



**Mississippi Gulf Coast  
Metropolitan Planning Organization  
Public Participation Plan**



**Mississippi Gulf Coast  
Metropolitan Planning Organization  
Gulf Regional Planning Commission**

**NON-DISCRIMINATION NOTIFICATION:**

GRPC prohibits discrimination in all of its programs, services and activities. Public participation is solicited without regard to race, color, national origin, age, sex, religion, disability, or other protected status. Persons who require assistance under the Americans with Disabilities Act should contact the MPO at least five (5) business days prior to the any scheduled meeting, event or the end of a public review and comment period. Contact Stephanie Plancich at 228-864-1167 or by email to [contactus@grpc.com](mailto:contactus@grpc.com) with any requests, questions or comments.

**NOTATION OF FINANCIAL ASSISTANCE:**

This document was prepared and published by Gulf Regional Planning Commission, the Mississippi Gulf Coast Metropolitan Planning Organization (MPO), in cooperation with or with financial assistance from the United States Department of Transportation (USDOT), the Federal Transit Administration (FTA), the Federal Highway Administration (FHWA) and the Mississippi Department of Transportation (MDOT). Assistance notwithstanding, the contents of this document do not necessarily reflect the official view or policies of the funding agencies.

**NOTICE OF PUBLIC REVIEW:**

In compliance with federal regulation 23 CFR 450 and the FTA public participation requirements of the Section 5307 POP notice, the Mississippi Gulf Coast Metropolitan Planning Organization (MPO) sought public input on the development of this public participation plan (PPP) from 2/10/2017 through 3/27/2017. All received comments will be included in Appendix G of this document.



## 6 ways to have your say

1. Call GRPC and speak to a staff member  
228-864-1167 or 866-847-7986
2. Mail in your comments or visit GRPC  
1635-G Poppo Ferry Road, Biloxi MS 39532
3. Email in your comments and feedback  
[contactus@grpc.com](mailto:contactus@grpc.com)
4. Visit the GRPC website and submit comments  
[www.grpc.com](http://www.grpc.com)
5. Attend an upcoming public event or meeting  
Call or visit website for event calendar
6. Connect with us on Facebook  
[www.facebook.com/gulfcoastplanning](http://www.facebook.com/gulfcoastplanning)

YOUR IDEAS CAN CHANGE THE WAY  
WE MOVE IN OUR COMMUNITY  
**PARTICIPATE TODAY!**

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## Chapter 1: Introduction

On December 20, 1973, Gulf Regional Planning Commission (GRPC) was designated as the Mississippi Gulf Coast Metropolitan Planning Organization (MPO). An MPO is a federally required transportation policy board. It is defined in 23 USC 134(b) and 49 USC 5303(c) as the local decision-making body responsible for carrying out the metropolitan planning process. An MPO must be designated for every urbanized area (UZA) with a population of at least 50,000 people as reported in the most current census report. Urbanized areas with a population of 250,000 or more are called Transportation Management Areas (TMA).

The MS Gulf Coast MPO serves the Gulfport-Biloxi TMA and the Pascagoula UZA. Together our planning area includes the 12 cities of Waveland, Bay St. Louis, Diamondhead, Pass Christian, Long Beach, Gulfport, Biloxi, Gautier, Pascagoula, Moss Point, D'Iberville and Ocean Springs, as well as the unincorporated areas of Hancock, Harrison and Jackson Counties. Any highway or transit project or program to be conducted or constructed within the planning area and to be paid for with federal funds, must receive approval of the MPO before those funds may be allocated.

In accordance with this law, the MPO must be certified as providing “a continuing, cooperative and comprehensive planning process that results in plans and programs that consider all transportation modes and supports the development and social goals of the metropolitan community. These plans and programs shall lead to the development and operation of an integrated, inter-modal transportation system that facilitates the efficient, economic movement of people and goods.” *23 USC 450.3*

### *How the MPO is supported by GRPC*

The MPO is coordinated, housed and staffed by GRPC. The agency provides support that is necessary for the MPO to meet its obligations to the region. GRPC’s professional staff is skilled in the varied applications of transportation planning theory and practice, including:

- Grant writing and management
- Program development and administration
- Data collection and analysis of land use and census data
- GIS development and mapping
- Traffic counts and travel demand modeling
- Urban and regional comprehensive and mitigation planning
- Transit development and planning
- Public engagement, education and outreach coordination
- Transportation planning and management particularly regarding congestion management, roadway safety, alternative transportation systems, air quality conformity and regional goods movement

## MPO Governance

### Transportation Policy Committee (TPC)

In accordance with federal guidelines, the TPC includes the “representation of local elected officials, officials of agencies that administer or operate major modes or systems of transportation and appropriate state officials” (23 CFR 450.306).

The TPC meets to discuss transportation planning and programming issues as they affect regional transportation planning goals and objectives. Among other duties and obligation, the TPC is responsible for the adoption of a Unified Planning Work Program (UPWP) and the Transportation Improvement Program (TIP), and for establishing policies and procedural guidelines that comply with federal regulations. The TPC is guided by the recommendations presented by the Technical Coordinating Committee (TCC).

The TPC typically meets quarterly. All TPC meetings are open to the public and an opportunity to hear comments and feedback regarding the planning process is provided on the meeting agenda.

The TPC includes the following officials or their designated representatives:

- Presidents of the Board of Supervisors for Hancock, Harrison and Jackson Counties
- Mayor/City Manager from the Cities of Waveland, Bay St Louis, Diamondhead, Pass Christian, Long beach, Gulfport, D’Iberville, Biloxi, Ocean Springs, Gautier, Pascagoula and Moss Point
- Gulf Regional Planning Commission Board Chairman
- Coast Transit Authority Board Chairman
- Mississippi Department of Transportation Executive Director
- Gulfport International Airport Executive Director
- Port Directors from the Mississippi State Port Authority, Jackson County Development Commission and the Hancock County Development Commission

TPC Non-Voting Members:

- Mississippi Trucking Association President
- Heritage Trails Partnership
- FTA Regional Administrator
- FHWA Division Administrator
- MS Coast Business Council President

\* NOTE: The first meeting of each new fiscal year is in December. It’s a joint meeting of the TPC and TCC committees and is the MPO’s Annual Meeting. All regular business is conducted, but the agenda will primarily focus on the last year’s accomplishments and reviewing regional planning priorities for the upcoming year.

\* NOTE: Public notice of all MPO meetings is published in the Sun Herald classifieds, in the GRPC event calendar on the homepage at [www.grpc.com](http://www.grpc.com) and through emails sent to all MPO members.

\* NOTE: The MPO fiscal year runs from October 1<sup>st</sup> through September 30<sup>th</sup> of each year.

## Technical Coordinating Committee (TCC)

The TCC consists of individuals whose skills, training and professional status qualify them to take an active role in helping to shape and to oversee the transportation planning program for the region.

The TCC reviews MPO deliverables and is responsible for making recommendations to the TPC with respect to the adoption of the MTP, UPWP and TIP, policies and procedures to be enacted by the MPO and guidance to the MPO staff on various transportation planning activities.

The TCC typically meets quarterly prior to the scheduled TPC meetings All TCC meetings are open to the public and an opportunity to hear comments and feedback regarding the planning process is provided on the meeting agenda.

The TCC consists of the following representatives:

- Representative from each of the 15 MPO member jurisdiction to include Hancock, Harrison and Jackson Counties as well as the cities of Waveland, Bay St Louis, Diamondhead, Pass Christian, Long beach, Gulfport, D'Iberville, Biloxi, Ocean Springs, Gautier, Pascagoula and Moss Point
- Gulf Regional Planning Commission Executive Director
- Coast Transit Authority Executive Director
- Mississippi Department of Transportation State Planning Engineer
- Mississippi Department of Transportation District 6 Engineer
- Gulfport International Airport Operation & Planning Director
- Port planning directors from the Mississippi State Port Authority, Jackson County Development Commission and the Hancock County Development Commission
- Mississippi Trucking Association Planning Director

TCC Non-Voting Members:

- FTA Regional Representative
- FHWA Regional Planning Engineer
- Representatives from NASA/Stennis Space Center, Keesler AFB, & the Naval Construction Battalion
- Directors from CSX, Kansas City Southern & Amtrak

## Required Language in Publications

The MPO is required, depending on the type of document being drafted, to include specific statements for public awareness. This language assures the public of our commitment to non-discrimination, identifies the agency or agencies that provided funding and/or other support.

The general language is as follows:

### *Non-Discrimination Assurance:*

GRPC prohibits discrimination in all of its programs, services and activities. Public participation is solicited without regard to race, color, national origin, age, sex, religion, disability, or other protected status. Persons who require assistance under the Americans with Disabilities Act should contact the MPO at least five (5) business days prior to the any scheduled meeting, event or the end of a public review and comment period. Contact Stephanie Planchich at 228-864-1167 or by email to [contactus@grpc.com](mailto:contactus@grpc.com) with any requests, questions or comments.

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### *FTA 5307 Notice*

When GRPC publishes legal notices for participation, and that activity or document includes all or in part, information on Coast Transit Authority (CTA) projects, FTA requires this statement be included:

Included in this activity/document is information regarding Coast Transit Authority's Program of Projects that are funded by the Federal Transit Administration. This public meeting/comment period satisfies the public participation requirements for the FTA Section 5307 POP notice. The proposed CTA Program of Projects will be final unless revised as a result of public comment.

### *Notice of Public Review*

This statement will be included in all MPO planning documents that require a public review and comment period. NOTICE OF PUBLIC REVIEW: In compliance with federal regulation 23 CFR 450, the Mississippi Gulf Coast Metropolitan Planning Organization (MPO) sought public input from 10/4/11 through 11/30/11. No comments were received. The TPC adopted the plan on 11/30/11.

# Public Participation Overview

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## Chapter 2: Public Participation

Public participation is recognized as a critical component of the transportation planning process and each MPO must develop a plan for effective public involvement. 23 CFR 450.316 states that “The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.” Agencies for consultation are defined as groups or agencies that would be interested in reviewing and making comment on the MPO’s planning documents and programs and may be referred to as resource agencies.

GRPC understands that the input of interested parties contributes to the regional transportation planning process. We seek to engage individuals with knowledge and insight about the transportation needs of the Mississippi Gulf Coast, with a pointed effort to involve members of traditionally underserved populations. These include; minorities, low-income, young and elderly, disabled, limited English proficiency, people with limited mobility and other protected persons.

The Public Participation Plan (PPP) is designed to serve as a guide for public engagement throughout the transportation planning process. There are many opportunities for the public to become involved in community decision-making. Engagement strategies utilized by GRPC are discussed in the following chapters.

The PPP was available for a 45-day public review period from October 27, 2014 to December 11, 2014. All outreach supporting documentation and received comments are recorded in the Appendix.

### Public Participation Guiding Principles

Public participation is a key element in ensuring that the work products of GRPC and the MPO reflect the needs and priorities of the people living in our region. Each plan and program (defined in the next section) is made available electronically through the agency website as well as in print upon request. Public comment is always encouraged and accepted.

Below are the guiding principles that we have identified as the core components of our public participation program. All outreach and engagement activities will be in support of one or more of these principles.

#### Be Inclusive

We strive to be inclusive as we conduct all GRPC and MPO programs, services and activities.

Activities include:

- Publishing MPO notices at least five days in advance of the event date
- Hosting regular MPO meetings that encourage public comment and attendance
- Conducting outreach activities to include the traditionally underserved in the planning process
- Use a wide variety of methods to encourage participation, to share information and to receive feedback from the public
- Build local partnerships to facilitate broader reach into the community with participation information
- Plan public meetings and events for days, times and at locations most convenient for the public to participate

### **Be Fiscally Responsible**

In these times of reduced financial resources we work diligently to make the best possible use of available funds. Some of the strategies employed to get maximum benefit include:

- Conducting outreach activities in the communities most likely to be impacted by proposed projects
- Selecting locations owned and managed by partner organizations to reduce costs
- Building relationships with service providers to provide no and low cost assistance when needed
- Publish general public notices through regional media outlets
- Provide opportunities to be engaged in the planning process from work or home to reduce the need for the public to spend their resources physically attending meetings and events
- Sharing information and getting engagement by attending existing meetings and events rather than setting new events for people to always come to us

### **Be Consistent**

Consistency and transparency are required elements of the MS Gulf Coast MPO's planning process and all efforts are made to establish confidence within the community that we serve. Some examples of our efforts to achieve a predictable program include:

- Setting regular meetings of the GRPC Board of Commissioners and the two MPO committees
- Using same or similar language in public notices and display ads
- Conducting activities within the brand structure of the program(s) in consideration
- Conducting staff awareness of activities and to ensure consistency of message and response
- Post planning schedules and event dates and times boldly on the agency website and in the office
- Send messaging to stakeholders that they will recognize as from the MPO and important to read

### **Be Proactive**

It is important to our staff that we attempt to be proactive in our efforts instead of reactive to unforeseen hazards. We recognize that it is the community members and other stakeholders who are in the best position to increase our effectiveness in identifying concerns and addressing them early. Ways in which we work to be proactive include:

- Work closely with representatives from each jurisdiction to identify projects that will address needs
- Create electronic forums to share and receive updates, awareness and education opportunities
- Taking surveys, polls and employing other feedback mechanisms to get community input

### **Be Visible**

Visibility differs from transparency in that it is not a requirement, but a desire of the agency. It is important to us that we become a recognized resource across the region for the variety of programs we actively pursue and participate in. These programs include: road safety, transit planning, air quality, sustainability, traffic counts, congestion management and more. Some of the ways in which we work to be more visible to the community include:

- Develop a strong agency branding that includes consistent, program-specific messaging
- Participate in community events to share agency information, updates and participation opportunities
- Work with local media to share highlights and participation options with the community
- Conduct presentations to inform, increase awareness and encourage participation in MPO activities from other groups, agencies and individuals
- Participate in, support and be present at appropriate events conducted by our jurisdictions, peer agencies and other partner organizations

## Be Responsive

Our responsiveness is a major component of the participation program evaluation process. There are two main ways in which we meet this objective. The first is to respond to changes in how we must conduct our business, and the second is to effectively and efficiently respond to public inquiries and comments. Specific examples include:

- Adapt to revised federal and state laws, policies and requirements
- Address new local priorities effectively and efficiently
- Follow-up with the participating public in a timely way - tell them how their input was considered/impacted the decision making process

## Be Creative and Flexible

Public participation is an ever evolving field since it fluctuates with the new ways in which people communicate. Best practices in outreach and engagement constantly shift as a result of developing technologies. By acknowledging this fact and consciously being flexible in our efforts to maintain an effective program we will be most prepared to respond in creative ways to address emerging social requirements. There are two core practices that help us achieve this principle. They are:

- Continue professional development activities to stay aware of best practice outreach and engagement strategies, technologies and opportunities
- Regularly evaluate program effectiveness with feedback from staff, stakeholders, participants and other interested parties and make any needed adjustments within the PPP

## MPO Plans and Programs

GRPC is required by the Federal Highway Administration and Federal Transit Administration to develop and maintain four transportation planning documents; The Metropolitan Transportation Plan, The Transportation Improvement Program, the Public Participation Plan and the Unified Planning Work Program. In addition, the MPO staff participate in the transit planning process and conduct a variety of technical studies that also require public engagement.

### MTP - Metropolitan Transportation Plan

Public Review Periods: 45 days for Update; 10 days for Amendment, None for Modification

The **MTP** is a Long-Range Transportation Plan that maps out the next 25 years of transportation investment on the MS gulf coast. It sets the framework for a balanced transportation system that promotes livability, sustainability, mobility and accessibility. The MTP exemplifies the region's commitment to multi-modal investment the supports continued enhancements to the roadway, public transit, freight movement, bicycle and pedestrian facilities and smart growth policies.

The MS Gulf Coast MPO is tasked as the decision-making body for transportation planning and funding allocation across our three county region. The MPO works closely with the public, elected officials, other government agencies, organizations and community groups to address transportation needs and develop the MTP.

In an effort to elicit widespread and meaningful input for the MTP, GRPC staff work closely with long-range planning consultants to develop and implement a comprehensive engagement strategy that encourages participation from the community that coincides with that larger statewide plan development and engagement processes.

## **TIP - Transportation Improvement Program**

Public Review Periods: 45 days for Update; 10 days for Amendment, None for Modification

The Transportation Improvement Program (**TIP**) is a list of selected transportation projects that have been allocated to receive federal transportation funds over a four year period. It is updated every two years, amended as needed every six months and performance and progress is reviewed quarterly. The Mississippi Gulf Coast TIP is developed by the MPO in cooperation with state and local leadership as well as public input. It must be consistent with the goals outlined in the MTP.

MPO staff conduct the initial review of submitted TIP project applications which results in a list of potential projects to be constructed in the community. This list is assessed by the TCC resulting in a draft TIP that is made available for MPO member and public review. Barring any significant changes to the draft, the TCC recommends adoption of the list to the TPC. With their approval it goes to MDOT, FHWA and FTA for final adoption and inclusion in the statewide program.

## **PPP - Public Participation Plan & Civil Rights Program**

Public Review Period: 45 days for any revision

The Public Participation Plan (**PPP**) guides our staff and consultants in meeting all public participation requirements of the Mississippi Gulf Coast MPO. The PPP tells the public what they can expect, and directs the MPO staff and members in ensuring effective public engagement is being conducted according to federal regulations. The PPP is reviewed regularly, and updated as needed.

The GRPC/MPO Civil Rights Program is included within the PPP. It outlines and describes how the agency is meeting its non-discrimination obligations. The civil rights program follows the same public review guidelines as the PPP itself.

## **UPWP - The Unified Planning Work Program**

Public Review Period: None Required

The Unified Planning Work Program (**UPWP**) is a document that describes the specific work tasks that will be performed by GRPC/MPO staff, Coast Transit Authority (CTA), and MDOT in the Mississippi Gulf Coast planning area over the next two fiscal years.

The document contains detailed information about who will perform the work, the schedule for completing the work, the resulting products and deliverables, proposed funding allocations, and the source of funds. The UPWP is developed prior to each two year work cycle and is modified as needed.

## **Technical Studies**

Public Review Period: 21 days to review draft

GRPC/MPO staff undertake technical studies on a variety of transportation topics including Intelligent Transportation System (ITS) and operations planning, the Congestion Management Process (CMP), safety planning, freight planning, bicycle and pedestrian mobility planning, High Occupancy Vehicle and Congestion Pricing, circulation and feasibility studies, corridor and intersection assessments, as well as various areas of transportation research and analysis. The public has the opportunity to view and make comments on study materials and results prior to publication of any findings.

## Modification and Amendment Processes

### TIP Amendments

Every six months, the MPO initiates a TIP amendment and evaluation process of the TIP. All project additions will be considered based on the availability of federal funds to maintain fiscal constraint of the program. This process will evaluate application according to the TIP Handbook, available for download at [www.grpc.com](http://www.grpc.com) or printed by request to an MPO staff member.

Changes to the TIP or changes to an existing project that are considered a major revision, will be processed as amendments. Amendments are made available for public review and comment, reviewed by the TCC and adopted by the TPC before being updated in the statewide plans.

Amendments include:

- Addition or deletion of a project
- Major changes in design or scope, such as changes that impact travel demand models or an approved air quality conformity analysis ( i.e. travel lanes, etc.)
- Termini changes that will affect additional community members
- Financial changes in a project's federal funds greater than 20% of the current apportionment

### TIP Amendment Process

GRPC will advertise in primary newspapers within the urbanized area for public input regarding proposed amendments to the TIP. GRPC will provide a 10 day public review and comment period regarding each proposed amendment. During that time frame, targeted outreach will be conducted within any directly impacted area of traditionally underserved populations as identified in the civil rights chapters of the PPP. Sample ad language for TIP amendments:

*"In compliance with federal regulation 23 CFR 450, the Mississippi Gulf Coast Metropolitan Planning Organization (MPO) is seeking the public's input on proposed amendments to the FY 2012-2015 Transportation Improvement Program [TIP]. The TIP includes all projects to be funded using the Gulf Coast's allocation of Surface Transportation Program (STP) funds, which are allocated by the Federal Highway Administration through the Mississippi Department of Transportation. The projects are selected based on local short term priorities set by the jurisdictions within the urbanized areas of Hancock, Harrison, and Jackson Counties."*

Amendments that include transit projects attach the following language,

*"Also listed in this document is Coast Transit Authority's Program of Projects that are funded by the Federal Transit Administration. The public meetings/comment period will satisfy the public participation requirements for the FTA Section 5307 POP notice. The proposed CTA Program of Projects will be final unless revised as a result of public comment."*

NOTE: In the event that a project is proposed to be added to the TIP that is not in the MTP, the MTP must be amended. MTP amendments are accomplished as described in the "TIP Amendment Process" above. During the TIP amendment process, notice should be given indicating that the MTP is being proposed for amendment as well. Fiscal constraint in the MTP shall be demonstrated.

## **Administrative Modifications to the TIP**

Revisions that qualify as administrative modifications are minor in nature. This generally means that the requested change will not distort fiscal constraint and that the availability of funds needed for the modification is already assured. Administrative modifications are processed by the MPO staff and no public review is required.

Modifications include:

- Correcting obvious minor data entry errors
- Splitting or combining projects without modifying the original project design, concept and scope or creating project segmentation
- Changing or clarifying elements of a project description. This change would not alter the original design, concept and scope. It also must be consistent with the approved environmental document.
- Moving a project from one federal funding category to another federal funding category
- Moving a project from federal funding to state funding
- Shifting the schedule of a project or phase within the years covered by the TIP
- Updating project cost estimates (within the original project scope and intent) not to exceed greater than 20% of the original cost estimate
- Moving identified project phase programmed for previous year into a new TIP
- Adding an additional agency to a group
- Adding projects within any of the MPO set-aside groups, provided fiscal constraint is maintained
- Removing a project reported as obligated or completed
- Other action where re-demonstration of fiscal constraint is not required

## ***TIP Administrative Modifications Process***

MPO staff will submit a letter from the MPO to MDOT showing the modifications made to the TIP and request that it be included on in the STIP. The letter should also include a copy of the new TIP page with the modified items. All modifications will be included in action summaries in the appendix of the TIP.

