

SouthEastern Arizona Governments Organization

Title VI Implementation & Public Participation Plan

Relating to Transportation Planning and Improvements

Annual Update – August 1, 2018

Approved by the SEAGO Executive Board on August 17, 2018

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Persons with a disability or language barrier may request this document in an alternative format or translation or request other reasonable accommodations by contacting Jessica Urrea at (520) 432-5301 Extension 215. Requests should be made as early as possible to allow time to arrange the accommodation.

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I. INTRODUCTION

The SouthEastern Arizona Governments Organization (SEAGO) is a regional planning agency which performs and coordinates a variety of functions. Established in 1972, SEAGO is a 501(c)3, nonprofit organization whose mission is to assist local governments in seeking cooperative solutions to area wide problems; to provide a forum for regional policy development and serve as a coordinating link between municipal, county, tribal, state, and federal agencies. SEAGO is one of six Arizona Councils of Governments (COGs).

SEAGO serves the four counties of Cochise, Graham, Greenlee, and Santa Cruz. SEAGO's programs focus on issues that often cross jurisdictional boundaries. Originally a planning entity, SEAGO's operational scope has expanded considerably since its inception to include planning as well as project programming and implementation activities in the areas of housing, economic development, social services, transportation, the environment, and public transit.

The SEAGO Transportation Program assists member entities with programs administered through the Arizona Department of Transportation (ADOT). Each community within the region is eligible for funding through a competitive application process. As a result, the smaller communities find it difficult to compete with the larger communities within the state of Arizona for valuable grant funding. SEAGO's transportation department provides technical support, data, and other information to these communities when applying for ADOT or transportation related grants.

State transportation agencies such as ADOT are the principal recipients of Federal-aid Highway Funds for transportation planning and infrastructure improvements. ADOT has the authority to delegate project administration and management to subrecipients including Local Public Agencies (LPAs) including "any city, county, township, municipality, or other political subdivision that may be empowered to cooperate with the State transportation department in highway matters" (23 CFR 635.102).

SEAGO, as a condition to receiving Federal funding assistance from the Federal Transit Administration (FTA), Federal Highways Administration (FHWA), and Arizona Department of Transportation (ADOT) must comply with the Title VI of the Civil Rights Act of 1964 and the 1994 Presidential directive of 1994, Executive Order 12898. The purpose of this plan is to describe how SEAGO intends to ensure that Title VI protected populations are provided meaningful opportunities to become involved in the transportation planning process within the SEAGO region.

II. POLICY STATEMENT

The SouthEastern Arizona Governments Organization (SEAGO), is committed to ensuring that no person is discriminated against on the grounds of race, color, national origin, sex, age, disability, limited English proficiency, or low- income status as provided by Title VI of the Civil Rights Act of 1964, The Civil Rights Restoration Act of 1987, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990 (ADA), Executive Order 12898 (Environmental Justice), Executive Order 13166 (Limited Proficiency), Code of Federal Regulations 49 Part 21, Code of Federal Regulations 23 part 200, and Code of Federal Regulations Part 303.

The SouthEastern Arizona Governments Organization (SEAGO) strives to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. As a sub- recipient of federal funding, the SEAGO is responsible for initiating and monitoring Title VI activities, preparing required reports, technical assistance and training. SEAGO's contractors/consultants must also comply with this policy.

By: _____

Randy Heiss, Executive Director
SouthEastern Arizona Governments Organization

III. ENVIRONMENTAL JUSTICE

Title VI of the Civil Rights Act of 1964 requires outreach to underserved groups. Title VI specifically requires that "No person in the United States shall on the grounds of race, color, or national origin be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal financial assistance." (42 USC 2000d)

Furthermore, in direct response to the 1984 Supreme Court decision in the Grove City College vs. Bell case (465 U.S. 555), the Civil Rights Restoration Act of 1987 restored the original intent of Title VI to include all programs and activities of federal-aid recipients and contractors whether federally funded or not. This includes other civil rights provisions of federal statutes and related authorities that prohibit discrimination in programs and activities receiving federal financial assistance (23 CFR 200.5(p)) including:

- The 1970 Uniform Act (42 USC 4601), which prohibits ***unfair and inequitable treatment*** of persons displaced or property to be acquired as a result of federal-aid programs & projects.

- Section 504 of the 1973 Rehabilitation Act (29 USC 790), which states "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."

- The 1973 Federal-aid Highway Act (23 USC 324), which states "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."

- The 1975 Age Discrimination Act (42 USC 6101), which states "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."

- Executive Order 13166 on Limited English Proficiency (LEP), which requires federal agencies [including those of recipients (see FHWA Order 6640.23(2)(h))] 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.

- Executive Order 12898 on Environmental Justice (EJ), which states "Each Federal agency shall conduct its programs, policies, and activities [including those of recipients (see FHWA Order 6640.23(2)(h))] that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under such programs, policies, and activities because of their race, color, or national origin."

In response to the federal requirements noted above, SEAGO considers environmental justice as an integral part of its planning activities. To ensure that all populations are acknowledged and engaged in SEAGO planning processes, ***SEAGO has developed a Public Participation Plan which is included as Section XV of this document.***

In addition to the Public Participation Plan, SEAGO takes additional steps to ensure compliance with federal requirements. These include:

ADA Accessible Facilities

SEAGO makes every effort to hold public meetings in facilities that are Americans with Disabilities Act (ADA) compliant; and, arrange for reasonable accessibility and accommodation to persons with disabilities. In order to ensure effective communication, whenever possible, SEAGO provides assistance to individuals who are hearing or visually impaired, upon request.

Demographic Data Analysis

Prior to conducting any transportation planning activity, SEAGO develops a demographic profile of the planning area. SEAGO uses the most current ACS Estimates from the U.S. Census data to identify minority and low-income populations. The demographic profile summarizes the data for both population groups by U.S. Census Tract. Although minority and low-income persons live throughout the SEAGO region, many are concentrated in specific locations and neighborhoods. SEAGO's most recent regional demographic analysis found that minorities comprise 56.3% of the population. Therefore, any census tract with a percentage of population considered minority that is above 56.3% is considered to have a regionally significant concentration of minority population. A similar approach is taken to establish regionally significant concentrations of low-income populations. SEAGO's most recent regional demographic analysis found that regional poverty rate was 19.9% of the population. Therefore, any census tract with a percentage of population considered "in poverty" that is above 19.9% was considered to have a regionally significant concentration of low-income population.

