

Addendum to the Memphis MPO 2014 Title VI Assessment

1. **Organization - 42 USC 2000et seq.; 49CFR Part 21; 28CFR Part 42, subpart F, Executive Order 12898 on Environmental Justice and Title VI; FTA C4702.1B; FTA C4703.1.**
 - a. **Planning Commission(s), Board(s), and/or Advisory Bodies should reflect the racial/ethnic composition of the community affected by their programs. Provide a breakdown for all MPO staff, transportation-related appointed boards, advisory bodies, or commissions by race and gender.**

Race and Ethnicity - Memphis MPO													
	TOTAL	Caucasian		African American		Asian		American Indian		Other		Latino or Hispanic Origin*	
		#	%	#	%	#	%	#	%	#	%	#	%
MPO Planning Area Population	1,118,005	531,974	47.6%	525,343	47.0%	23,604	2.1%	2,786	0.2%	34,298	3.1%	61,251	5.5%
MPO Transportation Policy Board (TPB)	25	23	92.0%	2	8.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>TPB Proportional Voting Representation</i>	100	55	55.0%	45	45.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Engineering & Technical Committee (ETC)	25	23	92.0%	1	4.0%	1	4.0%	0	0.0%	0	0.0%	0	0.0%
Active Transportation Adv. Committee (ATAC)	25	21	84.0%	4	16.0%	0	0.0%	0	0.0%	0	0.0%	2	8.0%
Freight Committee	32	28	87.5%	2	6.3%	2	6.3%	0	0.0%	0	0.0%	1	3.1%
Air Quality Committee	47	39	83.0%	5	10.6%	3	6.4%	0	0.0%	0	0.0%	0	0.0%
Safety Committee	13	12	92.3%	1	7.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
MPO Staff	11	4	36.4%	5	45.5%	2	18.2%	0	0.0%	0	0.0%	0	0.0%

*NOTE: The U.S. Census does not include "Latino or Hispanic Origin" under the categories for Race. According to 2010 Census definitions, "People who identify their origin as Spanish, Hispanic, or Latino may be of any race. Thus, the percent Hispanic should not be added to percentages for racial categories."

*NOTE: The Bike Ped Advisory Committee (BPAC) and Citizen Advisory Committee (CAC) has been combined and dissolved into the ATAC.

1.a. (continued)

Gender - Memphis MPO

	TOTAL	Female		Male	
		#	%	#	%
MPO Planning Area Population	1,118,005	582,235	52.1%	535,770	47.9%
MPO Transportation Policy Board (TPB)	25	3	12.0%	22	88.0%
<i>TPB Proportional Voting Representation</i>	<i>100</i>	<i>8</i>	<i>8.0%</i>	<i>92</i>	<i>92.0%</i>
Engineering & Technical Committee (ETC)	25	3	12.0%	22	88.0%
Active Transportation Adv. Committee (ATAC)	25	8	32.0%	17	68.0%
Freight Committee	32	4	12.5%	28	87.5%
Air Quality Committee	47	13	27.7%	34	37.0%
Safety Committee	13	4	30.8%	9	69.2%
MPO Staff	11	5	45.5%	6	54.5%

b. How are members of the board(s)/commission(s) selected?

The Memphis Urban Area Metropolitan Planning Organization Transportation Policy Board is composed of the principal elected officials of the governmental jurisdictions participating in the Memphis Urban Area transportation planning process along with the chairpersons of the major providers of local and regional transportation facilities. The current representation and selection process for the MPO's executive board were updated based on guidance received from the Federal Highway Administration during the MPO's 2003 Federal Certification Review. The MPO bylaws governing the composition of the board and committees of the MPO are included in the attached Prospectus of the Memphis MPO. The MPO is in the process of updated the MPO bylaws. The proposed MPO bylaws document (which is attached) is current under review by the Bylaws ad-hoc committee and will be approved and adopted by the Transportation Policy Board in the coming weeks.

c. Provide a demographic profile of MPO's metropolitan area that includes identification of minority populations in the aggregate.

Please see tables in response to 1.a.

d. Provide a description of the procedures used to determine and consider the mobility needs of the minority population.

The MPO strives to take into account the needs of low-income and minority populations in all its plans, studies, and documents. MPO staff has improved the data collection, monitoring, and analysis tools that

assess the needs and analyze the potential impacts of transportation plans and programs on communities protected by Title VI. Following are the key strategies to understand the mobility needs of low-income and minority populations throughout the region:

- Mapping and analysis of the most current U.S. Census data using Geographic Information Systems (GIS) to identify low-income and minority populations within the MPO planning area;
- Use of blocks and block groups as opposed to census tracts to identify the location and geographic distribution of low-income, minority, and Limited English Proficiency groups;
- Use of income information from the U.S. Census in the travel-demand forecasting model to assess the benefits to and burdens on targeted populations of existing and planned transportation system investments;
- Coordination between minority interest groups to identify mobility barriers using mapping and data analysis;
- The MPO's mapping and data analysis are used to strengthen its outreach efforts to the communities most directly impacted by transportation projects.

