Title VI Plan

New River Valley Metropolitan Planning Organization

DRAFT

Approved: _____

A plan for fairness and inclusion in transportation planning

New River Valley MPO

New River Valley
Metropolitan Planning Organization
May 5, 2016

Resolution approving the NRV MPO Title VI and Limited English Proficiency Plan

On a motion by _____, seconded by _____ and carried unanimously,

WHEREAS, the NRV MPO has the responsibility under provisions of the Moving Ahead for Progress in the 21st Century (MAP-21) for developing and carrying out a continuing, cooperative, and comprehensive transportation planning process for the metropolitan planning area; and

WHEREAS, the MPO is required to comply with Title VI requirements of the Civil Rights Act of 1964 as amended, and other related statutes prohibiting discrimination on the basis of race, religion, color, national origin, sex, age, or disability; and

WHEREAS, the MPO, as recipient of federal financial assistance, must have a Title VI and Limited English Proficiency (LEP) approved Plan; and

WHEREAS, the current MPO Title VI Policy needed revision and updating; and

WHEREAS, the MPO TAC has developed a revised Title VI and Limited English Proficiency Plan and advertised it for public comment for 30 days, and

WHEREAS, comments were also solicited from the MPO Interested parties and Government Regulatory Agencies; and

WHEREAS, no comments were received; and

WHEREAS, the TAC recommends approval of the Title VI and Limited English Proficiency Plan dated May 5, 2016.

NOW, THEREFORE, BE IT RESOLVED, that the New River Valley MPO approves the MPO Title VI and Limited English Proficiency Plan dated May 5, 2016.
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_____
F. Craig Meadows, Chairman

New River Valley MPO Policy Board Members

VOTING

Craig Meadows - Chairman
Montgomery County

Anne McClung - Vice Chairman
Town of Blacksburg

Michael Sutphin
Town of Blacksburg (elected official)

D. Michael Barber (Mayor)
Town of Christiansburg (elected official)

Adam Carpenetti
Town of Christiansburg

Annette Perkins
Montgomery County (elected official)

Bruce Brown
Mayor Radford City (elected official)

Basil Edwards
City of Radford

Danny Wilson, AICP, ISA
Pulaski County

Ranny O'Dell
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Ken King
Virginia Department of Transportation

NON-VOTING

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New River Valley Regional Commission

Steve Mouras (non-voting member)
Virginia Tech

James Perkins
Radford University (non-voting member)

Fritz Streff (non-voting member)
New River Community College

Tom Fox (non-voting member)
Blacksburg Transit

Brian Booth (non-voting member)
Radford Transit

Monica Musick (non-voting member)
Pulaski Area Transit

Michael St. Jean (non-voting member)
Virginia Tech/Montgomery Regional Airport Authority

Kevin Jones (non-voting member)
Federal Highway Administration - Virginia Division

Tony Cho (non-voting member)
Federal Transit Administration - Region III

Jay Lindsey (non-voting member)
Virginia Department of Rail and Public Transportation

J. Dan Brugh (non-voting member)
Executive Director, New River Valley
Metropolitan Planning Organization

Technical Advisory Committee Members

All members are voting, except as indicated

Emily Gibson
Montgomery County

Brian Hamilton
Montgomery County

Vacant
Town of Blacksburg

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Wayne Nelson
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Randy Wingfield
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SUMMARY

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 financial assistance*." Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. The New River Valley Area Metropolitan Planning Organization (NRVMPO) Title VI Plan was developed to ensure that NRVMPO is in compliance with nondiscrimination requirements as outlined in Title 23 CFR and 49 CFR and related laws and provides specific information on how to file a nondiscrimination complaint.

This Plan also provides an overview of Environmental Justice and Limited English Proficiency (LEP) concepts, definitions of Title VI and associated nondiscrimination acts, and how Title VI, Environmental Justice and LEP are incorporated into the metropolitan transportation planning process. Environmental Justice Outreach strategies for minority, low-income, and LEP populations are included within the NRVMPO Public Participation Plan approved in 2012.

DISCLAIMER

This plan was prepared by the NRVMPO in cooperation with the U.S. Department of Transportation (USDOT), the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Virginia Department of Transportation (VDOT) and the Virginia Department of Rail and Public Transportation (VDRPT). The contents do not necessarily reflect the official views or policies of the FHWA, FTA, VDOT, or VDRPT.

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NRVMPO Title VI Plan

The New River Valley Metropolitan Planning Organization (NRVMPO) assures that no person, on the grounds of race, color, national origin, handicap, sex, age, or income status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. This Plan provides information regarding procedures and responsibilities of the NRVMPO to ensure Title VI compliance. The NRVMPO will post the NRVMPO Title VI Non-Discrimination Statement as well as a Notice under the Americans with Disabilities Act in the MPO offices as well as on the MPO website. Title VI notices will be included in all MPO advertisements.

1.1 Introduction

The NRVMPO, as a sub-recipient of federal financial assistance, is required to comply with Title VI and subsequent nondiscrimination laws, as well as provide an overview of how the NRVMPO addresses Executive Order 12898 on Environmental Justice and Executive Order 13166 on Limited English Proficiency (LEP). The purpose of this Title VI Plan is to describe the measures taken by the NRVMPO to assure compliance with the rules and regulations associated with Title VI and subsequent nondiscrimination laws, Environmental Justice, and LEP.

The NRVMPO, for which this Title VI Plan is applicable, is the MPO for portions of Montgomery and Pulaski counties, the City of Radford, and the towns of Blacksburg and Christiansburg, Virginia. It is comprised of representatives from local, state, and federal governments, transit agencies, college and universities, and other transportation stakeholders. The Title VI Coordinator is responsible for coordinating the overall administration of the Title VI Plan and assurances for the MPO.

Title VI of the Civil Rights Act of 1964 prohibits federal agencies and sub-recipients of federal funds from discriminating, on the basis of race, color or national origin, against participants or clients of programs that receive Federal funding. Subsequent laws and Presidential Executive Orders added handicap, sex, age, or income status to the criteria for which discrimination is prohibited. This document addresses prohibition of discrimination as mandated by Title VI as well as by the authorities listed in the following section. In addition to nondiscrimination, this document provides information regarding two Presidential Executive Orders pertaining to fairness and inclusiveness. Executive Order 12898 mandates that federal agencies address equity and fairness, or Environmental Justice, toward low-income and minority persons and populations. Executive Order 13166 mandates that federal agencies ensure that people who have Limited English Proficiency (LEP) have meaningful access to federally-conducted and/or funded programs and activities. Detailed Environmental Justice guidelines and outreach strategies for minority, low-income, and LEP populations to comply with Executive Order 12898 and Executive Order 13166 are included in the NRVMPO Public Participation Plan approved in July 2007 and reviewed and updated in 2012.

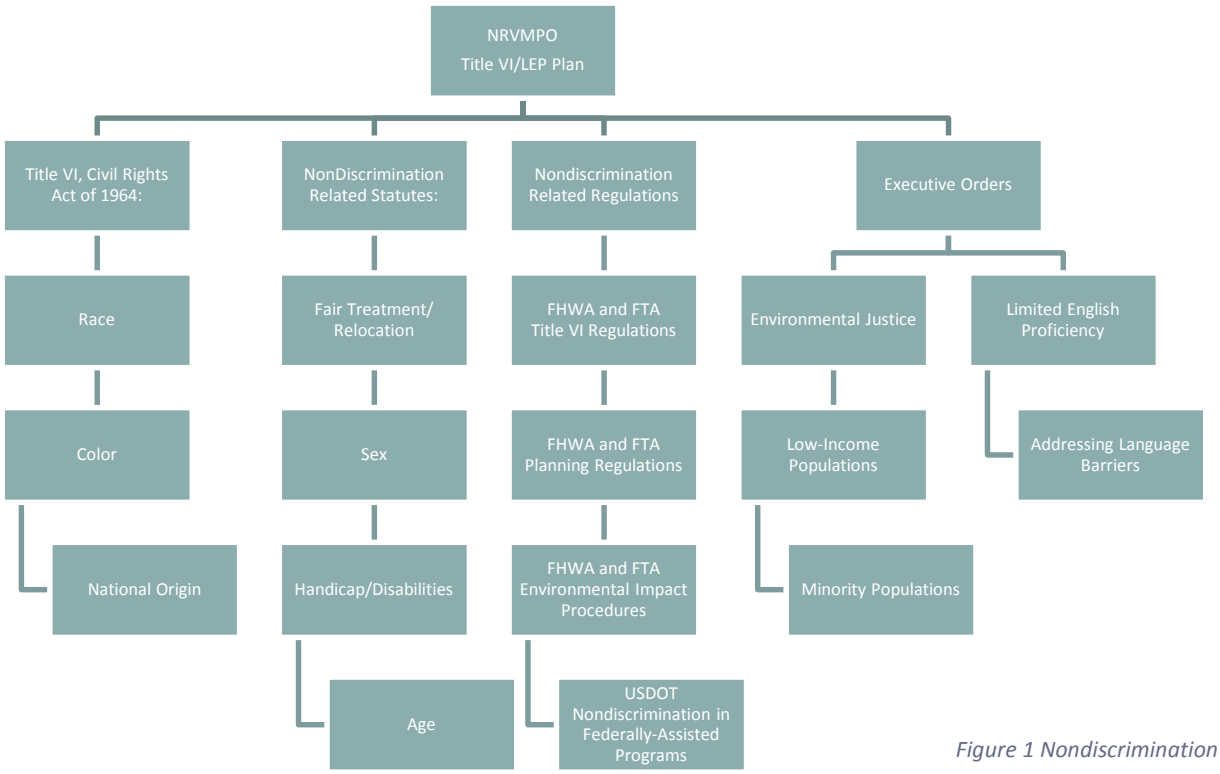


Figure 1 Nondiscrimination Authorities

1.2 Title VI and Other Nondiscrimination Authorities

Title VI is usually referred to in the context of federal nondiscrimination laws. Title VI is one of eleven titles included in the Civil Rights Act of 1964. The following is a list of all the Civil Rights Act titles:

I. Voting Rights
II. Public Accommodation
III. Desegregation of Public Facilities
IV. Desegregation of Public Education
V. Commission on Civil Rights
VI. Nondiscrimination in Federally Assisted Programs and Activities
VII. Equal Employment Opportunity
VIII. Registration and Voting Statistics
IX. Intervention and Procedure after Removal in Civil Rights Cases
X. Establishment of Community Relations Service
XI. Miscellaneous

Title VI "*declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy."* Any organization that receives Federal funds is bound to comply with Title VI.

Since the Civil Rights Act of 1964, other nondiscrimination laws have been enacted to expand the range and scope of Title VI coverage and applicability:

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 prohibits unfair and inequitable treatment of persons displaced or whose property will be acquired as a result of federal and federal-aid programs and projects.

The Federal Aid Highway Act of 1973 states that no person shall, on the grounds 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.

Section 504 of the Rehabilitation Act of 1973 states that no qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance. This Act protects qualified individuals from discrimination based on their disability.

The Age Discrimination Act of 1975 states that no person 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. This act prohibits age discrimination in Federally Assisted Programs.

The Civil Rights Restoration Act of 1987, P.L.100-209 amends Title VI of the 1964 Civil Rights Act to make it clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal assistance.

The American Disabilities Act (ADA) of 1990 prohibits discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.

23 CFR Part 200 – Federal Highway Administration regulations: Title VI Program and Related Statutes – Implementation and Review Procedures.