Targeted Outreach

The objective of SEAGO's public outreach efforts is to make every attempt to involve all stakeholders regardless of their demographic composition, and, those that may be directly impacted because of a transportation improvement. SEAGO uses the above demographic analysis to develop specific community outreach activities. This includes door-to-door and one-on-one outreach activities.

Limited English Proficiency Outreach

SEAGO also assists persons with limited English proficiency to actively participate in the transportation planning process. SEAGO ensures all planning surveys and outreach materials are provided in both English and Spanish. SEAGO attempts to have bilingual staff at public meetings. Staff will make every effort to provide Spanish translators and document translation, where feasible, upon request. Upon request, SEAGO staff are available to go speak to groups in an effort to eliminate participation barriers and involve citizens in the transportation process.

IV. PUBLIC PARTICIPATION PROCESS

The SouthEastern Arizona Governments Organization (SEAGO) recognizes the increasing importance of involving the public as they plan, organize and implement transportation projects. Engaging interested parties generally results in a more effective project overall. Taking time at the beginning to communicate with potentially affected interests, carefully explaining the proposal, and gathering input, can enhance the project and theoretically reduce the time and effort for implementation.

The goals of this public involvement are to ensure that:

- Residents are given the opportunity to participate in the transportation planning process.
- The issues and concerns of residents are given consideration in the selection of transportation investments.
- Transportation investments do not disproportionately burden any population with adverse impacts.

The SouthEastern Arizona Governments Organization (SEAGO) operates under a comprehensive Public Participation Plan (PPP). The Plan explains the agency goals for public participation, governing structure, and composition of boards, procedures for board meetings, program areas, interagency coordination, and specific procedures for public participation in the planning process, public engagement and notification methods. The full plan is incorporated into this document.

SEAGO has developed a Limited English Proficiency Plan (LEP) which is incorporated in this document.

Commitment to Public Involvement

The Public Participation Plan (PPP) contains background material, guidelines, and commitments that SEAGO is undertaking to incorporate an effective public process into future plans, projects, and programs. Specifically SEAGO is committed to:

- Inclusive and meaningful public involvement.
- Open and honest communications with all individuals and entities.
- Timely public notice.
- Full public access to information and key decisions.
- Creating a sense of shared responsibility and ownership for regional transportation/congestion problems and a shared sense of pride in the development of solutions to those problems.
- Helping form partnerships between member entities, and the private and public sectors to plan and implement transportation/congestion solutions.
- Establishing policies and prioritizing needs based on valid data and using objective, fair and consistent processes.
- Providing information and gathering input so that decision makers will be able to make informed decisions.

Dissemination of Title VI Information

Subrecipients of federal funding must post notices informing the public of the agency's Title VI obligations and of the protections afforded to the public through Title VI. SEAGO's public notice will appear in all significant publications of SEAGO and on the agency's website. This includes information about the complaint process described in section XI. The full text will be used when space is available. The abbreviated text will be used when space is limited. The public notice is posted on the SEAGO website and on the bulletin board that is visible immediately upon entry into SEAGO where all public meeting notices are posted.

SEAGO understands the need to keep the public aware of our transportation planning activities. In addition to posting meeting agendas on our website and offices, meeting notices and agendas are distributed via email to agencies that provide direct services to Title VI protected populations. We request that they make their clients aware of these opportunities for public involvement by posting the meeting notice at their office locations, websites, or social media pages.

Public Meetings

SEAGO's Executive Board meets quarterly. Meetings are the 4th Friday of February, May, August, and November. The SEAGO Administrative Council meets the 2nd Thursday of February, May, August, and November. The SEAGO Technical Advisory Committee meets the 3rd Thursday of January, March, May, July, September, and November. Agendas for each meeting are posted at the SEAGO office, 1403 W. Highway 92, Bisbee, Arizona, Bisbee City Hall located at 118 Arizona Street, Bisbee, Arizona and online at: www.seago.org a minimum of 72 hours in advance of each meeting.

The following statement is conveyed on each meeting agenda in both English and Spanish: "Individuals with disabilities who require special accommodations may contact John Merideth at (520) 432-5301 extension 207 at least 72 hours before the meeting time to request such accommodations."

Public participation is promoted at each meeting and our agendas give opportunity to call upon the public to make comment on any unrelated agenda topic as well as during discussion on an agenda topic.

In the event of a cancellation, notice will be posted on web site a minimum of 48 hours in advance as well as email notification sent to regular meeting participants and our Title VI notice distribution list.

Notice to the Public

The following "Notice to the Public" is posted in the SEAGO Office and on the SEAGO website at www.seago.org and included in this document as Appendix "C".

V. PUBLIC NOTICE

The SouthEastern Arizona Governments Organization, (SEAGO), complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. SEAGO operates without regard to race, color, national origin, age, gender, disability, income status, or level of English proficiency. SEAGO meetings are held in accessible locations, and materials are provided in accessible formats or in languages other than English upon request with a reasonable advance notice period.

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

EL AVISO PUBLICO

La Arizona gobiernos organización (SEAGO) cumple con el título VI de la ley de derechos civiles de 1964 y estatutos y reglamentos relacionados en todos los programas y actividades. SEAGO funciona independientemente de raza, color, origen nacional, edad, sexo, incapacidad, nivel de ingreso, o aptitud con ingles. Las reunions de SEAGO se ocurren en lugares de acceso y materiales se proporcionan en formatos accesibles o en idiomas distintos del ingles, si se reciben una peticion antes de la reunion.