In addition to technical analyses, the Memphis MPO strives to reach out to a diversity of community partners and stakeholder groups, with the understanding that not all its constituents are able to attend regular MPO events. The MPO uses several strategies to ensure that all groups have an opportunity to voice their transportation needs in the planning process, regardless of race, color, national origin, gender, age, disability, and income status. These include:

- Faith community notices (bulletin inserts have proven to be an excellent way to reach minority and ethnic communities)
- Briefings (meetings of social and civic clubs and organizations to provide an opportunity to inform and educate)
- Community events
- Public Service Announcements (PSAs)
- Information updates on Facebook (www.facebook.com/memphismpo) and Twitter (@MemphisMPO)
- Signage, informational materials, and MPO documents at public events, libraries, etc.
- News releases and legal notices in minority newspapers, including The Tri-State Defender (African American community) and La Prensa Latina (Hispanic community).
- Emails to a list of diverse stakeholder groups and interested parties gathered from public events and other outreach activities.
- Evaluation of the effectiveness of communications and outreach by tracking recipient lists, website hits, and attendance at public meetings.

- e. **Provide a copy of the MPO's Public Participation Plan that includes an outreach plan to engage the minority and limited English proficient (LEP) population. Please include narrative on planned actions to eliminate language, mobility, temporal, and other**

obstacles to allow the minority and LEP populations' full participation in federally funded activities and programs.

See attached Public Participation Plan.

f. Provide a copy of the MPO's plan for providing language assistance to LEP persons.

See attached LEP Policy.

g. Provide copies of MPO's instructions to the public regarding how to file a Title VI discrimination complaint.

See Attachment 4, 2011 Title VI Report, Appendix B.

h. Provide copies of MPO's notices to the public demonstrating compliance with Title VI and informing the public of the protections provided to them in Title VI. Include locations where notices are posted, e.g., website, building entrance, etc.

See attached Sample Public Notices. According to the MPO's Public Participation Plan, notice and information regarding the planning process is given to the public in a variety of formats, depending on the nature of the planning activity. In addition to legal public notices in the newspapers of record, the MPO uses email distribution lists, its website, printed notices posted in libraries and other public spaces, and press releases through Shelby County and other partner jurisdictions. More information on public notices can be found in the Public Participation Plan, Section V.

i. Provide a description of efforts used to ensure MPO subrecipients are complying with Title VI, including a schedule of subrecipients Title VI program submissions.

As the fiscal and administrative agent for the Memphis MPO, Shelby County Government, in particular the Purchasing Department and Contracts Office, is responsible for ensuring Title VI compliance for all MPO contractors, including subrecipients of federal planning funds. The MPO and Shelby County Government coordinate to ensure that Title VI requirements are included in contract and grant language. The MPO and Shelby County have the power to evaluate contractors or grantees working with the MPO for unresolved Title VI violations.

Shelby County Government's Contract Compliance Program requires that all vendors and contractors have a current, valid Equal Opportunity Compliance (EOC) Certification Number in order to do business with Shelby County Government, effective April 1, 2007. All firms, regardless of number of employees, must pre-qualify for EOC Contract Compliance Eligibility Number prior to submission of a bid for a contract. Shelby County also maintains a list of EOC ratings for qualified vendors, which are considered in the evaluations of proposals and qualifications for contract work with the Memphis MPO.

Additional information on MPO contracts over the past 12 months is included in response 4. a.

2. Documentation – 23 USC 109(h); Executive Order 12898; 49 CFR Part 21; Title VI; FTA C4702.1B; FTA C4703.1.

a. Name/Title of Title VI Coordinator

The Memphis MPO Title VI Coordinator is:

- John Paul Shaffer, Transportation Planner
 - John.shaffer@memphistn.gov
 - (901) 576-7130

b. Have there been any special studies of traditionally under-served or low income communities conducted in the past five years? What type studies? Purpose?

The Memphis Area Transit Authority (MATA), in cooperation with the Memphis MPO, completed a Short Range Transit Plan in 2012. The objective of the SRTP was to conduct a detailed review of MATA's transit services, identify strengths and weaknesses in the existing system and develop a series of recommendations that correct weaknesses and strengthen assets. As MATA primarily serves a market of travelers that depend on bus service to travel, the study was in large part focused on low-income communities within the agency's current service boundaries. The Memphis MPO completed a similar plan, DeSoto County Transit Plan, in 2012.

The Mid-South Regional Greenprint Plan, on which the MPO is a partner agency, has specifically analyzed social equity and transit access to employment throughout the Memphis and West Memphis MPO planning areas. The MPO plans to use data and recommendations from the Greenprint plan and studies in updating both the Regional Bicycle and Pedestrian Plan this year and the Livability 2040 LRTP, which will be completed in early 2016.

The Memphis MPO is currently conducting a regional travel survey, including a transit on-board survey, and an update of the MPO's travel demand model. This project will make specific considerations of socio-economic characteristics of the communities throughout the MPO planning area in order to best evaluate needs and project impacts for the region's transportation system. Zero-car households and other traditionally underserved populations are being over sampled in the survey and data weighting to ensure their accurate representation in the MPO's travel demand model and other analyses.

Additionally, the MPO is coordinating with MATA this year to update the Coordinated Human Services Transportation Plan, which evaluates needs and plans for transit services among the region's low-income, elderly, and disabled populations.