## ***Transit Project Changes***

If the change to the TIP includes transit projects, then the amendment or modification will need to be approved by both the Mississippi Federal Highway Administration (FHWA) Division Office and the Region 4 Federal Transit Administration (FTA).

## ***MDOT Project Changes***

MDOT must provide written request to the MPO for changes to the MPO TIP. MDOT should advise the MPO if the change should be processed as a modification or amendment. In the event the change is to be processed as an amendment, an MDOT representative should provide a presentation to the MPO TCC and TPC regarding the amendment.

## ***Listing of Obligated Projects***

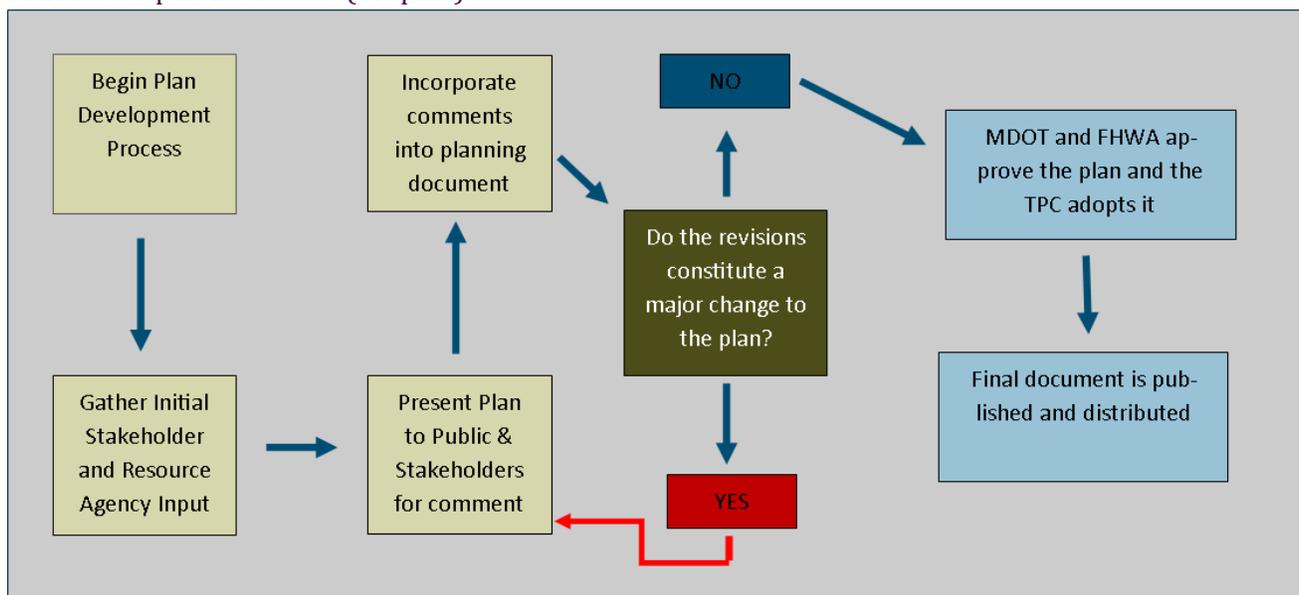
Each year MDOT provides the MPO with a list of all federal funds obligated through the planning process in the preceding program year. This list includes new projects receiving funding, as well as revised totals to reflect actual project expenses and/or funding increases approved by the MPO. In compliance with public notice requirements outlined in 23 USC 450.314(a), the MPO updates their list of obligated projects within 90 days of the end of the fiscal year, and posts the information in the TIP pages at [www.grpc.com](http://www.grpc.com).

## Incorporating Public Input into Program and Plan Development

In accordance with CFR 450.316, all public comments will be collected, reviewed and considered by the MPO prior to the adoption of an MPO plan. Following the review of all public comments, if no significant changes are made to the draft plan, it shall then be considered by the MPO for formal adoption. However, if significant changes are made to the draft, the draft document will be amended and an additional 10 day public review and comment period will be provided.

Significant changes to a draft are those in which the scope of a project is amended, such as adding new project elements, changes in number of lanes, or a significant increase in roadway mileage for a proposed project. Minor changes including; increase in congressional earmarks, change in year of implementation, or additional right-of-way acquisition, do not require an additional public comment period.

### Plan Development Process (Graphic)



# Engagement Strategies

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## Chapter 3: Engagement Strategies

GRPC uses a variety of methods to inform, and engage members of the public. The methods used and the audience targeted may vary, depending on the specifics of a particular planning activity.

### 10 Engagement Strategies Utilized by GRPC

1. **Website:** Maintain a GRPC website which provides easy access to MPO final reports, the participation calendar, and transportation related community activities, survey and opinion opportunities, maps, study reports, information on other GRPC projects, news and more.
2. **Surveys/Polls:** Conduct surveys and polls to solicit public input through the internet, telephone, or portable computer kiosks to facilitate participation by all interested parties
3. **Public Events:** Host public events to disseminate MPO information and gather public input independently and in partnership with other agencies. For example, MDOT.
4. **Partnerships:** Establishing partnerships with organizers and agencies in the region to share their knowledge, disseminate information to the public and encourage participation.
5. **Committee Meetings:** Communicating MPO information and status through the GRPC Board, TCC and TPC meetings which by providing for public comment at the start of each meeting.
6. **Email Communications:** MTP related articles and participation calendar is distributed in the quarterly "Coast in Motion" e-newsletter and GRPC email alert notifications.
7. **Print and Broadcast Media:** Utilizing television, radio and print media to inform the public of upcoming events, transportation changes, potential community impact and other transportation related information.
8. **Distribution Materials:** Brochures, Fliers, posters and invitations are all examples of materials designed for public distribution.
9. **Presentations and Trainings:** Conducting training events and presentations to increase awareness of regional transportation planning processes, concerns and countermeasures as well as increase public awareness of the MPO role and program of work.
10. **Social Media** – Utilizing a Facebook account to increase engagement pace and reach into the community, specifically to the youth.

### ***Strategy #1 – Website***

GRPC staff manage four unique web programs. The primary website for the agency is [www.grpc.com](http://www.grpc.com), program specific sites include: [www.get2b-ms.com](http://www.get2b-ms.com) (Safety), [www.gulfcoastplan.org](http://www.gulfcoastplan.org) (Sustainability) and [www.coastcleanair.org](http://www.coastcleanair.org) (Air Quality).

Management of the websites is done by GRPC staff. Public participation is facilitated numerous ways from the website.

- GRPC, MPO and specific programs and projects are published for public awareness
- Draft Documents are posted for public review and comment
- Approved documents are made available for download or can be printed on request
- Links are provided for event information and survey opportunities
- Inquiries can be submitted to GRPC electronically from the site
- Request to be added to MPO contact rosters can be done through site
- Social media links and highlights are posted on the website
- Presentations, maps and other printable materials are posted for download

The explosion of internet-based technologies and public techniques has not spread equally in every population GRPC seeks to engage in the planning process. The end-user must still have access to a computer and a basic understanding of how websites are navigated for this strategy to be effective. Therefore, lower income, elderly, and populations with English language barriers may not have equal access, so use of the website is partnered with several strategies.

### ***Strategy #2 – Surveys and Polls***

GRPC regularly utilizes the survey and poll as a means of capturing public opinion. Most surveys and polls are set-up to capture anonymous data but space is included for individuals who would like to be contacted. Polls ask the people to select their top priority, favorite, most used, etc. from a set of given possible answers. Surveys include a mix of questions including, ranking, multiple choice and fill in the blank questions.

Surveys serve a dual purpose. In addition to capturing public perception data, they also may be designed to capture demographic information that assists GRPC staff in assuring they are reaching the traditionally underserved or other target audiences. Demographic information collected may include zip code, disabled, gender, age range, and ethnic/racial background, mode of travel and income range.

### ***Strategy #3 – Public Events***

GRPC coordinates and/or facilitates public outreach and awareness events that are most often, public meetings or open-houses, but can also be training activities, presentations or other activities. Public events are held within ¼ mile of a transit stop whenever possible, held at times convenient for community members to attend and actively seek to increase awareness of the specific issue and the role of the MPO.

The methods used to promote events include:

- Signage in the immediate community
- Dissemination through partners
- Listed on GRPC website event calendar
- Print and/or broadcast media
- Email notifications
- Social Media Updates
- Public Presentations



### ***Strategy #4 – Partnerships***

GRPC has developed relationships with many community partners. These include governmental agencies, non-profit organizations, private sector businesses, clubs, groups, faith-based organizations and individuals. Through these partnerships information is disseminated to the public in many ways, including;

- Post notices at their place of business or service
- Make announcements to their clients and staff
- Encourage participation in upcoming public events
- Email opportunities to their own staff and partnership lists
- Assist the public in completing a survey or poll and collecting completed forms
- Having GRPC staff members speak to their members, clients, employees, etc.
- Share their resources to ensure we are meeting stated goals and objectives
- Assist with the research to determine the best ways of engaging different populations

### ***Strategy #5 – Committee Meetings***

The MPO provides opportunity for public comment at each of its committee meetings and public meetings. These comments are limited to three minutes per speaker. Public comments are made a part of the public record of the meeting.

GRPC is accountable to Mississippi Public Records and Open Meetings Acts. This legislation requires GRPC to ensure that policy and technical committee meetings, work sessions, video conferences and other included meeting types are made public and open for public participation.

Public record laws also require GRPC to maintain their records in written formats, viewable and recordable by the public. Requests to view the records must be granted within one working day after the request has been received by GRPC, which is allowed to charge a fee not to exceed the costs of researching and reproducing the requested records. Additional fees may be charged for electronic data, including the cost of establishing the geographic information system (GIS) in which the data is maintained in accordance with the commercial value of such data.

### ***Strategy #6 – Email Communications***

GRPC uses email to continually inform and engage with community members. The staff maintains an email communication distribution list that contains contacts representing the following:

- Area libraries
- Bicycle and pedestrian advocates
- Business associations/chambers of commerce
- Governmental agencies and officials
- Civic leagues
- Educational institutions
- Emergency responders
- Faith-based organizations
- General list for the MTP
- GRPC Technical Coordinating Committee
- GRPC Transportation Policy Committee
- Home owner/neighborhood associations
- Military installations
- News media
- Non-profit/community-based organizations
- Other interested parties
- Public information officers

**Strategy #7 – Print and Broadcast Media**

GRPC staff will publish legal notices and informational ads as required in local newspapers. In addition, staff may provide briefings, press releases and conduct interviews with to assist them in sharing correct project information, build community awareness, to share critical program results and other information.

**Broadcast Media**

Radio and television is periodically used to provide a broad reach into the community.

Radio ID	City	Station Type	Radio ID	City	Station Type
WMAH 90.3 FM	BIL	Public Radio	WXYK 107.1 FM	GP	Top-40
WAQY 91.7 FM	GP	Religious	WZKX 107.9 FM	BSL	Country
WQYZ 92.5 FM	OS	Religious	WQFX 1130 AM	GP	Gospel Music
WMJY 93.7 FM	BIL	Adult Contemporary	WBSL 1190 AM	BSL	Country
WJZD 94.5 FM	LB	Urban Contemporary	WGCM 1240 AM	GP	Country
WZNF 95.3 FM	LUM	Classic Rock	WRJW 1320 AM	PIC	Country
WUJM 96.7 FM	GP	Adult Contemporary	WROA 1390 AM	GP	Nostalgia
WCPR 97.9 FM	WIG	Alternative	WIGG 1420 AM	WIG	Americana/Roots
WKNN 99.1 FM	PASC	Country	WXBD 1490 AM	BIL	Sports
WGCM 102.3 FM	GP	Oldies	WRPM 1530 AM	POP	Gospel Music
WOSM 103.1 FM	OS	Gospel Music	WZZJ 1580 AM	PASC	News/Talk
WQRZ 103.5 FM	BSL	Variety	WTNI 1640 AM	BIL	News/Talk
WXRG 105.9 FM	PASC	Classic Rock			
TV ID	City	Description			
WLOX – 13	BIL	Local News (ABC, CBS)			
WXXV - 26	GP	Local news (NBC, FOX)			

**Print Media**

GRPC staff publishes public and legal notices, announcements for events and activities, press releases, and awareness campaign materials. Our print media contact list includes:

<u>State &amp; Regional Outlets</u>		
Mississippi Press	Biloxi-D’Iberville Press	Mississippi Business Journal
Coast Observer	Sea Coast Echo	Pass Christian Gazebo Gazette
Ocean Springs Gazette	Ocean Springs Record	The Bay Press
The Sun Herald	South Mississippi Living	The Press-Register
<u>Community Newsletters</u>		
Boat People SOS	Diamondhead Advisor	El Pueblo
Top of the Hill – Biloxi Seniors	Hope CDA	NAVASA
<u>Other Print Resources</u>		
Go Places Monthly	The Penny Pincher	GulfCoastNews.com
Journal of South MS Business	Lamar – Billboards & Posters	

### Strategy #8 – Marketing Materials

Marketing materials are an essential form of communication in any public involvement activity. The substance of the materials can be factual, present a point of view, background, request input, or in some instances be legally required and thus need specialized drafting. Marketing materials provide basic information about an activity, service, program or plan in a fast, concise, and clear way that the lay person can understand. They summarize or encapsulate the overall purpose or status of a project. They also provide information on how individuals can attend, submit a comment and/or get more involved. Translation requests can be emailed, written or phoned to the GRPC office.

### Strategy #9 – Presentations and Training Activities



Staff conduct a wide variety of presentations and training activities throughout the region. Some activities are planned as part of the work program of the agency, others are initiated at the request of a group or individual. They are prepared and capable of utilizing a wide variety of tools, including printed handouts, power point slide shows, poster boards and maps, videos, guest speakers, one-on-one and group discussions, to meet the needs and goals of the event.

GRPC staff will, upon request and as it fits within the mission of the agency, conduct a training event or make a presentation to a civic organization, school, special interest group, neighborhood, or others to inform and increase awareness of the MPO’s planning function, plans, programs, and other activities. Translation, including sign language services, will be provided by GRPC providing there is at least a five business day notice of the accommodation request.



### Strategy #10 – Social Media

Social media communication tools are the newest GRPC engagement methods. These outreach options allow GRPC staff and the MPO membership to communicate with a broad audience quickly. It is the goal of the public involvement coordinator to develop community awareness of the transportation planning process and participation opportunities by making announcements and posting news and activities electronically. Find us at: [www.facebook.com/gulfcoastplanning](http://www.facebook.com/gulfcoastplanning)



# Civil Rights/Title VI Program

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**Mississippi Gulf Coast  
Metropolitan Planning Organization**  
Gulf Regional Planning Commission

**MPO ANNUAL SELF-CERTIFICATION**

In accordance with 23 CFR 450.336, the STATE DEPARTMENT OF TRANSPORTATION and the Mississippi Gulf Coast Metropolitan Planning Organization for the Gulfport-Biloxi and Pascagoula urbanized areas hereby certifies that the transportation planning process is addressing the major issues in the State and is being conducted in accordance with all applicable requirements of:

- (1) 23 U.S.C. 134, 49 U.S.C. 5303, and this subpart;
- (2) In nonattainment and maintenance areas, sections 174 and 176(c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506(c) and (d)) and 40 CFR part 93;
- (3) Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR part 21;
- (4) 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;
- (5) Section 1101(b) of the FAST Act (Pub. L. 114-357) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in DOT funded projects;
- (6) 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
- (7) The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 *et seq.*) and 49 CFR parts 27, 37, and 38;
- (8) The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance;
- (9) Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender; and
- (10) Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities.

STATE DEPARTMENT  
OF TRANSPORTATION

  
\_\_\_\_\_  
State Planning Engineer

12/9/2016  
\_\_\_\_\_  
Date

METROPOLITAN PLANNING ORGANIZATION  
TRANSPORTATION POLICY BOARD

  
\_\_\_\_\_  
TPC Chairperson

12/8/16  
\_\_\_\_\_  
Date



**Mississippi Gulf Coast  
Metropolitan Planning Organization**  
Gulf Regional Planning Commission

## Agency Non-Discrimination Policy

Gulf Regional Planning Commission, the Mississippi Gulf Coast Metropolitan Planning Organization "Agency" assures that no person shall on the grounds of race color national origin or sex, as provided by the Federal Highway Act of 1973, Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any Agency program or activity.

The Civil Rights Restoration Act of 1987 expanded the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs, services or activities of Federal Aid recipients, sub-recipients and contractors/consultants, whether such programs receive direct federal financial assistance or not. (Public Law 100259 (S.557) March 22, 1988)

In the event the Agency distributes federal aid funds to a sub-recipient, Title VI language will be included in all written agreements and will be monitored for compliance.

The Agency's Title VI/Civil Right Coordinator is responsible for initiating and monitoring the Agency's non-discrimination activities, including preparing reports and completing other responsibilities as described in the Coordinator position description and as required by 23 CFR 200 and 49 CFR 21.

The Agency's Executive Director is responsible for the overall compliance of the Agency in meeting its various non-discrimination obligations under all applicable rules, laws and regulations.



Agency Executive Director

12-1-2016

Date



Agency Civil Rights Coordinator

12-1-16

Date



for GRPC and The MPO. The non-discrimination requirements defined in the Civil Rights Act apply to all federally assisted programs, public accommodations, voter rights, public education and more.

- **Civil Rights Restoration Act of 1987** - specified that recipients of federal funds must comply with civil rights laws in all areas, not just in the particular program or activity that received federal funding.
- **Section 504 of the Rehabilitation Act of 1973** - Section 504 forbids excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. It defines the rights of individuals with disabilities to participate in, and have access to programs and services.
- **Uniform Act of 1970** – Prohibits the unfair or unethical treatment of persons displaced or property to be acquired as a result of federal-aid programs and projects.
- **Americans with Disabilities Act of 1990** – The ADA also provides protections for disabled persons. There are five titles that make up the act, but only title II applies to the MPO at this time. Title II prohibits disability discrimination by ensuring that individuals have equal access to all agency programs and services. Access refers to both physical and programmatic access.
- **Age Discrimination Act of 1975** – This law prohibits discrimination based on age in programs or activities that receive federal financial assistance.
- **Federal-Aid Highway Act of 1973** – Applies to all agencies or programs receiving federal funds. The act prohibits discrimination based on sex/gender.
- **Executive order 12898: Environmental Justice** – The purpose of E.O. 12898 is to ensure that minority and low income community members do not bear disproportionately high or adverse burdens, have equal opportunity to participate in the planning process, that they are not denied program benefits.
- **Executive order 13166: Limited English Proficiency** – The purpose of E.O. 13166 is to ensure accessibility of programs and services to persons who are not proficient in the English language. This order states that individuals who do not read, write, speak, or understand English well are entitled to reasonable language assistance.

## Civil Rights Program Performance Measures

Pursuant to 23 CFR 200(b)(1), Stephanie Plancich, has been designated as the Title VI Coordinator responsible for the implementation of non-discrimination regulations and to conduct the day to day administration of the civil rights program. The Coordinator works to meet the program’s goals and objectives. The Gulf Regional Planning Commission Executive Director, Elaine Wilkinson, has the ultimate responsibility for ensuring non-discrimination requirements are being met throughout the agency’s work program, contracting process and hiring practices.

### ***Goal #1: Provide equitable access to and notice of programs, services and activities***

#### **Objective 1: Publish public notices that are timely and reach targeted populations**

- Step 1: Identify partner organizations that will provide translation, interpretation, or other services
- Step 2: Develop public notices in languages that meets civil rights compliance standards
- Step 3: Make the planning process accessible by conducting events at times and locations convenient for interested parties to participate, including the traditionally underserved
- Step 4: Conduct targeted outreach activities in traditionally underserved areas that have been identified as likely to be directly impacted by a proposed project
- Step 5: Make print information available in alternative languages and formats upon request

#### **Objective 2: Provide equal access to print materials, electronic information and services**

- Step 1: Ensure that the agency website, www.grpc.com is meeting current accessibility standards
- Step 2: Provide program, service or activity information in variable formats upon reasonable request
- Step 3: Provide printed, accessible copies of electronic materials upon reasonable request

Objective 3: Develop partnerships with local agencies and organizations to assist with providing reasonable assistance as well as distributing regional planning information

Step 1: Develop a list of agencies and organizations that will provide assistance services

Step 2: Review and update the list annually

***Goal #2: Be proactive in identifying and removing discrimination from the planning process***

Objective 1: Conduct an annual compliance review of agency program areas to determine the effectiveness of non-discrimination integration and make recommendations for improvement. (Ex. Phone, Website, TIP project Selection, Meeting locations, contracting, etc.)

Step 1: Integrate non-discrimination requirements into the strategies of the public participation plan

Step 2: Prepare an agency ADA transition plan and implement improvements as needed

Step 3: Meet with program staff to discuss and evaluate current program compliance

Step 4: Allocate funds within the UPWP to address program evaluation, reporting and other needs

Objective 2: Maintain a complaint policy and process that is easily located and utilized

Step 1: Develop procedures for prompt processing and disposition of any complaints of discrimination and make forms available in print and electronic formats

Step 2: Make a Spanish translated copy of the policy and forms available in the office and on-line

Step 3: Forward a copy of the resolved complaint log to the MDOT Civil Rights Office within 60 days after receipt of the complaint. If a resolution is not found within 60 days, seek MDOT assistance

Step 4: Take affirmative action to correct any deficiencies found by MDOT or USDOT within a reasonable period, not to exceed 90 days.