Cualquier persona que cree que han sido discriminados por SEAGO, o cualquiera de sus subreceptores o contratistas, puede presentar una queja por escrito a SEAGO o la oficina de derechos civiles de ADOT. Si la queja es contra SEAGO, el enlace de SEAGO para TÍTULO VI enviara la queja a la ofcina de derechos civiles de ADOT. Todas las quejas se investigaran inmediatamente por la oficina de derechos civiles de ADOT.

CONTACT INFORMATION:

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VI. SEAGO ASSURANCES

The SouthEastern Arizona Governments Organization (herein referred to as the "Recipient"), HEREBY AGREES THAT, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Federal Highway Administration and Arizona Department of Transportation, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation--Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);
- 23 C.F.R. Part 200 Subchapter C-Civil Rights (Title VI program implementation and related statues)

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

General Assurances

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

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

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

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federal Aid Highway Program.

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

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

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

   *"The **SouthEastern Arizona Governments Organization**, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252.42 U.S.C. §§ 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."*

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.

4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.

5. That where the Recipient receives Federal financial assistance to a construct a facility or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.

6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.

7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:

   a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
   b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project or program.

8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or

b. the period during which the Recipient retains ownership or possession of the property.

9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

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

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

By _____ Date 7/31/2018

Randy Heiss, Executive Director
SouthEastern Arizona Governments Organization

APPENDIX A

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

1. **Compliance with Regulations**: The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration or the Arizona Department of Transportation, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.

2. **Non-discrimination**: The contractor, with regard to the work performance by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.

3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and Regulations relative to Non-discrimination on the grounds of race, color, or national origin.

4. **Information and Reports**: The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient, the Federal Highway Administration or Arizona Department of Transportation to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient, the Federal Highway Administration, or Arizona Department of Transportation, as appropriate, and will set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance**: In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration or Arizona Department of Transportation, may determine to be appropriate, including, but not limited to:

    a. withholding payments to the contractor under the contract until the contractor complies; and/or

b. cancelling, terminating, or suspending a contract, in whole or in part.

6. **Incorporation of Provisions**: The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with request to any subcontract or procurement as the Recipient, the Federal Highway Administration, or Arizona Department of Transportation may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

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

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

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto ***SouthEastern Arizona Governments Organization*** and its successors forever, subject, however, to the covenants, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and will be binding on the ***SouthEastern Arizona Governments Organization*** , its successors and assigns.

The ***SouthEastern Arizona Governments Organization***, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [.] [and]* (2) that the ***SouthEastern Arizona Governments Organization*** will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended[, and (3) that in the event of breach of any of the above-mentioned non-discrimination conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

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

APPENDIX C

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

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the **SouthEastern Arizona Governments Organization** pursuant to the provisions of Assurance 7(a):

A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:

1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities,

B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, **SouthEastern Arizona Governments Organization** will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*

C. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, **SouthEastern Arizona Governments Organization** will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the **SouthEastern Arizona Governments Organization** and its assigns*.

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

APPENDIX D

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

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by **SouthEastern Arizona Governments Organization** pursuant to the provisions of Assurance 7(b):

A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add, "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended set forth in this Assurance.

B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, **SouthEastern Arizona Governments Organization** will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*

C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, **SouthEastern Arizona Governments Organization** will there upon revert to and vest in and become the absolute property of **SouthEastern Arizona Governments Organization** and its assigns.*

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

APPENDIX E

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

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin): and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures discrimination against minority populations by

discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;

- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1687 et seq).

Federal Transit Administration Assurances

The SouthEastern Arizona Governments Organization HEREBY CERTIFIES THAT, AS A CONDITION OF RECEIVING Federal financial assistance under the Federal Transit Act of 1964, as amended, it will ensure that:

1. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
2. The SouthEastern Arizona Governments Organization will compile, maintain and submit in a timely manner Title VI information required by FTA Circular 47021B in compliance with the Department of Transportation's Title VI regulation, 46 CFR Part 21.9(b).
3. The SouthEastern Arizona Governments Organization will make it known to the public that those person or persons alleging discrimination on the basis of race, color or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transportation Administration and/or the U. S. Department of Transportation.