49 CFR Part 21 – Nondiscrimination in Federally-Assisted Programs.

23 CFR Part 450 – Federal Highway Administration planning regulations.

23 CFR Part 771 – Federal Highway Administration regulations, Environmental Impact Procedures.

In addition to the laws listed on page 2, two executive orders must be taken into account when ensuring compliance with federal nondiscrimination laws, directives, and mandates:

Executive Order 12898 – Environmental Justice (February 11, 1994), a presidential mandate to address equity and fairness toward low-income and minority persons/population. Executive Order 12898 organized and explained the federal government's commitment to promote Environmental Justice. Each federal agency was directed to review its procedures and make environmental justice part of its mission. U.S. DOT Order 5610.2 (April 15, 1997) expanded upon Executive Order 12898 requirements and describes process for incorporating Environmental Justice principles into DOT programs, policies, and activities. FHWA Order 6640.23 (December 2, 1998) – FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

DOT Order 5610.2 on Environmental Justice summarized and expanded upon the requirements of Executive Order 12898 to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components.

Executive Order 13166 – Limited English Proficiency (August 11, 2000), a presidential directive to federal agencies to ensure people who have limited English proficiency have meaningful access to services. Executive Order 13166 ensures federal agencies and their recipients to improve access for persons with Limited English Proficiency to federally-conducted and federally assisted programs and activities.

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

FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning - This memorandum provides clarification for field officers on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

1.3 Environmental Justice

On February 11, 1994, President William J. Clinton signed **Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations**, which directs federal agencies to develop strategies to help them identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. The Executive Order was also intended to provide minority and low-income communities with access to public information and opportunities for public participation in matters relating to human health or the environment. Adverse effects as described in Executive Order 12898 is the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to:

- Bodily impairment, infirmity, illness or death.
- Air, noise, and water pollution and soil contamination.
- Destruction or disruption of:
  - man-made or natural resources
  - aesthetic values
  - community cohesion or a community's economic vitality
  - the availability of public and private facilities and services
- Adverse employment effects.
- Displacement of persons, businesses, farms, or non-profit organizations.
- Increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community.

- Denial of, reduction in, or significant delay in the receipt of benefits of the NRVMPO programs, policies, or activities.

Environmental Justice joins social and environmental movements by addressing the unequal environmental burden often borne by minority and low-income populations. The right to a safe, healthy, productive, and sustainable environment for all, where "environment" is considered in its totality to include the ecological (biological), physical (natural and built), social, political, aesthetic, and economic environments.

Environmental Justice helps to ensure that programs, policies, and activities that have adverse effects on communities do not affect minority and low-income populations disproportionately. To prevent discrimination as described in Executive Order 12898, the Federal Highway Administration Order 6640.23*Order To Address Environmental Justice in Minority Populations and Low-Income Populations* dated December 2, 1998 defines minority and low-income individuals and populations as follows:

Minority – a person who is Black, Hispanic, American Indian and Alaskan Native, or Asian American:

- **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.
- **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.
- **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.

Minority Population – 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 program, policy or activity.

Low-Income – a person whose household income is at or below the United States Department of Health and Human Services poverty guidelines.

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

Environmental Justice is incorporated through all phases of the transportation planning and programming process. Detailed Environmental Justice guidelines and outreach strategies for minority, low-income, and LEP populations to comply with Executive Order 12898 and Executive Order 13166 are included in the NRVMPO Public Participation Plan approved in July 2012 and reviewed and updated in 2012.

1.4 Limited English Proficiency

On August 11, 2000, President William J. Clinton signed **Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency**. The Executive Order 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. The Executive Order also requires that federal agencies work to ensure that recipients of federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient, or “LEP.” For an LEP individual, language can present a barrier to accessing benefits and services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. These individuals may be entitled to language assistance at no cost to them with respect to a particular type of service, benefit, or encounter.

The United States Department of Transportation guidelines require that recipients of federal financial assistance provide "meaningful access to programs and activities" by giving LEP persons adequate and understandable information and allowing them to participate in programs and activities, where appropriate. Recipients of federal funds must take reasonable steps to remove barriers for LEP individuals. While designed to be a flexible and fact dependent standard, the starting point is an individualized assessment that balances the following four factors:

1. Demography: number and/or proportion of LEP persons served and languages spoken in service area.
2. Frequency: rate of contact with service or program.
3. Importance: nature and importance of program/service to people's lives.
4. Resources: available resources, including language assistance services.

The four factor analysis should be used to determine which language assistance services are appropriate to address the identified needs of the LEP population.

Assessment of Needs and Resources

The need and resources for the LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

1.4.1 Factor 1: Proportion of LEP Persons Likely to be Served or Encountered in Eligible Service Population

NRVMPO has reviewed Census data on the number of individuals in its service area that have LEP.

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov for the Metropolitan Planning Area. Information from the 5-year 2009-13 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

This data will be used to determine how best to disseminate information that is accessible to persons with LEP. According to the U.S. Census 5-Year 2009-13 ACS, The overall LEP percentage for the NRVMPO 2040 Study area boundary is 2.02%. However there are specific block groups within the Study Area boundary that are above the Safe Harbor provision of 5% at the Census Block Group geographic level. Figures 5 and 8 document the Block group percentage ranges of LEP.

Limited English Speaking (LEP) Households		
Description	**#**	**%**
Total NRVMPO	33,932	100.00
Total Limited English Speaking Households	686	2.02
Spanish Speaking Households	176	0.52
Indo-European Language Speaking Households	51	0.15
Asian and Pacific Island Language Speaking Households	421	1.24
Other Language Speaking Households	38	0.11

1.4.2 Factor 2: Frequency with Which LEP Individuals Come Into Contact with NRVMPO Plans or Services

As Figures 7 and 8 attest LEP households are somewhat concentrated within the NNRVMPO study area. When NNRVMPO Plans and Programs affect these areas special effort will be made to reach out to the appropriate language communities.

The NRVMPO reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Calls to the NRVMPO's offices;
- Visits to the NRVMPO's office;
- Access to the NRVMPO's website;
- Attendance at community meetings or public hearings hosted by the NRVMPO;
- Public involvement and public engagement meetings/hearings for projects affecting LEP communities or individuals;

The NRVMPO has never been contacted by any LEP individuals regarding projects or programs the NRVMPO administers.

The NRVMPO will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (http://www.lep.gov/ISpeakCards2004.pdf)]

1.4.3 Factor 3: Nature and Importance of NRVMPO Plans and Services to the LEP Population

The NRVMPO's main function is to provide cooperative, comprehensive, and continuing transportation planning for the urbanized portions of the New River Valley. To this end, the NRVMPO develops the regional Transportation Improvement Program (TIP), the Long Range Transportation Plan, assists the member jurisdictions with development of their transportation planning documents, assists the local public transportation provider with planning needs, promotes multi-modal transportation options for the region, and provides other services as needed.

For LEP purposes, it was determined the following documents could be seen as vital documents:

- Long Range Transportation Plan
- Transportation Improvement Plan
- Unified Planning Work Program
- Public Participation Plan

Based on this evaluation and the language assessment in Factor 1 of the Four Factor analysis, the staff will seek partner organizations proficient in Spanish to provide information about NRVMPO plans and programs. Translation and/or interpretation services, for Spanish and other languages, will be considered upon request and in coordination with partner agencies in the region.

If any notice or document bears a direct impact toward a localized population that meets or exceeds the LEP Safe Harbor clause, then the notice or document will be considered for translation as described previously, to include translating notices and key information contained within vital documents. Federal law provides a "safe harbor'' which means that if an MPO provides written translations of documents of summaries and abbreviations of said documents under certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI. The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for MPOs that would like greater certainty of compliance than can be provided by a fact-intensive, four-factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary.

Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. Strong evidence of compliance with the recipient's written-translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally. This safe harbor provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

1.4.4 Factor 4: Resources Available to the Agency and Costs

The NRVMPO provides flexibility in the Unified Planning and Work Program and could devote additional funds to language assistance expenses in certain cases that would provide meaningful benefit to LEP populations. As discussed, this would be determined on an as needed basis related to projects that may impact those identified LEP populations.

Based on the analysis of demographic data and contact with community organizations and LEP persons, the NRVMPO has determined that there is no need to expand our translation services to languages other than Spanish at this time. However, when projects are based in areas identified as high LEP populations additional outreach or accommodations may be necessary.

1.4.5 Limited English Proficiency (LEP) Implementation Plan

Considering the NRVMPO's size and scope, LEP individuals in the NRVMPO Service Area, and financial resources, it is necessary to provide at least the most basic and cost-effective services available to ensure compliance with Executive Order 13166. The following recommendations are offered as measures to provide meaningful access to limited English speaking persons:

- With advance notice of fourteen calendar days, provide interpreter services at any meeting or public hearing. This will include foreign language and hearing impaired interpreter services.
- Place notices of NRVMPO's non-discrimination polices, Title VI Notice to the Public and information on the local and federal complaint process on the website in English and other languages via Google Translate, and make the notices available at public meetings.
- The NRVMPO non-discrimination policy and Title VI Notice to the Public will also be included in all significant publications and reports produced by the NNRVMPO including brochures and other publications for distribution to the public.
- Translate vital documents in languages other than English when there is potential for impact to LEP communities.
- Provide training to NRVMPO staff on the requirements for providing meaningful access to services for LEP persons.
- Monitor data and requests to ensure LEP requirements are fulfilled and report annually on the accomplishments related to LEP activities.
- Include a LEP policy in the updates of the NRVMPO Public Participation Plan through statements and notices that over-the- phone interpretation can be provided, upon prior request for language assistance as well as 7 days prior notice for sign language.
- Utilize the VDOT's LEP Guidelines and Public Participation Plan in conjunction with the DRPT's LEP Plan to identify low-income populations, minority populations, the elderly, and the disabled; who may be part of the LEP population.

1.4.6 Limited English Proficiency (LEP) Plan Monitoring and Updating

The NRVMPO will monitor and update its LEP Implementation Plan, as needed, to ensure meaningful access to its programs and services by LEP persons. The NRVMPO will use a combination of qualitative and quantitative approaches to monitor whether its LEP Implementation Plan effectively meets the needs of LEP persons across the NRVMPO Service Area. On at least a 5-year basis, the NRVMPO will review demographic data and solicit feedback from NRVMPO staff, LEP persons and community-based organizations serving LEP individuals to evaluate the effectiveness of its Title VI and Limited English Proficiency (LEP) Plan.

By establishing an evaluative review of the LEP Implementation Plan, the NRVMPO can assess whether its language assistance services are effective and have impacted relations with LEP communities. The NRVMPO will monitor its implementation plan by soliciting regular feedback from NRVMPO staff and third-party contractors, community-based organizations and LEP persons.

In compliance with U.S. DOT guidelines, the NRVMPO will monitor and evaluate its Title VI and Limited English Proficiency (LEP) Plan by reviewing the following information:

- Changes in the number and proportion of LEP persons in the NRVMPO planning area
- New demographic data from the U.S. Census and American Community Survey
- Changes in the frequency of contact with LEP language groups (e.g., language line usage and translated website pageviews)
- Nature and importance of programs, services and activities to LEP persons
- Expansion of services and programs
- Changes in the availability of resources, including technological advances and/or identification of additional financial resources
- The effectiveness of current language assistance measures in meeting the needs of LEP persons
- Feedback from LEP persons on the effectiveness of current language assistance services
- The effectiveness of staff LEP trainings and agency-wide language assistance protocol (e.g., “Vital Documents Guidelines”)

1.5 NRVMPO Title VI/LEP Coordinator

The NRVMPO Title VI Coordinator is generally responsible for overseeing compliance with applicable nondiscrimination authorities in each of the metropolitan transportation planning and programming areas. Other staff members are expected to provide information and support to assist this staff member perform his or her tasks.