***Goal #3: Coordinate a comprehensive training program to support agency compliance efforts***

Objective 1: Ensure that the Coordinator maintains a level of training and expertise necessary to carry out the agencies civil rights program as well as support MPO members in their compliance efforts

Step 1: The Coordinator will participate in trainings and other professional development opportunities on Title VI and other non-discrimination requirements

Objective 2: Ensure that the GRPC staff and Board of Commissioners stay aware of program requirements, current compliance strategies and Title VI related trends

Step 1: Post the Non-discrimination policy and complaint process on staff information board

Step 2: Discuss complaints, questions, comments and new requirements at staff and board meetings

Step 3: Issue a policy statement, signed by the GRPC Executive Director, which expresses a commitment to ensure non-discrimination practices in all agency programs, services and activities and make it available to GRPC staff, MPO members and other interested parties.

Objective 3: Ensure that the MPO Membership stays aware of program requirements, current compliance strategies and Title VI related trends through regular communication and by coordinating trainings.

Step 1: Discuss and make the Civil Rights Plan, policies and complaint forms available electronically

Step 2: Provide Title VI compliance workshops, reminder presentations and other awareness activities for the MPO members, jurisdiction coordinators, staff and board members regularly

Step 3: Discuss progress and sign the self-certification during the MPO Annual Meeting

## Identifying the MS Gulf Coast's Traditionally Underserved Populations

In order to identify traditionally underserved populations, the MPO;

1. Analyzes data describing the composition of the region; and
2. Maps where underserved populations are concentrated

For project evaluation purposes we mapped the following populations at the block group level: areas where community members speak English less than good to not at all, area where the minority population exceeded the percentage of the county it is located in, and areas where the household income is less classified as low-income to extreme poverty based on census bureau reports.

### *Understanding the Obstacles Hindering Participation*

Many people who have one or more personal challenges, including mobility or access limitations, fall into very particular patterns of behavior. They may be unwilling, unable, or unaware of opportunities to participate in key transportation decisions, some of which may impact their quality of life. For these reasons, the MPO works to engage with and to receive input from all populations of the region.

For those who are not members of a traditionally underserved populations it may be difficult to understand the challenges they face. To better understand draw from experiences in your life when you were challenged by the environment you were in. Examples include:

- Negotiating a crowded train or subway station when visiting a new city
- Caring for an aging parent or disabled child
- Trying to climb a flight of stairs with an injured leg
- Struggling to make travel arrangements when you couldn't drive
- Being dependent on others when your car is in the mechanic shop
- Traveling to a foreign country where English is seldom spoken or only poorly
- Getting lost in a dimly lit area without access to a map or ability to ask for help
- Having something to say in a meeting but feeling indulged or being completely ignored

These experiences represent only a fraction of what the traditionally underserved deal with every day. The MPO strives in their participation and planning processes to alleviate some of these obstacles to make information easier to access in various formats and making physical participation less of a burden by offering meetings at times and locations convenient to many.

## Targeted Participation Strategies

The unique populations of the MS Gulf Coast may interact with the MPO differently. It is important to understand these differences and implement activities in the participation process that are most likely to engage the specific target audience. Low-income populations may not engage with the MPO in the same way or degree as Hispanics; limited-English proficiency populations would not respond to written materials in the same manner as other population groups. Repeated experience working with various people has revealed four (4) common elements in successful public engagement and education efforts.

**Make the Message Interesting** - Because we select language carefully does not mean that we should dilute our message or its content. The goal is still to convey detailed information relevant to the audience. Take full advantage of graphic design to demonstrate elements of the content.

**Make the Message Simple** - Use standard terminology and manners of writing and speaking without overuse of technical jargon. Where we must use specific terms, explain them first.

**Go to the Target Audience** - Conducting events is standard practice, and even required in the case of some public hearings. However, these events may not be the most effective method of engaging the general populace in many communities. To improve attendance, GRPC attempts to tie presentations into existing community meetings, festivals, or other established events. This helps introduce new information and garner participation in a familiar setting.

**Use Multiple Methods** – The Engagement Matrix represents the GRPC distribution and engagement objective. A “perfect” outreach technique would have both high engagement and high distribution, falling into Area 4 of the chart. In the effort to reach and maintain an area 4 score, GRPC staff has identified which engagement methods are the most effective for each of the underserved populations, listed which strategies work best when paired together, and have determined what score is assigned to each method by target population.



Engagement Method Evaluation Data Sheet

<b>Engagement Method Evaluation Data Sheet</b>			<b>Seniors/ Elderly</b>	<b>Mobility Challenged</b>	<b>Limited English</b>	<b>Low-Income</b>	<b>Minority</b>	<b>Partner Agencies</b>
	<b>Engagement Strategy</b>	<b>Partnering Strategy</b>	<b>Distribution/Engagement Score</b>					
1	Events (Meeting, open house, fair)	4,8,10,12,13	1	1	1	1	1	0
2	Citizen Advisory Group	7,13	3	3	1	3	3	0
3	Working & Focus Groups	13	3	3	3	3	3	4
4	GRPC Website	*	1	2	1	1	1	2
5	Information Station	7,8	4	2	2	2	2	0
6	Surveys & Polls	1,6,10,12	2	2	2	2	2	2
7	Agency Consultations	*	0	0	0	0	0	3
8	Direct & Email Distribution	1,3,6	2	2	1	2	2	2
9	TCC & TPC Meetings	9,13	1	1	1	1	1	2
10	Newspaper Ads & Notices	1,3,6	2	2	1	2	2	0
11	Visual Aids (Maps, Renderings, etc.)	*	3	3	3	3	3	3
12	Webinar & Webcasts	2,3,7,8	2	2	1	1	1	3
13	Interactive, Online Mapping	4,5	2	2	2	1	1	4
14	School Based activities	4,5,7,8,12	4	4	4	4	4	0
15	Imbedded Hyperlinks	4,7	1	4	1	1	4	0
16	Beverage Jackets	8,12	2	0	0	0	2	0
17	Personal Interviews	1,3,7	4	4	4	4	4	4
18	Phone Trees	1,2,3,8,10,12	4	4	4	4	4	2
19	Translated Materials	1,2,3,4,7,10,12	3	2	3	3	3	1
20	Public Service Announcements	8,10,12	3	3	3	3	3	0
21	Interactive Games	1,2,3,9,11	4	4	4	4	4	4
22	Piggy Back on other events	1,2,3,9,11,14	4	4	4	4	4	4

The engagement method evaluation data sheet is used to plan public events that are cost effective with maximum involvement potential. The engagement score is 1 to 4.

- 1 = Low engagement & low distribution
- 2 = High engagement
- 3 = High distribution
- 4 = High engagement & High distribution

\* refers to a technique that generally supports all other techniques

# Civil Rights: Disadvantage Business (DBE) Program

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## Chapter 5: Disadvantaged Business (DBE) Program

As a recipient of federal financial assistance, Gulf Regional Planning Commission (GRPC), the Mississippi Gulf Coast Metropolitan Planning Organization (MPO), complies with a variety of non-discrimination rules, regulations and policies. Ensuring that Disadvantaged Business Enterprises (DBE) have an equitable opportunity to participate in federally-assisted contracts is no exception.

In order to meet the agency's DBE obligations, GRPC follows the guidelines contained within the Mississippi Department of Transportation's (MDOT) DBE program and works in support of the state's DBE goal.

### Definitions (43 CFR 26.7)

**Disadvantaged Business** means a small business that;

- A. Is at least 51% owned by one or more socially or economically disadvantaged individual(s), **OR** in the case of a publicly traded company, at least 51% of its stock is owned by one or more socially or economically disadvantaged individual(s), and
- B. The businesses management and daily operations are controlled by one or more of the socially or economically disadvantaged individuals who own it

Note: Absentee ownership or title ownership by an individual who does not take an active role in controlling the business is not consistent with the eligibility requirements for DBE status.

**DBE Discrimination** is defined in two categories.

- A. No person/business shall be excluded from participation in, denied the benefits of, or otherwise discriminated against in connection with the award and performance of a federally assisted contract on the basis of race, color, sex, national origin (or other protected status.)
- B. In administering your DBE program, you must not, directly or through contractual or other arrangements, use criteria or methods of administration that have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, sex, or national origin.

### Policy Statements

#### **MDOT POLICY:**

It is the policy of the Mississippi Department of Transportation to provide a level playing field, to foster equal opportunity in all federally assisted contracts, to improve the flexibility of the DBE program, to reduce the burdens on small businesses, and to achieve that amount of participation that would be obtained in a non-discriminatory market place. In doing so, it is the policy of GRPC/MPO that there will be no discrimination in the award and performance of federally assisted contracts on the basis of race, color, sex, age, religion, national origin, disability or other protected status.

#### **GRPC POLICY:**

Gulf Regional Planning Commission (GRPC), the Mississippi Gulf Coast Metropolitan Planning Organization (MPO), works in support of the program goals and complies with the procedural guidance outlined in the Mississippi Department of Transportation's DBE Program. GRPC will take all necessary and reasonable steps to ensure that DBE firms have an equal opportunity to compete for and participate in federally assisted contracts executed by the agency. Each contract will contain non-discrimination language that is consistent with the requirements of 43 CFR 26.

## **DBE Program Performance Measures**

### ***Goal #1: Designate a DBE Liaison to complete program activities***

GRPC will designate a member of its staff as the DBE Liaison. This individual will become familiar with the MDOT DBE Program and complete any training required to effectively manage GRPC's program.

#### **Objective 1: Maintain a knowledge level that is necessary to ensure DBE non-discrimination**

1. Complete at least one event per year (training, meeting, workshop, etc.) in which all or part of the agenda discusses DBE requirements and compliance information

#### **Objective 2: Complete annual tracking and reporting requirements**

1. Track all contracts executed and/or maintained by the agency.
2. Complete an annual performance report, and submit it to Public Participation/Title VI Coordinator by September 1st each year. (The report form is included as Appendix F.)

#### **Objective 3: Resolve any DBE complaints received by the agency**

1. Work with the Public Participation/Title VI Coordinator to rectify any DBE related complaints or corrective actions that are received

### ***Goal #2: Disseminate DBE information for agency and public awareness***

The GRPC DBE policy statement and program overview is published within the Civil Rights Chapters of the Public Participation Plan. It is reviewed regularly and updated as needed.

#### **Objective 1: Internal Dissemination**

1. Report any new DBE requirements, strategies or performance goals to Public Participation/Title VI Coordinator for inclusion in PPP.
2. Report any new DBE requirements to Executive Director for Board Awareness and implementation.
3. Hang DBE informational flier on the office information board for general awareness of the agency's policy and complaint procedure.

#### **Objective 2: External Dissemination**

1. Provide an overview presentation to the MPO membership for any rule changes they must be aware of, comply with, etc.
2. The DBE policy is included in the Public Participation Plan which is available in print by request as well as for download from [www.grpc.com](http://www.grpc.com).

### ***Goal #3: Ensure that GRPC contracts encourage equal participation and that each executed contract contains applicable non-discrimination language***

GRPC will make specific effort to encourage Disadvantaged Businesses to participate in the agency contracting processes. Each contract situation is unique and may require varied DBE outreach strategies. GRPC maintains program compliance by following MDOT DBE procedures throughout the contract process.

#### **Objective 1: Ensure equal access throughout the contract selection process**

1. Whenever required, GRPC will select a DBE organization from the MDOT Master List maintained on the state's website, [www.gomdot.com](http://www.gomdot.com).
2. At minimum, procurement advertisements will be placed in a regional print newspaper.
3. All advertisements for bid will include the statement "DBE encouraged to apply."
4. A complete list of organizations responding to an advertisement will be drafted. If a DBE applicant is not selected, the reason will be discussed and noted with the Public Participation/Title VI Coordinator. (ex. if use a scoring system, list all respondents, scoring criteria and final score for each.)

Objective 2: Ensure that all selected contractors, subcontractors, consultants, etc. are aware of their non-discrimination obligations as sub-recipients of GRPC

1. Every contract executed by GRPC, in its capacity as the MPO or another agency function, will include the following non-discrimination language, or its near equivalent.

*ANTI-DISCRIMINATION - The Consultant and its subcontractors, if any, shall not discriminate against any employee or applicant for employment, to be employed in the performance of this Agreement, with respect to its hire, tenure, terms, conditions, or privileges of employment, because of his/her race, color, religion, national origin, ancestry, sex, handicap, age, disabled veteran status or Vietnam era veteran status. Breach of this covenant may be regarded as a material breach of this Agreement. If available, the Consultant shall provide their internally adopted non-discrimination language for review prior to contracting.*

*UTILIZATION OF DISADVANTAGED BUSINESS ENTERPRISE FIRMS - In connection with the performance of this Agreement, the Consultant will cooperate with GRPC in meeting its commitments and goals with regard to the maximum utilization of disadvantaged business enterprises, and will use its best effort to ensure that disadvantaged business enterprises shall have the maximum practicable opportunity to compete for sub-contract work under this contract.*

*Failure to comply with these requirements is a material breach of the contract the may result in the termination of the contract or such remedy as deemed appropriate by GRPC.*

# Civil Rights: Americans with Disabilities (ADA) Compliance Program

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## Chapter 6: Americans with Disabilities (ADA) Compliance Program

As required by Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA), the Mississippi Gulf Coast MPO assures that it will not discriminate against individuals with disabilities in the admission to, access for, or operation of its programs, services or activities. This assurance is signed as part of the annual self-certification of the agency. (See chapter: Civil Rights Program)

Qualified individuals who need accessible communication assistance or other accommodations to participate in the transportation planning process are invited to make their needs and preferences known to the Title VI Coordinator. The MPO requires that requests for reasonable accommodation be received at least 5 business days in advance of a scheduled event date or publication deadline so they have enough time to reach out to partner agencies to coordinate the assistance being requested. They will make their best effort to meet the need of a community member who would like to participate.

Upon request, this plan and other MPO materials may be made available in alternative formats (for example, large print or audio tape). Questions, concerns and requests should be forwarded to the Title VI Coordinator.

Stephanie Planchich  
GRPC/MS Gulf Coast MPO  
Public Involvement & Title VI Coordinator  
1635-G Popp's Ferry Road, Biloxi MS 39532  
228-864-1167  
contactus@grpc.com  
www.grpc.com

A grievance policy and forms have been made available, in both print and electronic formats, to resolve complaints, see Appendix E.

### ADA Program Definitions

**Disability:** Source: [http://www.fhwa.dot.gov/civilrights/programs/ada\\_sect504qa.cfm#q1](http://www.fhwa.dot.gov/civilrights/programs/ada_sect504qa.cfm#q1)

To qualify as having a **disability** one or more of the following conditions must exist.

1. a physical or mental impairment that substantially limits one or more major life activities
2. a record of such an impairment; or
3. being regarded as having such an impairment

Physical or mental impairment means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine; any mental or psychological disorder such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities; includes contagious and noncontagious diseases and conditions as orthopedic, visual, speech, and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, specific learning disabilities, HIV disease (whether symptomatic or asymptomatic), tuberculosis, drug addiction, and alcoholism; does not include homosexuality or bisexuality.

Major Life Activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. A major life activity also includes the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

An impairment that is episodic or in remission is a disability if it would substantially limit a major life activity when active.

The determination of whether an impairment substantially limits a major life activity shall be made without regard to the improvement effects of mitigating measures such as; medication, medical supplies, equipment, or appliances, low-vision devices (which do not include ordinary eyeglasses or contact lenses), prosthetics, hearing aids and cochlear implants or other implantable hearing devices, mobility devices, or oxygen therapy equipment and supplies; use of assistive technology; reasonable accommodations or auxiliary aids or services; or learned behavioral or adaptive neurological modifications.

An individual meets the requirement of "being regarded as having such an impairment" if the individual establishes that he or she has been subjected to an action prohibited under this chapter because of an actual or perceived physical or mental impairment whether or not the impairment limits a major life activity. This does not apply to impairments that are transitory and minor. A transitory impairment is an impairment with an actual or expected duration of 6 months or less.

**Qualified Individuals:** Source: <http://www.ada.gov/t2hlt95.htm>

A "qualified" individual with a disability is one who meets the essential eligibility requirements for the program or activity offered by a public entity. The "essential eligibility requirements" will depend on the type of service or activity involved. For some activities, such as State licensing programs, the ability to meet specific skill and performance requirements may be "essential." For other activities, such as where the public entity provides information to anyone who requests it, the "essential eligibility requirements" would be minimal.

**Auxiliary aids and services:** Source: [http://www.fhwa.dot.gov/civilrights/programs/ada\\_sect504qa.cfm#q1](http://www.fhwa.dot.gov/civilrights/programs/ada_sect504qa.cfm#q1) The term "auxiliary aids and services" include qualified interpreters or other effective methods of making aurally delivered materials available to individuals with hearing impairments; qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments; acquisition or modification of equipment or devices; and other similar services and actions.

**Reasonable accommodation:** Source: <http://www.ada.gov/qandaeng.htm> is any modification or adjustment to a job or the work environment that will enable a qualified applicant or employee with a disability to participate in the application process or to perform essential job functions. Reasonable accommodation also includes adjustments to assure that a qualified individual with a disability has rights and privileges in employment equal to those of employees without disabilities.

An employer is only required to accommodate a "known" disability of a qualified applicant or employee. The requirement generally will be triggered by a request from an individual with a disability, who frequently will be able to suggest an appropriate accommodation. Accommodations must be made on an individual basis, because the nature and extent of a disabling condition and the requirements of a job will vary in each case. If the individual does not request an accommodation, the employer is not obligated to provide one except where an individual's known disability impairs his/her ability to know of, or effectively communicate a need for, an accommodation that is obvious to the employer. If a person with a disability requests, but cannot suggest, an appropriate accommodation, the employer and the individual should work together to identify one. There are also many public and private resources that can provide assistance without cost.

### **Undue Burden and Fundamental Alteration**

Title II of the ADA and Section 504, as applicable to state and local agencies, requires a public entity to make its programs accessible in all cases, except where to do so would result in undue financial or administrative burdens or fundamentally alter the nature of the program in question.

**Undue Burden:** Source: <http://www.ada.gov/qandaeng.htm>. An employer is not required to make an accommodation if it would impose an "undue hardship" on the operation of the employer's business. "Undue hardship" is defined as an "action requiring significant difficulty or expense" when considered in light of a number of factors. These factors include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the employer's operation. Undue hardship is determined on a case-by-case basis. In general, a larger employer with greater resources would be expected to make accommodations requiring greater effort or expense than would be required of a smaller employer with fewer resources.

If a particular accommodation would be an undue hardship, the agency must try to identify another accommodation that will not pose such a hardship. Also, if the cost of an accommodation would impose an undue hardship on the employer, the individual with a disability should be given the option of paying that portion of the cost which would constitute an undue hardship or providing the accommodation.

Example: An MPO decides to update its website. Several new elements are proposed including greater accessibility for non-English speakers, individuals needing larger print, users with screen readers and other assistive devices that are not currently supported. Another new element of the site is the development of an interactive regional map. To purchase an accessible version of the mapping software would require the entire project budget. The MPO can claim this expense as an undue hardship, but would be expected to provide the map information in some other format for users with disabilities.

**Fundamental Alteration:** Source [http://adalive.org/faq\\_episode4\\_q13](http://adalive.org/faq_episode4_q13). The classic example which may or may not have really happened is for someone who is Deaf to ask that the lights in a planetarium be raised so that she could see her interpreter. Of course, this would fundamentally alter the experience for everyone, including the person who asked. However, even though the planetarium could - and probably did - deny this request, the planetarium still has obligations under the ADA. One possible solution would be to offer the patron a seat off on the far right or left and position the interpreter with a dim light right in front of her. Another would be to provide her with the narrator's script and a clip on light.

## Steps to ADA Compliance

Meeting the requirements of the ADA can be accomplished by implementing seven general steps. Each step is listed below with a brief description of where GRPC is in accomplishing each listed task.

1. Designate an ADA Program Coordinator
  - a. Complete: GRPC designated a Title VI coordinator to oversee the Civil Rights Program which includes ensuring compliance with Title II of the ADA
2. Provide notice to the public about ADA requirements
  - a. Complete: Continuous notice is provided in public spaces at the GRPC office building as well as on the agency website at [www.grpc.com](http://www.grpc.com).
3. Establish a Grievance Procedure
  - a. Complete: The agency reviewed and revised its procedure and complaint process. The revised documents are available in English and Spanish in print upon request, electronically on the agency's website and posted in the GRPC office building.
4. Develop internal design standards, specifications and details
  - a. Complete: We follow the guidelines provided by the Department of Justice and discussed at [www.ada.gov](http://www.ada.gov).
  - b. To assess our interior spaces we followed the guidelines included in the architectural barrier removal checklist

5. Assigning personnel for the development of a transition plan and implementing it
  - a. Complete: The Title VI Coordinator oversaw the development of GRPC's transition plan and will annually review progress addressing improvement recommendations
6. Approving a schedule and budget for the transition plan
  - a. All items to be addressed on the transition plan will be implemented as staff time and other resources allow. All suggested changes are expected to be completed by end of FY2017.
7. Monitor implementation progress of the transition plan
  - a. Transition plan has been reviewed by Civil Rights Coordinator annually.

### *Who is covered by Title II of the ADA*

All activities, services, and programs of the public entity must comply with ADA regulations. Unlike section 504 of the Rehabilitation Act of 1973, which only covers programs receiving Federal financial assistance, title II extends to all the activities of State and local governments whether or not they receive Federal funds.

### **ADA Transition Plan**

The Americans with Disabilities Act is landmark legislation protecting persons with disabilities. There are five titles under the act. Title II applies to GRPC and the MPO since we are considered a "Public Entity" which is defined as any state or local government and all of its departments, agencies, or other instrumentalities. Title II specifically addresses the requirement to make public services and transportation accessible. To ensure compliance we are required to perform an annual self-evaluation and have a transition plan in place to correct any identified access deficiencies.

A transition plan should cover all facilities owned and operated by the agency. Plans typically have six core components.

1. List of physical barriers that limit accessibility (based upon annual self-evaluation)
2. Detailed description of how identified barriers will be prioritized and remedied
3. A schedule for removing the barriers
4. Name of the official responsible for implementation of the transition plan
5. Schedule for providing curb ramp improvements (This component is not applicable. GRPC does not own or manage public ROW. Our only ramps are from parking areas into our office building. These are covered in the barrier removal self-evaluation process.)
6. Record of opportunities given to the public to participate in the plan development process

NOTE: GRPC moved its office from 1232 Pass Road, Gulfport MS to 1635-G Popps Ferry Road, Biloxi MS in October 2013. This change of location sparked the need for a new self-evaluation and transition plan.