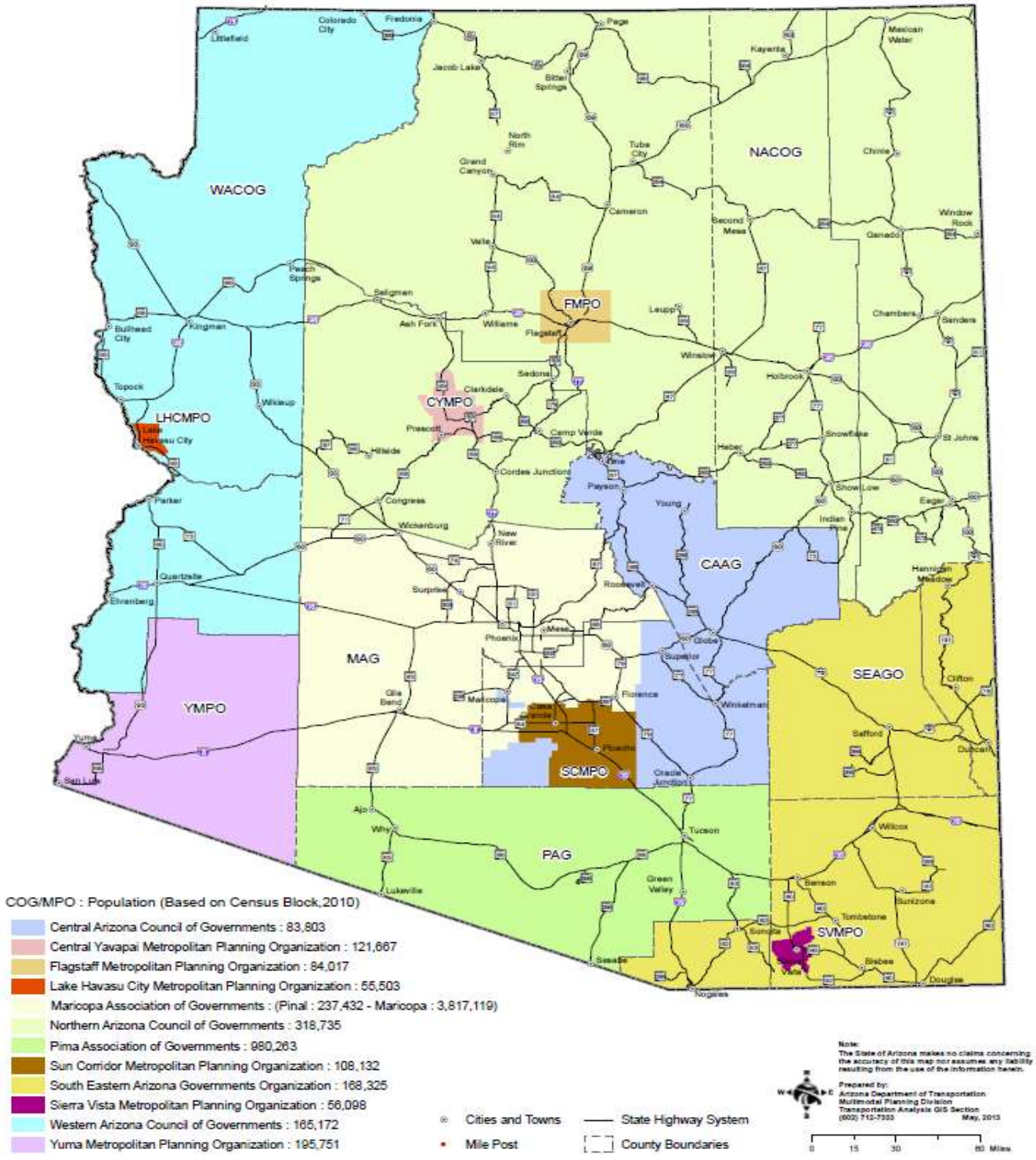
Certification

The SouthEastern Arizona Governments Organization will make it known to the public that those person or persons alleging discrimination gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration and Arizona Department of Transportation. This ASSURANCE is binding on Arizona, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal Aid Highway Program the person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

By _____ Date: 7/31/2018

Randy Heiss, Executive Director
SouthEastern Arizona Governments Organization

VII. SEAGO REGION MAP



VIII. SEAGO ORGANIZATION, STAFFING, AND TITLE VI ADMINISTRATION

a. *General Organization*

The SouthEastern Arizona Governments Organization (SEAGO) is a regional planning agency which performs and coordinates a variety of functions. Established in 1972, SEAGO is a 501 (c)3, nonprofit organization whose mission is to assist local governments in seeking cooperative solutions to area wide problems; to provide a forum for regional policy development and serve as a coordinating link between municipal, county, tribal, state, and federal agencies. SEAGO is one of six Arizona Councils of Governments (COGs).

SEAGO serves the four-county planning area of Cochise, Graham, Greenlee and Santa Cruz counties, which covers 14,000 square miles and is very rural. Within the region, there are fourteen incorporated communities and one Native American government – the San Carlos Apache Tribe. SEAGO is charged with providing technical assistance to all the entities within the region, for transportation planning, population data gathering, project management, transit programs and activities, and other related programs.

b. *SEAGO Title VI Staffing, Coordination and Administration*

The **Executive Director**, on behalf of the SEAGO Executive Board, is responsible for supervising and administering the overall activities of the SEAGO, its programs, and employees. As such, the Executive Director signs all necessary nondiscrimination assurances to aid in ensuring all civil rights requirements are met. The Executive Director is responsible for the overall implementation of the Title VI program, and serves as the Chief Title VI Officer. Duties or powers are delegated to carry out the efficient operation of the Title VI Program. **SEAGO's Executive Director is Randy Heiss.**

Mr. Heiss may be contacted via phone at 520-432-5301 extension 202. He may be contacted by email at rheiss@seago.org. He may be contacted by mail or in person at 1403 W. Highway 92, Bisbee, Arizona 85603.

The day to day administration of the program lies with the **SEAGO Transportation Program Administrator,** which includes, but is not limited to; activity such as reporting, data collection, technical assistance, and training. The position has responsibility for preparing required reports regarding Title VI compliance. This position is also responsible for overseeing the implementation of SEAGO's Limited English Proficiency Plan. Chris Vertrees is the Transportation Program Administrator.

Mr. Vertrees may be contacted via phone at 520-432-5301 extension 209. He may be contacted by email at cdvertrees@seago.org. He may be contacted by mail or in person at 1403 W. Highway 92, Bisbee, Arizona 85603.

The SEAGO Training Coordinator is also our Title VI Coordinator. The Title VI Coordinator has the delegated authority to have a direct line of communication to the SEAGO Executive Director involving all Title VI matters. The Title VI Coordinator is charged with ensuring that notices of opportunities for public involvement are directed to Title VI protected populations through agencies most likely to serve such populations. The Title VI Coordinator is also responsible for coordinating Title VI training for SEAGO staff

and collecting statistical data (race, color, sex, national origin and low-income status) of participants in and beneficiaries of SEAGO Transportation programs Jessica Urrea is SEAGO's Title VI Coordinator.

Ms. Urrea may be contacted via phone at 520-432-5301 extension 215. He may be contacted by email at jurrea@seago.org. He may be contacted by mail or in person at 1403 W. Highway 92, Bisbee, Arizona 85603.

Compliance is ongoing and strategies to include disadvantaged populations (including individuals with Limited English Proficiency) in the transportation planning and grant awards processes are outlined in the SEAGO Public Participation Plan which is included as Section IX of this document. Every effort is made to include disadvantaged populations in the SEAGO Technical Advisory Committee (TAC) process.

A copy of the SEAGO Organization Chart can be found in Attachment A of this plan.