Responsibilities of Title VI/LEP Coordinator:

The Title VI Coordinator is responsible for monitoring staff activities pertaining to nondiscrimination regulations and procedures set forth in federal guidance and in accordance with the NRVMPO Title VI Plan. In support of this, the Title VI Coordinator will:

- Identify, investigate, and work to eliminate discrimination when found to exist.
- Process discrimination complaints received by the NRVMPO. Any individual may exercise his or her right to file a complaint with the NRVMPO, if that person believes that he or she or any other program beneficiaries have been subjected to discrimination, in their receipt of benefits/services or on the grounds of race, color, national origin, sex, handicap, age, or income status. The NRVMPO will make a concerted effort to resolve complaints in accordance with Discrimination Complaint Procedures.
- Meet with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the NRVMPO Title VI Plan.
- Periodically review the NRVMPO Title VI Plan to assess whether administrative procedures are effective and adequate resources are available to ensure compliance.
- Assure that Consultant Contracts include all necessary Title VI provisions as described in the Consultant
- Contracts section of this document.
- Review important issues related to nondiscrimination with as needed.
- Maintain a list of Interpretation Service Providers.
- Assess communication strategies and address additional language needs when needed.
- Disseminate information related to the nondiscrimination authorities.
- Coordinate with appropriate federal, state, and regional entities to periodically provide NRVMPO staff with training opportunities regarding nondiscrimination as appropriate.

Questions:

For questions on the NRVMPO Title VI/Limited English Proficiency Plan and procedures, please contact Dan Brugh, Title VI/LEP Coordinator at (540) 394-2145 or by email at brughjd@montgomerycountyva.gov. For more information about NRVMPO's work programs and publications, please see the NRVMPO website at www.montva.com/mpo.

1.6 NRV MPO Americans with Disabilities Act (ADA) Coordinator

The ADA Coordinator for the NRVMPO is Dan Brugh. He can be contacted by phone at 540-394-2145 or by email at brughjd@montgomerycountyva.gov.

1.7 Annual Nondiscrimination Assurance to the Virginia Department of Rail and Public Transportation

As part of the Certifications and Assurances submitted annually with the Grant Applications for funding by Virginia Department of Rail and Public Transportation (VDRPT) and the Federal Transit Administration (FTA), the NRVMPO submits that it is compliant with all relevant Nondiscrimination Authorities in hiring, contracting, and development of MPO work products.

1.8 NRVMPO Responsibilities

The NRVMPO ensures compliance with all applicable nondiscrimination authorities and with regard to the following:

- Communications and Public Participation
- Planning and Programming
- Environmental Justice
- Consultant Contracts
- Education and Training

In addition to the responsibilities listed in this section, NRVMPO staff responsibilities may include reviewing Title VI guidelines and procedures for the NRVMPO Title VI Plan, and incorporating Title VI-related language and provisions into NRVMPO documents, as appropriate.

1.8.1 Communications and Public Participation Responsibilities

NRVMPO staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the NRVMPO public participation process. NRVMPO staff members will:

- Ensure that all communications and public participation efforts comply with nondiscrimination authorities.
- Provide services for individuals with special needs – Upon advance notice, deaf interpreters, translators, and Braille documents can be provided for public meetings.
- Notifications of opportunities for public participation will include contact information for people needing these or other special accommodations.
- Include contact information for people needing these or other special accommodations.
- Include the following statement in all of the NRVMPO public notices: "*The NRVMPO will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. Contact the NRVMPO at (540) 394-2145 for more information.*
- Include the following Title VI Statement to the Public in relevant press releases and on the NRVMPO website. "*The New River Valley Area Metropolitan Planning Organization (NRVMPO) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to obtain a Discrimination Complaint Form, email: brughjd@montgomerycountyva.gov or call (540) 394-2145.*"

1.8.2 Planning and Programming Responsibilities

The NRVMPO is responsible for developing long- and short-range transportation plans and programs to provide efficient transportation services for the NRVMPO Study Area. A comprehensive transportation process is used which entails the monitoring and collection of various data pertaining to transportation issues. The NRVMPO coordinates with VDOT, DRPT, cities, counties, and area transit agencies; seeks public participation; and provides technical support when needed. A public involvement strategy and guidelines for long-range transportation plan updates is included within the ***"NRVMPO Public Participation Plan approved November 1, 2012"***.

The NRVMPO is governed by a Policy Board, comprised of elected and appointed officials from the NRVMPO area local governments as well as representatives of public transit agencies including Blacksburg Transit, Pulaski Area Transit, and Radford Transit; the Virginia Tech/Montgomery Regional Airport Authority; Virginia Tech and Radford University as well as New River Community College; Virginia Department of Rail and Public Transportation (DRPT), Virginia Department of Transportation (VDOT) and others. The local, state and federal governments as well as others listed select their representatives to serve on the Policy Board. Member jurisdictions, agencies, and entities select their representatives to serve on the Policy Board. Members are not selected by the NRVMPO (membership shown on page ii).

There is one standing committee, the Technical Advisory Committee (TAC), and it serves in an advisory role to the Policy Board. All members of the TAC are staff that are appointed to the committee by the member jurisdictions, agencies, and entities. Members are not selected by the NRVMPO (membership shown on page iii).

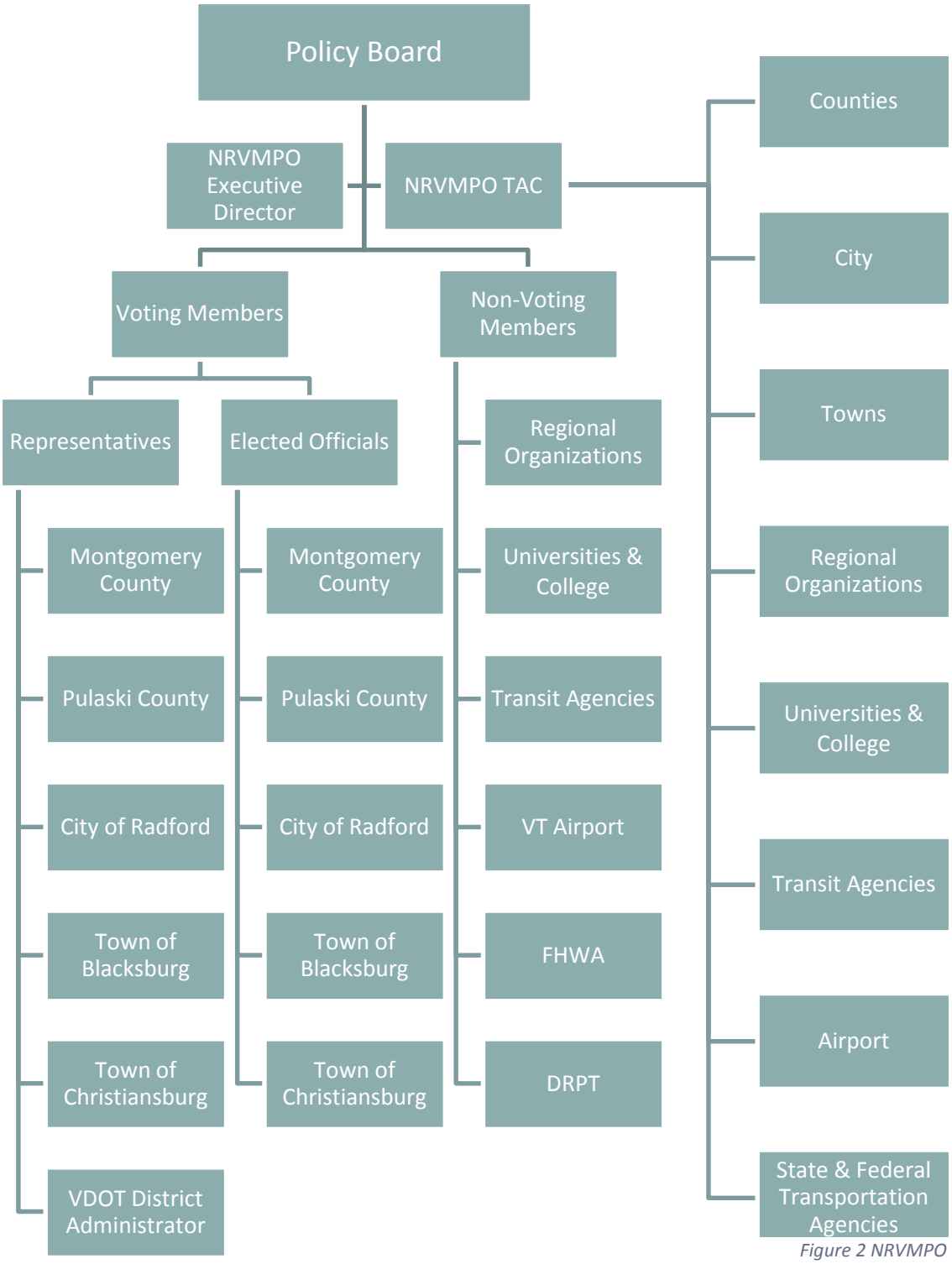


Figure 2 NRVMPO Organization Chart

1.8.3 Environmental Justice Responsibilities

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

NRVMPO staff is responsible for evaluating and monitoring compliance with applicable nondiscrimination authorities in all aspects of the NRVMPO efforts to address Environmental Justice. NRVMPO staff will:

- Ensure that all aspects of efforts to address Environmental Justice comply with nondiscrimination authorities.
- Conduct an Environmental Justice analysis during the development of the Long-Range Transportation Plan.
- Prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data.
- Ensure the updated NRVMPO Public Participation Plan includes Environmental Justice guidelines, which outline outreach strategies for minority, low-income, and LEP populations during the development and implementation of NRVMPO plans and programs.
- Disseminate information to the public on the processes used and findings of any analysis, in accordance with all NRVMPO public participation procedures.

1.8.4 Minority Population Planning Procedures

The Long-Range Transportation Plan is the primary plan generated. Other plans are developed to provide input to the LRTP for example: Bicycle and Pedestrian Master Plan, Bus Stop Safety and Accessibility studies, Regional Transit Study, etc. Through these planning processes the mobility needs of minority populations are considered and their input sought during the Plan's development. Input from minority populations is sought through a variety of activities that specifically target minority populations or encompass minority populations through general public outreach efforts. Such efforts often include the following:

- Notifications will be placed in public areas of the NRVMPO office
- on-board transit surveys (such as preference and feedback surveys)
- general public surveys distributed via local government communication methods
- flyer distributions at libraries and senior living centers
- advertisements and articles in the Roanoke Times, the Radford News Journal, the News Messenger, or the Southwest Times
- news stories or advertisements on WSLS, WDBJ, or WFXR television
- news stories or advertisements on radio on WBRW, WNMX, WPSK, WWBU, or WFNR

Transportation projects and proposed improvements consider the impact on minority populations by comparing the project's location, benefits, and burdens on minorities as analyzed using maps and geographic demographic data.

1.8.5 Consultant Contracts

Montgomery County as fiscal agent for the NRVMPO is responsible for selection, negotiation, and award of all consultant contracts. Montgomery County complies with all relevant federal and state laws in contract selection.

NRVMPO staff is responsible for evaluating and monitoring consultant contracts for compliance with nondiscrimination authorities. NRVMPO staff will:

- Ensure inclusion of nondiscrimination language in contracts and Requests for Proposals (RFPs).
- Review consultants for compliance as described below:
  - Ensure that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements.
  - If a recipient or sub-recipients is found to be not in compliance with nondiscrimination authorities, the Title VI Coordinator and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and write a remedial action if necessary.
- Review outreach activities to ensure small, disadvantaged, minority, women, and disabled veteran businesses are not excluded to participate in opportunities to compete for consulting contracts.
- Require consultants to submit annually their compliance report regarding compliance with Title VI requirements.

1.8.6 Education and Training

For education and training, nondiscrimination responsibilities include:

- Distribute information to NRVMPO staff on training programs regarding Title VI and related statutes.
- Track staff participation in nondiscrimination training.
- Maintain and update nondiscrimination training as necessary.
- Maintain and update the NRVMPO Title VI Plan as necessary.