We completed our self-evaluation using "The Americans with Disabilities Act Checklist for Readily Achievable Barrier Removal" which aligns with the ADA Accessibility Guidelines (ADAAG) adopted by the Department of Justice. The checklist introduction notes that its purpose is to assist in the identification of "accessibility problems and solutions in existing facilities in order to meet obligations under the ADA."

GRPC/MS Gulf Coast MPO ADA Transition Plan last updated 9/2014

Area/Item Description	Yes	No	Initial Findings/Notes	Recommendation
<b>Entrance/Exit Accessibility</b>				
Is there a route of travel that doesn't require using stairs?	X		From parking lot to the front door entrance	N/A
Is the travel route stable, firm and slip resistant?	X		Concrete and level pavers	N/A
Is the route at minimum 36" wide?		X	Previous route was non-compliant due to decorative building features protruding into travel path	GRPC is coordinating the construction of a new Van Accessible parking space in front of the office building with compliant ramp and sidewalk space up to the front door.
Are all protruding objects 27" or less off ground, at least 80" high or sticking out less than 4"?	X		Small tree branches have grown over accessible walkway	Complex owner completes at least 1 annual tree trimming, keeping sidewalks clear. GRPC staff will maintain clear pathway at other times, as needed
Is there a curb cut from the parking area?	X		Has slight erosion but complies with curb ramp design standards.	N/A
Are the slopes of the ramp no more than 1:12?	X		In each direction, the ramp meets or exceeds the standard	N/A
Do we meet the ramp, railing, surface, rise and other ramp characteristic requirements?		X	New ramp installed at front entrance is compliant. Rear ramp, for emergencies only, will be put in place by GRPC staff (all are trained) as needed in an emergency	
<b>Parking &amp; Drop Off Areas</b>				
Is there at least 1 accessible parking space for every 25 spaces provided?	X		16 spaces in front of GRPC and 13 in the side lot. (29 total) 1 is accessible	N/A
One of every 8 spaces must be van accessible. Is at least one of the accessible spaces for vans?		X	Previous space met car standards of 8' space with 5' aisle. – This space is replaced with van compliant space.	GRPC will construct a new van accessible space that meets all minimum requirements (8 space, 8' Aisle with 98" of vertical clearance.) Solves several issues.
Is the access aisle part of the accessible route?	X		Connects directly with curb ramp to sidewalk	N/A
Are accessible spaces close to the accessible entrance?	X		1 <sup>st</sup> space in front of main entrance	N/A
<b>Parking and Drop Off Cont'd</b>				
Are spaces marked with international accessibility symbol?	X		Painted in center of space	N/A
Is space marked with a Van Accessible sign?		X	Previous space had only a regular car sign on post – upgraded with new space	Newly constructed space includes a sign stating it is van accessible
Is an enforcement procedure in place to ensure space is available for qualified individuals?	X		Upon notice, staff will report to office, police will be called	N/A
<b>Entrance and Exit Areas</b>				
Do all inaccessible entrances have signs to the accessible	X		No signs are posted	Request that landlord add directional signs outside

route?				
Can the alternative accessible entrance be used independently?	UB		1. We do not have an alternative accessible option, 2. Rear door was made to be an alternative accessible exit for emergency use only. Added a ramp at the door and have a ramp from sidewalk into parking lot available whenever needed. Signs direct guest to the front door for entry.	
Do the entry/exit doors have at least 32" clear space?	X		Front + is 32", back is 34.5"	N/A
Is there at least 18" of clear space on the door knob side of each door?	X		Ensure items are not placed in the way ex. trash can, coast rack, plants	N/A
Are thresholds ¼" high or less, or if beveled ¾" high or less?	X		All interior and exterior thresholds are compliant	N/A
Is carpeting or mats a maximum of 1/2 "high?	X		All carpets and rugs have low knap	N/A
Are flooring edges secure to minimize trip hazard?	X		All surfaces are secure	N/A
Is door handle no more than 48" high?	X		All handles are within the height standard	N/A
Do door handles pass closed fist test? BACK DOOR	X		Back door has no interior handle to help lock/unlock, door pushes out, Exterior, failed closed fist test	Added an interior handle, no change needed for outside handle as door remains locked for security reasons and will only be used as an emergency exit
Do door handles pass closed fist test? FRONT DOOR		X	Front door exterior handle fails closed fist test, inside push bar is fine	GRPC looking into adding a push button at the front entrance to avoid needing to use the handles.
Can doors be opened with 5lbs of force or less?	X		Back door passes – front door is too heavy	GRPC had front door serviced and a new closing mechanism installed – weight and speed now good
Does door take at least 3 seconds to close? (1-one thousand, 2 one thousand...)	X		Back door is good – front door a little fast (2.5 seconds) or locks open	See above – all has been corrected
<b>Access to goods/services</b>				
Does the accessible entrance provide direct access to main floor?	X		Yes – both door are in/out of single floor office building	N/A
Are all public space on accessible route?	X		Yes – office are not counted as accessible routes	N/A
Is accessible route and pathways to materials and services at least 36" or wider?	X		Most of route is 5' wide	N/A
Are 5' wide circles or T-spaces provided for wheelchairs to turn around?	X		Spaces are provided throughout the route	N/A
In circulation paths, are obstacles 27" of lower, 80" or higher or less than 4" from wall?	X		Routes and pathways are clear	N/A
<b>Interior Doors</b>				
Does the opening have at least 32" of clear space?	X		Interior doors are 33" or wider	N/A
On pull side of door, next to handle is there an 18" clear wall space?	X		Small Conf room doesn't comply – Room is not used as a public space – will use large room for public activities since it complies (undue burden to repair)	
Can doors be opened with 5lb force or less?	X		Each door complies	Will continue to regular maintenance and repairs of structure as issues or concerns are identified
Are handles at 48" high or less?	X		All door comply	N/A

Do door pass the closed fist test?	X		Interior doors use lever handles and all are easily pushed/pulled	N/A
Do thresholds meet ¼" or ¾" standards?	X		All thresholds are compliant	N/A
<b>Signage</b>				
Are emergency systems equipped with audio and visual signals? (alarm and flashing lights)	x		Audio and visual is compliant throughout building	N/A
Are room ID placards located on door knob side, with centerline at 60", with symbol, raised characters and braille?	UB		The placard characteristics and locations are all compliant, however, they were installed with 60" as the top line instead of center line. The result of moving them up 3" from their current location would be an undue burden on the agency causing paint/texture/sheetrock damage to move 3".	
Do signs over 80" overhead have letters at least 3", high contrast with non-glare finish?	X		Exit signs at both doors meet the standards	N/A
<b>Controls, Seating, Tables, Counters</b>				
Are all public controls accessibly located? (Reach limits: 54" side, 48" forward, 15" high, 9" wide)	X		All public controls are accessible – internal controls may need tweaked if a staff person becomes disabled or for a new hire ex. Microwave is high	
Can controls be used with closed fist?	X		Pass closed fist test	N/A
Are aisles between fixed seating at least 36" wide?	X		Break area & light table areas comply	N/A
Are there spaces for wheelchair seating?	X		Seating room is available or can be made available in all public spaces	N/A
Are tops of tables and counters between 28" and 34" high?	X		Tables & food service counters comply	N/A
Are knee spaces 27" high, 30" wide and 19" deep?	X		All tables comply	N/A
For cashier, food service or other similar counters is a portion no higher than 36" or is there a space at side to pass items for people who have trouble reaching over high counters?	UB		Front desk counter is over 40" high. It's an undue burden to tear out and replace – self-service materials are place on accessible tables in front of counter. Door is equipped with buzzer/bell so front desk staff are aware of everyone entering the lobby and will provide personalized service whenever needed.	
<b>Vertical Circulation:</b> Are there ramps, lifts, elevators, etc. to all public spaces/levels?	x		There are no vertical circulation requirements we have a single story building	N/A
<b>Restrooms</b>				
Is at least one bathroom fully accessible?	X		All restrooms comply	N/A
Is there a tactile sign identifying the rooms?	X		Signs for rest rooms are compliant, but need raised as noted in Signage section	N/A
Is there at least 32" of clear door space	X		Doors open with 34" of clear space	N/A
Are doors accessible? Force, close speed, handles at 48" or less, operable with closed fist?	X		Handles are tight, don't pass closed fist test, especially because they are a bit heavy	Replace interior handles with compliant options
Is a 5' maneuvering space provided in the rest room?	X		Between door, sink, trash can, etc. the second is within the accessible stall	N/A
Is there a 48" minimum space between door swing and any fixture?	X		Complies to sink, first stall, cupboard, etc.	N/A
Is the path to all fixtures at least 36" wide?	X		All pathways comply	N/A

Does stall offer a 5x5 space for maneuvering clear of the door swing?	X		Both restrooms have a compliant stall	N/A
Is the stall door operable with closed fist?	X		Slide mechanism complies	N/A
Are grab bars placed beside and behind the toilet?	X		Bars comply	N/A
Is the toilet seat between 17" and 19" high?	X		Both measure at 18"	N/A
Is sink top at 34", bottom at 29" excluding pipes?	x		Sink is 33.5 at top and 28 at bottom	N/A
Can faucets be operated with closed fist?	X		Lever handles pass test	N/A
Is mirror mounted with bottom at 40" or less?	X		Right on a 40" – men's even tilts	N/A
Are towels, soap dispensers, dryers, within reach (48" or less) and usable with a fist?	X		Soap & paper towel dispenser comply	N/A
<b>Telephones</b>				
Is there a public phone available that is hearing aid compatible, TTY/TTD equipped and marked as such?	UB		We do not provide public phones but those on site are push button, with volume controls and can be placed at accessible heights if needed – A new hire needing this accommodation would trigger this purchase. Until then it is an undue burden.	
<b>Website</b>				
Does the agency website meet 508 accessibility standards?	x		We meet very few with the current website.	Complete website rebuild in FY2015. Fully compliant offering additional services such as font size and Google translation as well as direct email to staff.
<b>Drinking Fountains</b>				
Is there clear floor space of 30" by 48" in front of fountain?	X		Moved a recycle bin to meet 48" requirement	N/A
Is the drinking spout no more than 36" high?	X		Spout is right at 36"	N/A
Are controls mounted on front or side and operable with closed fist?	X		Front controls are push button	N/A
Is fountain cane detectable?	x		Bottom of fountain is right at 27"	N/A

Completed By:  Stephanie Plancich, GRPC public Involvement/Title VI Coordinator

Civil Rights:  
Limited English  
Proficiency (LEP) Plan

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## Chapter 7: Limited English Proficiency (LEP) Plan

### Executive Order 13166: Improving access to programs, services and activities for persons with Limited English Proficiency

The purpose of E.O. 13166 is to ensure accessibility to programs and services for persons who are not proficient in the English language. This executive order states that individuals who do not speak English well and who have a limited ability to read, write or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964, further;

*Each agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities.*

All federal agencies must have a plan and fully comply with LEP guidelines. As a recipient of federal funds, GRPC is bound to comply with the Title VI and LEP guidelines of the federal agency from which funds are provided, for example the US Department of Transportation. As a recipient, GRPC must comply with Title VI regulations in all of its activities not just those of the MPO.

The United States Census Bureau defines an LEP person as someone who does not speak English as their first language AND who has an ability level of “not well” or “not at all” in reading, writing, speaking or understanding the English language.

The intent of this Limited English Proficiency Plan is to ensure access to the planning process and information published by GRPC where it is determined that a substantial number of residents do not speak or read English proficiently. The production of multi-lingual publications and documents and/or interpretation assistance at meetings or events will be provided to the degree that funding permits based on current laws and regulations.

This LEP plan will be evaluated as part of the Transportation Management Area (TMA) review process. The review is conducted every four years jointly by the Federal Highway and Federal Transit Administrations.

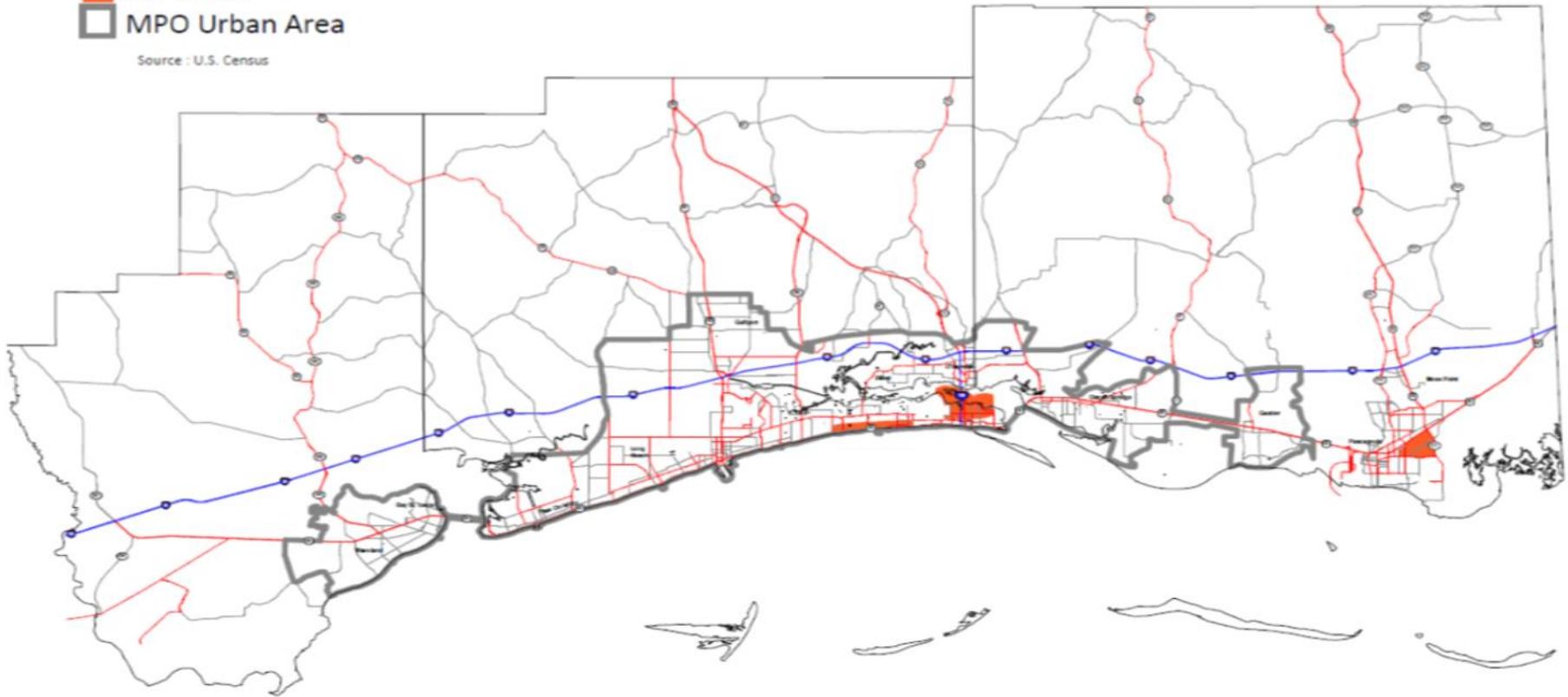
#### *Title VI and LEP Comparison of Considerations*

<b>Title VI of the Civil Rights Act of 1964</b>	<b>Limited English Proficiency E.O. 13166</b>
Federal Law	Federal Policy
Enacted in 1964	Enacted in 2000
Considers all persons	Considers the eligible population
Contains monitoring & oversight requirements	Contains monitoring & oversight requirements
Provides protection based on race, color and national origin	Provides protection on the basis of national origin
Focuses on eliminating discrimination in federally funded programs	Focuses on providing LEP people meaningful access to services using a four factor analysis
Requires annual accomplishment an upcoming goals report to FHWA	Requires annual accomplishment an upcoming goals report to FHWA

# Regional Limited English Proficiency Areas (LEP) By Tracts

- LEP Areas
- MPO Urban Area

Source : U.S. Census



For Planning Purposes Only  
03/05/13



## **LEP Four Factor Analysis**

As a recipient of federal funding, the MPO must take reasonable steps to ensure meaningful access to the information and services it provides. As noticed in the Federal Register Volume 70, Number 239 (12.14.2005), there are four factors to consider in determining “reasonable steps.” Below we have listed the four factors and the conclusions found by the GRPC in assessing the MS Gulf Coast community.

### ***Factor 1: The number and proportion of LEP persons in the eligible service area***

The number and proportion of LEP populations in the MPO planning area warrants consideration in the public participation plan. The primary language, other than English, spoken in our region is Spanish. According to the 2010 Census, there is a very small percentage of Vietnamese speaking residents that would require language accommodations to participate in the planning process. These numbers fall below the “substantial number” threshold where the MPO would be required to translate public outreach documentation as a rule. The Spanish population, however, does meet the threshold, therefore general public notices and agency fliers meant for general public dissemination will be translated and made available in Spanish without request.

### ***Factor 2: The frequency with which LEP persons encounter MPO programs***

LEP populations do not regularly, nor actively participate in the transportation planning process. Agency staff do not encounter non-English speaking individuals with great frequency. On the rare occasion we do have the opportunity to interact with an LEP individual, they most often arrive in a familial or other group which provides its own language support services. (GRPC has never had a formal request for language services prior to a scheduled event or activity.) Recent program changes including; translation service on the GRPC website, targeted outreach in LEP project areas, and bi-lingual publication of informational materials is expected to increase LEP levels of participation and the agency will continue to adopt to community needs.

### ***Factor 3: The importance of the service provided by MPO programs***

Each MPO program directly impacts the well-being of its constituents, including LEP populations. The identification of resources and costs to the MPO to provide communication and interaction with LEP populations is warranted. MPO projects and programs may affect the quality of life of LEP individuals as they may alter how they move in and out of the community.

### ***Factor 4: The resources available and overall cost to the MPO***

Hiring out all translation and interpreter services could be financially unfeasible for the MS Gulf Coast MPO; however, GRPC staff is compiling a resource roster of potential reduced cost or no cost service providers as they build partnerships in the community. System upgrades to both the phone and website will encounter some cost, but GRPC will make the necessary upgrades even if in stages. GRPC staff will also develop generic messaging for translation that will not have to be interpreted more than once for print media and other publications, thus saving costs.

## Summary of LEP Analysis

### Spanish v Vietnamese LEP populations

County	<u>Spanish</u> speakers with low or no English	<u>Vietnamese</u> speakers with low or no English
Harrison County	1831	235
Hancock County	159	0
Jackson County	905	46

Per this table it is clear that the MPO LEP priority needs to be on reaching the Spanish speaking population, however, GRPC staff has, in their community analysis, still considered the needs of the Vietnamese speaking individuals.

Since the 2000 Census reports, the Vietnamese population has seen significant changes. Populations in Biloxi reduced from 1707 to 1034, a 39.4% decrease. D'Iberville grew from 432 to 609, a 41% increase and Ocean Springs saw an 18.6% increase from 215 to 255 residents. It is reported that the changes are due to the effect of Hurricane Katrina, the rise of insurance costs near the coast and the impact of the BP oil disaster on local fishing communities (*Asian Americans for Change. 2011*). These statistics, however, are the total number of people who have identified themselves as Vietnamese. Only a small portion of these do not speak English as their primary language. As shown above, there are no individuals needing Vietnamese translation services in Hancock County, very few in Jackson County and Harrison County.

The MPO has considered these changes and has determined the following;

1. It is no longer fiscally responsible to translate materials into Vietnamese unless specifically requested to do so, and then we'll use online translation sources to create a printable document
2. Vietnamese interpretation services will still be available upon request at events and meetings
3. Targeted outreach will be conducted when a jurisdiction requests it, the population requests it or a project will directly impact known community gathering places and/or businesses  
Vietnamese concentrations in Harrison County
4. Vietnamese publications will be utilized when major agency documents are being updated. For example, the MTP, TIP or a completed project or study.

GRPC staff has completed the four factor community assessment and have identified who the LEP populations are, where they are located, the MPO role in their well-being and potential cost saving measures in providing language services. The assessment revealed that within the MPO boundary, Spanish speakers with limited English proficiency are the MPO priority but that we must continue to consider the needs of Vietnamese and other speakers as well. The MPO is committed to ensuring that all region residents have reasonable access to its information and to participate in the transportation planning process.

## Engagement Strategies that Engage the LEP Community

### LEP ENGAGEMENT STRATEGIES:

1. *HIRE A CIVIL RIGHTS COORDINATOR*
2. *ADD TRANSLATION OPTIONS TO THE MPO WEBSITE*
3. *TARGETED OUTREACH AND ENGAGEMENT EFFORTS*
4. *UTILIZE PRINT MEDIA IN OTHER LANGAUGES*
5. *PROVIDE TRANSLATED MATERIALS (UPON REQUEST)*
6. *COORDINATION OF INTERPRETERS (UPON REQUEST)*

Translation and interpretation service providers include:

- Coast Transit Authority
- Our Lady of Fatima
- The United Methodist Church
- Church of the Vietnamese Martyrs
- The Buddhist Congregation in Biloxi
- Boat People SOS
- The Village El Pueblo Outreach Services
- Gulf Coast Community College

Requests for assistance, including requests for interpretation or translation must to be submitted at least 5 business days before needed to allow GRPC staff to coordinate with service providers. Requests should include the name and contact information of the requestor or their representative, the name and date of the upcoming event or desired delivery date and the title of the MPO document being requested and a description of the assistance needed. This can be mailed to 1635-G Popps Ferry Road, Biloxi MS 39532, called in to 228-864-1167 or emailed to [contactus@grpc.com](mailto:contactus@grpc.com).

