



**PIMA COUNTY**

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TRANSPORTATION



**TITLE VI**  
Implementation Plan  
2015-2018

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## Introduction

Title VI of the 1964 Civil Rights Act and the 1994 Executive Order on Environmental Justice require that any federally-funded planning, programming, and project implementation activities be free of discrimination. Further guidance from the Federal Highway Administration and the Federal Transit Administration incorporates the American with Disabilities Act (ADA) regulations in addition to Title VI and Environmental Justice into regional transportation plans. Today, federal transportation legislation known as MAP-21 ([www.fhwa.dot.gov](http://www.fhwa.dot.gov)) recognizes these non-discrimination requirements as applying to both the planning as well as the individual project implementation phases. Additionally, Title VI compliance requires the inclusion of both data collection and analytic methods to assess the impacts on protected groups, and access to and level of public involvement.

This plan summarizes the Pima County Department of Transportation's (PCDOT) intended efforts to implement Title VI requirements in its planning and programming activities over the next three years. This plan highlights recently-completed or upcoming activities in PCDOT's Transportation Planning and Project Implementation program areas. Existing policies and procedures, such as PCDOT's Title VI Assurances and Complaint Procedures, are also included in this plan.

## Non-Discrimination Policy Statement

The Pima County Department of Transportation (PCDOT) complies with Title VI of the Civil Rights Act of 1964 and all related statutes and regulations in all of its programs and activities. PCDOT operates without regard to race, color, national origin, age, sex, or disability. PCDOT meetings are held in accessible public locations, and materials are provided in accessible formats or in languages other than English upon request within reasonable advance notice.

Any person who believes they have been discriminated against by PCDOT or any of its sub-recipients or contractors may file a written complaint with PCDOT and/or the Arizona Department of Transportation (ADOT) Civil Rights Office. If the complaint is filed against PCDOT, then the PCDOT Title VI Liaison will forward the complaint to the ADOT Civil Rights Office. All complaints will be promptly investigated by the ADOT Civil Rights Office.

As both the recipient and programming agency for certain types of federal funding, PCDOT has the responsibility to follow federal nondiscrimination laws and policies as well as assist with the compliance of recipients of the federal funds that are provided through its programs, services, and processes. The Civil Rights Act of 1964, as well as several Presidential Executive Orders, outline these responsibilities. Applicable federal requirements include:

- Civil Rights Act of 1964

- Civil Rights Restoration Act of 1987
- Federal-Aid Highway Act of 1973
- Section 504 of the Rehabilitation Act of 1973
- Americans with Disabilities Act of 1990
- Age Discrimination Act of 1975
- Uniform Relocation Act of 1970
- Executive Orders 12898 and 13166

## **NONDISCRIMINATION MEASURES**

PCDOT has or pledges to have policies and procedures in place before the end of the current Fiscal Year (2015) to promote open access to its programs, services, and processes and/or allow participation to all interested parties. These efforts include but are not limited to the following:

### **Staff Training**

Designated PCDOT staff will be trained on the agency’s responsibilities to follow federal non-discrimination laws.

### **Public Involvement Policy (PIP)**

The PCDOT Public Involvement Policy (PIP) will be reviewed and possibly amended to include a discussion of Title VI and Environmental Justice issues, incorporating strategies to engage traditionally under-served populations throughout.

### **Meeting Locations and Times**

PCDOT strives to hold public meetings at locations that are convenient and located in close proximity to available public transit. Public meetings are held late in the afternoon into the early evening to facilitate most traditional “working schedules.” Meeting locations are also accessible according to the provisions of the Americans with Disabilities Act (ADA).

### **Development of a Limited English Proficiency (LEP) Plan**

PCDOT has reviewed and will utilize the US Department of Transportation recommended four-factor analysis guidelines conducted by the regional Metropolitan Planning Organization (MPO), the Pima Association of Governments (PAG), to determine what language assistance is appropriate for PCDOT’s service area, and formulate a Limited English Proficiency (LEP) Plan based on that analysis.

### **Agendas**

PCDOT public meeting agendas will contain a footnote in English and Spanish that translations are available upon request going forward.

### **Website**

The PCDOT website will provide a link to program summary materials translated into Spanish.