1.9 Discrimination Complaint Procedures

Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color, or national origin. Subsequent laws and Presidential Executive Orders added handicap, sex, age, income status and limited English proficiency to the criteria for which discrimination is prohibited, in programs and activities receiving federal financial assistance. As a sub-recipient of federal assistance, the NRVMPO has adopted a Discrimination Complaint Procedure as part of its Title VI Plan to comply with Title VI and associated statutes.

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, or any nondiscrimination authority, may file a complaint with the NRVMPO. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the NRVMPO Title VI Coordinator for review and action.
2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
   a. The date of the alleged act of discrimination; or
   b. Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

   In case the recipient or his/her designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the recipient, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.

4. Within 10 days, the NRVMPO Title VI Coordinator will acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the allegation, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available, such as the Virginia Department of Transportation (VDOT) and the Federal Highway Administration (FHWA).

5. Within 10 days, a letter will be sent to the VDOT Central Office, Civil Rights Division, and a copy to the FHWA Virginia Division Office. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator.

6. In the case of a complaint against the NRVMPO, a VDOT investigator will prepare a final investigative report and send it to the complainant, respondent (NRVMPO person listed), the NRVMPO Title VI Coordinator, and FHWA Virginia Division.

7. Generally, the following information will be included in every notification to the VDOT Office of Civil Rights:
    a. Name, address, and phone number of the complainant.
    b. Name(s) and address(es) of alleged discriminating official(s).
    c. Basis of complaint (i.e., race, color, national origin, sex, age, handicap/disability, income status, limited English proficiency).
    d. Date of alleged discriminatory act(s).
    e. Date of complaint received by the recipient.
    f. A statement of the complaint.
    g. Other agencies (state, local or federal) where the complaint has been filed.
    h. An explanation of the actions the recipient has taken or proposed to resolve the issue raised in the complaint.

8. Within 60 days, the NRVMPO Title VI Coordinator will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Executive Director of the recipient of federal assistance. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

9. Within 90 days of receipt of the complaint, the NRVMPO Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the Virginia Department of Transportation or the Federal Highway Administration, if they are dissatisfied with the final decision rendered by the NRVMPO. The NRVMPO's Title VI Coordinator will also provide the VDOT Civil Rights Central Office with a copy of the determination and report findings.

10. In the case a nondiscrimination complaint that was originated at the NRVMPO is turned over to and investigated by VDOT, FHWA or another agency, the NRVMPO Title VI Coordinator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations and VDOT policies and procedures.

11. In accordance with federal law, the NRVMPO will require that applicants of federal assistance notify the NRVMPO of any lawsuits filed against the applicant or sub-recipients of federal assistance or alleging discrimination; and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.

12. The NRV MPO will submit Title VI accomplishment reports to the VDOT Central Office, Civil Rights Division, in compliance with VDOT's established processes.

13. The NRV MPO will collect demographic Data on staff, committees, and program areas in accordance with 23 CFR, 49 CFR
14. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the NRVMPO will retain Discrimination Complaint Forms and a log of all complaints filed with or investigated by the NRVMPO.
15. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act.

List of transit-related Title VI Investigations, complaints, and/or lawsuits:
Since the submission of the Title VI program to the FTA there have been no Title VI investigations, complaints, or lawsuits received by the NRVMPO.

1.10 NRVMPO Demographic Profiles

The total population of the NRVMPO urbanized area is 99,552. The following figures indicate the percentages of the population below the poverty threshold, minority population, and limited English proficient (LEP) households by Census Block Group. 2014 data was used to develop the supporting figures shown on pages 16-18.

The estimated population living below the poverty threshold is 27,563, which accounts for slightly more than a quarter of the total NRVMPO population. Poverty Guidelines are issued in the Federal Register annually by the Department of Health and Human Services. The guidelines are a simplification of poverty thresholds, developed by the Census Bureau, to be used for determining financial eligibility for certain federal programs. The guidelines are available online here: https://aspe.hhs.gov/2015-poverty-guidelines#threshholds.

The estimated population of minorities is 17,656, which accounts for approximately 15% of the total NRVMPO population. Minority population data is available for 2014 through the United States Census Bureau's American FactFinder, Table ID B03002. American FactFinder provides access to data about the United States, Puerto Rico, and the Island Areas. The data comes from several decennial censuses and surveys conducted by American Community Survey. To access the data, visit: http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml.

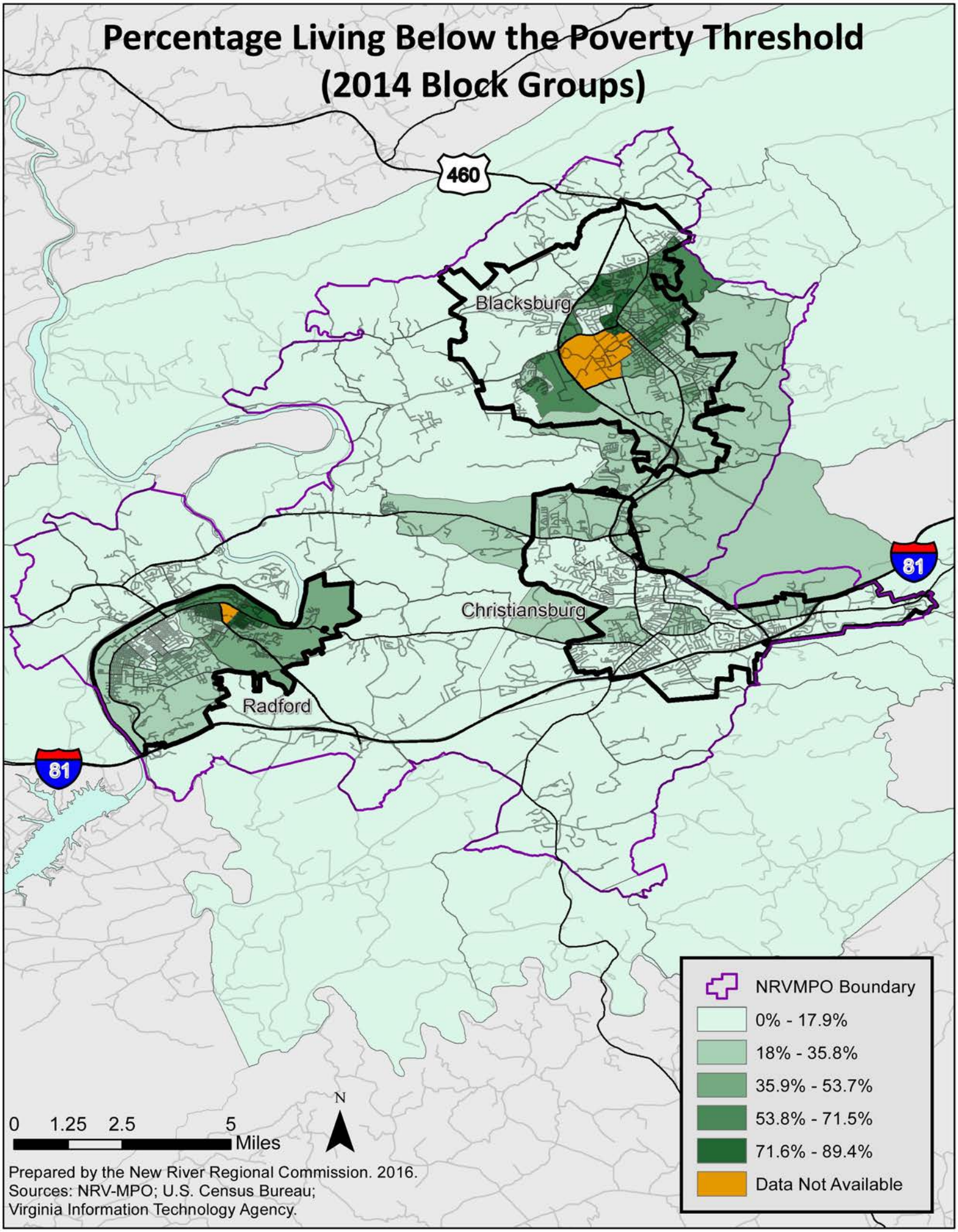
The estimated number of LEP Households is 686, which accounts for slightly more than 2% of the total NRVMPO population. Limited English proficiency status data is available for 2014 through the United States Census Bureau's American FactFinder, Table ID B16002. To access the data, visit: http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml.

1.11 Allocation of Funds to Predominantly Disadvantaged Population Concentration Areas:
Appendix D identifies traditionally disadvantaged groups to determine what level of investment these areas would receive in terms of transportation spending as part of the NRVMPO 2040 Long-Range Plan (LRP). Appendix E analyzes disadvantaged populations impacted by public transportation service.

NRVMPO staff possesses neither the expertise nor specific project knowledge to properly assess the environmental impacts of the candidate projects beyond the investment of funding in disadvantaged population areas. As these projects move through the construction process, they will be subject to project-specific NEPA review that will appropriately assess any negative environmental (human or otherwise) impacts these projects might have on neighboring populations.

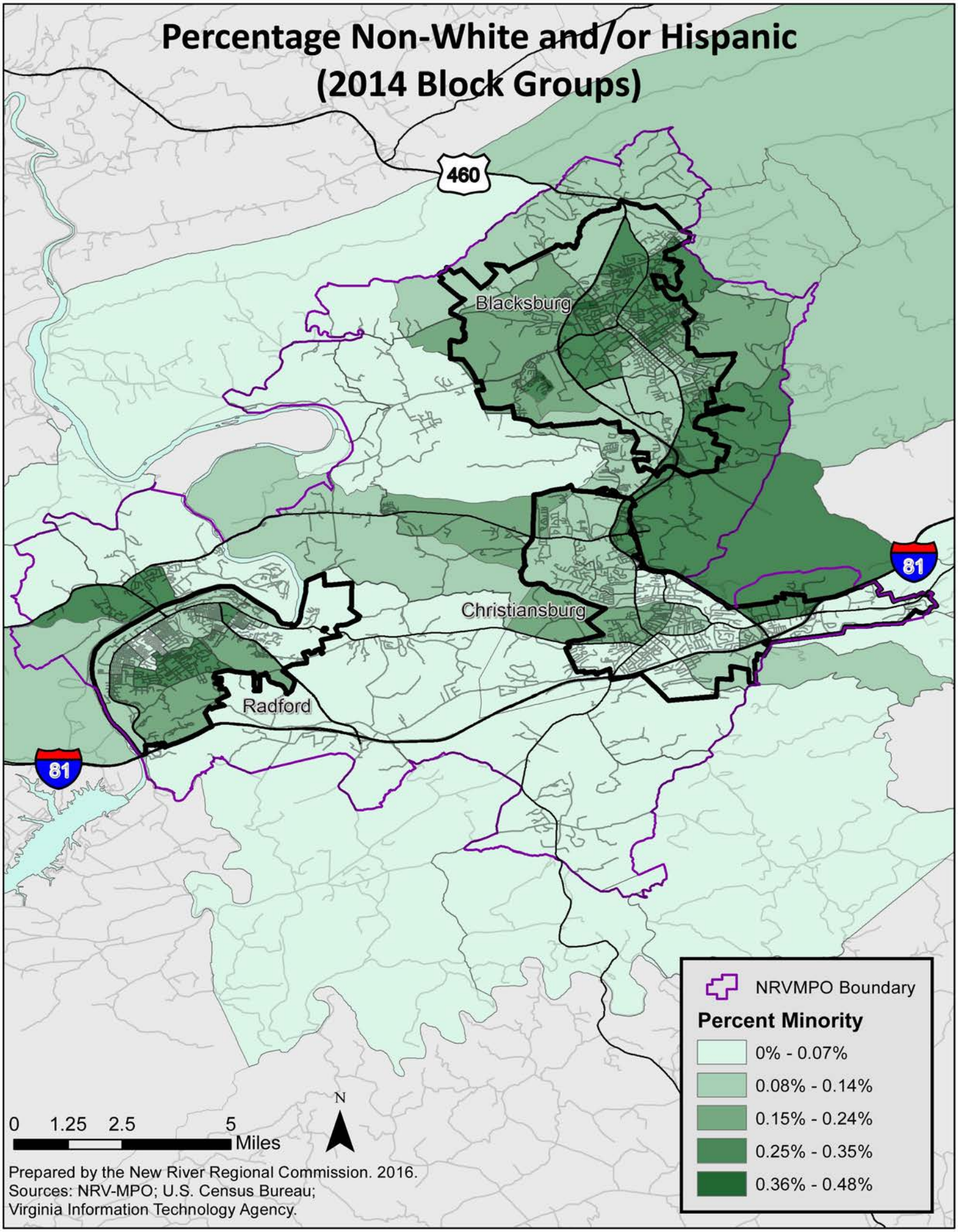
Summing the current construction cost estimates for all of the 2040 LRP financially constrained list projects equals approximately $334,605,762.