There have been no other studies specifically directed toward under-served or low-income communities conducted by the Memphis MPO over the past five years. However, all core MPO plans and programs, as well as the majority of special studies conducted by the MPO, include analysis of existing conditions in and potential effects on affected communities, as well as considerations for Title VI and environmental justice. One example is the MPO's Regional Bicycle and Pedestrian Plan, adopted in 2011, which provides recommendations for connecting diverse neighborhoods to jobs, services, transit facilities, and other opportunities through a continuous and convenient network of non-motorized transportation facilities.

c. Does the MPO have Title VI Assurances?

Yes. Please see attached Signed Title VI Assurances.

d. Provide a narrative of the MPO's complaint procedures, and provide a copy of complaint form and log.

The Memphis MPO follows the guidelines and procedures of Shelby County Government in administering its Title VI program, which is developed with guidance from the Tennessee and Mississippi Departments of Transportation, as described in the MPO's Title VI Report. The MPO has created a page on its website providing all relevant Title VI documentation, including the Title VI Plan submitted to TDOT and the Title VI compliance report and certification letter. Any Title VI activities, including training, certifications, inquiries, and complaints, are documented digitally on the MPO's servers based on the date of the activity.

In the event that a Title VI inquiry is made or a complaint is filed with the Memphis MPO, the agency coordinates with the Title VI Coordinator with the Shelby County Mayor's office to determine how best to investigate and respond. For details and a copy of the complaint form, please see attached Title VI Report, Appendix B.

e. List all active transportation-related Title VI complaints, investigations or lawsuits filed on the basis of race, color, and/or national origin (including, but not limited to, actions brought pursuant to Title VI against sub - recipient containing the date of filing; summary of allegation(s); and status.

The MPO has one (1) active Title VI complaint, numbered US DOT Complaint 2012-0143.

The purpose of the complaint was to protest racial discrimination in the operation, planning, and funding of mass transit facilities and services in the State of Tennessee and the Memphis/Mid-South region. Complainants sought to suspend or terminate federal funding to the state and local transit agencies, as well as the City of Memphis, and the Memphis MPO, based on the alleged discrimination. The complaint alleged similar violations of Title VI by the Memphis MPO, Memphis Area Transit Authority (MATA), the Tennessee Department of Transportation (TDOT) and the City of Memphis.

The MPO has provided a full response, the summary document of which is attached, to FTA and has not yet received an update on the disposition of the US DOT investigation of the allegations.

f. List all funding sources to the MPO and provide a description of the procedures the MPO uses to pass through Federal financial assistance to subrecipients in a nondiscriminatory manner.

The MPO is a recipient, through the state DOTs, of FHWA Section 112 (PL) and FTA Section 5303 funds. As documented in response 1.i., the Memphis MPO follows the policies and guidelines of Shelby County Government to ensure Title VI compliance in its contracts with consultants and subrecipients of federal funds, including MATA. MATA, as a designated recipient of FTA funds, must maintain a current Title VI

program, and coordinates with the MPO to ensure the compliance of both agencies. The MPO also can indirectly receive for use on planning activities State Planning & Research (SPR) funds from the Tennessee and Mississippi DOTs, both of which must maintain current Title VI programs and coordinate with the MPO to ensure compliance.

g. List funding sources and any applications approved for enhancement projects.

The MPO is directly responsible for approving projects under the Surface Transportation Program (STP-M) and Transportation Alternatives Program (TAP). Other funding programs within the MPO planning area are administered by the state DOTs in coordination with the MPO and its member jurisdictions. All federal funding for projects within the MPO, including enhancement projects, is shown in the MPO's current 2014-17 Transportation Improvement Program (TIP), which is attached to this response.

The MPO currently has two projects in consideration for TDOT's statewide Multimodal Access Fund, which will provide state funds for bicycle, pedestrian, and transit facilities: Poplar-Cleveland Intersection & Transit Access Improvements; and Intersection Improvements at Greenline East Extension and N. Germantown Pkwy (SR-177).

The MPO is also currently working with its Tennessee member jurisdictions within the air quality non-attainment and maintenance areas to finalize a slate of applications to submit to TDOT's statewide CMAQ program in spring 2014. The projects being considered for inclusion involve the coordination and improvement of traffic signals within the City of Memphis and Shelby County, and the purchasing of low emission natural gas heavy-duty trucks replacing diesel fueled trucks in Memphis. These projects are specifically designed to alleviate air quality issues related to transportation sources within the MPO.

h. Provide a summary of all Title VI activities for the last year that includes the purpose of any reviews; name of agency or organization performing review; any findings and recommendations; and status of and/or disposition of findings and recommendations.

In the past year, the MPO has conducted annual online Title VI training for its staff and Title VI Coordinator Training through Shelby County Government. The MPO also submitted to TDOT a no-change affidavit based on its most recent Title VI Report, which was submitted in 2011. The MPO's last on-site review by TDOT was conducted in concurrence with the MPO's quadrennial federal certification review in August 2011.

i. Provide a written description of the planning process in terms of its responsiveness to the requirements of Title VI discussing how project selection and/or criteria for the Unified Planning Work Program (UPWP), Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP) will be accomplished in a nondiscriminatory manner.