### **Public Notice**

Public notices and advertisements to public meetings will include a note, in Spanish, that translation is available upon request.

### **Posted Public Notice**

A notice has been produced and will be posted in public view wherever agendas for upcoming public meetings are also posted; as well as in the applicable buildings and spaces that house PCDOT offices where the public and clients of PCDOT are frequently present in full view of the public. The notice states that PCDOT complies with Title VI and provides direction to the Title VI Coordinator and the website for the complaint form and process.

### **Procurement Policies**

PCDOT procurement policies and contracts will contain provisions for Disadvantaged Business Enterprise outreach and nondiscrimination language whenever possible.

### **Nondiscrimination Process and Log**

PCDOT has developed a discrimination complaint process and will have it posted on the web site. Additionally, PCDOT will keep a log to track discrimination-related investigations, lawsuits, and complaints.

## **Assurances**

The Civil Rights Act of 1964 (Title 49, CFR Part 21) requires states to submit assurances to the federal government that no person will be discriminated against on the basis of race, color or national origin in programs and activities receiving federal assistance from the U.S. Department of Transportation. Each state requires these same assurances from sub-recipients and contractors that receive federal funds, including funds from the Federal Highway Administration and the Federal Transit Administration. These assurances ensure that contractors and their employers know the terms of agreement between citizens and their government that protect the rights of the public. PCDOT has submitted its authorized assurances to the Arizona Department of Transportation (ADOT) per these requirements, which are attached to this Plan.

## **Departmental Organization and Program Administration**

### **GENERAL ORGANIZATION**

The Pima County Department of Transportation (PCDOT) is a public governmental agency which is responsible for a variety of service and programmatic areas. PCDOT oversees the design, reconstruction, maintenance, and operations of nearly 2,200 miles of roadways and infrastructure throughout unincorporated Pima County. This includes hundreds of bridges and drainage structures, street lights and traffic signs, traffic signals, bicycle facilities, and public art works throughout the transportation system.

## **PROGRAM ADMINISTRATION**

### **Transportation Planning**

The Transportation Systems Division is responsible for planning future transportation corridors and multi-modal facilities throughout unincorporated Pima County. The division develops future transportation plans and reports and works closely with the Pima Association of Governments (PAG) and other local jurisdictions to develop the long-range Regional Transportation Plan (RTP) and the short-range transportation improvement program (TIP). The division seeks and evaluates funding for projects and manages the Roadway Development Impact Fee Program.

The Major Streets and Scenic Routes Plan (MSSRP) is one of the tools used to plan for future roadways in Pima County. The MSSRP is a map of current and future major roadways and establishes setbacks to allow for future roadway widening.

Pima County seeks public involvement in the development of projects. Citizens, neighborhoods and businesses provide valuable input during the design and construction phases of projects. Typically a citizens' advisory committee is established for major projects. The Community Participation and Mitigation Ordinance identifies the policies and processes for citizen involvement.

### **Traffic Engineering**

The Traffic Engineering Division maintains over 100 traffic signals, thousands of signs, and hundreds of miles of roadway striping. It is also responsible for all aspects of traffic safety on the County roadway system and for collecting traffic data, including current and historical traffic counts for most streets; accident statistics for intersections and roadway segments; and traffic control ordinances such as speed limits, stop signs, and school crossings. The Traffic Engineering Division collects and maintains a database of traffic counts for most of the roadways and intersections in unincorporated Pima County. These counts are listed in tabular form and also in a GIS Map application. Traffic counts are organized alphabetically by major road, minor roads, and intersection approach counts.

The Transportation Engineering Division is also responsible for the engineering and project management of the design of transportation capital improvement projects, and maintains Design Standards and Manuals, a Public Art policy, a Native Plant Salvage Program, and Plan Sheet standards.

### **Roadway Maintenance**

The Maintenance and Operations Division maintains nearly 2,200 miles of roadways, and provides the following services:

- Pothole Patching
- Street Sweeping
- Shoulder Repair
- Road Grading (dirt roads)
- Vegetation Management
- Snow and Ice Control (Mt. Lemmon)
- Storm Clean-up
- Other Incidentals (guardrails, cattle guards, etc.)