Percentage Living Below the Poverty Threshold (2014 Block Groups)



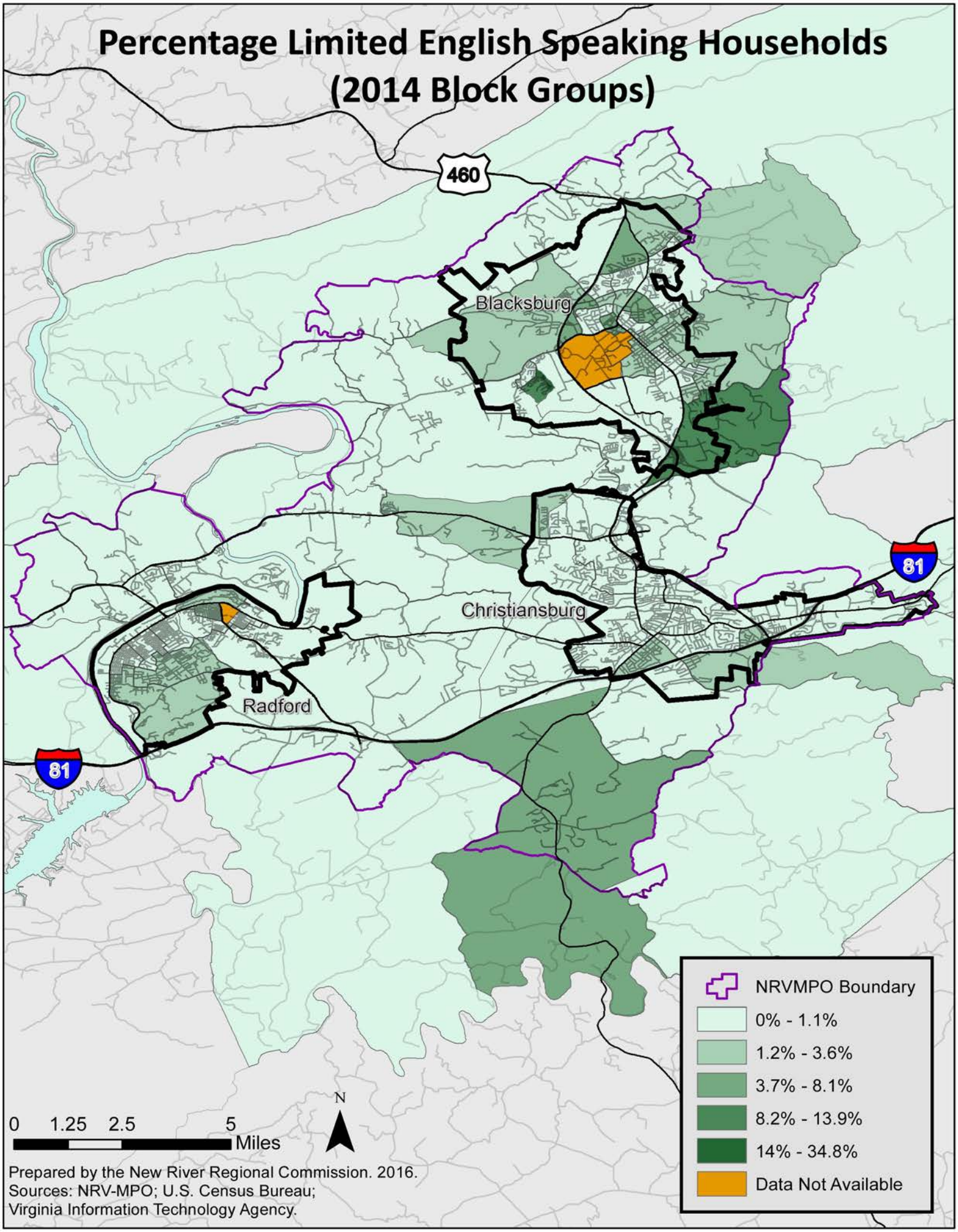
Prepared by the New River Regional Commission. 2016.
Sources: NRV-MPO; U.S. Census Bureau;
Virginia Information Technology Agency.

Percentage Non-White and/or Hispanic (2014 Block Groups)



Prepared by the New River Regional Commission. 2016.
Sources: NRV-MPO; U.S. Census Bureau;
Virginia Information Technology Agency.

Percentage Limited English Speaking Households (2014 Block Groups)



Prepared by the New River Regional Commission. 2016.
Sources: NRV-MPO; U.S. Census Bureau;
Virginia Information Technology Agency.

Title VI Plan Appendices

Appendix A – Title VI Discrimination Complaint Form

New River Valley MPO
Complaint of Discrimination Form
(Complaints must be filed within 180 days of the alleged discrimination)

Name: _____ Date of Birth: _____
Address: _____ Race: _____
_____ SSN: _____
Home Telephone: _____ Business Telephone: _____
If Employed (Currently/Previously) by the New River Valley MPO:
Position: _____ Date of Hire: _____
Organizational unit which you believe has discriminated:
Name: _____
Location: _____
Category of discrimination (Injured party was discriminated against because of: Circle ALL that apply):
Race Disability National Origin Religion Sex Age Sexual Harassment
Political Affiliation (Violation of Executive Order Number One) Color Retaliation
Nature of Complaint:
Date this discrimination occurred: _____
Have you discussed your complaint with anyone within the organization? If yes, give name(s) and position(s):
_____
Did you request, from the party taking the action, an explanation of the action? Yes No
If Yes, was it a: Verbal Request Written Request Date of Request: _____
Did you receive a response? Yes No Date of Response: _____
If Yes, was it a: Verbal Response _____ Written Response _____(check one)
Give your account of the event that motivated your complaint of discrimination (use additional sheets if necessary).
_____
_____
_____
_____
Have efforts been made to resolve this complaint through the Grievance Procedure? Yes No
If yes what is the status of the grievance? _____
Has this complaint also been filed with a Federal, State or local civil rights agency? Yes No
If yes, please explain: _____
Agency: _____ Contact Person: _____
Address: _____ Date Filed: _____
What relief do you want? _____
_____
_____
I affirm that the above information is true to the best of my knowledge and belief.

Signature: _____ Date: _____
Filing with this office does not preclude you from filing with the U.S. Equal Employment Opportunity Commission (EEOC). Forward the completed form to the MPO at 755 Roanoke Street, Suite 2I, Christiansburg, VA 24073.

Appendix B – NRVMPO Title VI Non-Discrimination Statement

The New River Valley Metropolitan Planning Organization (NRVMPO) gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), and all related statutes. The NRVMPO is committed to ensuring that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the NRVMPO receives Federal financial assistance as required by Title VI.

Please contact the NRVMPO to request a copy of the department's Title VI Plan.

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from the participation in, been denied the benefits of, or been otherwise subjected to discrimination under any program or activity for which the NRVMPO provides assistance, and believes the discrimination is based upon race, color, national origin, gender, age, economic status, or limited English proficiency has the right to file a formal complaint.

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

If a complaint addresses a particular service provider, the complaint should be lodged with that provider. A complaint must be submitted within 180 days of the alleged discriminatory act. Complaints may also be filed with the US Federal Transit Administration. If a complaint addresses DRPT, you may file the complaint through email via the link below, by phone, or in writing.

For complainants who may be unable to file a written complaint, verbal information will be accepted by the NRVMPO at (540) 394-2145 or by email at brughjd@montgomerycountyva.gov, as well as by the individual service providers.

To submit a formal complaint or to request additional information on Title VI obligations, contact Dan Brugh, Title VI/LEP Coordinator at (540) 394-2145 or by email at brughjd@montgomerycountyva.gov. For more information about NRVMPO's work programs and publications, please see the NRVMPO website at www.montva.com/mpo.

Appendix C – Notice Under the Americans with Disabilities Act

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), the New River Valley Metropolitan Planning Organization (NRVMPO) will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

Employment: the NRVMPO does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: the NRVMPO will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in NRVMPO's programs, services and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing or vision impairments.

Modifications to Policies and Procedures: the NRVMPO will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services and activities.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a NRVMPO program, service or activity, should contact Dan Brugh, Title VI/LEP Coordinator at (540) 394-2145 or by email at brughjd@montgomerycountyva.gov. For more information about NRVMPO's work programs and publications, please see the NRVMPO website at www.montva.com/mpo.

The ADA does not require the NRVMPO to take any action that would fundamentally alter the nature of its programs or services, or impose any undue financial or administrative burden.

Complaints that a NRVMPO program, service or activity is not accessible to persons with disabilities should be directed to Dan Brugh, Title VI/LEP Coordinator at (540) 394-2145 or by email at brughjd@montgomerycountyva.gov. For more information about NRVMPO's work programs and publications, please see the NRVMPO website at www.montva.com/mpo.

The NRVMPO will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy.

Appendix D – Impacts of the Distribution of State and Federal Funds for the Long-Range Transportation Plan (LRTP)

This section reviews the proximity of projects identified in the New River Valley Long-Range Transportation Plan to disadvantaged populations.