It is important to note that translation and interpretation services often have an associated cost and may take some time to coordinate. GRPC staff has and are continuing to develop relationships with individuals and organizations that may provide language services at a reduced rate or free of charge. However, there may be instances where financial constraints may make the service unreasonable. Similarly, if GRPC exhausts its list of translation service providers and no one is available on the date or at the time of the event they may not be able to provide the service. However, in either situation, GRPC staff will respond to the requesting person and will attempt to offer alternative solutions. For example, if an interpreter is not available to attend a set event, GRPC may schedule a meeting on a later date where the information could be discussed one on one with the interested person/people.

# Civil Rights: Environmental Justice (EJ) Plan

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## Chapter 8: Environmental Justice (EJ) Program

**Executive Order 12898: Identify and address disproportionately high and adverse human health or environmental effects of agency programs, policies, and activities on minority and low-income populations, and (DOT added) whether these populations are being denied benefits or not**

EJ encompasses three fundamental principles:

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

EJ requires the MPO to:

1. Examine the allocation of benefits and burdens, currently and in projects planned in the future.
2. Ensure that minority and low-income communities are treated equitably in the provision of transportation services and projects.
3. Provide ample participation for minority and low-income communities to advise the MPO during its planning and decision-making process.

Like the Title VI and LEP policies, Environmental Justice must be a consideration of GRPC in all of its agency activities, not just those that involve the use of federal funds. The US Department of Transportation (DOT) in *23 CFR 450*, specifically mandates that the MPO must "seek out and consider the needs of those traditionally underserved by existing transportation systems, including, but not limited to, low-income and minority households." The goal of the DOT Order is to ensure that programs, policies, and other activities do not have a disproportionately high and adverse effect on minority or low-income populations.

### When should Environmental Justice be considered?

Throughout the planning process, planners must determine whether Environmental Justice issues exist and use data and other information to: (1) determine benefits to and potential negative impacts on minority populations and low-income populations from proposed investments or actions; (2) quantify expected effects (total, positive and negative) and disproportionately high and adverse effects on minority populations and low-income populations; and (3) determine the appropriate course of action (avoidance, minimization, or mitigation.)

If identified issues are not addressed in the planning stage, they may be more costly or difficult to mitigate later, they can delay project decisions or halt project construction. It is important that the MPO makes a concerted effort to identify all impacted populations of a project and document how they may be impacted. Both positive and negative impacts should be discussed and addressed appropriately.

Environmental justice determinations are made based on **effects**, not population size. It is important to consider the **comparative impact** of an action among different population groups. Disproportionately high and adverse effects are the bases for Environmental Justice. A very small minority or low-income population in the project, study, or planning area does not eliminate the possibility of a disproportionately high and adverse effect on these populations. What is needed is to show the comparative effects on these populations in relation to either non-minority or higher income populations, as appropriate.

## What constitutes an environmental impact?

All reasonably foreseeable adverse social, economic, and environmental effects on minority populations and low-income populations must be identified and addressed. Adverse effects include, but are not limited to:

- Bodily impairment, infirmity, illness, or death.
- Air, noise, and water pollution and soil contamination.
- Destruction or disruption of man-made or natural resources.
- Destruction or diminution of aesthetic values.
- Destruction or disruption of community cohesion or a community's economic vitality.
- Destruction or disruption of the availability of public and private facilities and services.
- Vibration.
- Adverse employment effects.
- Displacement of persons, businesses, farms, or nonprofit organizations.
- Increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community.
- The denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.

## Definitions

### *Minority*

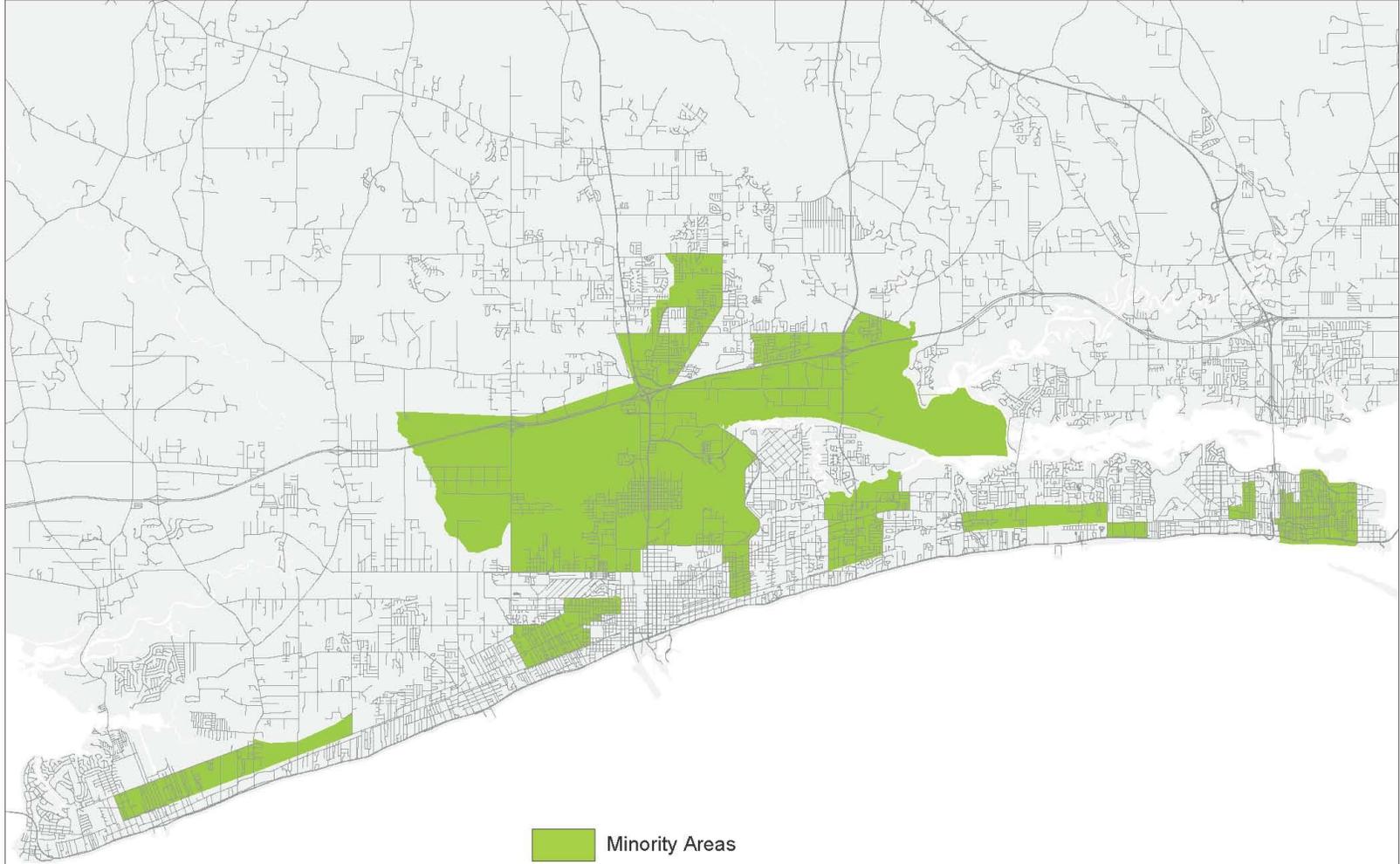
The U.S. DOT Order (5610.2) on Environmental Justice defines "Minority" in the Definitions section of the Appendix, and provides clear definitions of the four (4) minority groups addressed by the Executive Order. These groups are:

- Black (a person having origins in any of the black racial groups of Africa).
- Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, etc.)
- Spanish culture or origin, regardless of race.
- Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands).
- American Indian and Alaskan Native (a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition).
- Native Hawaiian or Other Pacific Islander - a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands

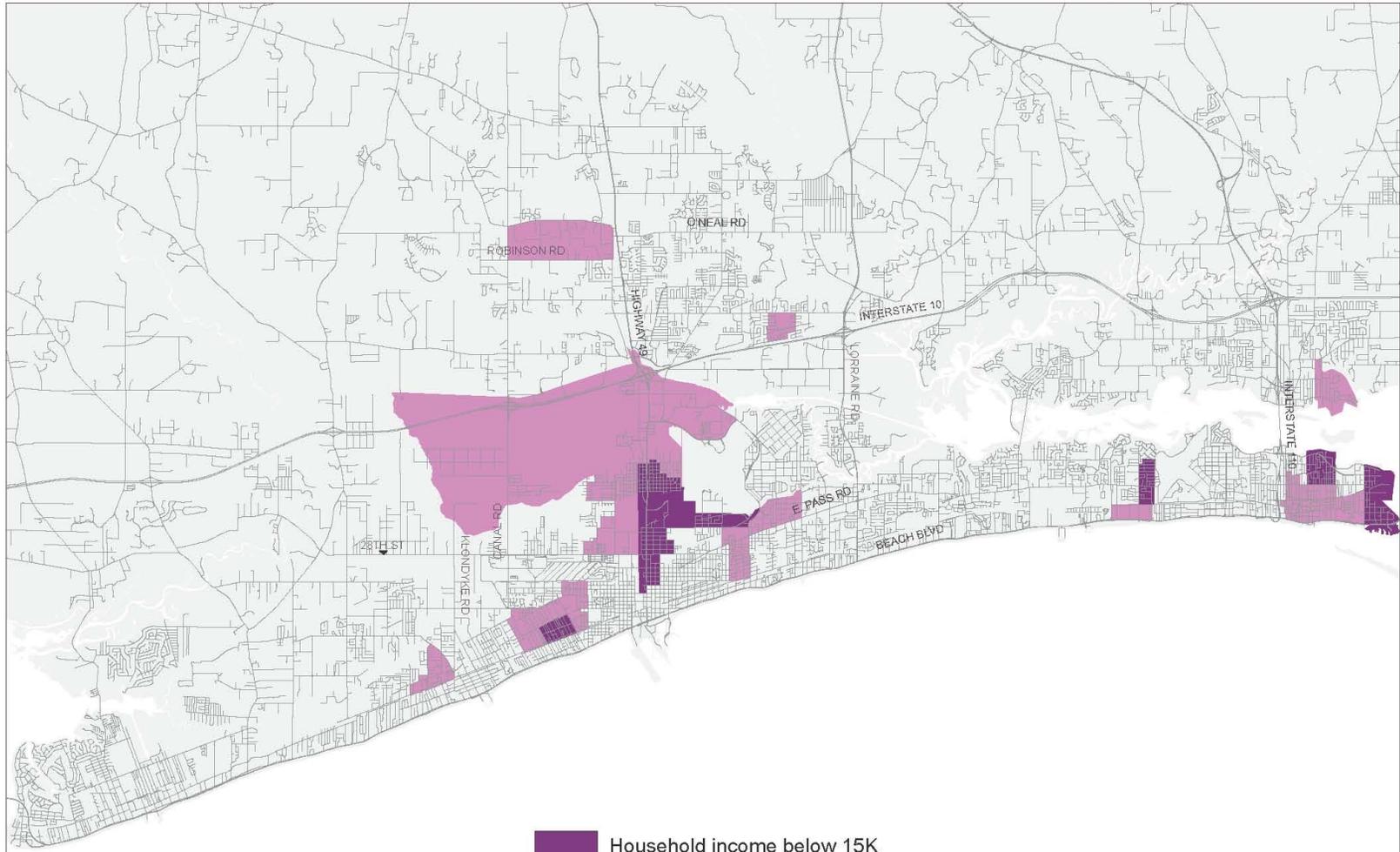
### *Low-Income*

The FHWA Order defines "low-income" as "a person whose household income is at or below the Department of Health and Human Services poverty guidelines."

With reference to the regional maps provided depicting low-income populations. The MPO defined Low income as households reporting \$25,000 or less annual income, and extremely low-income households as those reporting \$15,000 or less annually.

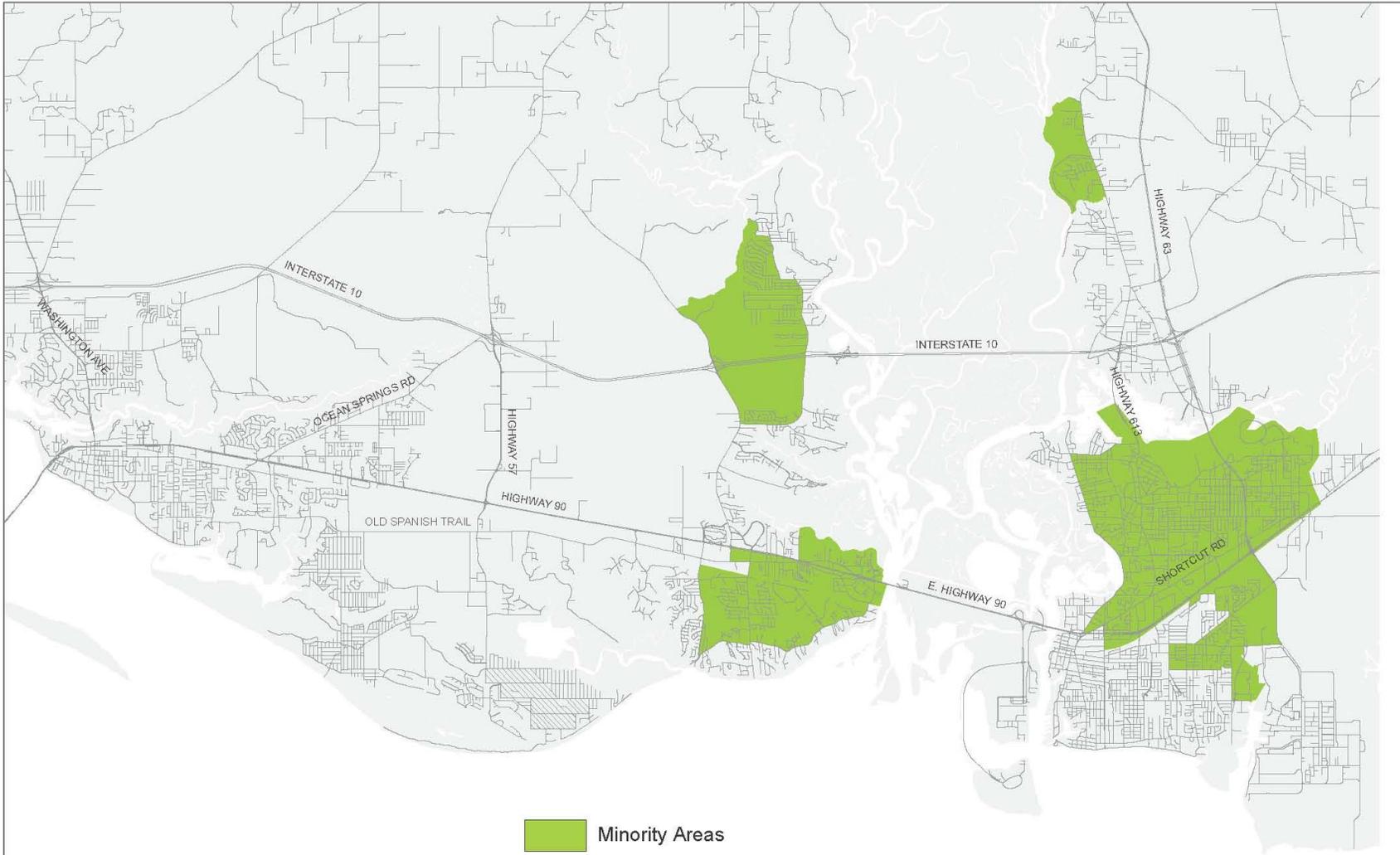


Harrison County Minority Areas



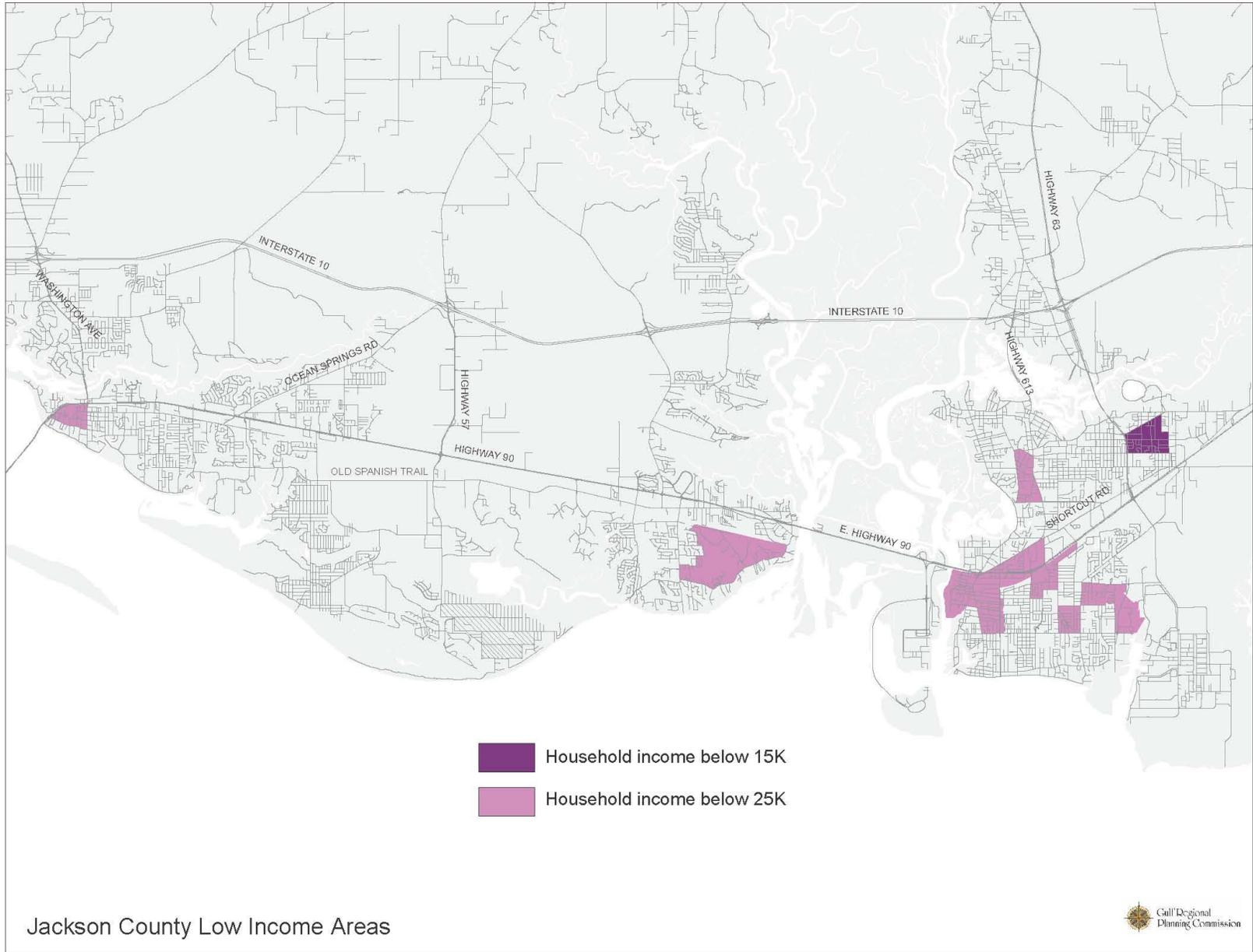
- Household income below 15K
- Household income below 25K

Harrison County Low Income Areas

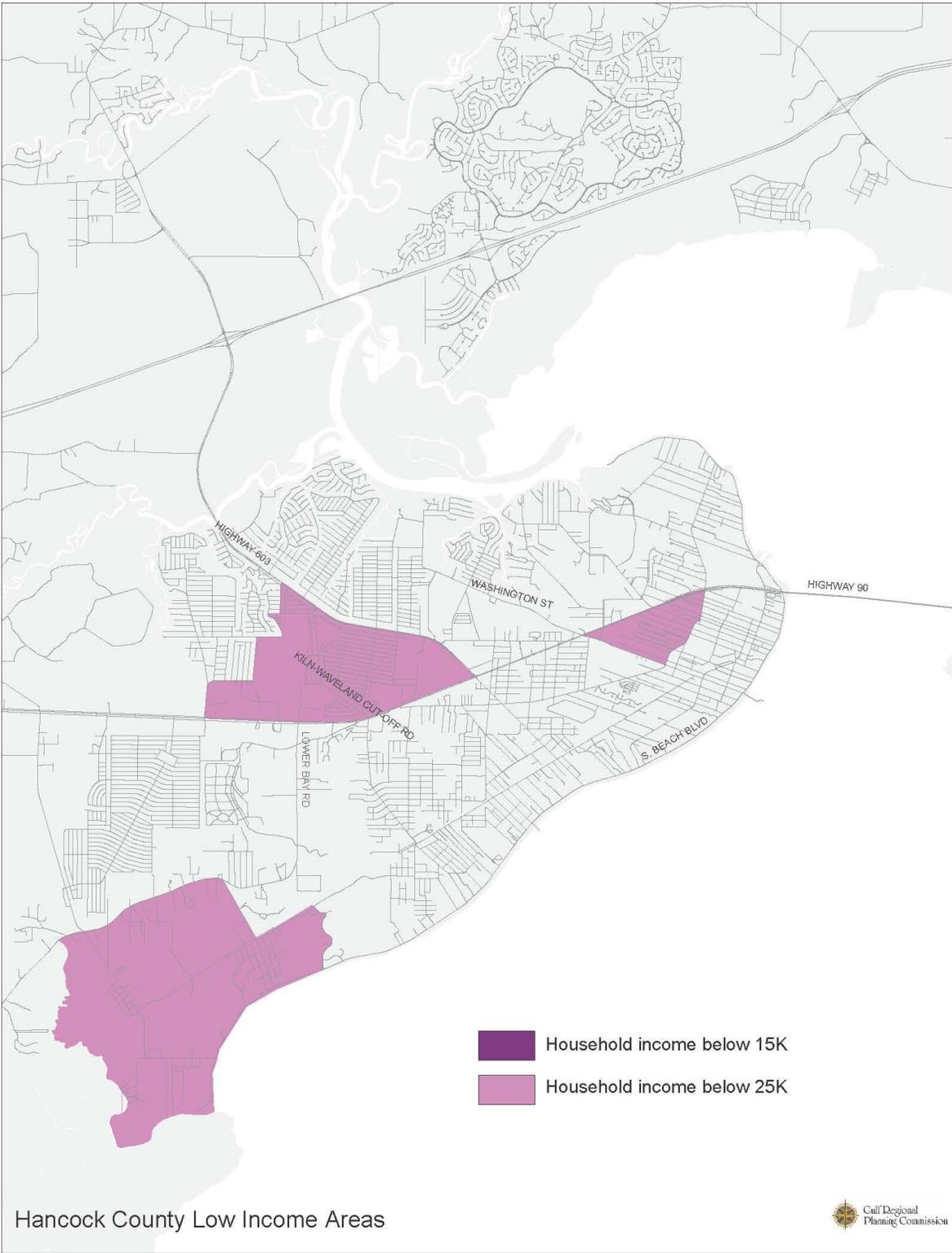


Jackson County Minority Areas









# Participation in Regional Transit Planning

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## Chapter 9: Regional Transit Planning

### Coast Transit Authority Overview

In 1970, the Mississippi State Legislature created the Mississippi Coast Transportation Authority (MCTA) and tasked the agency to provide public transportation services within the gulf coast region. Operation of services under this authority officially commenced on August 16, 1974. In 1985, MCTA changed its name to the Coast Transit Authority (CTA).