Pavement preservation and rehabilitation plans are also developed upon direction and funding allocation from County Administration and the Board of Supervisors. Such programs vary annually depending on the funding available. The most current plans and progress are posted as they become obtainable.

### **Bicycle and Pedestrian Program**

The Pima County Bicycle and Pedestrian Program is responsible for planning, engineering, and improving bicycle and pedestrian facilities throughout unincorporated Pima County. The program is dedicated to improving safety and access for walkers and cyclists and seeks to accomplish this through engineering, education, enforcement, encouragement, and evaluation. The program works in partnership with the Tucson-Pima County Bicycle Advisory Committee, Brad P. Gorman Memorial Bikeway Fund, Pima Trails Association, Pima County Department of Environmental Quality, Pima Association of Governments (PAG), City of Tucson, Arizona Department of Transportation, Greater Arizona Bicycling Association, Perimeter Bicycling Association, and other interested groups who are striving to improve walking and cycling conditions in our community. Pima County is also developing *The Loop* around metro Tucson with links to Marana, Oro Valley, and South Tucson. Over 100 miles of shared-use path have been completed. Once finished, *The Loop* will total 131 miles.

### **Public Transit**

Public transit in Pima County and City of Tucson is provided by the *Sun Tran* and *Sun Shuttle* service. PCDOT does not manage this service, but provides financial assistance to the Regional Transportation Authority, which does. *Sun Tran* operates fixed-route buses throughout the metropolitan region including limited areas of unincorporated Pima County.

The Regional Transportation Authority (RTA) also operates rural transit service in Marana, Oro Valley, Catalina, Sahuarita, Green Valley, San Xavier, Tucson Estates, and Ajo. *Sun Shuttle* buses operate along fixed routes, but some routes allow flag stops and pick-ups or drop-offs within 3/4 mile of *Sun Shuttle* routes if pre-arranged.

*Sun Shuttle* also provides dial-a-ride service for individuals with disabilities and who live within a designated eligibility area, which includes parts of Pima County, central Tucson, and portions of Marana and Oro valley. These services are available to persons who qualify through the Americans with Disabilities Act (ADA) Eligibility Office, in accordance with the ADA. The ADA Eligibility Office of the City of Tucson determines eligibility for all special needs transportation in the region. Once approved for services, advance reservations are required.

### **Permits and Fees**

PCDOT is responsible for the issuance and administration of several types of fees and permits. The Roadway Development Impact Fee is assessed for new or proposed developments to help pay for the arterial roadway capacity needs created by new development. Monies collected must be used to increase roadway traffic capacity (i.e. widening) on roadways specified for improvements. The fees are charged in eleven designated benefit areas. Fees cannot be used for roadway maintenance or to improve local roads, and are assessed at the time of development.

Anyone desiring to conduct work in the Pima County right-of-way needs to obtain a permit from PCDOT. Activities that require a permit include the digging of any hole, drain, trench or ditch in any public street, alley, drainage-way or thoroughfare; the removal or change of any curb; the pavement of or other constructed improvement; the construction of any paving, irrigation, or landscaping or any other improvement; or the construction of any improvement for flood-control purposes in any public drainage-way or drainage easement.

Special event permits are required to conduct, manage, or sponsor any organized special event within a public street or right-of-way in Pima County, and Oversize Vehicles that exceed 8.5 feet in width or 13.5 feet in height need to obtain a permit from PCDOT in order to operate as well.

### **Adopt-a-Roadway Program**

PCDOT's Adopt-a-Roadway Program (AAR) was established in 1992, and is designed to help beautify Pima County by facilitating trash removal on arterial and collector roadways. Volunteer groups participating in the program save the taxpayers of Pima County approximately \$250 per mile cleaned, which translates into thousands of dollars saved. By adopting a roadway, civic and other nonprofit organizations help to generate pride in their community and create economic benefits to all citizens of Pima County.

Through the Adopt-a-Roadway Program, nonprofit organizations make a two-year commitment to pick up litter at least twice a year along a two-mile stretch of county roadway. The areas of responsibility are marked with two AAR signs bearing the organization's name.