IX. SEAGO MEMBERSHIP

List of Member Communities

The member agencies of SEAGO are represented on the Executive Board by elected officials and by Private Sector Representatives appointed by the Executive Board members in accordance with Economic Development Administration requirements. It is the function of the Executive Board to act as a policy body, coordinating transportation planning and related implementation activities within the four-county transportation region. The Board must approve all agreements and contracts, and authorize the Executive Director to sign all appropriate documents related to contracts and agreements. **The SEAGO Title VI Implementation and Public Participation Plan along with its Annual Updates is reviewed and approved by the Executive Board.** The current Executive Board membership is shown in the table below:

Community	Executive Board Representative
Cochise County	Peggy Judd, Supervisor
City of Benson	Toney King, Mayor
City of Bisbee	David Smith, Mayor
City of Douglas	Robert Uribe, Mayor
Town of Huachuca City	Ken Taylor, Mayor
City of Sierra Vista	Rick Mueller, Mayor
City of Tombstone	Bill Barlow, Council Member
City of Willcox	Gerald Lindsey, Council Member
Private Sector Representative	Barbara Richardson, Cochise County
Private Sector Representative	Iona Smerekanich, Cochise County
Graham County	Paul David, Supervisor
Town of Pima	C.B. Fletcher, Mayor
City of Safford	Richard Ortega, Vice-Mayor
Town of Thatcher	Bob Rivera, Mayor
San Carlos Apache Tribe	Terry Rambler, Tribal Chairman
Private Sector Representative	Patrick O'Donnell, Graham County
Greenlee County	David Gomez, Supervisor
Town of Clifton	Luis Montoya, Mayor
Town of Duncan	Billy Waters, Mayor
Private Sector Representative	Dustie L. Robinette, Greenlee County
Santa Cruz County	Bruce Bracker, Supervisor
City of Nogales	Hon. John Doyle, Mayor
Town of Patagonia	Hon. Ike Isakson, Mayor
Private Sector Representative	Tony Sedgwick Jr., Santa Cruz County

Administrative Council

The member agencies of SEAGO are also represented on the Administrative Council. The Administrative Council is comprised of the city, town, county, and tribal government manage or their designees. It is the function of the Administrative Council to provide recommendations to the Executive Board regarding business and policy matters of SEAGO. The current Administrative Council membership is shown in the table below:

Community	Administrative Council Representative
Cochise County	Ed Gilligan, Administrator
City of Benson	Vicki Vivian, Interim City Manager
City of Bisbee	Robert Smith, City Manager
City of Douglas	Jim Russell, City Manager
Town of Huachuca City	Matthew Williams, Town Manager
City of Sierra Vista	Matt McLachlan, Community Devel. Director
City of Tombstone	Donna Driskell, Clerk
City of Willcox	Crystal Hadfield, Interim City Manager
Graham County	Dustin Welker, Manager
Town of Pima	Sean Lewis, Town Manager
City of Safford	Horatio Skeete, City Manager
Town of Thatcher	Heath Brown, Interim Town Manager
San Carlos Apache Tribe	Marvin Mull, Planner
Greenlee County	Kay Gale, Administrator
Town of Clifton	Heather Ruder, Town Manager
Town of Duncan	John Basteen, Town Manager
Santa Cruz County	Jenifer St. John, Administrator
City of Nogales	Frank Felix, City Manager
Town of Patagonia	Dave Teel, Town Manager

Technical Advisory Committee

The SEAGO Technical Advisory Committee (TAC) is the transportation advisory committee to the Administrative Council and Executive Board. The voting members of the TAC are comprised of an appointed representative from each public works department of each member entity (or the local equivalent), and an ADOT representative. The TAC has the authority, and primary responsibility to conduct technical reviews regarding all work activities of the Work Program; to recommend project awards; and to advise the Administrative Council and Executive Board on appropriate actions to be taken for the overall transportation planning policies and direction of the region. The 2010 Census triggered the creation of several new Metropolitan Planning Areas in Arizona. One of those is the Sierra Vista MPO which now administers its own transportation planning process. As a result, the City of Sierra Vista is no longer officially represented on the SEAGO TAC. The current TAC membership is shown in the table below.

Community	TAC Representative
Cochise County	Karen Lamberton, Transportation Planner
City of Benson	Michelle Johnson, City Planner
City of Bisbee	Dwayne Wallace, Interim Public Works Director
City of Douglas	Lynn Kartchner, Public Works Director
City of Tombstone	Donna Driskell, Clerk
City of Willcox	Crystal Hadfield, Interim City Manager
Graham County	Michael Bryce, County Engineer
Town of Pima	Sean Lewis, Town Manager
City of Safford	Randy Petty, City Engineer
Town of Thatcher	Heath Brown, Town Engineer
San Carlos Apache Tribe	Charles Russell, Director, Transportation Dept.
Greenlee County	Phil Ronnerud, County Engineer
Town of Clifton	Heather Ruder, Town Manager
Town of Duncan	John Basteen, Town Manager
Santa Cruz County	Jesus Valdez, Public Works Director
City of Nogales	Juan Guerra, City Engineer
Town of Patagonia	Dave Teel, Town Manager
ADOT	Mark Hoffman, ADOT MPD

Ethnicity and Gender Statistics for SEAGO Committees:

	ETHNICITY				GENDER	
SEAGO Boards & Committees	White	Hispanic	Native American	Other	Male	Female
Executive Board	17	6	1	0	20	4
Administrative Council	16	1	1	1	13	6
TAC	14	2	1	0	12	5

X. POPULATION & DEMOGRAPHIC PROFILE OF THE SEAGO REGION

Population & Households			Census Block Groups			
Category	SEAGO		Number of block groups >= Area Percentage	% Block Groups	Affected Population	% of Affected Population Captured in Census Block Groups
	Total	Percent				
Population Base	221,808	N/A	184	100.0 %	N/A	N/A
Minority	118,800	53.6 %	72	39.1 %	78,949	66.5 %
Below Poverty Level	40,911	19.9 %	80	43.5 %	29,023	70.9 %
Age 65+	37,471	16.9 %	87	47.3 %	26,202	69.9 %
Population with a Disability	30,506	14.6 %	97	52.7 %	19,738	64.7 %
Limited English Proficient Persons	24,694	11.9 %	107	58.2 %	23,301	94.4 %

Sources: U.S. Census Bureau, 2010-2014 American Community Survey (ACS) 5-Year estimates and 2010 Decennial Census.
ACS data are based on a sample and are subject to sampling variability.