CTA is a non-profit provider of public transportation for the three coastal counties of Mississippi. It is an independently managed public utility that is governed by a Board of Commissioners. The Board is tasked with establishing policy for the management staff. The day-to-day operations of the authority is under the leadership of an executive director who is supported by three department directors and two supervisors.

Funding for CTA's operations and capital projects are currently provided by self-generated revenue, the Federal Transit Administration, State of Mississippi, Harrison County, and the Cities of Biloxi, Gulfport, D'Iberville and Ocean Springs. Self-generated funds consist of passenger fares, advertising revenue, charter revenue, contract revenue, vending revenue and sale of surplus equipment. Federal Transit Administration (FTA) funding is provided in the form of operating (50/50) and capital (80/20) grants. To access these grants, either 50% or 20% local matching funds are required to be available.

#### *The CTA Mission*

To provide safe, dependable, clean, comfortable, convenient and affordable public transportation services to the Mississippi Gulf Coast in a cost efficient manner.



CTA Beach Comfort Station at Courthouse Rd.



CTA Trolley at Biloxi Lighthouse and Welcome Center

CTA works closely with Gulf Regional Planning Commission (GRPC) as a member of the MPO, to ensure that transit programs and projects are adequately represented in MPO planning documents as well as to accomplish a variety of planning tasks including route studies, data collection and transit plan updates.

## Transit Service Profile

CTA offers the following types of transit services to the general public:

**Fixed-Route Public Transportation** – CTA offers a total of ten routes which provide service in portions of Ocean Springs, St. Martin, D’Iberville, Biloxi and Gulfport. Service is also offered during community events as well as to Keesler Air Force Base in Biloxi. All CTA buses and trolleys are ADA accessible except Keesler RT 24. Portions of the fixed route system run on Sundays. Bilingual, English/Spanish, route and schedule information is available on the CTA website: [www.coasttransit.com](http://www.coasttransit.com) and is written in the Rider’s Guide, available for free to the community.



**Bike ‘N Bus** – Every bus and trolley on the fixed route system is equipped to accommodate up to two bicycles on an easy to use front rack free of charge.

**ADA Para Transit** – CTA offers complementary curb-to-curb ADA para transit services within Harrison and Jackson Counties to qualified individuals. Applications for service are taken at the CTA Offices (333 DeBuys Road, Gulfport, MS). ADA para transit is available within 3/4 of a mile on either side of CTA’s fixed route bus system. Individuals may go anywhere they want, as long as the destination is on an existing CTA fixed route.



**ADA Para Transit Plus** The goal of ADA Para Transit PLUS is to provide transportation to people with disabilities that live outside of the ADA mandated 3/4 mile service corridors. You must make an appointment to ride *ADA Para Transit PLUS*. Service requests are taken Monday - Friday from 8am to 5pm at the CTA offices and are available to people in all three coastal counties. The same eligibility requirements exist for ADA and ADA Plus services.



**Park-N-Ride** – CTA offers park-and-ride services from the following locations within Harrison County: *Gulfport Transit Center; Biloxi Transit Center; Edgewater Mall; Courthouse Road* (Left- *Gulfport Transit Center*, Right- *Biloxi Transit Center*)



**Senior Demand-Response Transportation** – The Senior Citizen Service is a non-emergency curb-to-curb service the CTA provides in cooperation with the Harrison County Board of Supervisors. Transportation is provided free of charge to eligible participants for medical appointments, grocery shopping and to senior citizen centers. Applications for this service are collected by the Harrison County Human Resource Agency. Applicants may apply online, in person and by phone.

**Coast Commuter** – The Coast Commuter is a work transportation program consisting of vanpools, carpools and fixed route services. The Commuter program provides cost and stress reducing commute options for the three coastal counties. Contact CTA at 228-896-8080 or [www.coasttransit.com](http://www.coasttransit.com).



**Emergency Services** – CTA provides transportation services in the event of an emergency situation impacting residents in the Gulf Coast region. The most common type of service is free access to inclement weather shelters. Harrison County residents may also utilize evacuation services provided in partnership with the Harrison County Emergency Management Agency. The service is available to all citizens including seniors, the disabled and people with pets. Some restrictions apply. Citizens can register for emergency transportation by calling CTA at 228-896-8080 or at [www.coasttransit.com](http://www.coasttransit.com).

## Public Participation Overview

Just like the MPO, CTA is required by 23 CFR 450 to “... provide complete information, timely public notice, full public access to key decisions, and support early and continuing involvement of the public in developing plans and Transportation Improvement Programs...” Similarly, under Title VI of the Civil Rights Act, they may not discriminate against any of the protected populations in the commission of their programs, activities and services.

Per FTA Circular 4702.1B, CTA is not required to conduct a formal equity analysis for proposed service and fare changes, they must follow US DOT guidance to avoid or mitigate disparate impacts on the protected populations.

In compliance with this guidance, CTA and MPO staff review all proposed changes to identify whether or not one or more traditionally underserved groups will be impacted by a proposed change. Awareness of a possible disparate impact directs the staff in planning effective participation events in appropriate locations and times. The review process also reveals the percentage of impact expected for those populations. The percentage of impact helps staff determine if the change is minor and major, which in turn, defines the length of public review the change will require.

More information on disparate impact and the CTA Title VI Plan can be found at [www.coasttransit.com](http://www.coasttransit.com) or can be requested from CTA staff at [slamey@coasttransit.com](mailto:slamey@coasttransit.com) or 228-896-8080.



*Public Meeting on proposed service changes and corresponding TV coverage*



## **CTA Role in MPO Planning Activities**

MPO staff work closely with CTA staff and stakeholders throughout the development process of several regional transportation planning documents and to meet public outreach goals and objectives.

CTA staff work closely with the MPO in developing the transit goals for the MS Gulf Coast. There is a transit chapter included in the Metropolitan Transportation Plan. This chapter is a small excerpt of the much more comprehensive Transit Development Plan maintained by CTA.

Similarly, transit is included in its own section of the Transportation Improvement Program (TIP). CTA staff develop their list of projects for the 4 year planning period. It is made available for public review as part of the TIP review period for update and amendments. CTA allocations are adopted by the TPC and are approved by MDOT and FHWA.

The MPO work program (UPWP) includes specific activities that MPO staff will conduct over a two year period. Transit development efforts are included in this document. Commonly occurring activities include collecting and reporting transit data, supporting outreach efforts and conducting transit growth and development studies, as well as, updating and maintaining required planning documents.

CTA staff and their Board of Commissioners have elected to follow the MPO maintained Public Participation Plan (PPP) instead of managing a separate document. This transit chapter was added to the GRPC/MPO PPP during the 2014 plan update to better address transit specific participation needs and requirements. CTA staff will participate in the updating, amending and review process for the PPP to ensure that the transit information contained within remains current, relevant and effective in meeting objectives.

The staff at CTA have been made available to the MPO for translation purposes. CTA currently has three bilingual staff members who are able to interpret verbal comments as well as translate written materials into Spanish and Vietnamese. CTA has agreed to assist the MPO staff with meeting the participation plan's LEP and EJ goals by sharing their language resources when possible. In addition to language assistance, CTA also supports MPO efforts to host meetings in convenient locations and times by allowing MPO staff to use transit center meeting spaces for events.

## **MPO Role in CTA Planning Activities**

The MPO role in the CTA/GRPC partnership focuses mainly on conducting planning activities. The MPO staff regularly service improvement studies to support CTA development efforts. Common outputs include route and stop enhancements, bus shelter and transit access needs, service expansion planning, headway reduction analysis and encouraging the incorporation of transit in regional roadway improvement projects.

GRPC meeting space is made available to CTA for their agency events and activities. CTA education and outreach materials are distributed in the GRPC office building and are often taken to public events hosted and attended by MPO staff. The MPO Public Participation/Civil Rights Coordinator works directly with CTA to develop and maintain their Title VI plan and works with the staff, when requested, to conduct transit related outreach and awareness activities.

More transit planning information, current participation opportunities and copies of MPO planning documents and transit specific plans can be found at [www.grpc.com](http://www.grpc.com) and/or [www.coasttransit.com](http://www.coasttransit.com).

## Public Participation Guidelines for CTA Planning Documents

Coast Transit Authority (CTA) maintains several planning documents that provides a vision for future service, establishes guidelines and lists activities for the use of federal funding. When updates and changes to these documents are required, opportunity for public review is provided as described below:

CTA Planning Document Change Descriptions	
<i>FULL UPDATE</i>	<ul style="list-style-type: none"> <li>• Required document update</li> </ul>
<i>AMENDMENT</i>	<ul style="list-style-type: none"> <li>• Addition or deletion of a project</li> <li>• Major changes scope</li> <li>• Change in system service standard measure or threshold</li> <li>• Financial changes in a project’s programmed amount of federal funds greater than 20% of the original cost</li> </ul>
<i>MODIFICATION</i>	<ul style="list-style-type: none"> <li>• Correcting obvious minor data entry errors</li> <li>• Splitting or combining projects without modifying the original project design, concept and scope or creating project segmentation</li> <li>• Changing or clarifying elements of a project description. This change would not alter the original project design, concept and scope. It also must be consistent with the approved environmental document.</li> <li>• Moving a project from one federal funding category to another federal funding category</li> <li>• Moving a project from federal funding to state funding</li> <li>• Shifting the schedule of a project or phase within the years covered by the TIP</li> <li>• Updating project cost estimates (within the original project scope and intent) not to exceed greater than 20% of the original cost estimate</li> <li>• Moving any identified project phase programmed for previous year into a new TIP (rollover provision)</li> <li>• Adding an additional agency to a group</li> <li>• Adding projects with grouped projects within the TIP, provided fiscal constrain is maintained</li> <li>• Removing a project reported as obligated or completed</li> <li>• Re-demonstration of fiscal constrain is not required</li> </ul>

Planning Documents Public Review	
<i>FULL UPDATE</i>	<ul style="list-style-type: none"> <li>• CTA Board of Commissioners approval</li> <li>• 30-day public comment period</li> <li>• Public meeting as needed</li> <li>• Public comment report</li> </ul>
<i>AMENDMENTS</i>	<ul style="list-style-type: none"> <li>• 10-day public comment period</li> </ul>
<i>MODIFICATIONS</i>	<ul style="list-style-type: none"> <li>• None</li> </ul>

## Public Participation Guidelines for CTA Route Changes

The Service Review Plan, which takes place annually, provides for a general evaluation of all transit services considering changes in the local environment (funding, population, development). The Plan identifies new transit services or significant changes to existing services for the following year. The Plan identifies changes that are designed to achieve specific service goals and opportunities for service expansion and improvement. The Service Review Plan provides a process with which to measure and evaluate system performance on a year-to-year basis. When planning for transit service expansion or reduction, an evaluation process should be followed to determine if service reduction or expansion is warranted. Once the recommendations developed, a public review and comment period is used to gather input from CTA customers and general public as follows:

Types of Transit System Changes	
<b>MAJOR CHANGE</b>	<ul style="list-style-type: none"> <li>• Adding a new service route (25% or greater)</li> <li>• Revenue route miles reduction to a route (25% or greater)</li> <li>• Service area reduction to a route (25% or greater)</li> <li>• Span of service changes to a route (25% or greater)</li> <li>• All system fare increases</li> <li>• System wide changes to process and/or standards</li> <li>• Route elimination</li> <li>• All headway changes</li> </ul>
<b>MINOR CHANGE</b>	<ul style="list-style-type: none"> <li>• Revenue route miles reduction to a route (less than 25%)</li> <li>• Service area reduction to a route (less than 25%)</li> <li>• Span of service changes to a route (less than 25%)</li> <li>• Administrative changes to service standards</li> <li>• Load factor changes</li> <li>• Vehicle type change</li> </ul>

Transit System Changes Public Review	
<b>MAJOR CHANGE</b>	<ul style="list-style-type: none"> <li>• CTA Board of Commissioners approval</li> <li>• 30-day public comment period</li> <li>• Public meeting</li> <li>• Targeted outreach to affected low-income, minority and LEP areas</li> <li>• Targeted outreach to other vulnerable populations</li> <li>• Public comment report</li> <li>• Customer impact analysis</li> </ul>
<b>MINOR CHANGE</b>	<ul style="list-style-type: none"> <li>• CTA Board of Commissioners approval</li> <li>• Informational meeting</li> <li>• Customer impact analysis</li> </ul>

*\*Temporary addition of service or demonstration projects that last less than 12 months can be exempt from these requirements.*

# Public Participation: Program Evaluation

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## Chapter 10: Public Participation Evaluation

### Internal Program Assessments

The Public Involvement/Civil Rights Coordinator is responsible for assessing the Public Participation Plan (PPP). Reviews will be conducted, at minimum annually, to assess the effectiveness, financial feasibility and goal performance.

The PPP, like the other MPO required planning documents, is made available for public review and comment before the implementation of any recommended changes. A full plan update is subject to a 45 day review period, an amendment is accompanied by a 10 day review period. A plan modification does not require public review prior to adoption.

In addition to regular staff assessments of the participation plan and the strategies contained within, the MPO also completes an annual self-certification. The certification is an assurance to US DOT and MDOT that the MPO is acting in compliance with applicable non-discrimination law, rules and regulations.

### External Program Assessments

Every four years the MPO must also ensure compliance through a Transportation Management Area (TMA) certification review process. The review is conducted jointly by a representative of the Federal Highway Administration and the Federal Transit Administration. The requirements for certification reviews are included in the US Code of Federal Regulations, 40 CFR 450.334. Certification reviews are rigorous and detailed audits of the MPO planning processes. They are conducted over a 2-3 day period and include opportunities for public input. After the review concludes, the FHWA/FTA staff compile their findings and submit a summary report that includes recommended and corrective actions. The MPO then shares the summary with their boards and committees to initiate the corrective actions.

The “opportunities for public input” are one place where the certification review process can interface with the Public Participation Plan. However, a more important relationship is the requirement for public engagement contained in the surface transportation legislation. The FHWA/FTA review team, for example, will typically inspect the Public Participation and Title VI Plans regularly for adequacy. Perhaps still more important is the consideration of evidence presented by the TMA that the agency is doing a commendable job of engaging the public.

# Appendix

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## APPENDIX

### Appendix A - Federal Requirements

#### *Federal Laws*

#### **Current (2014) Transportation Bill: Moving Ahead for Progress in the 21<sup>st</sup> Century (Map 21)**

On July 6, 2012, President Obama signed into law P.L. 112-141, the Moving Ahead for Progress in the 21st Century Act (MAP-21). Funding surface transportation programs at over \$105 billion for fiscal years (FY) 2013 and 2014, MAP-21 is the first long-term highway authorization enacted since 2005. MAP-21 represents a milestone for the U.S. economy – it provides needed funds and, more importantly, it transforms the policy and programmatic framework for investments to guide the growth and development of the country’s vital transportation infrastructure.

MAP-21 creates a streamlined, performance-based, and multimodal program to address the many challenges facing the U.S. transportation system. These challenges include improving safety, maintaining infrastructure condition, reducing traffic congestion, improving efficiency of the system and freight movement, protecting the environment, and reducing delays in project delivery. MAP-21 builds on and refines many of the highway, transit, bike, and pedestrian programs and policies established in 1991. *(Source: MAP 21 Summary from the Federal Highway Administration)*

Gulf Regional Planning Commission, the Metropolitan Planning Organization for the Mississippi Gulf Coast region, is required to maintain a Public Participation Plan. As referenced in the following Sec.1201. Metropolitan Transportation Planning of H.R. 4348.

(6) Participation by interested parties.--

(A) In general.--Each metropolitan planning organization shall provide citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with a reasonable opportunity to comment on the transportation plan.

(B) Contents of participation plan.--A participation plan

(i) shall be developed in consultation with all interested parties; and

(ii) shall provide that all interested parties have reasonable opportunities to comment on the contents of the transportation plan.

(C) Methods.--In carrying out subparagraph (A), the metropolitan planning organization shall, to the maximum extent practicable--

(i) hold any public meetings at convenient and accessible locations and times;

(ii) employ visualization techniques to describe plans; and

(iii) make public information available in electronically accessible format and means, such as the World Wide Web, as appropriate to afford reasonable opportunity for consideration of public information under subparagraph (A).

(7) Publication.--A transportation plan involving Federal participation shall be published or otherwise made readily available by the metropolitan planning organization for public review, including (to the maximum extent practicable) in electronically accessible formats and means, such as the World Wide Web, approved by the metropolitan planning organization and submitted for information purposes to the Governor at such

times and in such manner as the Secretary shall establish.

(8) Selection of projects from illustrative list.-- Notwithstanding paragraph (2)(C), a State or metropolitan planning organization shall not be required to select any project from the illustrative list of additional projects included in the financial plan under paragraph (2)(C).

(j) Metropolitan TIP.-- ``(1) Development.-- ``(A) In general.--In cooperation with the State and any affected public transportation operator, the metropolitan planning organization designated for a metropolitan area shall develop a TIP for the metropolitan planning area that—

(i) contains projects consistent with the current metropolitan transportation plan;

(ii) reflects the investment priorities established in the current metropolitan transportation plan;

(iii) once implemented, is designed to make progress toward achieving the performance targets established under subsection (h)(2).

(B) Opportunity for comment.--In developing the TIP, the metropolitan planning organization, in cooperation with the State and any affected public transportation operator, shall provide an opportunity for participation by interested parties in the development of the program, in accordance with subsection (i)(5).

### **Previous Transportation Bill: Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU, Public Law 109-59)**

This act states that the Metropolitan Planning Organization (MPO) shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process as shown below from 23 CFR 450.316 Interested parties, participation, and consultation.

(a) The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

(1) The participation plan shall be developed by the MPO in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for:

(i) Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;

(ii) Providing timely notice and reasonable access to information about transportation issues and processes;

(iii) Employing visualization techniques to describe metropolitan transportation plans and TIPs;

(iv) Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;

(v) Holding any public meetings at convenient and accessible locations and times;

(vi) Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;

(vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;

(viii) Providing an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts;

(ix) Coordinating with the statewide transportation planning public involvement and consultation processes under subpart B of this part; and

(x) Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.

(2) When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency consultation process required under the EPA transportation conformity regulations (40 CFR part 93), a summary, analysis, and report on the disposition of comments shall be made as part of the final metropolitan transportation plan and TIP.

(3) A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.

(b) In developing metropolitan transportation plans and TIPs, the MPO should consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation (including State and local planned growth, economic development, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities. In addition, metropolitan transportation plans and TIPs shall be developed with due consideration of other related planning activities within the metropolitan area, and the process shall provide for the design and delivery of transportation services within the area that are provided by:

(1) Recipients of assistance under title 49 U.S.C. Chapter 53;

(2) Governmental agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and

(3) Recipients of assistance under 23 U.S.C. 204.

(c) When the MPA includes Indian Tribal lands, the MPO shall appropriately involve the Indian Tribal government(s) in the development of the metropolitan transportation plan and the TIP.

(d) When the MPA includes Federal public lands, the MPO shall appropriately involve the Federal land management agencies in the development of the metropolitan transportation plan and the TIP.

(e) MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under 23 CFR 450.314.

Americans with Disabilities Act - 1990 (42 U.S.C. 12101 et seq.) and 49 CFR parts 27, 37 and 38  
This act stipulates involving the community, particularly those with disabilities, in the development and improvement of services. GRPC fully complies with ADA through its ADA plan and policies. Measures such as wheelchair accessibility, elevators with floor numbers posted in Braille, communications devices for hearing-impaired persons, and sign language interpreters are made available for meetings upon request. A telecommunications device for the deaf (TDD) is available to communicate with people who are deaf or have communications impairment over the telephone. GRPC's building complies with ADA accessibility standards.

Rehabilitation Act of 1973, Section 504 (29 U.S.C. 794) and 49 CFR part 27

This act states that "no otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Civil Rights Act of 1964, Title VI, as amended (42 USC 2000d 1) and 49 CFR part 21

This act states 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 benefit of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Civil Rights Restoration Act of 1987 (Public Law 100-259 [§557])

This act restores the broad scope of coverage and clarifies the application of Title VI of the Civil Rights Act of 1964. The legislative action was necessary to restore the prior consistent and long-standing executive branch interpretation and broad, institution-wide application of the Civil Rights Act of 1964 and other laws (Title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, and the Age discrimination Act of 1975) as administered.

Age Discrimination Act of 1975 (42 USC 6101 – 6107)

This act states that "no person in the United States shall, on the basis of age, be excluded from participation, in be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance."