It is the goal of the Memphis MPO to ensure that no one is denied the opportunity to participate in the metropolitan transportation planning process because of their race, color, or national origin. The MPO informs the public through regular legal notices published in all major newspapers and in newspapers

that target minority populations in the metropolitan area. The MPO uses a variety of public involvement tools to engage and inform the public. These tools are described in Title VI report in detail in Chapter IV (Public Involvement), and in the MPO's Public Participation Plan.

In selecting projects for inclusion in its plans and programs, the MPO relies on input from its board, committees, stakeholder groups, and the general public in developing criteria that evaluate proposals based on their benefits to and impacts on the region and individual communities. Project selection criteria used by the MPO make considerations for projects which advance the region's goals, including increased transportation choices and mobility, reduced environmental impacts, and more equitable distribution of funding. Specifically, the criteria consider regional transportation impacts, including: traffic congestion, air pollution, freight traffic through inner-city residential neighborhoods, regional transit availability, ADA accessible sidewalks, regional bicycle and pedestrian connectivity, and mobility options for the elderly, low-income or limited English proficiency communities, and persons with disabilities.

The Memphis MPO places particular emphasis on reaching out to public who typically have not been participants in the transportation planning process, whether low income, minority or ethnic groups or communities with limited English proficiency (LEP). Special ad hoc committees are formed as needed to solicit comments and input on issues specific to those communities. Furthermore, the MPO takes steps to bring the involvement process to underrepresented communities, with staff attending neighborhood meetings and special events, rather than relying on MPO event as the sole opportunity for involvement.

For public comment, the MPO holds formal public meetings and review and comment periods for all its major activities, and conducts public hearings at all TPB meetings to allow persons the opportunity to comment on proposed transportation improvements.

Some of the MPO's efforts to reach out to all segments of the community, which are described in more detail in this document in MPO's Title VI Report and in the Public Participation Plan, include:

- Outreach to underserved communities through documents sent to libraries for public review and informational posters placed in libraries, community centers, public buildings, etc.;
- Media releases (radio and newspaper);
- Plans and documents available on the Memphis MPOs website;
- Public Notices run in La Prensa Latina (Spanish language newspaper), and the Tri-State Defender (African American newspaper);
- Information updates on Facebook (www.facebook.com/memphismpo) and Twitter (@MemphisMPO)
- Flyers and posters for public meetings printed in Spanish;
- Distribution of flyers and posters for public meetings to senior centers, including several with high minority populations;
- Plans and documents provided in accessible formats when requested, executive summaries for major documents provided in Spanish on the MPO website;
- Web translation service provided for the MPO website;

- Transportation assistance to and from MPO public meetings and hearings provided when requested;
- Inviting representatives of organizations that represent minority, disabled and elderly members of our community to meetings and appropriate workshops ;
- Provision of translators at public meetings if requested.

j. Provide an analysis assessing any effects on Environmental Justice (EJ) traditionally under-served communities that include transportation enhancement, congestion and air quality projects.

While the MPO does not directly implement the environmental or design phases of capital transportation projects, it does perform an analysis of the cumulative environmental and social effects of all transportation projects included in its plans and programs. The MPO planning process includes these analyses in or to avoid or mitigate any unfair or disproportionate impacts transportation projects may have on a community. The methodology followed by the MPO in assessing Title VI and environmental justice issues, including demographic analyses, stakeholder outreach, and assessment of the impacts of projects, is included in the attached Chapter 6: Environmental and Social Screening of the MPO's Direction 2040 Long Range Transportation Plan.

3. Public Involvement – 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F, Executive Order 12898

a. Describe the effectiveness of your public involvement process as well as any strategies to ensure traditionally under-served populations have an opportunity for full participation in your planning process.

The public involvement process for the Memphis MPO, including tracking the effectiveness of outreach strategies used, is described in full in the MPO's Public Participation Plan. Additionally, each plan conducted by the Memphis MPO contains a specific public outreach strategy based on the tools contained in the Public Participation Plan. An important outreach strategy for the Memphis MPO is to take the planning process directly to the community, by attending neighborhood meetings and special events to provide information and solicit input on MPO planning activities.

The MPO has instituted performance measures related to its reach in communicating with and involving the public in the planning process. Over the past years, the MPO has seen an increase in its communications with interested citizens, a broader reach of its media and social media campaigns, and greater participation from diverse communities throughout the region. These stakeholders, including individual citizens, business owners, public officials, environmental groups, civic organizations, neighborhood associations, and advocacy groups, provide valued input regarding transportation needs and priorities for the MPO planning area.

The Memphis MPO regularly utilizes the following strategies to reduce barriers to participation in the planning process and encourage the involvement of traditionally underserved communities and populations:

- Provide adequate public notice of activities, particularly as it relates to the LRTP and the TIP;
- Provide timely notice and reasonable access to information regarding issues and process;
- Incorporate innovative visualization techniques in the planning process for the LRTP and TIP;
- Provide information in electronic formats for easy accessibility;
- Schedule public meetings at convenient and accessible locations and times (most meetings are located along public transit routes);
- Allow for open consideration and response to public input regarding the LRTP and TIP;
- Seek out and consider the needs of those who are traditionally underserved;
- Allow for public comment regarding significant changes to the LRTP and TIP;
- Periodically review the PPP for effectiveness;
- Potential meeting locations may include: neighborhood faith centers, community centers, public schools, libraries, and transit facilities;
- Provides Spanish translations of documents distributed to local libraries, and make efforts to provide translations of other documents upon request;
- Uses demographic information from the US Census to analyze regional socio-economic characteristics and to target limited English proficiency and low literacy populations for additional outreach.

b. Describe how traditionally under-served media sources are appropriately included in all notification processes for public meetings or public review of agency documents.

