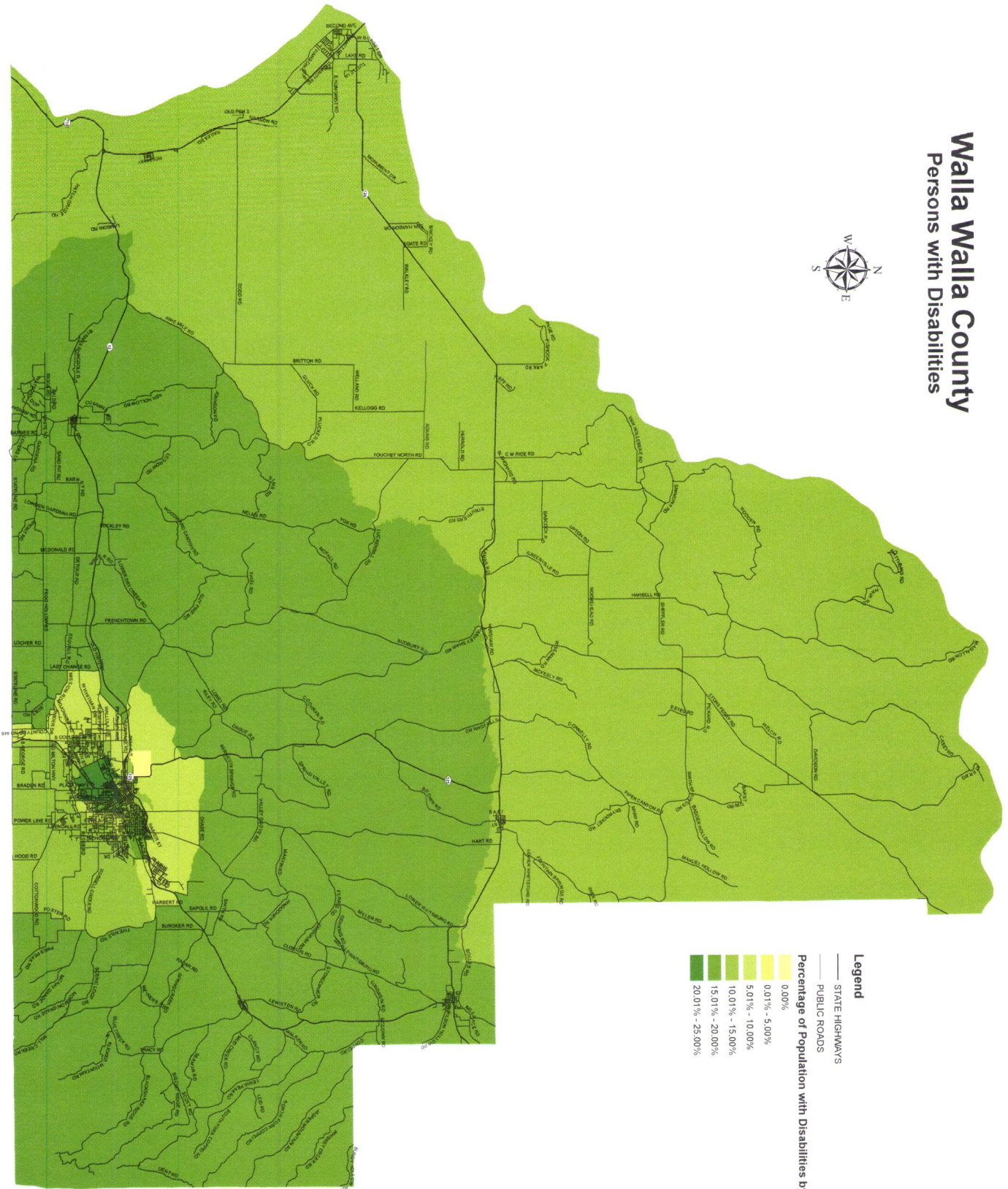
Walla Walla Valley Metropolitan Planning Organization