Data Collection, Reporting, and Analysis

SEAGO collects, reviews, and analyzes demographic data annually to develop a demographic profile (baseline) for the region. ***SEAGO uses the most current ACS Estimates from the U.S. Census data*** to identify minority, low-income, age 65+, disabled, and limited English proficient populations (see table above). The demographic profile summarizes the data for these population groups by U.S. Census Tract.

Demographic Data Used in Transportation Planning

SEAGO's uses the Demographic Profile data to determine the presence of Title VI communities as well as the potential to affect them through the planned activity. The process that SEAGO uses to identify Title VI communities is:

1. Prior to conducting any transportation planning activity, SEAGO develops a demographic profile of the planning area with a focus on minority and low-income populations. Although minority and low-income persons live throughout the SEAGO region, many are concentrated in specific locations and neighborhoods. SEAGO's most recent regional demographic analysis found that minorities comprise 56.3% of the

population. Therefore, any census tract with a percentage of population considered minority that is above 56.3% is considered to have a regionally significant concentration of minority population.

2. A similar approach is taken to establish regionally significant concentrations of low-income populations. SEAGO's most recent regional demographic analysis found that regional poverty rate was 19.9% of the population. Therefore, any census tract with a percentage of population considered "in poverty" that is above 19.9% was considered to have a regionally significant concentration of low-income population.
3. Appropriate outreach and analysis will be incorporated into all relevant activities from the beginning. Therefore, a Public Participation Plan specific to the identified Title VI community shall be developed prior to any planning activity taking place.
4. The Title VI Coordinator will assist staff as needed in determining the potential effect of planning activities on Title VI populations.

Data Reporting

SEAGO will collect and report to ADOT the following data by August 1 of each year:

a. Lawsuits Alleging Discrimination

SEAGO will keep data on any lawsuits or complaints relating to discrimination have been filed against SEAGO and report on the status and outcome of such incidences.

b. Outreach Efforts

SEAGO will maintain records on its efforts to invite participation from Title VI in its planning activities.

c. Public Participation Data

SEAGO will gather data reflecting the extent to which members of Title VI protected populations participate in planning activities and any issues raised by those participants.

d. Ethnicity and Gender Statistics for SEAGO Committees

SEAGO will report the ethnicity and gender of SEAGO's primary advisory committees.

e. Demographic Composition of the SEAGO Region

SEAGO will update the demographic composition of the SEAGO region's population each year.

f. Pending Applications for Federal Assistance

SEAGO will report the federal funding sources that it receives direct funding from each year. SEAGO currently applies annually for federal funds directly from the U.S. Department of Commerce. SEAGO also receives federal pass through funding from a number of state agencies, including but not limited to ADOT, Arizona Department of Housing, and the Arizona Department of Economic Security.

XI. NON-DISCRIMINATION COMPLAINT PROCEDURES

FHWA Title VI Complaint Procedures

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 as they relate to any Federal Highway Administration program or activity administered by the SouthEastern Arizona Governments Organization, its subrecipients, consultants and contractors. In addition to these procedures, complainants reserve the right to file formal complaints with other state or federal agencies or take legal action for complaints alleging discrimination.

Required procedures for FHWA Title VI Complaints filed against the SouthEastern Arizona Governments Organization, the SouthEastern Arizona Governments Organization subrecipients, contractors or consultants:

1. Any person, specific class of persons or entity that believes they have been subjected to discrimination on an FHWA-related activity or program as prohibited by the legal provisions of Title VI on the basis of race, color, national origin, can file a formal complaint with the SouthEastern Arizona Governments Organization. A copy of the Complaint Form may be accessed electronically here.

2. The complaint must be filed within 180 days of the alleged discrimination, and include the date the alleged discrimination became known to the complainant or the last date of the incident.

3. Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. However, the complainant may call the SouthEastern Arizona Governments Organization and provide the allegations by telephone for transcription. Once transcribed the SouthEastern Arizona Governments Organization will send the written complaint to the complainant for correction and signature.

4. A complaint should contain at least the following information:
    a. A written explanation of what has happened;
    b. A way to contact the complainant;
    c. The basis of the complaint (e.g., race, color, national origin);
    d. The identification of a specific person/people and the respondent (e.g., agency/organization) alleged to have discriminated;
    e. Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal Highway Administration financial assistance; and is a consultant, contractor or subrecipient of the SouthEastern Arizona Governments Organization and
    f. The date(s) of the alleged discriminatory act(s).

5. Upon receipt of a completed complaint, the SouthEastern Arizona Governments Organization will forward all FHWA Title VI complaints to Arizona Department of Transportation (ADOT) Civil Rights Office (CRO) within 72 hours.

6. ADOT CRO will forward all FHWA Title VI complaints to the FHWA Division Office.

7. All Title VI complaints received by the FHWA Division Office will be forwarded to the FHWA Office of Civil Rights for processing and potential investigation.

8. If the FHWA Office of Civil Rights determines a Title VI complaint against a subrecipient can be investigated by ADOT CRO, the FHWA Office of Civil Rights may delegate the task of investigating the complaint to ADOT CRO. ADOT CRO will conduct the investigation and forward the Report of Investigation to the FHWA Office of Civil Rights for review and final disposition.

9. The disposition of all Title VI complaints will be undertaken by the FHWA Office of Civil Rights, through either (1) informal resolution or (2) issuance of a Letter of Finding of compliance or noncompliance with Title VI. A copy of the Letter of Finding will be sent to the FHWA Division Office.