### **Graffiti Removal**

The purpose of this program is to immediately abate graffiti on all public properties and to provide private property owners in unincorporated Pima County with a Graffiti Abatement

Assistance Program. In addition, PCDOT's *Taking Action against Graffiti* (TAAG) Program is designed to prevent and control the spread of graffiti.

### **Neighborhood Traffic Management Program**

The Neighborhood Traffic Management Program (NTMP) improves traffic safety in neighborhoods by reducing speeding vehicles and reducing cut-through traffic. Residents may partner with Pima County to modify neighborhood streets with traffic calming techniques such as speed humps and traffic circles.

### **Airports and Rail**

Pima County owns, operates, and maintains the Eric Marcus Municipal Airport in Ajo, Arizona. Pima County Real Property Services in downtown Tucson administers and manages the airport while PCDOT maintains the facility. The Ajo Airport Master Plan provides additional, more detailed information about the airport, and can be accessed online.

Pima County was recently awarded a TIGER grant from the US Department of Transportation through the Federal Rail Administration to oversee the implementation of rail infrastructure enhancements at the Port of Tucson, a private intermodal container rail export facility located in the City of Tucson, east of Kolb Road and adjacent to the Union Pacific Railroad Sunset Corridor Mainline. This expansion of the Port of Tucson's infrastructure will facilitate higher speed access between the Union Pacific mainline and the Port of Tucson's International Intermodal yard and provide the region with improved and accelerated access to international trade via ocean containers.

## **Title VI Complaint Process**

Any person who believes that he or she, either individually, as a member of any specific class of persons, or in connection with any minority contractor, has been subjected to discrimination prohibited by Title VI of Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 may file a Title VI complaint. The complaint must be unequal treatment because of race, color, national origin, sex, age and/or disability, or noncompliance with Title VI rules or guidelines adopted there under.

PCDOT will maintain a Title VI complaint log and provide a Title VI Complaint Form at public meetings, and on the PCDOT website as well as at PCDOT main office locations. Designated PCDOT staff will be trained on the federal Title VI requirements and how to assist any member of the public who would like to file a Title VI Complaint.

The Title VI complaint process described below applies to PCDOT and its programs, as well to consultants and contractors funded by PCDOT.

The Arizona Department of Transportation (ADOT) has the principal responsibility for processing, investigating, and resolving any complaint arising as a result of operations of its sub-recipients such as PCDOT. PCDOT will be responsible for processing, investigating, and resolving complaints of discrimination within the department. The PCDOT Title VI Coordinator contact information is as follows:

Mandley Rust  
PCDOT Title VI Coordinator  
201 North Stone Avenue – 4<sup>th</sup> Floor  
Tucson, AZ 85701  
Telephone: (520) 724-6410  
mandley.rust@pima.gov

The complaint process will follow the ADOT procedures. Complaints received by PCDOT will be forwarded to the ADOT Civil Rights Office. Complaints also may be sent directly to ADOT but they must be filed in writing to:

ADOT Civil Rights Office  
1135 North 22nd Avenue, 2nd floor mail drop 154A  
Phoenix, AZ 85009  
(602) 712-7716

A formal complaint must be filed within 180 calendar days of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct. This timeframe is prescribed by 49 CFR 21.11(b).

The complaint must meet the following requirements or include the following elements:

- a. The complaint shall be in writing and signed by the complainant(s) and must include the complainant(s)' name, address, and phone number. The PCDOT Title VI Coordinator, Mandley Rust, will assist the complainant with documenting the issues if necessary.
- b. The complaint must contain the present date of the alleged act of discrimination; the date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct.
- c. The complaint must present a detailed description of the issues, including the names and job titles of those individuals perceived as parties of the incident in question.
- d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been

established. For this, the complainant is required to mail a signed, original copy of the fax or e-mail transmittal for PCDOT to be able to process it.

e. Allegations received by telephone will be transcribed and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to PCDOT for processing.

f. PCDOT will submit the complaint to ADOT's Civil Rights Office (CRO). Within 45 calendar days of the acceptance of the complaint, the ADOT investigator will prepare a draft investigative report for the review of the ADOT CRO Deputy Administrator. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

g. ADOT's final investigative report with the preliminary findings and a copy of the complaint will be forwarded by certified mail to either the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Federal Aviation Administration (FAA), or National Highway Traffic Safety Administration (NHTSA); within 60 calendar days of the acceptance of the complaint, per 23 CFR 200.9(b)(3).