Minority Populations



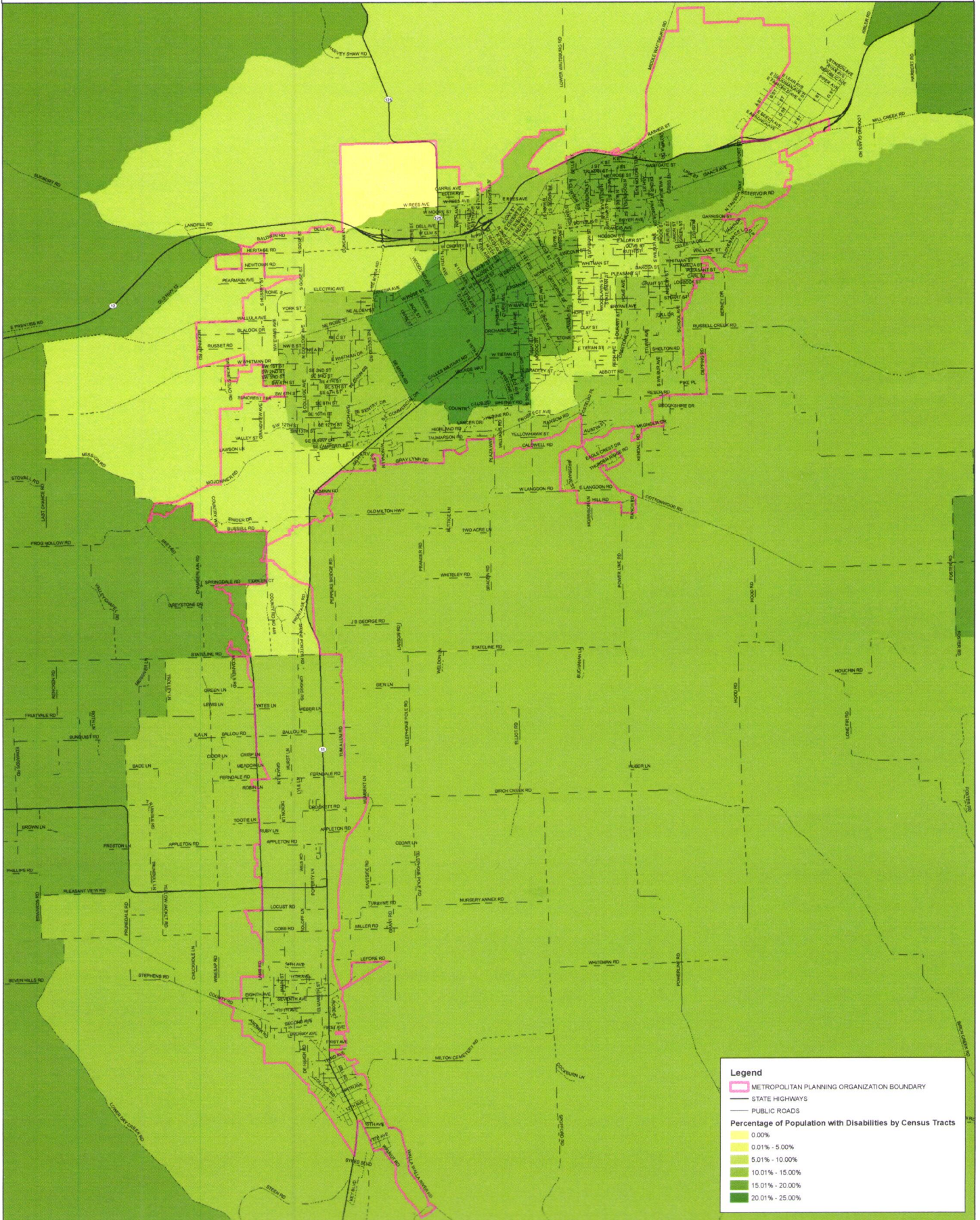
Walla Walla County