10. The complainant may also file a discrimination related complaint on an FHWA program or activity directly with ADOT or with the Federal Highway Administration by contacting the agencies at:

ADOT Civil Rights Office
206 S. 17th Avenue, Mail Drop 155A
Phoenix, AZ 85007
Email: civilrightsoffice@azdot.gov
602.712.8946
602.239.6257 FAX

Federal Highway Administration U.S. Department of Transportation Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
Email: CivilRights.FHWA@dot.gov
202-366-0693
202-366-1599 FAX

Complaints involving FTA funded programs or activities will be investigated by SEAGO utilizing the above complaint procedures. The complainant may file a discrimination related complaint directly with SEAGO at:

Randy Heiss, Executive Director
1403 W. Highway 92
Bisbee, AZ 85603
Phone: (520) 432-5301 Extension 202
Fax: (520) 432-5858
Email: rheiss@seago.org

Or with ADOT or with the Federal Transit Administration by contacting the agencies at:

ADOT Civil Rights Office 206 S. 17th Avenue, Mail Drop 155-A Phoenix, AZ 85007 Phone: 602.712.8946 Fax: 602.239.6257 Civilrightsoffice@azdot.gov	FTA Office of Civil Rights 1200 New Jersey Avenue SE, Washington, DC20590

Complaint Form

SEAGO's **Title VI Complaint Form** can be found in **Attachment C** or at https://www.keepandshare.com/doc12/247416/discrimination-complaint-form-pdf-318k?da=y .

If information is needed in another language, please contact SEAGO at 520-432-5301. Si se necesita información en Español, por favor comuníquese con la Oficina SEAGO al 520-432-5301.

XII. TITLE VI PROGRAM COMPLIANCE AND ENFORCEMENT

Transportation Planning

The purpose of the SEAGO Transportation Program is to ensure that transportation related resources are equitably, effectively, and efficiently distributed throughout the region to support the safe movement of goods and people. This is accomplished by transportation planning and coordination with local, state, federal agencies, and the general public to identify and implement projects and multi-modal programs to meet the transportation needs of the region.

Management of the planning process is performed by the SEAGO Transportation Planner, with strategic direction from the Executive Director. The Technical Advisory Committee (TAC) provides review and input, as appropriate, and works directly with the Transportation Planner, providing recommendations on regional transportation policy and the development and maintenance of a fiscally constrained five-year Transportation Improvement Program (TIP). It is the function of the Executive Board to act as a policy body for transportation planning, and related implementation activities.

Other Activities Provided by the SEAGO Transportation Program

- Public Involvement – Provide outreach activities to stakeholders.
- Highway Performance Management System – Traffic counts & road classification.
- Data Collection – Population data collection and Air Quality Standards.
- Regional Planning Coordination – Technical Assistance for project management, grant writing, funding research
- Transit – Planning and management activities to all rural transit programs throughout the region.
- Regional Mobility Management - Training and technical assistance to public transit programs to assist them in meeting compliance with program requirements.

Compliance Training, Investigations, Complaints and Lawsuits

SEAGO is committed to Title VI and other nondiscrimination authorities and will make every effort to identify and address discrimination in its programs and activities, if found to exist. Compliance is ongoing and falls under the direction of the Title VI Coordinator.

Title VI Program Compliance and Enforcement Process

SEAGO will actively pursue the prevention of deficiencies and will take the necessary steps to ensure compliance with all program requirements. To further enhance the ability to identify and eliminate patterns of discrimination, SEAGO will ensure that staff, sub-recipients, and beneficiaries are educated and informed regarding Title VI roles and responsibilities. SEAGO's Title VI Compliance and Enforcement Process is identified below:

a. Internal compliance and sub-recipient reviews will be conducted to 1) ensure compliance with Title VI; 2) identify deficiencies; and 3) correct deficiencies, when found to exist.

b. When conducting Title VI compliance reviews, any deficiencies found will be communicated in writing. It is SEAGO's goal to secure voluntary compliance at the outset in every noncompliance situation and will be pursued through each enforcement action.
c. Remedial action/correction steps shall be identified, agreed upon, and remedial action shall be completed within 90 calendar days.
d. Technical assistance will be made available to any department or sub-recipient in finding methods, strategies, and processes to ensure effective Title VI implementation and compliance.
e. When a sub-recipient fails or refuses to comply with the requirements within the time frame allotted, SEAGO will involve the ADOT Civil Rights Office to initiate remedies.
f. Compliance audits, results, and corrective actions will be included in the SEAGO Title VI Non Discrimination Annual Goals and Accomplishments Report.

Compliance Training

a. SEAGO is committed to Title VI/Nondiscrimination training. SEAGO's Transportation Program Administrator and/or Title VI Coordinator will participate in ADOT provided Title VI training and meetings.
b. On a semi-annual basis (January/July) the SEAGO Title VI Coordinator will review ADOT, FHWA, and FTA resource websites to identify training opportunities and changes in program requirements.
c. The Title VI Coordinator will provide at least one Title VI training annually to all SEAGO staff. The training will serve to review and refresh staff's' knowledge of program. This will include complaint procedures, LEP, website resources, and Title VI contacts.
d. A training sign-in sheet shall be completed for training provided. The Title VI Coordinator will maintain all training documentation including sign-in sheets and training materials.
e. SEAGO sub-recipients shall be required to complete Title VI training annually. They may attend SEAGO annual training or submit a self-certification sheet demonstrating completion of training.

Sub-recipient Review Procedures

SEAGO at times may use consultants to assist in the completion of the above activities. SEAGO sub-recipient review procedures include review of sub-recipient contracts, data collection and analysis efforts, and staff interviews to help ensure compliance with Title VI and subsequent authorities. The SEAGO Transportation Program Manager and the Title VI Coordinator will monitor these sub-recipients to ensure compliance with Title VI and related authorities.

a. SEAGO sub-recipients shall be reviewed annually for compliance with Title VI.
b. The Transportation Program Administrator and/or Title VI Coordinator shall review of sub-recipient contracts for compliance with required Title VI language.
c. Sub-recipient development of a Public Participation Plan (PPP) shall be included in all contract Scopes of Work. SEAGO will review and approve the PPP before in other work is allowed to proceed.
d. Sub-recipients shall submit to SEAGO any outreach/survey materials created at least 10 days prior to any outreach activity. SEAGO will review materials for Title VI compliance.

e. Within 7 days following the completion of a public meeting, sub-recipients shall submit to SEAGO copies of sign-in sheets and materials. SEAGO will review the information to ensure that efforts to reach our Title VI population are being met.