## Limited English Proficiency (LEP) Program

As both the recipient of and programming agency for some types of federal funding, PCDOT has the responsibility to follow federal nondiscrimination laws and policies as well as assist with the compliance of recipients of the federal funding that are programmed through PCDOT's processes. The Civil Rights Act of 1964, as well as several issued Executive Orders, outlines these responsibilities.

Executive Order 13166, titled "Improving Access to Services to Persons with Limited English Proficiency," indicates that in some circumstances differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. This order applies to all state and local agencies which receive federal funding.

This Limited English Proficiency (LEP) Plan provides direction on how PCDOT will stay compliant with these provisions and it was prepared in accordance with Title VI of the Civil Rights Act of 1964.

It is the policy of PCDOT to ensure that its programs and activities are accessible to persons with Limited English Proficiency (LEP) and thus does not discriminate on the basis of national origin in violation of the Title VI prohibition against national origin discrimination. PCDOT will, to the maximum extent feasible, provide appropriate alternative non-English formats for persons with LEP to access PCDOT information and services in its official deliberations and communications, community outreach, and related notifications, if requested.

As previously outlined above, any person who believes that he or she, either individually, as a member of any specific class of persons, or in connection with any minority contractor, has been subjected to discrimination may file a complaint, the process for which has also been defined above. The referring documents, along with the Discrimination Complaint Form, will be provided on the PCDOT website at [www.pima.gov/government/transportation](http://www.pima.gov/government/transportation).

## PLAN ASSESSMENT

As a recipient of federal funding, PCDOT pledges to take reasonable steps to ensure that all members of the community, regardless of their proficiency to understand English, have the opportunity for meaningful access to all of PCDOT’s planning and programming processes. The US Department of Transportation (US DOT) provides guidance on conducting a four-factor analysis to determine what language assistance is appropriate, the analysis of which has been conducted by the Pima Association of Governments (PAG), the regional Metropolitan Planning Organization (MPO) to which Pima County is a member jurisdiction. Due to the similarity in the service area between PAG and PCDOT, PCDOT will use the data compiled and analyzed by PAG in its own LEP Plan until it determines that such information is either no longer applicable or insufficient for PCDOT’s purposes or processes.

The factors recommended for analysis according to US DOT guidance include:

- Factor 1: The number or proportion of LEP persons served by the service area
- Factor 2: The frequency with which LEP individuals come in contact with the programs
- Factor 3: The importance of the service provided by programs
- Factor 4: The resources available and the overall cost

PAG and PCDOT’s combined analysis of the four factors is provided below:

### **Factor 1: The Number or Proportion of LEP Persons Served by the Service Area**

PAG reviewed U.S. Census Bureau data for the percentage of population in Pima County that indicated that they spoke English “less than very well.”

Languages Spoken at Home in Pima County by LEP Persons who Speak English "less than very well" (US Census Bureau's 2006-2010 American Community Survey)						
	Total Population	LEP Population	% Total Non-LEP Population	% Total LEP Population	% Total LEP Population that Speaks Spanish	% Total LEP Population that Speaks Language Other

						Than Spanish
Pima County	901,096	85,211	90.54%	9.46%	7.89%	1.57%
Tucson	482,208	59,212	87.72%	12.28%	10.43%	1.85%

Further, the data was analyzed to determine which language(s) were the primary languages spoken by those who spoke English "less than very well." Spanish was the predominant primary language in the PAG/PCDOT service area of those who indicated that they spoke English "less than very well."

Top Three Languages Spoken at Home in Pima County by LEP Persons who speak English "less than very well" (US Census Bureau's 2006-2010 American Community Survey)								
Population 5 years and older	Number of LEP Persons	Percent of Total that are LEP Persons	LEP Persons who Speak Spanish		LEP Persons who Speak Chinese		LEP Persons who Speak Vietnamese	
			Total	Percent of Total	Total	Percent of Total	Total	Percent of Total
901,096	85,211	9.46%	71,079	7.89%	2,888	0.32%	1,826	0.20%

It was determined that it was not cost effective to take specific actions for languages of the LEP populations other than Spanish, all being less than 1 percent, unless a specific request was made for an accommodation, and PCDOT agrees with this assessment.