Persons with Disabilities



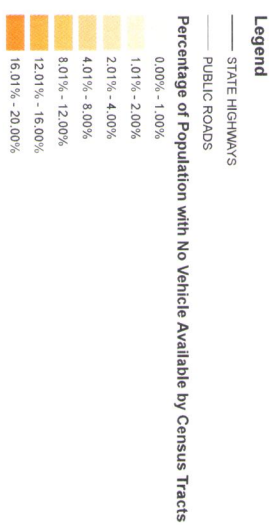
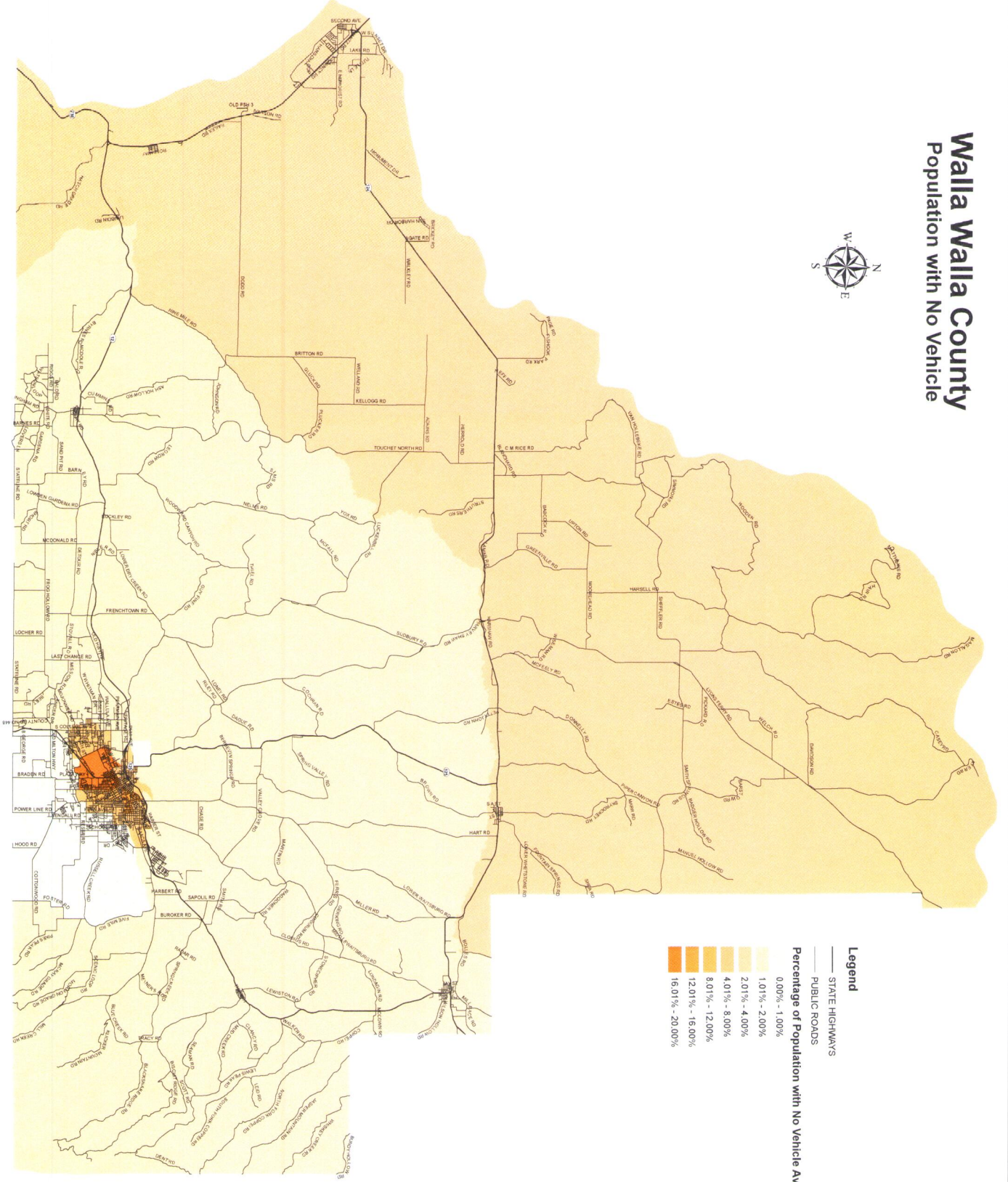