As part of regular public notification, the MPO sends news releases to minority newspapers, including “The Tri-State Defender” (African American Community) and “La Prensa Latina” (Hispanic Community). Legal public notices and advertisements of availability of documents for review, public comment periods and public meetings are posted in these and other news outlets as needed, in accordance with the MPO’s adopted public involvement guidelines. The MPO have produced several informational videos that explain the MPO’s purpose and process. All videos are available online with Spanish subtitles. The MPO also maintains lists of contacts within traditionally under-represented communities, translation services for its website, documents, and meetings when necessary, and regularly updating the Memphis MPO with meeting materials. The MPO regularly utilizes social media (Facebook, Twitter) to notify the public at-large.

c. Describe how meeting locations and formats encourage or facilitate participation by traditionally under-served populations.

All proceedings of the Memphis MPO, its Transportation Policy Board, and its committees are open to the public. Notification for all MPO meetings and workshops are made according to federal regulations and best practices for public outreach as reflected in the MPO’s Public Participation Plan. As stated on

MPO public notices and documents, MPO documents and presentations are available in accessible formats with sufficient notice to MPO staff.

The MPO holds all its public meetings in ADA-accessible facilities, and strives to locate MPO events in locations which provide the greatest accessibility within the region, including by transit service. Assistance in attending MPO proceedings is available by contacting the MPO prior to the event.

4. Contracting Opportunities – 42 USC 2000d et seq.; 49 CFR Part 21.5(b) (2) & (3); 28 CFR Part 42, Subpart F

- a. List primary or subcontracting opportunities for planning studies, corridor studies, or other work which have been provided to minority and women owned firms in the last twelve months.**

In the previous twelve months, the Memphis MPO has released two requests for proposal (RFPs) and three request for qualifications (RFQs) soliciting qualified contractors for planning and analysis services. All MPO RFPs, RFQs, and contracts (with the exception of MATA contracts using MPO PL or Section 5303 funds) are conducted in accordance with the policy and procedures of Shelby County Government and its Purchasing Department. Shelby County Government’s Contract Compliance Program requires that all vendors and contractors have a current, valid EOC Certification Number in order to do business with Shelby County Government, effective April 1, 2007. All firms, regardless of number of employees, must pre-qualify for an EOC Contract Compliance Eligibility Number prior to submission of a bid for a contract.

Shelby County Purchasing maintains a list of EOC qualified vendors, including a number of minority and women owned firms, to which notification of all requests for contracting services with the county is provided. Additionally, The Memphis MPO, in accordance with its Public Participation Plan, advertises contracting opportunities through its website, email, and media lists, including legal notices in regional newspapers. These legal notices are made in the Commercial Appeal, the DeSoto Times, the Tri-State Defender (African American community), and La Prensa Latina (Hispanic and Latino community).

The following Memphis MPO consultant contracts for the past twelve months include locally-owned small businesses (LOSBs) and minority or women-owned business certified as Disadvantaged Business Enterprises (DBEs):

- Memphis Urban Area Regional Intelligent Transportation System Architecture
 - Update to existing architecture and deployment plan
 - Kimley-Horn & Associates
- Mid-South Regional Travel Surveys and Travel Demand Model Update
 - Multimodal travel surveys, technical/modeling services for the Memphis TN-MS-AR MSA
 - Cambridge Systematics, lead
 - Dikita Enterprises (DBE – African American/Woman-owned), sub
 - Abt SRBI, sub
 - Neel-Schaffer, sub

- Olympic Staffing (LOS/DBE – African American-owned), sub
- Memphis MPO Website Update
 - Redesign of the MPO website and branding/outreach services
 - Hornsby Brand Design

Consultants have not yet been selected for the following RFQs currently either open or under development for the Memphis MPO:

- Pedestrian Facilities Inventory
 - GIS data collection of sidewalks, crosswalks, curb ramps, walking paths and trails within the MPO Planning Area
- Memphis MPO Transportation Plan Public Outreach
 - Documentation and facilitation of public outreach services for the MPO Planning Area
- Memphis MPO Land Use Model Update
 - Technical assistance in update of the MPO Land Use Model
- Memphis MPO Congestion Management Plan
 - Technical/tracking services
- Livability 2040 Long Range Transportation Plan
 - Planning, technical/modeling, and public outreach services for the MPO Planning Area

5. Community Impact Assessment – 23 USC 109(h) lists the types of adverse social and economic impacts that must be investigated and documented.

- a. Describe how community value, social, neighborhood issues; environmental justice and any discrimination issues are normally addressed by the MPO.**

The MPO's primary method of evaluating the impacts of the regional transportation system on minority, low-income, and Limited English Proficiency communities is the Long Range Transportation Plan, which also includes an evaluation of all projects programmed in the current TIP for short term implementation. The LRTP evaluates transportation impacts, including: regional traffic congestion, regional air pollution from mobile (on-road) sources, freight traffic through inner-city residential neighborhoods, regional transit availability, ADA accessible sidewalks, regional bicycle and pedestrian connectivity, mobility for the Spanish speaking community, mobility options for the elderly, low-income communities, and persons with disabilities.