**Factor 2: The Frequency with which LEP Individuals Come in Contact with Programs**

Transportation planning is an area that affects everyone in Pima County. As such, PCDOT believes that an effort should be made to provide the Spanish speaking community an opportunity to participate in the planning process. See the "Language Assistance Measures" portion of this document for more detail on how Spanish is incorporated into PCDOT's community outreach and public involvement efforts.

**Factor 3: The Importance of the Service Provided by Programs**

The importance of the programs and services provided by PCDOT cannot be understated. Most PCDOT activities relate to identifying and planning funding for future projects; while also designing and implementing such projects where appropriate. Since PCDOT's activities bring it into continuous direct contact with the public, it is pivotal for PCDOT to ensure that LEP populations have input in the planning of future and current projects for the region. PCDOT strives to be inclusive in soliciting community participation for services and programs that it provides directly to the public.

#### **Factor 4: The Resources Available and Overall Cost**

PCDOT has limited staff and financial resources, which makes the translation of all materials cost prohibitive. Often, persons with a limited English proficiency have several trusted sources to interpret for them. PCDOT will work to provide sufficient bilingual information for the LEP population to understand which PCDOT services are available or what major planning activities are taking place so that they can ask for assistance from PAG or one of their trusted sources.

### **LANGUAGE ASSISTANCE MEASURES**

#### **Agency Training**

- All appropriate staff members will receive training regarding PCDOT's responsibilities for providing LEP services and the resources that PCDOT has available in fulfilling these responsibilities.
- Staff will receive instruction on what to do when individuals with Limited English Proficiency seek to participate in a PCDOT program, process, or service.
- PCDOT's Human Resource Officer shall maintain a list of PCDOT employees who speak or write additional languages other than English.

#### **Identification of Individuals who Require Language Assistance**

- PCDOT will adhere to the Census "Language Identification Flashcards" which PAG utilizes to identify potential future needs. These cards have been enhanced to include O'odham and Yaqui, as these are the predominate Native American languages spoken in the PCDOT service area.
- PCDOT will examine records to observe if requests for language assistance have been received in the past, either at meetings or over the phone, to determine the extent to which language assistance might be needed at future events.
- When PCDOT sponsors an event, there will be a staff person to greet participants as they arrive whenever possible. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
- Front-office staff and other staff members who speak directly with the general public will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year.

#### **Outreach Techniques**

- PCDOT public meeting agendas will contain a footnote in English and Spanish which will state that translations are available upon request.

- The PCDOT website will provide a link to program summary materials translated into Spanish.
- Public notices and advertisements to public meetings will include a footnote, in Spanish, that translation will be made available upon request.
- The PCDOT service area is adjacent to the Pascua Yaqui Tribe and Tohono O’odham Nation. Some members of both the Tribe and the Nation have greater proficiency with their own tribal languages than with English. If and when PCDOT events take place on Tribal or Nation Lands, every effort will be made to work with the respective jurisdictional staff to make accommodations for cultural and language assistance as the hosting jurisdiction considers appropriate.

## **MONITORING AND UPDATING THE LEP PLAN**

The LEP Plan will be updated regularly as required by US DOT guidance and direction. At a minimum, the LEP Plan will be updated when new census data becomes available, in cooperation with the analytical work previously conducted by PAG. It is understood that the community profile of Pima County will undoubtedly continue to change over time. Not only will the four-factor analyses need to be revisited, but the appropriate language assistance measures may need to be improved to reflect community changes.

## **CONTACT INFORMATION**

PCDOT, through development of this LEP Plan, does not intend to exclude anyone from the participating in and PCDOT process or from taking advantage of PCDOT programs or services. PCDOT will make every reasonable effort to accommodate any special needs request. Questions or comments regarding this LEP Plan may be submitted to the PCDOT Title VI Coordinator:

Mandley Rust  
 PCDOT Title VI Coordinator  
 201 North Stone Avenue – 4<sup>th</sup> Floor  
 Tucson, AZ 85701  
 Telephone: (520) 724-6410  
 Mandley.Rust@pima.gov

## **Program Area Implementation of Title VI**

### **TRANSPORTATION PLANNING**

PCDOT will develop maps showing the concentration distribution of “protected” classes (as defined by federal regulation) within its area of service, namely unincorporated Pima County.