Walla Walla Valley Metropolitan Planning Organization Persons with Disabilities



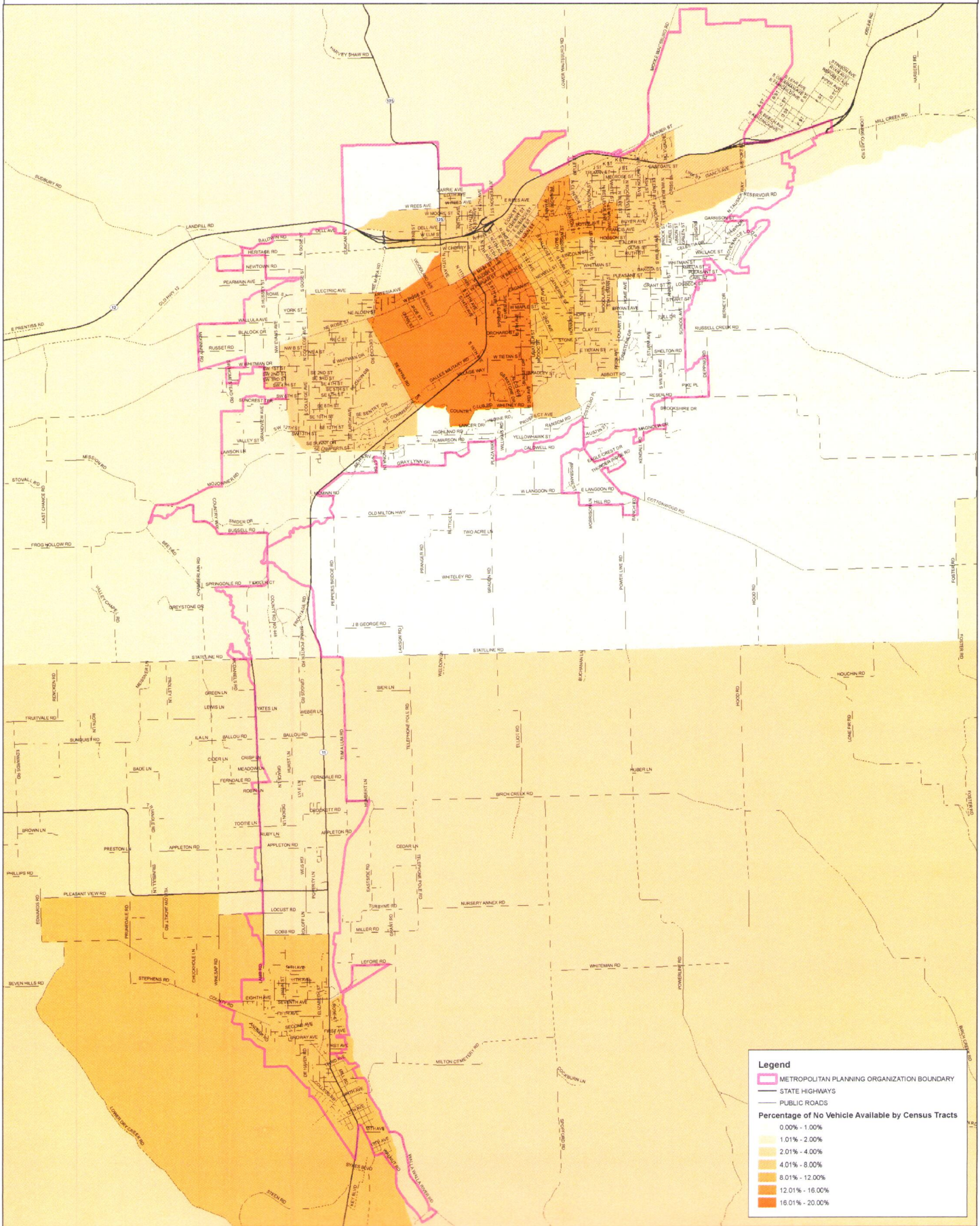
Walla Walla County

Population with No Vehicle





Walla Walla Valley Metropolitan Planning Organization Population with No Vehicle



Legend

- METROPOLITAN PLANNING ORGANIZATION BOUNDARY
- STATE HIGHWAYS
- PUBLIC ROADS

Percentage of No Vehicle Available by Census Tracts

- 0.00% - 1.00%
- 1.01% - 2.00%
- 2.01% - 4.00%
- 4.01% - 8.00%
- 8.01% - 12.00%
- 12.01% - 16.00%
- 16.01% - 20.00%