These issues are also addressed as part of the MPO's TIP project selection criteria, which are used in programming funds for locally managed roadway and enhancement projects, particularly under the STP-M and TAP funding programs. In administering these programs the MPO staff engages the board, committees, stakeholder groups, and the general public in ensuring that proposed projects are evaluated on a holistic basis as to their benefits and impacts on the region and individual communities. Project selection criteria used by the MPO make considerations for projects which advance the region's

goals, including increased transportation choices and mobility, reduced environmental impacts, and more equitable distribution of funding.

- 6. Service Equity – Executive Order 12898 Cumulative Impacts; 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F. In the context of land use planning, cumulative impacts of the benefits and burdens (regional plan level), please address the following:**
- a. Describe to what extent the MPO coordinates with citizens and community-based agencies, groups and/or organizations in defining communities within the MPO’s geographic area of responsibility in assessing potential benefits and impacts of transportation system investments, particularly related to traditionally under-served populations and other traditionally under-utilized populations.**

The Memphis MPO strives to take into account the needs of low-income and minority populations in all its plans, studies, and documents. The MPO planning process reaches out to community organizations such as community development corporations (CDCs), neighborhood associations, disability community representatives, and the regional transit agency to form a more comprehensive understanding of the needs of these communities. These conversations help the MPO better identify the size and location of low-income and minority population groups, an important first step toward assessing whether or not transportation system investments disproportionately burden or fail to meet the needs of any segment of the population.

- b. Are specific criteria used to determine which projects will be included in the TIP?**

In considering projects for inclusion in the TIP, the Memphis MPO uses a prioritization process which evaluates candidate projects for their potential contributions to both the short-term needs and long-term goals and objectives for the region’s transportation system, as described in the Long Range Transportation Plan (LRTP). The attached 2014-17 TIP contains a complete list of policies and criteria used for project selection under locally managed programs in Appendix B.

The TIP project selection process gives particular consideration to the scoring of projects eligible for those funding categories directly managed by the MPO, including the Surface Transportation Program (STP); Congestion Mitigation and Air Quality (CMAQ); Transportation Alternatives Program (TAP) within the Memphis Urbanized Area (UZA); and FTA Sections 5307, 5337, and 5339. Projects better suited for state-managed funding programs, such as interstate and certain highway projects, were evaluated primarily for the purpose of communicated priorities to the state DOTs.

- c. How is the distribution of impacts to socioeconomic and ethnic minorities identified and measured?**

As described previously, the Memphis MPO’s LRTP evaluates all projects within the planning area for their impacts on and benefits to the diverse communities within the region. The LRTP looks at a variety of factors, including environmental impacts, mobility, accessibility, air quality, and economic impacts on

minority and low-income communities. As part of this evaluation, the MPO uses its Regional Travel Demand Model, which utilizes income and other demographic data to analyze factors such as demand for transit service in the region.

As any project moves from the conceptual planning stage to implementation, it must be evaluated for environmental and socio-economic impacts under the National Environmental Protection Act (NEPA) process. The environmental analysis conducted under the Preliminary Engineering (PE) phase of any project is the responsibility of the implementing agency, whether state or local.

For state-sponsored projects in Shelby or Fayette County, TDOT collects Census data for the area in which the proposed transportation facility will be located. Specifically, both socioeconomic and demographic data is collected for the affected area. This data is used to evaluate the potential effects a transportation project may have on a community. For projects which likely will have an impact, or for which the environmental outcomes are unsure, an Environmental Assessment (EA) must be conducted by the project sponsor. If the EA concludes that there would be significant impacts on the community because of the proposed project, the project sponsor is responsible for preparing an Environmental Impact Statement (EIS). This report is an investigative report as required by the National Environmental Policy Act (NEPA) that quantifies the environmental impacts of.

d. How does the MPO collect and utilize transit data?

MATA is directly responsible for maintaining a database of transit ridership data, including passenger counts and other geographic data, which is used in planning, travel demand modeling, and reporting on system performance. The MPO partners with MATA to help maintain and use the data in performing regional analysis on the transportation network as a whole, including modeling existing and potential future transit services. The MPO actively utilizes transit data, including those collected and generated by MATA, in its travel demand model and analyses for the LRTP, TIP, air quality and other programs.

The Memphis MPO and MATA cooperatively determine their mutual responsibilities in carrying out regional transportation planning tasks as programmed in the MPO's Unified Planning Work Program. The following table details the roles of each agency in collecting and analyzing data for regional transit planning activities.