Identification of Disadvantaged Population & Concentration Areas:

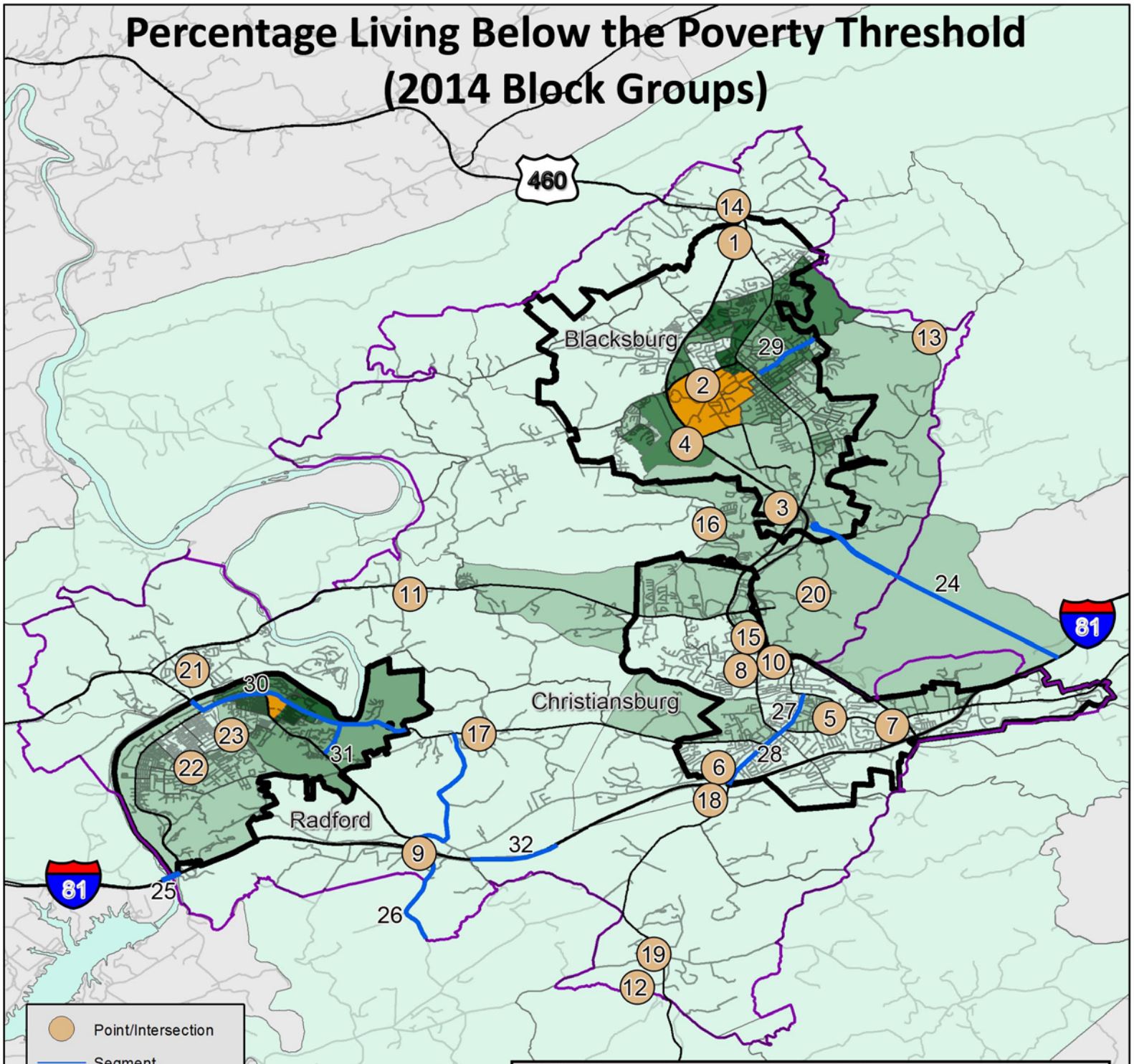
Disadvantaged population (Low income, Minority, and Limited English) information is available in Section 1.10 Demographic Profiles of this document. Higher concentrations of population living below the poverty threshold tend to be in close proximity to the Virginia Tech and Radford University campuses. Minority and Limited English proficient populations were more evenly distributed.

ID	Jurisdiction	Location/Description	Demographic Analysis**					
			Minority		*LEP*		*Low Income*	
			#	%	#	%	#	%
1	Blacksburg	Reconfigure intersection and extend acceleration/deceleration lanes at intersection of Route 460 Bus. and North Main Street.	727	12.2%	38	1.7%	223	3.8%
2	Blacksburg	Construct multi-modal transportation facility on Perry Street at Virginia Tech's campus.*	2,698	23.3%	43	4.0%	1,488	53.9%
3	Blacksburg	Traffic signal improvements and new lane construction at ramps to Rte. 460 and Research Center Drive.*	1,089	19.6%	146	5.6%	1,668	31.4%
4	Blacksburg	Construct interchange and connector road at Southgate Drive.*	596	20.2%	0	0.0%	740	42.7%
5	Christiansburg	Upgrade bridge on Depot St (Route 11) over Walnut Branch.	288	5.0%	0	0.0%	616	10.8%
6	Montgomery Christiansburg	Approaches and ramp improvements and replace bridges on I-81, Route 8 at exit 114.	212	3.2%	47	1.7%	542	8.2%
7	Christiansburg	Relocation of Park & Ride off of exit 118B.	733	10.0%	19	0.7%	1,137	15.6%
8	Christiansburg	Reconfigure intersection at Franklin Street, Cambria St, & Route 460 WB exit ramp.	866	12.4%	0	0.0%	1,079	15.4%
9	Montgomery	Install signals at Tyler Road (Route 177) Ext 109A off of I-81.	21	0.5%	0	0.0%	570	12.8%
10	Montgomery	Reconstruct and add sound walls, and a Park & Ride lot at I-81 Exit 114.	212	3.2%	47	1.7%	542	8.2%
11	Montgomery	Bicycle and pedestrian improvements, and safe routes to school at Belview ES & Auburn ES/MS.	113	3.0%	0	0.0%	361	9.7%
12	Montgomery	Bicycle and pedestrian improvements, and safe routes to school at Belview ES & Auburn ES/MS.	36	1.7%	36	4.4%	251	11.7%
13	Montgomery	Upgrade bridge at Catawba Road (Route 785) over Indian Run.	1,118	14.4%	59	2.0%	916	11.9%
14	Montgomery	Upgrade bridge at Coal Bank Hollow (Route 649) over Tom's Creek.	727	12.2%	38	1.7%	223	3.8%
15	Montgomery	Construct new ramp at Franklin Street interchange.	866	12.4%	0	0.0%	1,079	15.4%
16	Montgomery	Improve intersection at Merrimac Road (Rout 657) and Hightop Road (Route 808).	345	5.9%	0	0.0%	1,081	19.1%
17	Montgomery	Safety improvements at Radford Road (US 11) and Walton Road (Route 663).	21	0.9%	0	0.0%	394	16.8%

ID	Jurisdiction	Location/Description	Demographic Analysis**					
			Minority		*LEP*		*Low Income*	
			#	%	#	%	#	%
18	Montgomery	Safety improvements at Riner Road (Route 8) and Life Drive (Route 1295).	212	3.2%	47	1.7%	542	8.2%
19	Montgomery	Install turn lanes at Route 669.	36	1.7%	36	4.4%	251	11.7%
20	Montgomery	Upgrade bridge at Yellow Sulphur Road (Route 643) over Wilson Creek.	508	26.0%	0	0.0%	558	28.6%
21	Pulaski	Riverlawn Court Trail	371	8.8%	0	0.0%	332	7.9%
22	Radford	Bicycle and pedestrian improvements, and safe routes to school at McHarg ES.	717	19.3%	18	1.1%	485	13.1%
23	Radford	Road widening and improvement at Park Road and Second Ave.	993	19.9%	18	0.9%	1,163	23.7%
24	Montgomery	Smart road, 2-lanes on 4-lane right of way.	1,597	21.1%	146	4.6%	2,226	30.6%
25	Montgomery Pulaski	Replace bridges over the New River.	600	8.8%	9	0.4%	1,012	16.4%
26	Montgomery	Restoration and reconstruction on Route 600.	21	0.5%	0	0.0%	570	12.8%
27	Christiansburg	Streetscape enhancement and improvements along Main Street.	938	6.5%	47	0.7%	1,425	10.0%
28	Christiansburg	Widen to 4-lanes on Route 8 (W Main St) from Route 11 to I-81.	869	7.5%	47	0.9%	1,197	10.2%
29	Blacksburg	Bicycle and pedestrian improvements, and safe routes to school on Harding Ave.	4,550	21.5%	117	2.4%	5,379	43.8%
30	Radford	City-wide traffic signal analysis and installation.	2,291	11.2%	17	0.2%	5,633	32.2%
31	Radford	Construct new 2-lane connector at Tyler Avenue to Route 11.	588	7.1%	0	0.0%	2,970	36.5%
32	Montgomery	Revenue sharing reconstruction and paving along I-81.	150	1.8%	41	1.2%	937	11.3%

Notes: Percentages based on a total of 115,084. Includes all 2014 ACS block groups that intersect with MPO boundary feature. * Denotes a project where demographic data is not available, total number and percentage of effected population could be greater than shown above. ** Demographic populations within a ½-mile radius of project locations, numbers include the total of intersecting block groups.

Percentage Living Below the Poverty Threshold (2014 Block Groups)



Point/Intersection
Segment
NRVMPO Boundary
0% - 17.9%
18% - 35.8%
35.9% - 53.7%
53.8% - 71.5%
71.6% - 89.4%
Data Not Available