Walla Walla County

Residents over sixty-five

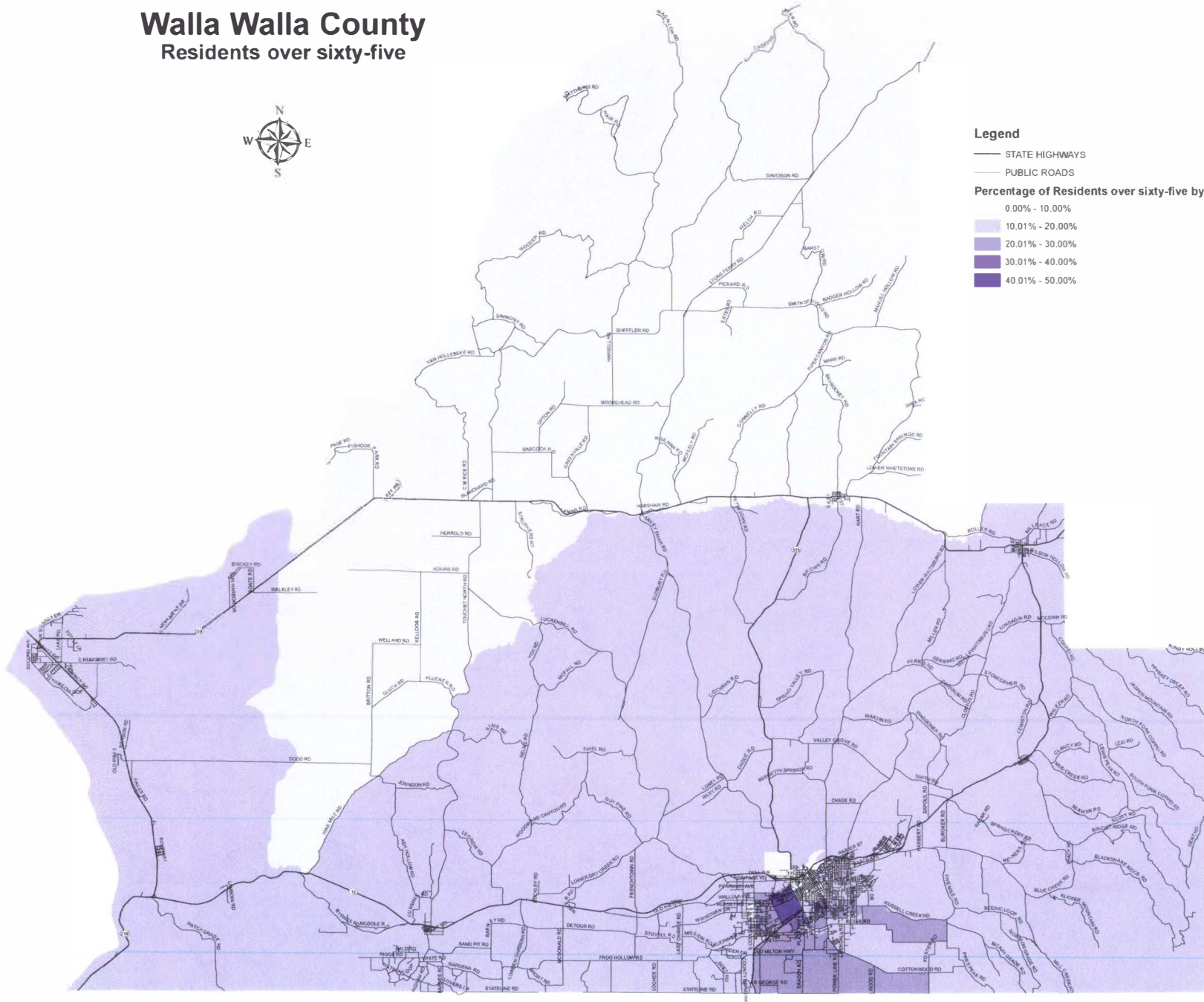


Legend

- STATE HIGHWAYS
- PUBLIC ROADS

Percentage of Residents over sixty-five by Census Block Groups

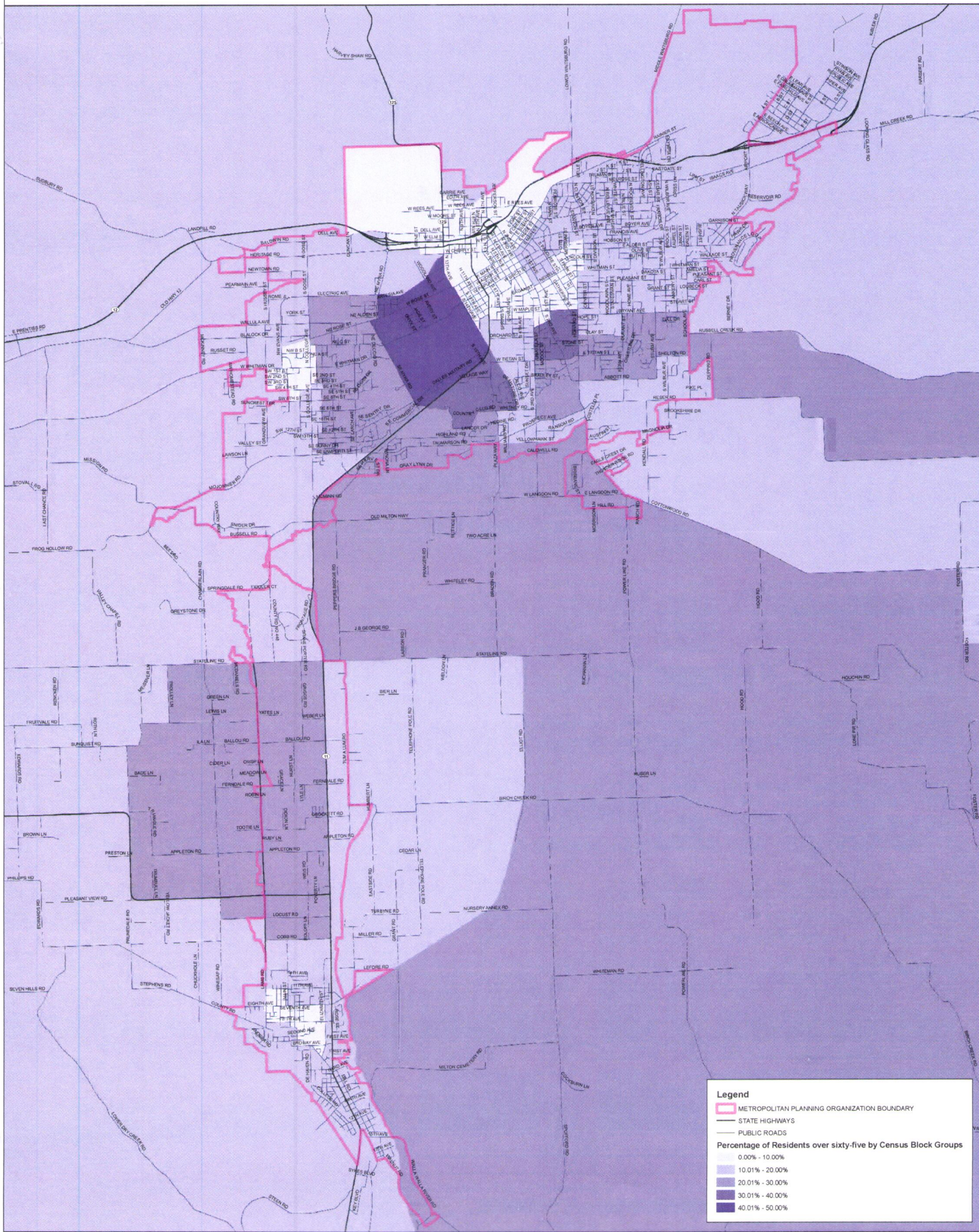
- 0.00% - 10.00%
- 10.01% - 20.00%
- 20.01% - 30.00%
- 30.01% - 40.00%
- 40.01% - 50.00%