Federal-Aid Highway Act of 1973 (23 USC 324)

This act states that "no person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance under this title or carried on under this title. This provision will be enforced through agency provisions and rules similar to those already established, with respect to racial and other discrimination, under Title VI of the Civil Rights Act of 1964. However, this remedy is not exclusive and will not prejudice or cut off any other legal remedies available to a discriminate.

### *Executive Orders*

**Executive Order 12898** — Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

This executive order requires that disproportionately high and adverse human health or environmental effects on minority and low-income populations be identified and addressed in order to achieve environmental justice. Minority populations are defined in the executive order as Black/African-American, Hispanic, Asian/Pacific Islander, American Indian and Alaskan Native. Low-income populations are defined in the order as persons whose household income (or in the case of a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines, with those at 80 percent of median income classified as low income and those at 50 percent of median income classified as very-low income.

**Executive Order 13166** - Improving Access to Services for Persons with Limited English Proficiency  
EO 13166 requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

**Executive Order 13175** — Consultation and Coordination with Indian Tribal Governments  
This executive order establishes regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, to strengthen the government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes.

### *Code of Federal Regulations*

#### **23 CFR 450.316 - Interested parties, participation, and consultation**

(a) The MPO shall develop and use a documented participation plan that defines a process for providing citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

(1) The participation plan shall be developed by the MPO in consultation with all interested parties and shall, at a minimum, describe explicit procedures, strategies, and desired outcomes for:

- (i) Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including but not limited to a reasonable opportunity to comment on the proposed metropolitan transportation plan and the TIP;
- (ii) Providing timely notice and reasonable access to information about transportation issues and processes;
- (iii) Employing visualization techniques to describe metropolitan transportation plans and TIPs;
- (iv) Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
- (v) Holding any public meetings at convenient and accessible locations and times;
- (vi) Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP;
- (vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;
- (viii) Providing an additional opportunity for public comment, if the final metropolitan transportation plan or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts;
- (ix) Coordinating with the statewide transportation planning public involvement and consultation processes under subpart B of this part; and
- (x) Periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.

(2) When significant written and oral comments are received on the draft metropolitan transportation plan and TIP (including the financial plans) as a result of the participation process in this section or the interagency

consultation process required under the EPA transportation conformity regulations (40 CFR part 93), a summary, analysis, and report on the disposition of comments shall be made as part of the final metropolitan transportation plan and TIP.

(3) A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.

### **23 CFR 450.322 (f) (7)**

The metropolitan transportation plan shall, at a minimum, include: (7) A discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the metropolitan transportation plan. The discussion may focus on policies, programs, or strategies, rather than at the project level. The discussion shall be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies. The MPO may establish reasonable timeframes for performing this consultation.

### **23 CFR 450.322 (g)**

(g) The MPO shall consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the transportation plan. The consultation shall involve, as appropriate:

- (1) Comparison of transportation plans with State conservation plans or maps, if available; or
- (2) Comparison of transportation plans to inventories of natural or historic resources, if available.

### **23 CFR 450.334 Self-Certifications and Federal Certifications**

(a) [Annual Self-Certification] For all MPAs, concurrent with the submittal of the entire proposed TIP to the FHWA and the FTA as part of the STIP approval, the State and the MPO shall certify at least every four years that the metropolitan transportation planning process is being carried out in accordance with all applicable requirements including:

- (1) 23 U.S.C. 134, 49 U.S.C. 5303, and this subpart;
- (2) In nonattainment and maintenance areas, sections 174 and 176 (c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 (c) and (d)) and 40 CFR part 93;
- (3) Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d–1) and 49 CFR part 21;
- (4) 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;
- (5) Section 1101(b) of the SAFETEA – LU (Pub. L. 109–59) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;
- (6) 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
- (7) The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 *et seq.*) and 49 CFR parts 27, 37, and 38;
- (8) The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance;
- (9) Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender; and
- (10) Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities.

(b) [Four-Year Federal Certification] In TMAs, the FHWA and the FTA jointly shall review and evaluate the transportation planning process for each TMA no less than once every four years to determine if the process meets the requirements of applicable provisions of Federal law and this subpart.

- (1) After review and evaluation of the TMA planning process, the FHWA and FTA shall take one of the following actions:

- (i) If the process meets the requirements of this part and a TIP has been approved by the MPO and the Governor, jointly certify the transportation planning process;
- (ii) If the process substantially meets the requirements of this part and a TIP has been approved by the MPO and the Governor, jointly certify the transportation planning process subject to certain specified corrective actions being taken; or (iii) If the process does not meet the requirements of this part, jointly certify the planning process as the basis for approval of only those categories of programs or projects that the FHWA and the FTA jointly determine, subject to certain specified corrective actions being taken.

(2) If, upon the review and evaluation conducted under paragraph (b) (1) (iii) of this section, the FHWA and the FTA do not certify the transportation planning process in a TMA, the Secretary may withhold up to 20 percent of the funds attributable to the metropolitan planning area of the MPO for projects funded under title 23 U.S.C. and title 49 U.S.C. Chapter 53 in addition to corrective actions and funding restrictions. The withheld funds shall be restored to the MPA when the metropolitan transportation planning process is certified by the FHWA and FTA, unless the funds have lapsed.

(3) A certification of the TMA planning process will remain in effect for four years unless a new certification determination is made sooner by the FHWA and the FTA or a shorter term is specified in the certification report.

(4) In conducting a certification review, the FHWA and the FTA shall provide opportunities for public involvement within the metropolitan planning area under review. The FHWA and the FTA shall consider the public input received in arriving at a decision on a certification action.

(5) The MPO(s), the State(s), and public transportation operator(s) shall be notified of the actions taken under paragraphs (b) (1) and (b) (2) of this section. The FHWA and the FTA will update the certification status of the TMA when evidence of satisfactory completion of a corrective action(s) is provided to the FHWA and the FTA.

#### **40 CFR 93.105 Air Quality Implementation Plan — Procedures for interagency consultation, resolution of conflicts, and public consultation**

Requires well-defined consultation procedures in the state implementation plan whereby representatives of the MPOs, state and local air quality planning agencies, state and local transportation agencies, and other organizations with responsibilities for developing, submitting, or implementing provisions of an implementation plan required by the Clean Air Act must consult with each other and with local or regional offices of the United States Environmental Protection Agency (EPA), Federal Highway Administration (FHWA), and Federal Transit Administration (FTA) on the development of the implementation plan, the transportation plan, the transportation improvement program (TIP), and associated conformity determinations.

#### **40 CFR 93.126 and 93.217 Air Quality Implementation Plan — determining conformity of federal actions to state or federal air quality implementation plans; specifically, exempt projects.**

Defines highway and transit projects that are exempt from the requirement to determine air quality conformity, and which may proceed toward implementation even in the absence of a conforming transportation plan and TIP. These projects would be subject to the conformity requirement if GRPC, in consultation with other agencies who are consulted in the development of the state implementation plan, the EPA, and the FHWA (in the case of a highway project) or the FTA (in the case of a transit project) concur that it has potentially adverse emissions impacts for any reason.

GRPC's key planning and programming activities are the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP). GRPC is the MPO responsible for developing the state and federally required MTP every four years in coordination with the 12 cities and unincorporated areas of

Hancock, Harrison, and Jackson Counties. Under memoranda of understanding, long-range transportation plans in Hancock, Harrison, and Jackson Counties are incorporated into the MTP.

Federal law requires the MTP to conform to air quality goals for the region, satisfy financial constraints such that all proposed projects can be reasonably funded, and undergo extensive public review.

The MTIP is a federally required programming document. The program includes a listing of all transportation-related projects requiring federal funding or other approval by the federal transportation agencies. The MTIP also lists non-federal, regionally significant projects for information and air quality modeling purposes.

## *Circulars*

### **FTA C 4702.1B**

This circular provides recipients and sub recipients of FTA financial assistance with guidance and instructions necessary to carry out the USDOT's Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the USDOT's Order on Environmental justice (Order 5610.2), and Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency Persons (70 FR 74087, December 14, 2005). This circular applies to all recipients of financial assistance from the Federal Transit Administration.

NOTE: FTA C 4702.1B (Adopted October 1, 2012) replaced Circular FTA C 4702.1A (Adopted May 13, 2007.) This PPP reflects the updated FTA requirements guidance.

## Appendix B – Acronyms and Abbreviations

- A. **ADA** Americans with Disabilities Act of 1990
- B. **CAA** Clean Air Act
- C. **CDR** Air Quality Conformity Determination Report
- D. **CEQ** Council on Environmental Quality
- E. **CFR** Code of Federal Regulations
- F. **CTA** Coast Transit Authority
- G. **EJ** Environmental Justice
- H. **EPA** Environmental Protection Agency
- I. **FHWA** Federal Highway Administration
- J. **FTA** Federal Transit Administration
- K. **GIS** Geographic Information Systems
- L. **GRPC** Gulf Regional Planning Commission
- M. **LEP** Limited English Proficiency
- N. **L RTP/MTP Long-Range** Metropolitan Transportation Plan
- O. **MAP-21** Moving Ahead for Progress in the 21<sup>st</sup> Century
- P. **MDOT** Mississippi Department of Transportation
- Q. **MGCMPO** Mississippi Gulf Coast Metropolitan Planning Organization
- R. **MPA** Metropolitan Planning Area
- S. **MPO** Metropolitan Planning Organization
- T. **PPP** Public Participation Plan
- U. **SAFETEA-LU** Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
- V. **SIP** State Implementation Plan
- W. **STIP** Statewide Transportation Improvement Program
- X. **TPC** Transportation Policy Committee
- Y. **TIP** Transportation Improvement Program
- Z. **TMA** Transportation Management Area
- AA. **TCC** Technical Coordinating Committee
- BB. **UPWP** Unified Planning Work Program
- CC. **USDOT** U.S. Department of Transportation

## Appendix C – Glossary

**Alternatives analysis (AA)** means a study required for eligibility of funding under the Federal Transit Administration's (FTA's) Capital Investment Grant program (49 U.S.C. 5309), which includes an assessment of a range of alternatives designed to address a transportation problem in a corridor or subarea, resulting in sufficient information to support selection by State and local officials of a locally preferred alternative for adoption into a metropolitan transportation plan, and for the Secretary to make decisions to advance the locally preferred alternative through the project development process, as set forth in 49 CFR part 611 (Major Capital Investment Projects).

**Attainment area** means any geographic area in which levels of a given criteria air pollutant (e.g., ozone, carbon monoxide, PM10, PM2.5, and nitrogen dioxide) meet the health-based National Ambient Air Quality Standards (NAAQS) for that pollutant. An area may be an attainment area for one pollutant and a nonattainment area for others. A “maintenance area” (see definition below) is not considered an attainment area for transportation planning purposes.

**Available funds** means funds derived from an existing source dedicated to or historically used for transportation purposes. For Federal funds, authorized and/or appropriated funds and the extrapolation of formula and discretionary funds at historic rates of increase are considered “available.” A similar approach may be used for State and local funds that are dedicated to or historically used for transportation purposes.

**Committed funds** mean funds that have been dedicated or obligated for transportation purposes. For State funds that are not dedicated to transportation purposes, only those funds over which the Governor has control may be considered “committed.” Approval of a TIP by the Governor is considered a commitment of those funds over which the Governor has control. For local or private sources of funds not dedicated to or historically used for transportation purposes (including donations of property), a commitment in writing (e.g., letter of intent) by the responsible official or body having control of the funds may be considered a commitment. For projects involving 49 U.S.C. 5309 funding, execution of a Full Funding Grant Agreement (or equivalent) or a Project Construction Grant Agreement with the USDOT shall be considered a multi-year commitment of Federal funds.

**Conformity** means a Clean Air Act (42 U.S.C. 7506(c)) requirement that ensures that Federal funding and approval are given to transportation plans, programs and projects that are consistent with the air quality goals established by a State Implementation Plan (SIP). Conformity, to the purpose of the SIP, means that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the NAAQS. The transportation conformity rule (40 CFR part 93) sets forth policy, criteria, and procedures for demonstrating and assuring conformity of transportation activities.

**Conformity lapse** means, pursuant to section 176(c) of the Clean Air Act (42 U.S.C. 7506(c)), as amended, that the conformity determination for a metropolitan transportation plan or TIP has expired and thus there is no currently conforming metropolitan transportation plan or TIP.

**Congestion management process** means a systematic approach required in transportation management areas (TMAs) that provides for effective management and operation, based on a cooperatively developed and implemented metropolitan-wide strategy, of new and existing transportation facilities eligible for funding under title 23 U.S.C., and title 49 U.S.C., through the use of operational management strategies.

**Consideration** means that one or more parties takes into account the opinions, action, and relevant information from other parties in making a decision or determining a course of action.

**Consultation** means that one or more parties confer with other identified parties in accordance with an

established process and, prior to taking action(s), considers the views of the other parties and periodically informs them about action(s) taken. This definition does not apply to the “consultation” performed by the States and the MPOs in comparing the long-range statewide transportation plan and the metropolitan transportation plan, respectively, to State and Tribal conservation plans or maps or inventories of natural or historic resources (see §450.214(i) and §450.322(g)(1) and (g)(2)).

**Cooperation** means that the parties involved in carrying out the transportation planning and programming processes work together to achieve a common goal or objective.

**Coordinated public transit-human services transportation plan** means a locally developed, coordinated transportation plan that identifies the transportation needs of individuals with disabilities, older adults, and people with low incomes, provides strategies for meeting those local needs, and prioritizes transportation services for funding and implementation.

**Coordination** means the cooperative development of plans, programs, and schedules among agencies and entities with legal standing and adjustment of such plans, programs, and schedules to achieve general consistency, as appropriate.

**Design concept** means the type of facility identified for a transportation improvement project (e.g., freeway, expressway, arterial highway, grade-separated highway, toll road, reserved right-of-way rail transit, mixed-traffic rail transit, or bus way).

**Design scope** means the aspects that will affect the proposed facility's impact on the region, usually as they relate to vehicle or person carrying capacity and control (e.g., number of lanes or tracks to be constructed or added, length of project, signalization, safety features, access control including approximate number and location of interchanges, or preferential treatment for high-occupancy vehicles).

**Designated recipient** means an entity designated, in accordance with the planning process under 49 U.S.C. 5303, 5304, and 5306, by the chief executive officer of a State, responsible local officials, and Publicly-owned operators of public transportation, to receive and apportion amounts under 49 U.S.C. 5336 that are attributable to transportation management areas (TMAs) identified under 49 U.S.C. 5303, or a State regional authority if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.

**Disabled Population** means for transportation planning purposes, the “disabled” population includes persons defined by the U.S. Census as having sensory, physical, mental, self-care, and employment disabilities.

**Elderly Population** means for planning purposes, the GRPC defines “elderly” as: Persons 65 and older (Persons eligible for Medicare).

**Environmental mitigation activities** means strategies, policies, programs, actions, and activities that, over time, will serve to avoid, minimize, or compensate for (by replacing or providing substitute resources) the impacts to or disruption of elements of the human and natural environment associated with the implementation of a long-range statewide transportation plan or metropolitan transportation plan. The human and natural environment includes, for example, neighborhoods and communities, homes and businesses, cultural resources, parks and recreation areas, wetlands and water sources, forested and other natural areas, agricultural areas, endangered and threatened species, and the ambient air. The environmental mitigation strategies and activities are intended to be regional in scope, and may not necessarily address potential project-level impacts.

**Federal land management agency** means units of the Federal Government currently responsible for the administration of public lands (e.g., U.S. Forest Service, U.S. Fish and Wildlife Service, Bureau of Land

Management, and the National Park Service).

**Federally funded nonemergency transportation services** means transportation services provided to the general public, including those with special transport needs, by public transit, private non-profit service providers, and private third-party contractors to public agencies.

**Financial plan** means documentation required to be included with a metropolitan transportation plan and TIP (and optional for the long-range statewide transportation plan and STIP) that demonstrates the consistency between reasonably available and projected sources of Federal, State, local, and private revenues and the costs of implementing proposed system improvements.

**Financially constrained or Fiscal constraint** means that the metropolitan transportation plan, TIP, and STIP includes sufficient financial information for demonstrating that projects in the metropolitan transportation plan, TIP, and STIP can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained. For the TIP and the STIP, financial constraint/fiscal constraint applies to each program year. Additionally, projects in air quality nonattainment and maintenance areas can be included in the first two years of the TIP and STIP only if funds are “available” or “committed.”

**Freight shippers** mean businesses that routinely transport products from one location to another by providers of freight transportation services or by its own vehicle fleet.

**Full funding grant agreement** means an instrument that defines the scope of a project, the Federal financial contribution, and other terms and conditions for funding New Starts projects as required by 49 U.S.C. 5309(d)(1).

**Governor** refers to the Governor of any of the 50 States or the Commonwealth of Puerto Rico or the Mayor of the District of Columbia. In this context, the Governor of the State of Mississippi is the typical reference.

**Illustrative project** means an additional transportation project that may (but is not required to) be included in a financial plan for a metropolitan transportation plan, TIP, or STIP if reasonable additional resources were to become available.

**Indian Tribal government** means a duly formed governing body for an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian Tribe pursuant to the Federally Recognized Indian Tribe List Act of 1994, Public Law 103–454.

**Intelligent transportation system (ITS)** means electronics, photonics, communications, or information processing used singly or in combination to improve the efficiency or safety of a surface transportation system.

**Interim metropolitan transportation plan** means a transportation plan composed of projects eligible to proceed under a conformity lapse and otherwise meeting all other applicable provisions of this part, including approval by the MPO.

**Interim transportation improvement program (TIP)** means a TIP composed of projects eligible to proceed under a conformity lapse and otherwise meeting all other applicable provisions of this part, including approval by the MPO and the Governor.

**Limited English Proficient (LEP) person** is a person who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

**Long-Range statewide transportation plan** means the official, statewide, multimodal, transportation plan covering a period of no less than 20 years developed through the statewide transportation planning process.

**Metropolitan Transportation Plan (MTP)** is the blue print for the region's transportation development and identifies all regionally significant transportation projects and programs for the Mississippi Gulf Coast metropolitan planning area. The MTP has a planning horizon of at least 20 years and is updated every four years to reflect changing conditions such as new planning priorities, population projections, and economic change, as well as anticipated travel demand. Regionally significant transportation projects must be included in the MTP to receive state and federal funding.

**Low-Income** is a person whose median household income is at or below the US Department of Health and Human Services poverty guidelines. (See *Environmental Justice Chapter and Appendix F*)

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

**Maintenance area** means any geographic region of the United States that the EPA previously designated as a nonattainment area for one or more pollutants pursuant to the Clean Air Act Amendments of 1990, and subsequently re-designated as an attainment area subject to the requirement to develop a maintenance plan under section 175A of the Clean Air Act, as amended.

**Management system** means a systematic process, designed to assist decision-makers in selecting cost effective strategies/actions to improve the efficiency or safety of, and protect the investment in the nation's infrastructure. A management system can include: Identification of performance measures; data collection and analysis; determination of needs; evaluation and selection of appropriate strategies/actions to address the needs; and evaluation of the effectiveness of the implemented strategies/actions.

**Metropolitan planning area (MPA)** means the geographic area determined by agreement between the metropolitan planning organization (MPO) for the area and the Governor, in which the metropolitan transportation planning process is carried out.

**Metropolitan planning organization (MPO)** means the policy board of an organization created and designated to carry out the metropolitan transportation planning process.

**Metropolitan transportation plan (MTP)** means the official long-range multimodal transportation plan addressing no less than a 20-year planning horizon that is developed, adopted, and updated by the MPO through the metropolitan transportation planning process.

**Minority** is a person, as defined by the US Census Bureau, who is:

Black (a person having origins in any of the black racial groups of Africa);

Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race);

Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands); or

American Indian and Alaskan Native (a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition)

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

**National ambient air quality standard (NAAQS)** means those standards established pursuant to section 109 of the Clean Air Act.

**Non-attainment area** means any geographic region of the United States that has been designated by the EPA as a nonattainment area under section 107 of the Clean Air Act for any pollutants for which an NAAQS exists.

**Non-metropolitan area** means a geographic area outside a designated metropolitan planning area.

**Non-metropolitan local officials** refer to elected and appointed officials of general purpose local government in a non-metropolitan area with responsibility for transportation.

**Obligated projects** means strategies and projects funded under title 23 U.S.C. and title 49 U.S.C. Chapter 53 for which the supporting Federal funds were authorized and committed by the State or designated recipient in the preceding program year, and authorized by the FHWA or awarded as a grant by the FTA.

**Operational and management strategies** are actions and strategies aimed at improving the performance of existing and planned transportation facilities to relieve congestion and maximizing the safety and mobility of people and goods.

**Project construction grant agreement** means an instrument that defines the scope of a project, the Federal financial contribution, and other terms and conditions for funding Small Starts projects as required by 49 U.S.C. 5309(e)(7).

**Project selection** means the procedures followed by MPOs, States, and public transportation operators to advance projects from the first four years of an approved TIP and/or STIP to implementation, in accordance with agreed upon procedures.

**Provider of freight transportation services** means any entity that transports or otherwise facilitates the movement of goods from one location to another for others or for itself.

**Public transportation operator** means the public entity which participates in the continuing, cooperative, and comprehensive transportation planning process in accordance with 23 U.S.C. 134 and 135 and 49 U.S.C. 5303 and 5304, and is the designated recipient of Federal funds under title 49 U.S.C. Chapter 53 for transportation by a conveyance that provides regular and continuing general or special transportation to the public, but does not include school bus, charter, or intercity bus transportation or intercity passenger rail transportation provided by Amtrak.

**Regional ITS architecture** means a regional framework for ensuring institutional agreement and technical integration for the implementation of ITS projects or groups of projects.

**Regionally significant project** means a transportation project (other than projects that may be grouped in the TIP and/or STIP or exempt projects as defined in EPA's transportation conformity regulation (40 CFR part 93)) that is on a facility which serves regional transportation needs (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers; or transportation terminals) and would normally be included in the modeling of the metropolitan area's transportation network. At a minimum, this includes all principal arterial highways and all fixed guide way transit facilities that offer a significant alternative to regional highway travel.