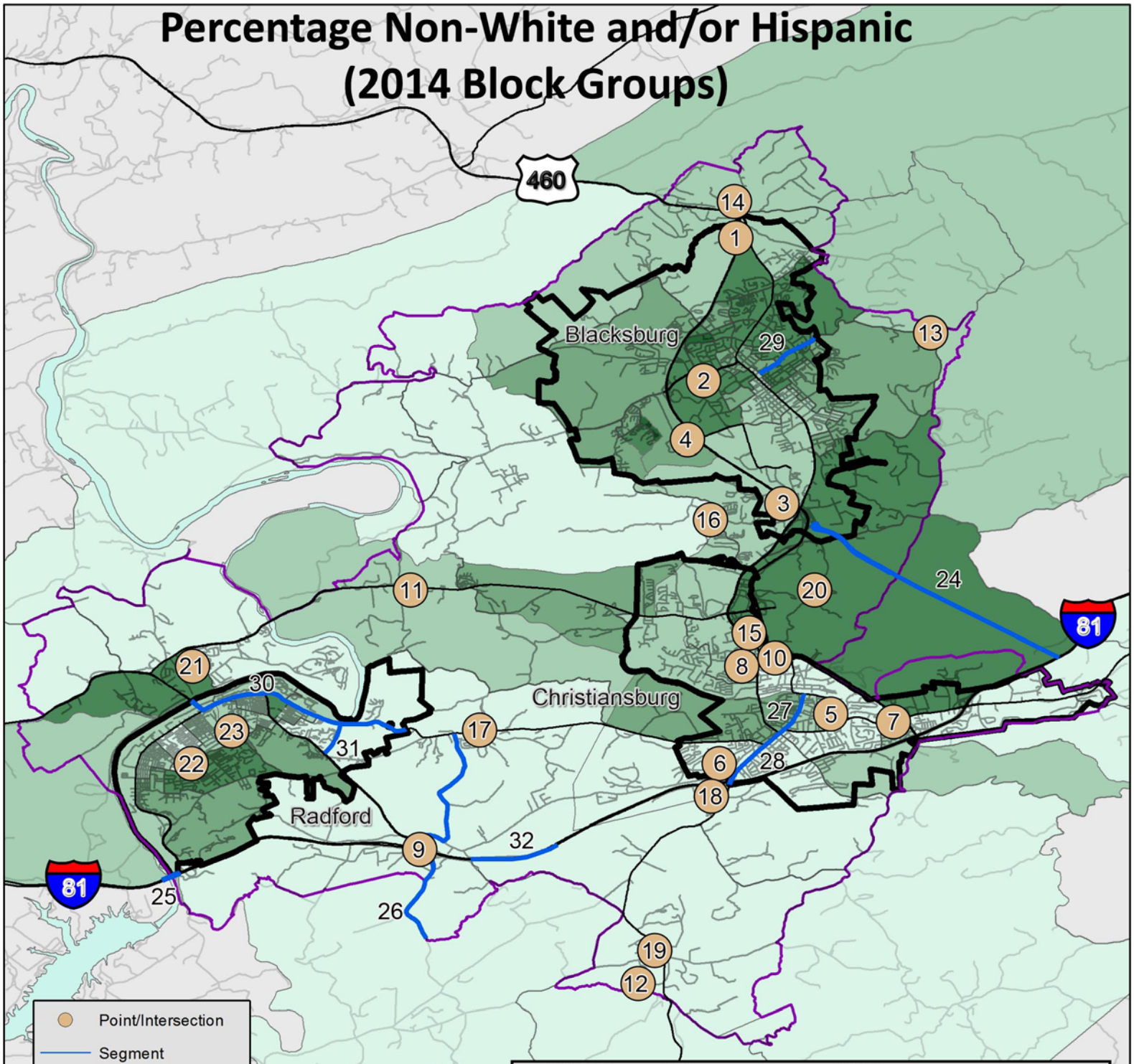
0 1.25 2.5 5 Miles

N

	LABEL	Jurisdiction	Location	Description
Point/Intersection	1	Blacksburg	At Rte 460 Bus N Main St	Reconfigure intersection, Extend acceleration and deceleration lanes
	2	Blacksburg	Perry St, VT Campus	Construct Multi-Modal Transportation Facility
	3	Blacksburg	Ramps to Rte 360, Research Center Dr	Traffic Signal Improvements, New Land Construction
	4	Blacksburg	Southgate Dr	Interchange & Connector Road
	5	Christiansburg	Deport St (Rte 111) over Walnut Branch	Upgrade Bridge
	6	Mont/Cburg	Ext 114	Replaces bridges on I 81 Rte 8 at Ext 114 Approaches, Ramp Improvements
	7	Christiansburg	Ext 118B off of I 81	Relocation of Park & Ride Lot
	8	Christiansburg	Franklin St, Cambria St, Rte 460 WB Exit Ramp	Reconfigure Intersection
	9	Montgomery	I 81 at Tyler Rd (Rte 177) Ext 109A	Install signals
	10	Montgomery	At Ext 114	Add a Park & Ride Lot
	11	Montgomery	Belview ES & Auburn ES/MS	Safe Routes to School, Bicycle/Pedestrian Improvements
	12	Montgomery	Belview ES & Auburn ES/MS	Safe Routes to School, Bicycle/Pedestrian Improvements
	13	Montgomery	Catawba Rd (Rte 785) over Indian Run	Upgrade bridge
	14	Montgomery	Coal Bank Hollow (Rte 649) over Toms Creek	Upgrade bridge
	15	Montgomery	At Franklin St Interchange	Construct New Ramp
	16	Montgomery	Merrimac Rd (Rt 657) at Hightop Rd (Rt 808)	Improve intersection
	17	Montgomery	Radford Rd (US 11) at Walton Rd (Rte 663)	Safety Improvements
	18	Montgomery	Riner Rd (Rte 8) at Life Dr (Rte 1295)	Safety Improvements
	19	Montgomery	at Rte 669	Install Turn Lanes
	20	Montgomery	Yellow Sulphur Rd (Rte 643) over Wilson Creek	Upgrade bridge
	21	Pulaski		Riverlawn Court Trail
	22	Radford	McHarg ES	Safe Routes to School, Bicycle/Pedestrian Improvements
	23	Radford	Park Rd & Second Ave	Road Widening & Improvement
Segment	24	Montgomery		2 lanes on 4 land Right of Way
	25	Montgomery & Pulaski	Bridges over the New River	Replaces bridges over the New River
	26	Montgomery		Restoration & Reconstruction
	27	Christiansburg	Main St	Streetscape Improvements
	28	Christiansburg	Rte 8 (W Main St) from Rte 11 to I-81	Widen to four lanes
	29	Blacksburg	Harding Ave	Bicycle/Pedestrian Improvements
	30	Radford	City Wide	Traffic Signal Analysis & Installation
	31	Radford	Tyler Avenue to Rte 11	Construct New 2 Lane Connector
	32	Montgomery	I-81	Revenue Sharing Reconstruction, Paving

Prepared by the New River Regional Commission. 2016.
Sources: NRV-MPO; U.S. Census Bureau;
Virginia Information Technology Agency.

Percentage Non-White and/or Hispanic (2014 Block Groups)



Point/Intersection

Segment

NRVMPO Boundary

Percent Minority

- 0% - 0.07%
- 0.08% - 0.14%
- 0.15% - 0.24%
- 0.25% - 0.35%
- 0.36% - 0.48%

0 1.25 2.5 5 Miles

N

	LABEL	Jurisdiction	Location	Description
Point/Intersection	1	Blacksburg	At Rte 460 Bus N Main St	Reconfigure intersection, Extend acceleration and deceleration lanes
	2	Blacksburg	Perry St, VT Campus	Construct Multi-Modal Transportation Facility
	3	Blacksburg	Ramps to Rte 360, Research Center Dr	Traffic Signal Improvements, New Land Construction
	4	Blacksburg	Southgate Dr	Interchange & Connector Road
	5	Christiansburg	Deport St (Rte 111) over Walnut Branch	Upgrade Bridge
	6	Mont/Cburg	Ext 114	Replaces bridges on I 81 Rte 8 at Ext 114 Approaches, Ramp Improvements
	7	Christiansburg	Ext 118B off of I 81	Relocation of Park & Ride Lot
	8	Christiansburg	Franklin St, Cambria St, Rte 460 WB Exit Ramp	Reconfigure Intersection
	9	Montgomery	I 81 at Tyler Rd (Rte 177) Ext 109A	Install signals
	10	Montgomery	At Ext 114	Add a Park & Ride Lot
	11	Montgomery	Belview ES & Auburn ES/MS	Safe Routes to School, Bicycle/Pedestrian Improvements
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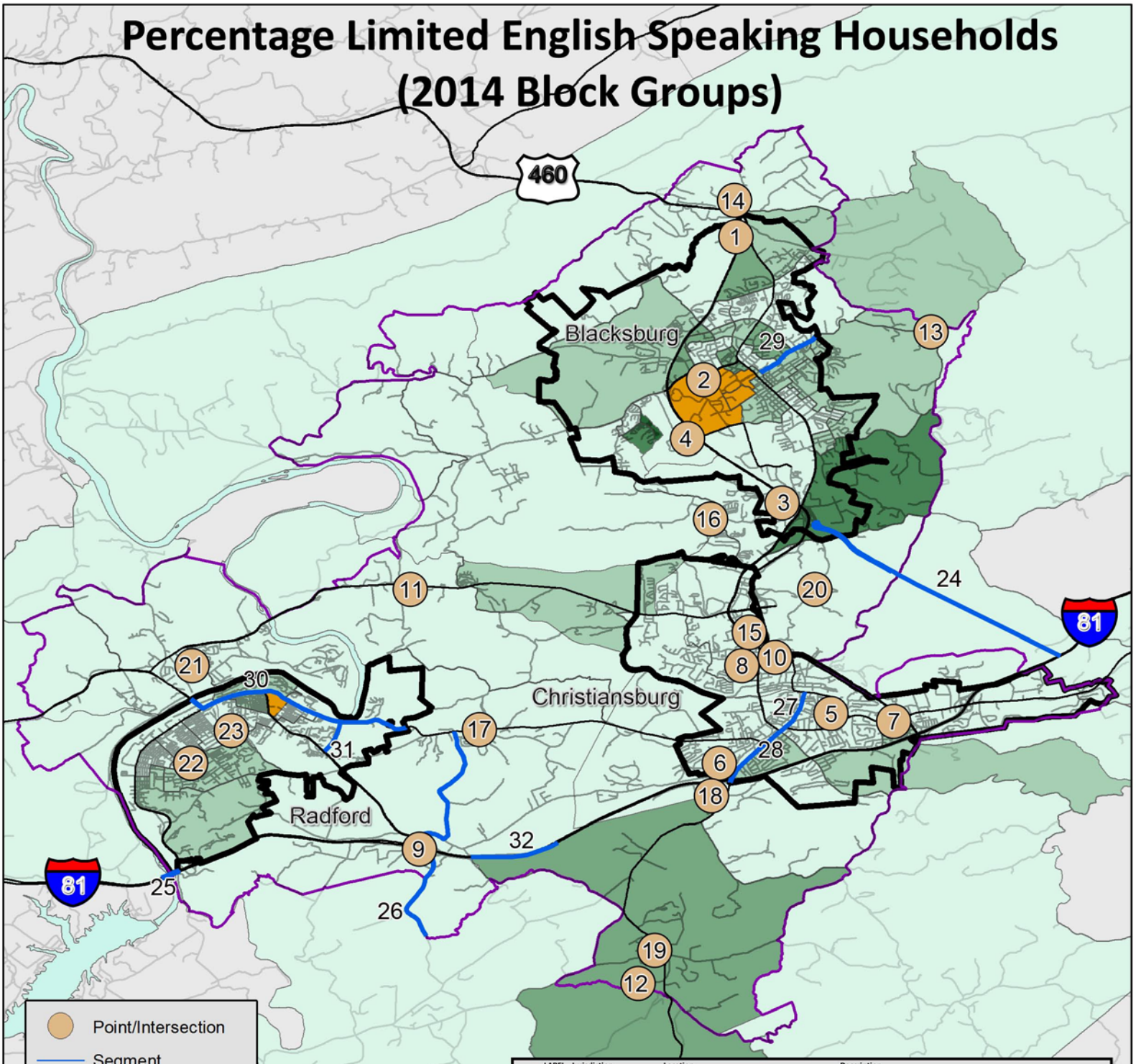
	30	Radford	City Wide	Traffic Signal Analysis & Installation
	31	Radford	Tyler Avenue to Rte 11	Construct New 2 Lane Connector
	32	Montgomery	I-81	Revenue Sharing Reconstruction, Paving

Prepared by the New River Regional Commission. 2016.
Sources: NRV-MPO; U.S. Census Bureau;
Virginia Information Technology Agency.

Percentage Limited English Speaking Households (2014 Block Groups)



Point/Intersection
Segment
NRVMPO Boundary
0% - 1.1%
1.2% - 3.6%
3.7% - 8.1%
8.2% - 13.9%
14% - 34.8%
Data Not Available

0 1.25 2.5 5 Miles

N

	LABEL	Jurisdiction	Location	Description
Point/Intersection	1	Blacksburg	At Rte 460 Bus N Main St	Reconfigure intersection, Extend acceleration and deceleration lanes
	2	Blacksburg	Perry St, VT Campus	Construct Multi-Modal Transportation Facility
	3	Blacksburg	Ramps to Rte 360, Research Center Dr	Traffic Signal Improvements, New Land Construction
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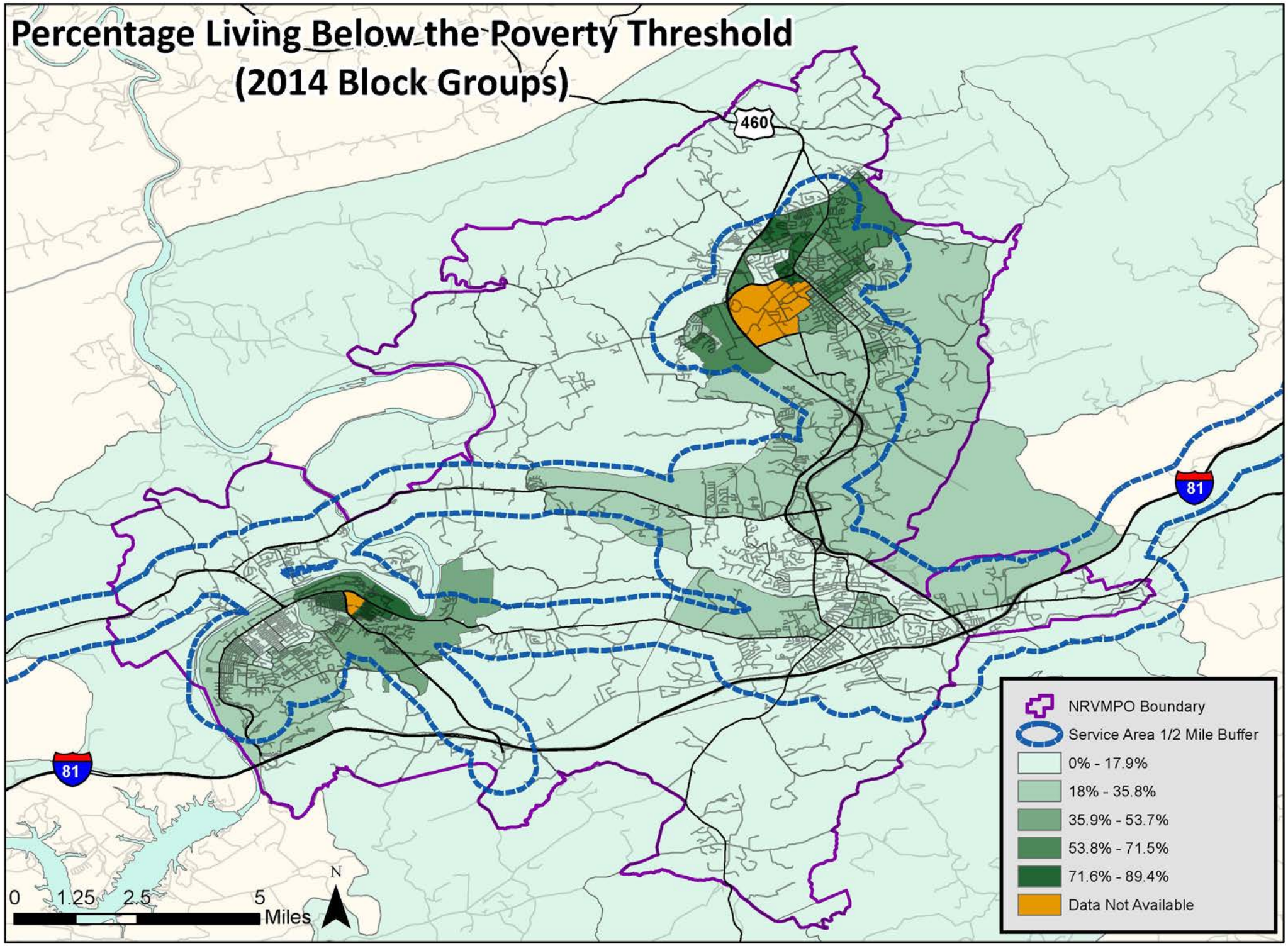
Sources: NRV-MPO; U.S. Census Bureau;
Virginia Information Technology Agency.