Walla Walla Valley Metropolitan Planning Organization

Residents over sixty-five



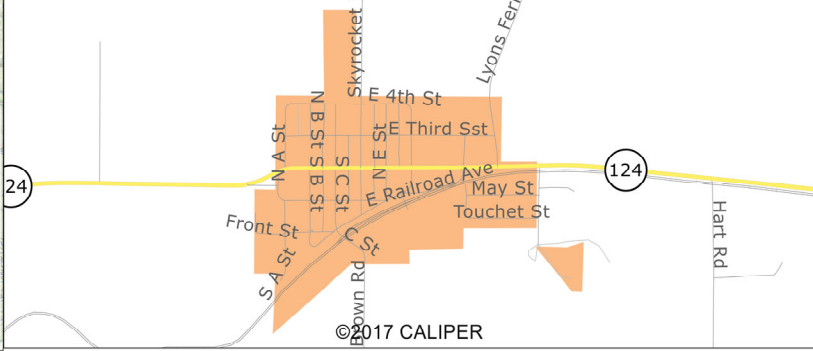
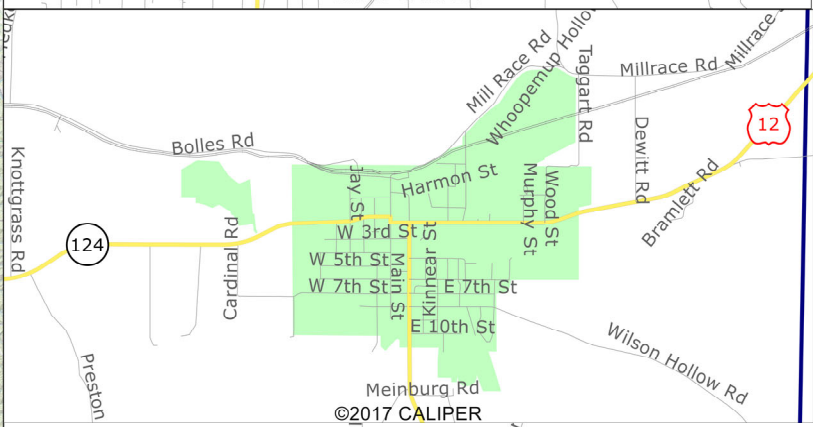
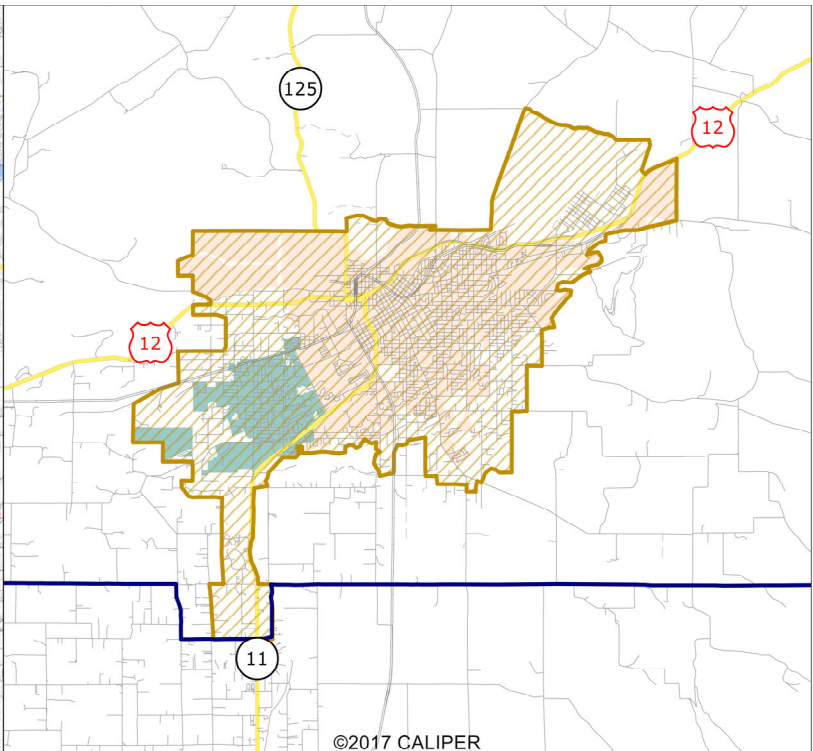
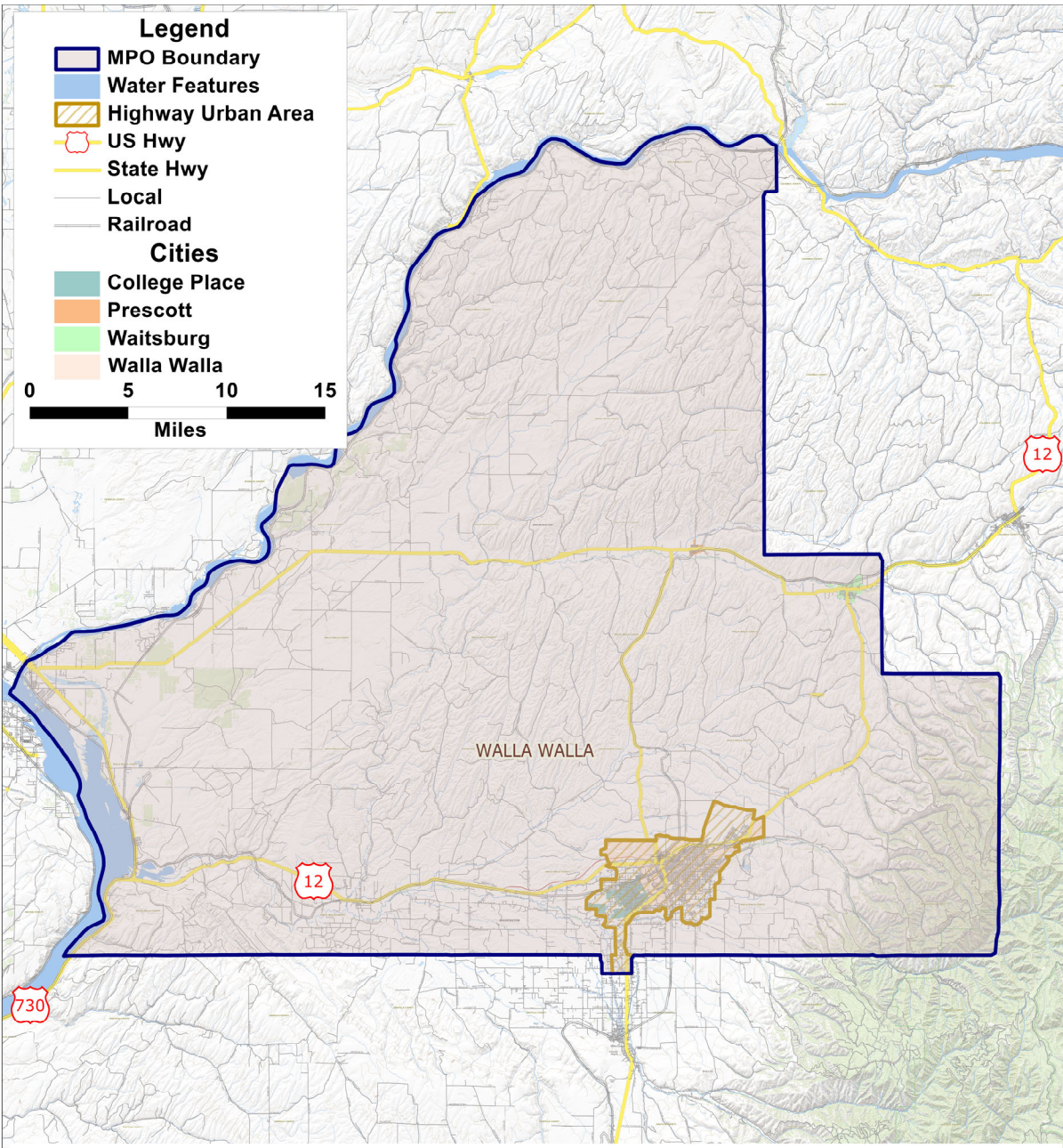
Legend