These maps, along with official population statistics, current estimates and projections, and other household data in the PCDOT service region, will serve to assist in analyzing the potential disparate impacts of the Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP) on these groups.

The types of projects that appear in the RTP and TIP may include roadway improvements, bridge improvements, transit improvements, transportation enhancements, transportation planning studies, bicycle and pedestrian programs, alternate mode programs, and airport improvements.

## **PUBLIC INVOLVEMENT**

PCDOT's Community Participation and Mitigation Ordinance provides guidelines for full and fair participation for all potentially-affected communities. Identifying these communities requires close coordination between the development and implementation of the public involvement effort and the data collection and analysis phases of the planning process, all of which are subject to Title VI and Environmental Justice provisions. The data collection phase provides information on the protected populations, which are often synonymous with the underserved/under-represented populations and, therefore, may require particular attention in the public involvement effort. The analysis phase provides information on the potential level of impact to the various populations which will need to be integrated into those public involvement efforts seeking input on alternative development, alternative preferences, and/or mitigation.

PCDOT will address Title VI requirements both quantitatively and qualitatively with extensive public involvement and data analysis techniques. Federal regulations define specific groups as "protected populations."

To promote and help foster public participation, staff in each program area will work to ensure that information is readily accessible and make certain that the people likely to be affected by and/or interested in a specific program are identified and made aware of opportunities to participate. The following sections address each of these practices in detail.

### **Access to PCDOT Information**

PCDOT's documents, data, and information, with very few exceptions, are a matter of public record. Intrinsicly, any request from a member of the public for a PCDOT document is responded to in a timely manner. At a minimum, a written response is provided within one (month) of the receipt of a public information request.

### **Stakeholder Analysis**

PCDOT staff investigates and analyze who is potentially affected and/or interested in the planning issue or policy being developed, and identifies both internal and external stakeholders. Internal stakeholders typically include PCDOT staff involved in related activities,

and other governmental agencies with jurisdiction or interest in the activity. External stakeholders typically include non-governmental parties and citizens who may be directly affected by the activities and/or have an interest in them. This includes Title VI and Environmental Justice populations.

Many of PCDOT's program areas have already compiled their own lists of external stakeholders. For each new activity, or over the course of longer activities, these lists are reviewed to ensure they are up to date and reflect the broadest range of stakeholders reasonably possible. A common method for identifying additional stakeholders is to interview existing stakeholders to determine who else needs to be involved.

PCDOT's public relations staff maintains a database of stakeholders and members of the general public identified through a variety of public involvement initiatives over time with previous and continual efforts. This database includes civic and community organizations serving Title VI and Environmental Justice populations, neighborhood and homeowner associations, environmental and business groups, elected officials, partner jurisdiction staff at various levels, and other public groups. Public involvement staff are available to assist other agency staff in conducting stakeholder analyses and in accessing the public participation database upon request.

#### **Public Notification of PCDOT Activities and Services**

The promotion of inclusive and accessible public involvement includes regular efforts within each PCDOT program area to notify a wide range of stakeholders and the general public regarding the information, data, funding, policy and planning issues being addressed.

Public information is presented in formats that are accessible to the intended audiences. Public involvement program staff are available for consultation in determining what information is appropriate to publicize and in what form.

For reaching the general public, the website and media outreach (e.g., press releases) are encouraged. For reaching stakeholder groups, distribution of public information documents such as reports and newsletters via direct mail also may be an effective communication method. The use of other methods is considered to promote equal access to information for targeted audiences. In particular, efforts to overcome barriers to accessing information among underserved populations, youth, and other individuals who may not have Internet access or read newspapers are undertaken.

For example, public service radio announcements on Latino radio outlets are one method for reaching Hispanic populations, particularly non-English speaking residents. Additionally, underserved populations are no different than other populations in that they are more likely to read information distributed through trusted and familiar communications channels. E-mail is used to distribute notices to school and community-based newsletters for publication.