Appendix E – Identification of Public Transportation Services in Disadvantaged Population & Concentration Areas

Disadvantaged population (Low income, Minority, and Limited English) information is available in Section 1.10 Demographic Profiles of this document. This section reviews the investment of State and Federal funds in the aggregate for public transportation projects. In general, the NRVMPO is served by four public transportation providers: 1) Blacksburg Transit, 2) Valley Metro's Smart Way, 3) Radford Transit, and 4) Pulaski Area Transit. Within a half-mile of existing transit deviated-fixed or go-anywhere routes/services: 15,630 Low income and 9,825 Minority populations, and 401 LEP households. The transit service area is compared to disadvantaged population areas on pages 28-30.

Service	Description	Demographic Analysis**					
		Minority		*LEP*		*Low Income*	
		#	%	#	%	#	%
Deviated-Fixed Route Services	Regional existing operating services.	9,825	59%	401	58%	15,630	60%

Service	Description	Budget
Blacksburg Transit	Operating Expenses	$6,665,947 (total)
Blacksburg Transit	Capital Expenses	$15,430,315 (total)
Blacksburg Transit	Revenues	Operating Farebox: $71,800 Operating Advertising: $105,000 Federal Funds: $12,392774 State Funds: $3,003937 Local Funds: $4,922,751
Radford Transit	Operating Expenses	$1,390,965 (total)
Radford Transit	Capital Expenses	$45,000 (total)
Radford Transit	Revenues	Operating Farebox: $17,880 Operating Advertising: $13,410 Federal Funds: $584,657 State Funds: $286,033 Local Funds: $533,985
Pulaski Area Transit	Operating Expenses	$584,403 (total)
Pulaski Area Transit	Capital Expenses	$192,104 (total)
Pulaski Area Transit	Revenues	Operating Farebox: $80,000 Operating Advertising: $0 Federal Funds: $405,885 State Funds: $118,313 Local Funds: $172,309
Greater Roanoke Transit Company	Operating Expenses (Smart Way only)	$654,304 (total)
Greater Roanoke Transit Company	Revenues (Smart Way only)	Operating Revenue: $266,273 Federal Funds: $196,185 State Funds: $61,350 Local Funds: $130,496



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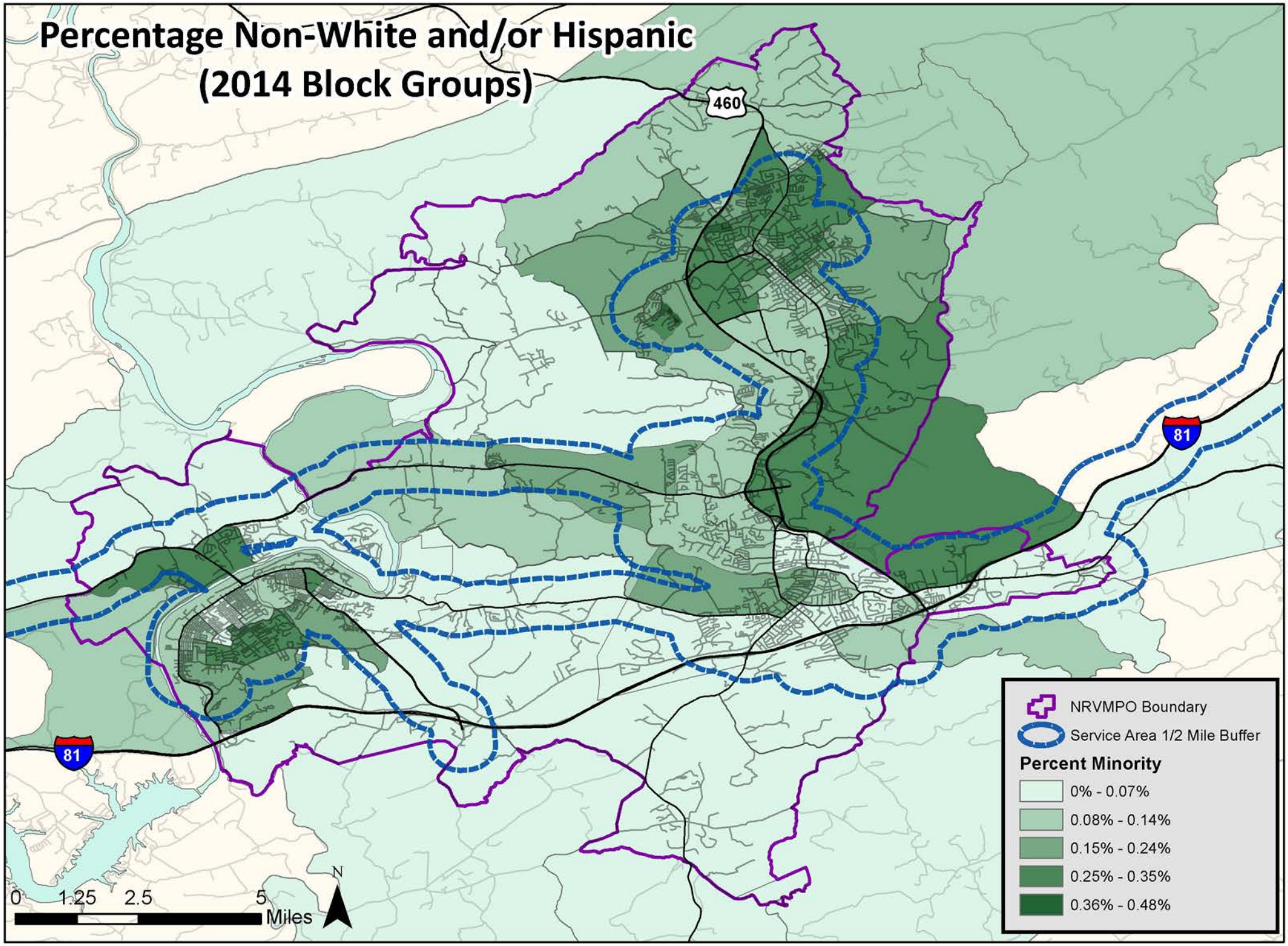

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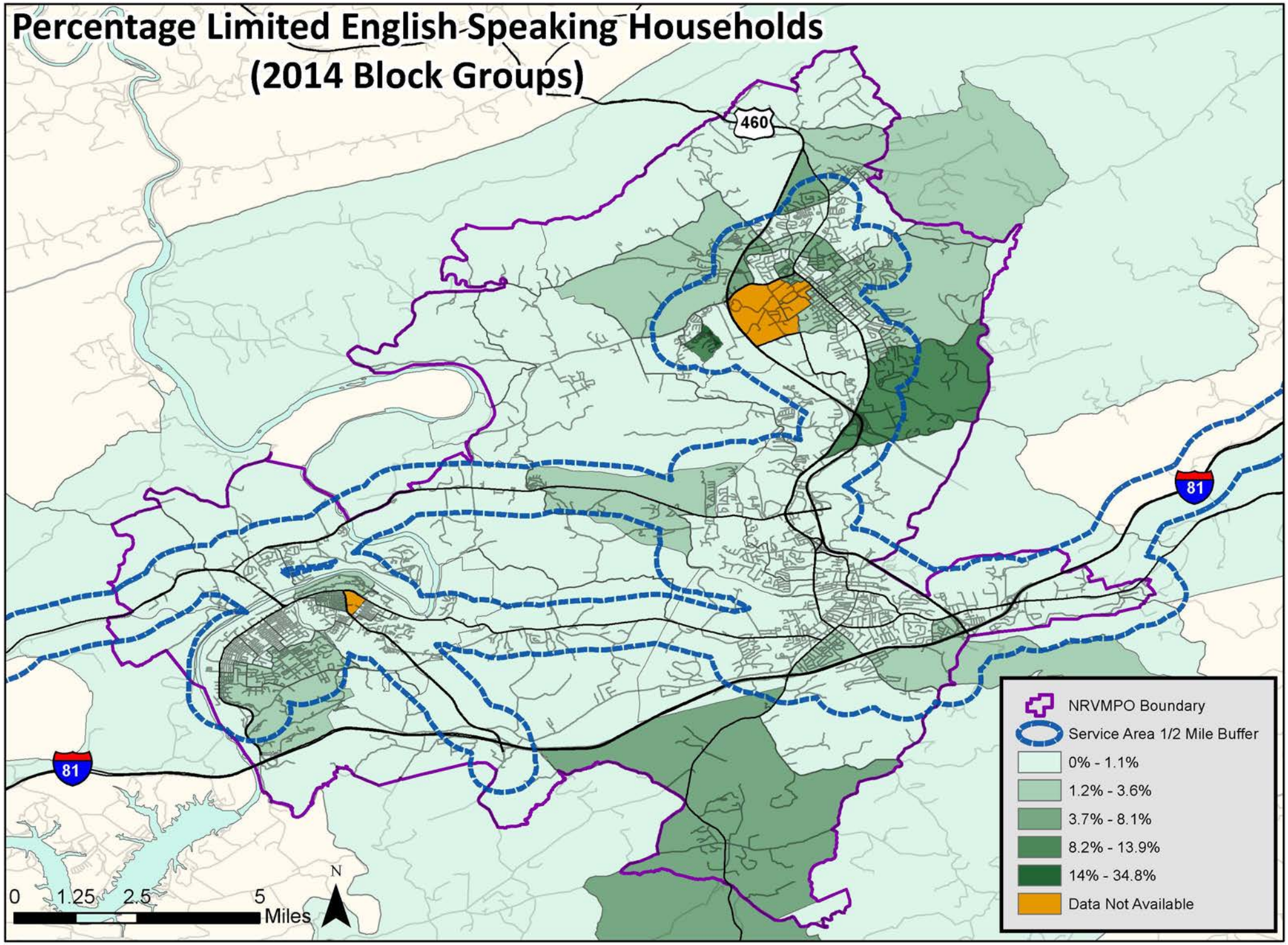

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