- METROPOLITAN PLANNING ORGANIZATION BOUNDARY
- STATE HIGHWAYS
- PUBLIC ROADS

Percentage of Residents over sixty-five by Census Block Groups

- 0.00% - 10.00%
- 10.01% - 20.00%
- 20.01% - 30.00%
- 30.01% - 40.00%
- 40.01% - 50.00%

Appendix C. Walla Walla Valley MPO Boundary



Drawn By: Walla Walla Valley Metropolitan Planning Organization

Date: January 2024

Disclaimer: <http://wwwmpo.org/documents-maps.html>



Appendix D. Public Comments

Public Comment Period - December 5 through December 18, 2023

The public comment period for the Title VI Plan was held from December 5 through December 18, 2023.

Comments received on this Title VI Plan from the public, committee members, or any local organization, whether positive or negative, are handled in the following manner:

- ◆ All comments are requested in writing.
- ◆ Comments concerning specific projects are forwarded to the sponsoring agency or jurisdiction.
- ◆ A copy, or summaries of substantive comments, will be provided to the Technical Advisory Committee and Policy Board for their evaluation.
- ◆ A written response is provided to the individual or organization concerning recommendations or decisions arising from the Policy Board meeting or the sponsoring entity, as appropriate.
- ◆ Copies of all comments received on the Title VI Plan are included in the final document.

The MPO did not receive any comments.