**Revision** means a change to a long-range statewide or metropolitan transportation plan, TIP, or STIP that occurs between scheduled periodic updates. A major revision is an "amendment," while a minor revision is an "administrative modification."

**State** means any one of the fifty States, the District of Columbia, or Puerto Rico.

**State implementation plan (SIP)** means, as defined in section 302(q) of the Clean Air Act (CAA), the portion (or portions) of the implementation plan, or most recent revision thereof, which has been approved under section 110 of the CAA, or promulgated under section 110(c) of the CAA, or promulgated or approved pursuant to regulations promulgated under section 301(d) of the CAA and which implements the relevant requirements of the CAA.

**Statewide transportation improvement program (STIP)** means a statewide prioritized listing/program of transportation projects covering a period of four years that is consistent with the long-range statewide transportation plan, metropolitan transportation plans, and TIPs, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

**Strategic highway safety plan** means a plan developed by the State DOT in accordance with the requirements of 23 U.S.C. 148(a) (6).

**Transportation control measure (TCM)** means any measure that is specifically identified and committed to in the applicable SIP that is either one of the types listed in section 108 of the Clean Air Act or any other measure for the purpose of reducing emissions or concentrations of air pollutants from transportation sources by reducing vehicle use or changing traffic flow or congestion conditions. Notwithstanding the above, vehicle technology-based, fuel-based, and maintenance-based measures that control the emissions from vehicles under fixed traffic conditions are not TCMs.

**Transportation Improvement Program (TIP)** means a prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by an MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

**Transportation management area (TMA)** means an urbanized area with a population over 200,000, as defined by the US Census Bureau and designated by the Secretary of Transportation, or any additional area where TMA designation is requested by the Governor, the MPO and by the Secretary of Transportation.

**Unified planning work program (UPWP)** means a statement of work identifying the planning priorities and activities to be carried out within a metropolitan planning area. At a minimum, a UPWP includes a description of the planning work and resulting products, the person that will perform the work, time frames for completing the work, the cost of the work, and the source(s) of funds.

**Update** means making current a long-range statewide transportation plan, metropolitan transportation plan, TIP, or STIP through a comprehensive review. Updates require public review and comment, a 20- year horizon year for metropolitan transportation plans and long-range statewide transportation plans, a four-year program period for TIPs and STIPs, demonstration of fiscal constraint (except for long-range statewide transportation plans), and a conformity determination (for metropolitan transportation plans and TIPs in nonattainment and maintenance areas).

**Urbanized area** means a geographic area with a population of 50,000 or more, as designated by the US Census Bureau.

**Users of public transportation** means any person, or groups representing such persons, who use transportation open to the general public, other than taxis and other privately funded and operated vehicles.

**Visualization techniques** means methods used by States and MPOs in the development of transportation plans and programs with the public, elected and appointed officials, and other stakeholders in a clear and easily accessible format such as maps, pictures, and/or displays, to promote improved understanding of existing or proposed transportation plans and programs

## Appendix D – Non-Discrimination Notices, Procedures and Forms

English and Spanish Notices of public rights under Title VI of the Civil Rights Act .

### Notifying the Public of Rights Under Title VI

## **Gulf Regional Planning Commission (GRPC) and the Mississippi Gulf Coast Metropolitan Planning Organization (MPO)**

- GRPC and the MPO operate its programs, activities and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with GRPC.
- For more information on GRPC's civil rights program, and the procedures to file a complaint, contact 228-864-1167 x218 or email [contactus@grpc.com](mailto:contactus@grpc.com). You may also visit our office at 1232 Pass Road, Gulfport MS 39501.
- A complainant may be filed directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Civil Rights Coordinator, 230 Peachtree NW #800, Atlanta GA 30303.
- If information is needed in another language, contact 228-864-1167 x218 to make the request.

### Notificación al Público de los Derechos Bajo el Título VI

## **Gulf Regional Planning Commission (GRPC) and the Mississippi Gulf Coast Metropolitan Planning Organization (MPO)**

- GRPC y MPO opera sus programas y servicios sin distinción de raza, color ó nacionalidad, de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree que él ó ella ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja ante la GRPC.
- Para obtener más información sobre el programa de derechos civiles GRPC, y los procedimientos para presentar una queja, comuníquese con 228-864-1167 x218; [contactus@grpc.com](mailto:contactus@grpc.com) correo electrónico ó visite nuestra oficina administrativa en 1232 Pass Road, Gulfport MS 39501.
- Una queja puede ser presentada directamente ante la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Título VI, 230 Peachtree NW # 800, Atlanta GA 30303.
- Si se necesita información en otro idioma, comuníquese con 228-864-1167 x218 para hacer la solicitud.



## **Title VI Statement of Policy**

Gulf Regional Planning Commission (GRPC), the MS Gulf Coast Metropolitan Planning Organization (MPO) is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) to conform to Title VI of the Civil Rights Act of 1964 and its amendments. Title VI of the Civil Rights Act of 1964 requires that no person in the United States, shall, on the grounds of race, color or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination, under any program or activity receiving federal financial assistance. Presidential Executive Order 12898 addresses Environmental Justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with Limited English Proficiency. The rights of women, the elderly and the disabled are protected under related statutes. These Presidential Executive Orders and the related statutes fall under the umbrella of Title VI.

GRPC is committed to enforcing the provisions of Title VI and protecting the rights and opportunities of all persons associated with GRPC or affected by its programs. This commitment includes vigorously enforcing all applicable laws and regulations that affect GRPC and those organizations, both public and private, which participate and benefit through GRPC's programs. GRPC will take positive and realistic affirmative steps to ensure that all persons and/or firms wishing to participate in its programs are given an equal and equitable chance to participate. All sub-recipients and contractors are required to prevent discrimination and ensure nondiscrimination in all of their programs, activities and services.

GRPC's Executive Director is responsible for providing leadership, direction and policy to ensure compliance with Title VI of the 1964 Civil Rights Act. Any person(s) or firm(s) who feels that they have been discriminated against is encouraged to report such violations to GRPC at:

Gulf Regional Planning Commission (GRPC)  
1635-G Popps Ferry Road,  
Biloxi MS 39532



## Title VI Complaint Procedures

This procedure outlines the Title VI complaint procedures related to providing programs, services, and benefits. It does not deny the complainant the right to file formal complaints with the Secretary of the US Department of Transportation, Equal Employment Opportunity Commission (EEOC), Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or to seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 requires that no person in the United States shall, on the grounds of race, color or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

1. Any person who believes that they have been subjected to discrimination may file a written complaint with Gulf Regional Planning Commission (GRPC). Complaints should be filed within 180 calendar days of the alleged incident.
2. The complainant may download the complaint form from the GRPC website ([www.grpc.com](http://www.grpc.com)) or request a complaint form from the GRPC Public Involvement Coordinator at: Phone : 228-864-1167 or by emailing [contactus@grpc.com](mailto:contactus@grpc.com).
3. The complainant may also submit a written statement that contains all of the following information:
  - a. Name, address, and telephone number of the complainant.
  - b. The basis of the complaint i.e., race, color, national origin, sex, elderly or disabled.
  - c. The date or dates on which the alleged discriminatory event or events occurred.
  - d. The nature of the incident that led the complainant to feel discrimination was a factor.
  - e. Names, addresses, and telephone numbers of persons who may have knowledge of the event.
  - f. Other agencies or courts where complaint may have been filed and a contact name.
  - g. Complainant's signature and date.
  - h. If the complainant is unable to write a complaint, GRPC staff will assist the complainant.
  - i. The complaint may be sent to the following address:

Gulf Regional Planning Commission (GRPC)  
1635-G Popps Ferry Road, Biloxi MS 39532  
The complaint may be sent via email to: [contactus@grpc.com](mailto:contactus@grpc.com)
4. The complainant also has the right to file a Title VI claim with the US Department of Transportation, Federal Transit Administration, Office of Civil Rights-Region IV. 230 Peachtree, NW, Suite 800, Atlanta, GA 30303, **within** the 180 day timeframe.
5. GRPC will begin an investigation within fifteen (15) working days of receipt of a complaint.
6. GRPC will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed to investigate the complaint. If the complainant fails to provide the requested information in a timely basis, GRPC may administratively close the complaint.
7. GRPC will use its best effort to complete the investigation of Title VI complaints within ninety (90) days of receipt of the complaint. A written investigation report will be prepared by the investigator. The report shall include a summary description of the incident, findings, and recommendations for disposition.



## TITLE VI COMPLAINT FORM – GULF REGIONAL PLANNING COMMISSION

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, or national origin by a recipient of Federal Transit Administration(FTA) funding can file an administrative complaint under Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance”.

This protection and same opportunity to file a complaint extends to the public through Executive Order 12898, “Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations,” and the Department of Transportation’s Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

Individuals and organizations may file a complaint by completing and submitting the following Title VI complaint form. Assistance is available upon request. Complaints must be signed and include contact information and should be sent via mail or delivered to: Gulf Regional Planning Commission, 1635-G Poppo Ferry Road, Biloxi MS 39532 or emailed to [contactus@grpc.com](mailto:contactus@grpc.com).

1. Complainant’s Name: \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_
4. Telephone No. (Home): \_\_\_\_\_ Cell: \_\_\_\_\_ Business: \_\_\_\_\_
5. Email Address: \_\_\_\_\_ TDD/Other: \_\_\_\_\_
6. Are you filing this complaint on your own behalf? *(check the appropriate box)*  
 Yes *(go to question 10)*       No
7. If No, please give us the following information on the person discriminated against:  
 Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Telephone: \_\_\_\_\_ Email Address: \_\_\_\_\_  
 Relationship to Complainant: \_\_\_\_\_

8. Which of the following best describes why you think the discrimination took place? Was it because of your:

<input type="checkbox"/>	Race/Color (Title VI)
<input type="checkbox"/>	National Origin(Title VI)
<input type="checkbox"/>	Low Income (Executive Order 12898)
<input type="checkbox"/>	Limited English Proficiency (Executive Order 13166)

<input type="checkbox"/>	Sex/gender(Title VI)
<input type="checkbox"/>	Age (Age Discrimination Act of 1967)
<input type="checkbox"/>	Minority Status (Executive Order 12898)
<input type="checkbox"/>	Disability (Americans with Disabilities Act of 1990 & Rehabilitation Act of 1973)

9. What date did the alleged discrimination take place? : \_\_\_\_\_

10. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please attach additional sheets of paper if more space is required.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

11. Have you filed this complaint with any other federal, state or local agency, or with any federal or state court? (check appropriate box) [ ] Yes [ ] No

If answer is yes, check each box that applies:

<input type="checkbox"/>	Federal Agency	<input type="checkbox"/>	Local Agency (Other than Gulf Regional Planning Commission)
<input type="checkbox"/>	Federal Court	<input type="checkbox"/>	Other:
<input type="checkbox"/>	State Agency	_____	
<input type="checkbox"/>	State Court	_____	

Please provide contact person information for the agency or court you also filed the complaint with (attach more sheets if necessary):

Name/Agency: \_\_\_\_\_

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

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

Telephone No.: \_\_\_\_\_ Date Filed: \_\_\_\_\_

1. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

(Note: We cannot accept your complaint without a signature, Thank You!)



## **Título VI Declaración de Pólizas**

Gulf Regional Planning Commission (GRPC), un beneficiario del subsidio federal, es requerido por la Administración Federal de Tránsito (FTA) para cumplir con el Título VI del AGRPC de Derechos Civiles de 1964 y sus enmiendas. Título VI del AGRPC de Derechos Civiles de 1964 requiere que ninguna persona en los Estados Unidos podrá, por motivos de raza, color u origen nacional, sea excluido de, negado los beneficios de, ó sea sujeto a discriminación bajo cualquier programa ó actividad que reciba asistencia financiera federal. Orden Ejecutiva Presidencial 12898 aborda la justicia ambiental en poblaciones minoritarias y de bajos ingresos. Orden Ejecutiva Presidencial 13166 aborda los servicios a las personas con dominio limitado del inglés. Los derechos de las mujeres, los ancianos y los discapacitados están protegidos por las leyes correspondientes. Estas órdenes ejecutivas presidenciales y de los estatutos relacionados caen bajo el del Título VI.

GRPC se compromete a cumplir las disposiciones del Título VI y la protección de los derechos y oportunidades de todas las personas relacionadas con la GRPC ó afeGRPCdos por sus programas. Este compromiso incluye vigorosamente la aplicación de todas las leyes y reglamentos que afeGRPCn a GRPC y esas organizaciones, tanto públicas como privadas, que participan y se benefician a través de programas del GRPC. GRPC tomará medidas afirmativas positivas y realistas para asegurar que todas las personas y / ó empresas que deseen participar en sus programas se les dé una oportunidad igual y equitativa para participar. Todos los sub-beneficiarios y contratistas tienen la obligación de prevenir la discriminación y garantizar la no discriminación en todos sus programas, actividades y servicios.

El Director Ejecutivo de la GRPC es responsable de proporcionar liderazgo, dirección y pólizas para asegurar el cumplimiento con el Título VI del AGRPC de Derechos Civiles de 1964. Cualquier persona (s) ó empresa (s) que siente que ha sido discriminado se anima a informar tales violaciones a GRPC a: Gulf Regional Planning Commission (GRPC), 1635-G Popp's Ferry Road, Biloxi MS 39532, [contactus@grpc.com](mailto:contactus@grpc.com).

## **Título VI Procedimientos de Quejas**

Este procedimiento describe los procedimientos del Título VI de quejas relacionadas con los programas que ofrecen, servicios y beneficios. No niega al demandante el derecho a presentar quejas formales ante el Secretario del Departamento de Transporte de EE.UU., Equal Employment Opportunity Commission (EEOC), Administración Federal de Carreteras (FHWA), Administración Federal de Tránsito (FTA), ó buscar un abogado privado para denuncias de discriminación, intimidación ó represalia de ningún tipo que está prohibido por la ley Título VI del AGRPC de Derechos Civiles de 1964 requiere que ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluido de, negado los beneficios de, ó sea sujeto a discriminación bajo cualquier programa ó actividad que reciba asistencia financiera federal.

1. Cualquier persona que crea que ha sido objeto de discriminación puede presentar una queja por escrito ante Gulf Regional Planning Commission (GRPC). Las quejas deben ser presentadas dentro de los 180 días siguientes alegados al incidente.
2. El demandante puede descargar el formulario de queja por medio de GRPC ([www.grpc.com](http://www.grpc.com)) ó solicitar el formulario de quejas del Director Ejecutivo. Asimismo, el demandante puede presentar una declaración escrita que contenga toda la información que se indica en la Sección 3 A á la F.3.
3. La denuncia incluirá la siguiente información:
  - a. Nombre, dirección y número de teléfono del denunciante.
  - b. La base de la denuncia, es decir, color, raza, origen nacional, sexo, edad ó discapacitadas
  - c. La fecha ó fechas en que el presunto acto discriminatorio ó hechos.
  - d. La naturaleza del incidente que llevó al autor a sentir la discriminación que fue un factor.
  - e. Nombres, direcciones y números telefónicos de las personas que puedan tener conocimiento del evento.
  - f. Otros organismos ó tribunales donde denuncia haya sido presentada y un nombre de contacto.
  - g. Firma del demandante y la fecha.
  - h. Si el demandante no puede escribir una queja, GRPC asistirá al demandante.
  - i. La queja puede ser enviada vía correo electrónico a: [contactus@grpc.com](mailto:contactus@grpc.com)
  - j. La denuncia podrá ser enviada a la siguiente dirección:

Gulf Regional Planning Commission (GRPC)  
1635-G Popps Ferry Road, Biloxi MS 39532  
228-864-1167
4. Asimismo, el demandante tiene derecho a presentar una reclamación Título VI con el Departamento de Transporte de EE.UU., Federal Transit Administration, Office of Civil Rights, IV Región. 230 Peachtree, NW, Suite 800, Atlanta, GA 30303, dentro del plazo de 180 días.
5. GRPC se iniciará una investigación dentro de los quince (15) días hábiles siguientes a la recepción de una queja.
6. GRPC se pondrá en contacto con el demandante por escrito no más tarde de treinta (30) días hábiles siguientes a la recepción de la comunicación para obtener información adicional, si es necesario para investigar la denuncia. Si el demandante no proporciona la información solicitada en forma oportuna, GRPC administrativamente puede cerrar la queja.
7. GRPC hará uso de su mejor esfuerzo para completar la investigación del Título VI quejas dentro de los noventa (90) días siguientes a la recepción de la queja. Un informe de investigación escrito será preparado por el investigador. El informe incluirá un resumen descriptivo de los hechos, las conclusiones y las recomendaciones para su disposición.



# Gulf Regional Planning Commission

## Título VI Formulario para Quejas- Gulf Regional Planning Commission

Las personas u organizaciones que creen que se les ha negado los beneficios de, excluidos de participar en, ó sujetos a discriminación por motivos de raza, color u origen nacional de un recipiente de la Administración Federal de Tránsito (FTA) de financiación puede presentar una queja administrativa con respecto al Título VI de la Ley de Derechos Civiles de 1964. Título VI del AGRPC de Derechos Civiles de 1964 establece que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, sea excluida de participar en, sea negado los beneficios de, o sea sujeto a discriminación bajo cualquier programa ó actividad que reciba asistencia federal".

Esta protección y oportunidad igual para presentar una queja se extiende al público a través de la Orden Ejecutiva 12898, "Acciones federales para abordar la justicia ambiental en poblaciones minoritarias y de bajos ingresos", y el Departamento de Orientación de Transporte a los recipientes de Servicios especiales sobre el lenguaje para Dominio Limitado del Inglés (LEP) Beneficiarios.

Los individuos y las organizaciones pueden presentar una queja llenando y enviando el siguiente formulario de queja Título VI. La ayuda está disponible a petición. Las quejas deben ser firmadas é incluyendo información de contacto y deben ser enviados por correo o entregados a: Gulf Regional Planning Commission, 1232 Pass Road, Gulfport, MS 39501. Alternativamente, se puede enviar por fax al 228/864-1149 ó por correo electrónico a [contactus@grpc.com](mailto:contactus@grpc.com).

1. Nombre del Querellante: \_\_\_\_\_

2. Dirección: \_\_\_\_\_

3. Pueblo \_\_\_\_\_ Estado: \_\_\_\_\_ Código:: \_\_\_\_\_

4. No. de Teléfono (Casa): \_\_\_\_\_ Cel.: \_\_\_\_\_ Trabajo:: \_\_\_\_\_

5. Correo Electrónico: \_\_\_\_\_ Otro: \_\_\_\_\_

6. Se está quejando por sí mismo? (*Marque el apropiado*) [ ] Si (*vaya a la pregunta #10*) [ ] No

7. Si No, denos la información a quien discriminaron en contra:

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

Dirección: \_\_\_\_\_

Pueblo: \_\_\_\_\_ Estado: \_\_\_\_\_ Código: \_\_\_\_\_

Teléfono: \_\_\_\_\_ Correo Electrónico: \_\_\_\_\_

Relación al Querellante: \_\_\_\_\_

8.Cuál de las siguientes mejor describe come discriminaron en contra del querellante y porque piensa que discriminaron en contra del querellante? Fue por?

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Raza/Color  
Origen de Nacionalidad  
Bajos Ingresos  
Limite del Ingles

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Sexo  
Disabilidad  
Edad  
Condición de minoría

9. Fecha en que discriminaron? : \_\_\_\_\_

10. En sus propias palabras describa la alegación de discriminación. Explique qué paso, y quien usted piensa que fue responsable. Por favor una más hojas de papel si el espacio no es bastante si lo requiere.

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11. A usted apelado dicha querella con cualquier otra agencia federal, estado local ó cortes federales ó estatales? *(Marque el apropiado)* [ ] Si [ ] No

Si es Si, marque las cajas que le corresponda:

<input type="checkbox"/>	Agencia Federal	<input type="checkbox"/>	Agencia Local (edemas de Gulf Regional Planning Commission)
<input type="checkbox"/>	Corte Federal	<input type="checkbox"/>	Otro:
<input type="checkbox"/>	Agencia del Estado	_____	
<input type="checkbox"/>	Corte del Estado	_____	

Sírvanse proporcionar información sobre la persona de la agencia ó tribunal en donde usted también presentó la queja. (Una más hojas si es necesario):

Nombre de Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Pueblo: \_\_\_\_\_ Estado: \_\_\_\_\_ Código: \_\_\_\_\_

Teléfono.: \_\_\_\_\_ Fecha de queja: \_\_\_\_\_

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Por Favor firme. Usted puede unir más hojas ó cualquier otra información si le es necesario para su queja.

Firme: \_\_\_\_\_ Fecha: \_\_\_\_\_

*(Nota No Podemos aceptar su queja sin la firma. Muchas Gracias!)*

## Appendix F – DBE Performance Report



### DBE Performance Report

To: Civil Rights Office  
Mississippi Dept. of Transportation  
401 N West Street  
Jackson MS 39201

To whom it may concern,

Gulf Regional Planning Commission, the Mississippi Gulf Coast MPO (MPO) is providing notice that the agency has received \_\_\_\_\_ complaints for discrimination, including no disadvantaged business enterprises (DBE) related complaints.

The MPO does not have a requirement to award a specific portion of their contracts to disadvantaged business enterprises (DBE). However, the agency makes conscious effort to not discriminate in the performance of any of its services, programs or activities and selects contract recipients with regard to their qualifications to meet company needs and/or a defined project scope.

This report covers the time period between our Transportation Management Area compliance reviews, June 2013 through June 2017. In that time period, the agency has executed \_\_\_\_\_ contracts and of those \_\_\_\_\_ are women or minority owned, although they may not be formally included in the Mississippi Department of Transportation's DBE roster.

The GRPC/MPO Title VI Coordinator is:

Stephanie Plancich  
228-864-1167 x218  
splancich@grpc.com

The GRPC/MPO DBE Liaison is:

Jeff Loftus  
228-864-1167 x211  
jol@grpc.com