Plan/Program	MATA	MPO
Database of transit infrastructure and future networks for use in modeling and planning	Cooperate/Collaborate	Cooperate/Collaborate
Identify needed service and facility improvements, evaluate, and schedule improvements based on need and funding	Lead Agency	Coordinate
Obtain and update local GIS data resources; incorporate transit system data with socioeconomic and census information into travel demand model	Cooperate/Collaborate	Lead Agency
Monitor transit and transportation planning activities and developments within Regional Rail Corridors and initiate planning and feasibility studies as necessary	Cooperate/Collaborate	Cooperate/Collaborate

Conduct feasibility studies for future transit or bus/rail facilities and services	Coordinate	Lead Agency
Conduct bus stop study to improve safety and access for MATA passengers while improving operating efficiencies for fixed-route buses.	Lead Agency	Coordinate
Monitor transportation and transit system performance	Lead Agency	Coordinate
Partner with public, private, non-profit agencies and institutions or universities in the development of plans to improve public transportation infrastructure, service, and utilization	Cooperate/Collaborate	Cooperate/Collaborate

e. List examples of planning related tools/methodology or programs sensitive to Title VI, EJ, and/or ADA adherence (a special, or unique effort and/or involvement where a protected class receives benefits)

In addition to the MPO's core plans, programs, and technical analyses, the Coordinated Human Services Transportation Plan identifies the transportation needs of the region's low-income, elderly, and disabled populations and examines ways to coordinate service among regional service providers serving those populations. This plan, developed cooperatively by the Memphis MPO and MATA, is used to evaluate potential transportation projects that may be funded by FTA and other programs intended to increase access and mobility in the region. Particularly for transit, the Memphis MPO staff coordinates with MATA to evaluate potential projects which might increase mobility for low-income, elderly, and disabled populations.

The Memphis MPO is an active partner in the Mid-South Regional Greenprint, an initiative of the Memphis & Shelby County Office of Sustainability under a federal planning grant through the Partnership for Sustainable Communities. Components of the Greenprint plan include assessing non-motorized and transit mobility needs, particularly access to jobs and educational opportunities, as well as building capacity and increasing engagement among traditionally under-represented communities in the region. Recommendations and strategies from the Greenprint plan, which covers the Memphis MPO and West Memphis, Arkansas MPO planning boundaries, will be incorporated into future MPO plans and studies.

- f. Not applicable**
- g. Not applicable**
- h. Not applicable**
- i. Not applicable**
- j. Not applicable**

LIST OF ATTACHMENTS TO THE MEMPHIS MPO 2014 TITLE VI ASSESSMENT

1. Prospectus of the Memphis MPO
2. Public Participation Plan of the Memphis MPO
3. Limited English Proficiency (LEP) Plan of the Memphis MPO
4. 2011 Title VI Report of the Memphis MPO
5. Sample public notices for MPO planning activities
6. Memphis MPO Title VI Assurances, signed
7. Memphis MPO / Memphis & Shelby County Division of Planning & Development Response to DOT Complaint No. 2012-0143 (summary)
8. FY 2014-17 Transportation Improvement Program & Appendices
9. Direction 2040 Long Range Transportation Plan – Chapter 6: Environmental and Social Screening
10. Memphis MPO FY 2014-17 TIP Environmental Justice Areas Map
11. Proposed Memphis MPO Bylaws



**2014 Tennessee Department of Transportation
Civil Rights Office
Metropolitan Planning Organization
General Reporting Requirements**



1. Organization - 42 USC 2000et seq.; 49CFR Part 21; 28CFR Part 42, subpart F, Executive Order 12898 on Environmental Justice and Title VI; FTA C4702.1B; FTA C4703.1.

- a. Planning Commission(s), Board(s), and/or Advisory Body(ies) should reflect the racial/ethnic composition of the community affected by their programs.

Provide a breakdown for all MPO staff, transportation - related appointed board(s), advisory body(ies) or commission(s) by race and gender.

Body	Caucasian	Latino	African American	Asian American	Native American
Population					
Committee 1					
Committee 2					
Committee 3					

*Use addendum sheet to add additional committees.

- b. How are members of the board(s)/ or commission(s) selected? [\(attach by-laws\)](#)

- c. Provide a demographic profile of MPO's metropolitan area that includes identification of minority populations in the aggregate. (Use addendum sheets.)

- d. Provide a description of the procedures used to determine and consider the mobility needs of the minority population. (Use addendum sheets.)
- e. Provide a copy of the MPO's Public Participation Plan that includes an outreach plan to engage the minority and limited English proficient (LEP) population. Please include narrative on planned actions to eliminate language, mobility, temporal, and other obstacles to allow the minority and LEP populations full participation in Federally funded activities and programs.
- f. Provide a copy of the MPO's plan for providing language assistance to LEP persons.
- g. Provide copies of MPO's instructions to the public regarding how to file a Title VI discrimination complaint.
- h. Provide copies of MPO's notices to the public demonstrating compliance with Title VI and informing the public of the protections provided to them in Title VI. Include locations where notices are posted, e.g., website, building entrance, etc.
- i. Provide a description of efforts used to ensure MPO subrecipients are complying with Title VI, including a schedule of subrecipients Title VI program submissions.

2. Documentation - 23 USC 109(h); Executive Order 12898; 49 CFR Part 21; Title VI; FTA C4702.1B; FTA C4703.1.

a. Name/Title of Title VI Coordinator?

b. Have there been any special studies of traditionally under-served or low income communities conducted in the past five years? What type studies? Purpose?