Placement of English / Spanish information in libraries, community centers, or other public places is also used.

### **Spanish Translations**

As indicated in PCDOT's Limited English Proficiency (LEP) Plan, Spanish is the predominant primary language spoken by those in the PAG Service area who speak English "less than very well".

Public information documents written in English, including meeting notices, include a tagline affirming that PCDOT will make reasonable accommodations to translate any materials in Spanish.

As a general provision, Spanish-speaking staff are on hand at public meetings intended for gathering input.

Spanish translations are used for activities specifically targeted to the general public even without a request. Examples of materials to be translated include meeting notifications (e.g., flier or Web posting). Additional information that is translated upon request includes any public meeting handouts, such as fact sheets, newsletters, and executive summaries of planning documents under review.

### **Task Force Composition**

Efforts will be made to assess the composition of PCDOT's task forces and citizen's advisory committees and groups to ensure that invited or appointed members represent a cross section of key stakeholder groups.

### **Geographic Analysis of Underserved Populations**

Staff within each PCDOT division and program area will be asked to periodically perform a basic assessment to identify the location of protected Title VI populations as it relates to the provision of information and planning programs and services. PCDOT will provide program staff with maps showing the location of protected Title VI and Environmental Justice populations for any specific geographic areas, and ensure that such information is available online. Zip Code maps will be used to show locations of people in databases. Proposed maps of protected populations and mailing list Zip Codes will be compiled as a way to demonstrate that protected populations are being notified and/or involved, the documentation of which is important for demonstrating compliance with Title VI and Environmental Justice provisions.

### **Meeting Scheduling, Location and Access**

Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.

When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the PCDOT service area, the meeting or hearing is held within that geographic area or jurisdiction. The appropriate elected officials as identified in the stakeholder analysis are consulted and/or informed of relevant outreach activities within their jurisdictions.

Public meetings are held in locations accessible to people with disabilities and are located near a transit route whenever possible.

### **Title VI Information on the PCDOT Website**

PCDOT will add a Title VI section to the PCDOT website where the public can learn about PCDOT's Title VI commitments and efforts, Non-Discrimination Policy, and Limited English Proficiency Plan, as well as download the Title VI complaint process and complaint form.

A Spanish-language version of the Title VI webpage will also be added to the PCDOT website, with all of the same information and documents. A "Google Translate" button will be looked at for the potential to be added to the Title VI webpage to allow users to translate the entire PCDOT website into over 50 languages. The public will be able to access the English and Spanish versions of the Title VI webpages from PCDOT's homepage as soon as this is made possible.

### **ANNUAL UPDATE AND STATISTICAL REPORTING**

PCDOT will provide an annual report by August 1<sup>st</sup> of each year which will highlight its Public Outreach and Involvement activities and efforts for the previous year, as well as report on the population it serves by making available figures on the diversity of those who have actively taken part in PCDOT programs, services, and processes. The latter statistical reporting will be compiled by gathering the demographic data of those who take part in such activities and wish to voluntarily disclose such information when appropriate and possible. In addition, PCDOT will provide information on complaints made during the year, as well as any legal action pertaining to alleged discrimination.

## **Disadvantaged Business Enterprise (DBE) Program**

It is Pima County's policy, as a federally-assisted corporate body of the State of Arizona, to encourage small and minority businesses and women's business enterprises to submit proposals for contracted work, including projects overseen or administered by PCDOT. In accordance with Pima County policy, DBE language will be included in PCDOT solicitations for work regarding ADOT and federally-funded projects.

PCDOT will work closely with contracted agencies to ensure DBE compliance. ADOT establishes a DBE goal for each competitive federal aid contract whenever applicable, and that goal will then be incorporated into the contract between PCDOT and its consultant. Both PCDOT and its

contractors are then required to track invoices and payments in ADOT's online Local Public Agency DBE Data Collection and Reporting System.

## Attachments

- A. TITLE VI ASSURANCES
- B. PUBLIC NOTICE POSTER
- C. ORGANIZATIONAL CHART
- D. COMPLAINT FORM FORMAT
- E. SAMPLE COMPLAINT LOG
- F. PIMA COUNTY DISADVANTAGE BUSINESS ENTERPRISE (DBE) POLICY