Yes No If yes, what type?

c. Does the MPO have Title VI Assurances? (provide copy) Yes No
 (If no, see attached Title VI Sample)

d. Provide a narrative of the MPO's complaint procedures, and provide a copy of complaint form and log.

e. List all active transportation-related Title VI complaints, investigations or lawsuits filed on the basis of race, color, and/or national origin (including, but not limited to, actions brought pursuant to Title VI against sub - recipient containing the date of filing; summary of allegation(s); and status.

f. List all funding sources to the MPO and provide a description of the procedures the MPO uses to pass through Federal financial assistance to subrecipients in a nondiscriminatory manner.

g. List funding sources and any applications approved for enhancement projects.

h. Provide a summary of all Title VI activities for the last year that includes the purpose of any reviews; name of agency or organization performing review; any findings and recommendations; and status of and/or disposition of findings and recommendations.

i. Provide a written description of the planning process in terms of it's responsiveness to the requirements of Title VI discussing how project selection and/or criteria for the Unified Planning Work Program (UPWP), Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP) will be accomplished in a nondiscriminatory manner.

j. Provide an analysis assessing any effects on Environmental Justice (EJ) traditionally under-served communities that include transportation enhancement, congestion and air quality projects.

- The potential impact on traditionally under-served communities and businesses during and after project;
- The potential environmental impact;
- Detailed list of traditionally under-served owned businesses and households to be effected;
- Any significant changes or impacts on traditionally under-served communities; and
- Description of how this/these project(s) will mitigate any identified adverse, social, economic, or environmental effects.

Note: If report(s) on the above-described projects have been conducted or are in the possession of TDOT personnel, provide the name, date and project termination date of each such project.

3. Public Involvement – 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F, Executive Order 12898

a. Describe the effectiveness of your public involvement process as well as any strategies to ensure traditionally under-served populations have an opportunity for full participation in your planning process.

b. Describe how traditionally under-served media sources are appropriately included in all notification processes for public meetings or public review of agency documents.

c. Describe how meeting locations and formats encourage or facilitate participation by traditionally under-served populations.

4. Contracting Opportunities – 42 USC 2000d et seq.; 49 CFR Part 21.5(b) (2) & (3); 28 CFR Part 42, Subpart F

- a. List primary or subcontracting opportunities for planning studies, corridor studies, or other work which have been provided to minorities and women owned firms in the last twelve months.

Include documentation for the following information:

- _____ The number and nature of consultant contracts used by the MPO.
- _____ The number of certified Disadvantaged Business Enterprises and other small, minority and women – owned businesses (by race) used by the MPO, including the nature of the work, type and description of projects, and locations.
- _____ Outreach methods used by the MPO to attract certified Disadvantaged Business Enterprises and other small, minority and women – owned businesses.

Program Specific Requirements

The following applies to planning areas with a population of 200,000 or greater

5. Community Impact Assessment – 23 USC 109(h) lists the types of adverse social and economic impacts that must be investigated and documented.

- a. Describe how community value, social, neighborhood issues; environmental justice and any discrimination issues are normally addressed by the MPO.

6. **Service Equity – Executive Order 12898 Cumulative Impacts; 42 USC 2000d et seq.; 49 CFR Part 21; 28 CFR Part 42, Subpart F.** In the context of land use planning, cumulative impacts of the benefits and burdens (regional plan level), please address the following:

a. Describe to what extent the MPO coordinates with citizens and community-based agencies, groups and/or organizations in defining communities within the MPO's geographic area of responsibility in assessing potential benefits and impacts of transportation system investments, particularly related to traditionally under-served populations and other traditionally under utilized populations.

b. Are specific criteria used to determine which projects will be included in the TIP?

c. How is the distribution of impacts to socioeconomic and ethnic minorities identified and measured?

d. How does the MPO collect and utilize transit data?

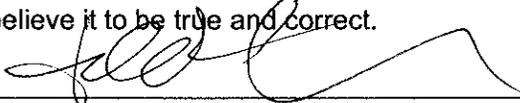
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- e. List examples of planning related tools/methodology or programs sensitive to Title VI, EJ, and/or ADA adherence (a special, or unique effort and/or involvement where a protected class receives benefits)
- Handicap ridership/transit needs
 - Impacts of reverse commute on protected groups
 - Welfare to work initiatives
 - Inter-city vs. suburban development impacts
- See Addendum 6.e.
-
-

For MPOs that are providers of fixed route public transportation service (50 + peak vehicles):

- f. If there have been any major service changes, provide the Title VI equity analysis that was conducted during the planning stage for the particular change, i.e., fare changes, facility constructions (in regard to location), etc. with regard to facility location.
- g. Provide passenger surveys.
- h. Provide a copy of the MPOs Set System-Wide Service Standard, i.e., non-discrimination policies, etc.
- i. Submit any evaluations conducted on Service fare changes.
- j. Submit any analysis/monitoring of ridership data, minority routes, etc.

7. DECLARATION OF RESPONDENT

I declare that I have completed this Title VI Assessment to the best of my knowledge and believe it to be true and correct.



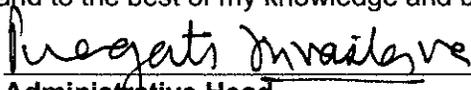
Title VI Coordinator

2/24/2014

Date

8. DECLARATION OF ADMINISTRATIVE HEAD

I declare that I have reviewed and approved the information provided in this assessment and to the best of my knowledge and believe it is true, correct and complete.



Administrative Head

2/24/2014

Date