SEAGO does not have any sub-recipients at this time.

Compliance Reviews/Lawsuits

ADOT performed a compliance review for FTA-related services in FY14. No deficiencies were identified.

No lawsuits or complaints have been filed regarding SEAGO since this Plan's initial development in 2013.

SEAGO's ***Title VI Complaint Log*** can be found below.

Title VI Complaints, Investigations and Lawsuits				
Description/Name	Date Month, Day & Year	Summary (Basis of Complaint)*	Status	Actions / Final Findings
Complaints				
1)				
2)				
3)				
Investigations				
1)				
2)				
3)				
Lawsuits				
1)				
2)				
3)				

Include basis of complaint.

Report to be Submitted Annually to ADOT Title VI Department

XIII. LIMITED ENGLISH PROFICIENCY PLAN

It is the policy of SEAGO to ensure that our programs and activities, normally provided in English, are accessible to Limited English Proficiency (LEP) persons. As a recipient of federal funding, SEAGO is required 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 SEAGO's planning and programming process. U.S. Department of Transportation guidance on LEP requires a four-factor analysis to determine the need for translation services in order to fully engage LEP populations in the planning process. The four factors are as follows:

1. The number or proportion of LEP persons served by the SEAGO service area.
2. Frequency of contact with SEAGO services or programs.
3. Nature and importance of SEAGO programs and services to people's lives.
4. The resources available and the overall cost to SEAGO.

SEAGO's analysis of the four factors is provided below.

Factor 1: The number or proportion of LEP persons served by the SEAGO service area.

According to the 2010 to 2014 American Community Survey (ACS) five-year estimates 36.5 percent of the region's population speaks a language other than English with 33.5 percent speaking Spanish. The ACS also indicated that 11.9 percent of persons five years old and over speak English less than "very well." The predominant language for this group is Spanish.

SEAGO has determined that it was not cost effective to take specific actions for languages of the LEP populations other than Spanish unless a specific request was made for an accommodation. This is because languages other than Spanish made up less than 1 percent of those that speak English less than "very well".

Factor 2: The number or proportion of LEP persons served by the SEAGO service area.

SEAGO recognizes that transportation planning is an area that touches everyone's lives. However, as a planning agency SEAGO's contact with the general public is significantly less frequent than programs that offer direct transportation services. When the scope of a proposed project or plan has the potential to significantly impact LEP persons, SEAGO will, to the maximum extent feasible, provide appropriate alternative non-English formats. Additional translation and interpreter services are offered.

Factor 3: Nature and importance of SEAGO programs and services to people's lives.

Transportation is an important element to people's independence. Inclusive community engagement is critical to ensuring that transportation planning is responsive to the needs of all residents.

Factor 4: The resources available and the overall cost to SEAGO.

SEAGO 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. SEAGO works to provide enough bilingual information for the LEP population to understand which SEAGO services are available or what major planning activities are taking place so that they can ask for assistance from SEAGO or one of their trusted sources.

On the basis of this four-factor analysis, SEAGO will, to the maximum extent feasible, provide appropriate alternative non-English formats when the scope of a proposed project or plan has the potential to significantly impact LEP persons. All SEAGO agendas and public notices will contain a footnote in Spanish that translations are available upon request. SEAGO staff will make every effort to provide Spanish translators and document translation of SEAGO's official deliberations and communications, community outreach, and related notifications, where feasible and upon request. Requested translation and interpreter services will be provided for SEAGO public meetings with advance notice as stated in our public notices.

XIV. PUBLIC PARTICIPATION PLAN

Background

Over the past few years, governmental agencies have come to recognize the increasing importance of involving the public as they plan, organize, and implement transportation projects. Involving interested parties generally results in a more effective project overall. Taking time at the beginning to communicate with potentially affected parties, carefully explaining the proposal, and gathering input, can enhance the project and potentially reduce the time and effort for implementation.

The goals of public involvement are to ensure that:

- Residents are given the opportunity to participate in the transportation planning process.
- The issues and concerns of residents are given consideration in the selection of transportation investments.
- Transportation investments do not disproportionately burden any population with adverse impacts.

This plan outlines the importance of, and specific guidelines for, involving community members, organizations, governments, transportation professionals and others in ongoing and future regional projects, plans, and programs. Included is information about the value of public participation, how it will be accomplished, and what will be done with the results.

It is important to note that a Public Participation Plan (PPP) needs to incorporate a broad array of interested parties. These include agencies responsible for land use management, natural resources, environmental protection, conservation and historical preservation. Involving all the potentially affected interests, including the traditionally underserved populations, can significantly increase a plan or project's efficiency and effectiveness. By following the process outlined in this plan, SEAGO will be able to better ensure inclusive and meaningful public involvement.

Public Involvement Process

Public participation implies an open process. This means that anyone who is potentially affected, or is just interested in the process, is welcome to participate. Some of the reasons for encouraging this openness are:

- Project leaders may gain new information.
- Participants, who want a project to be completed, can provide additional resources in the form of assistance, goods, or services.
- Public participation can be a forum for dispute resolution.
- Progress can be made and implementation occur because:
    - The project itself will be better designed with public input.
    - The community better understands what the project is about.
    - Input can provide a warning mechanism for potential problems.

Participant comments help the project leaders understand areas where residents and other stakeholders may have concerns or misunderstandings. This can be used to provide better information to others who are not actively participating in meetings or providing input.

Just opening the process to the public is not enough. There are numerous populations that are not likely to get involved unless a special effort is made to reach out to them. In this Plan, groups that need a more focused effort to get involved are referred to as "underserved populations". These include, but are not limited to:

- Minority (Hispanic and/or non-white) community members.
- Low-Income community members.
- Physically and mentally challenged community members.
- People who may rely on alternative transportation.
- People with limited English proficiency.
- Aging individuals.

By making a reasonable extra effort to include these populations, SEAGO hopes to ensure that the interests and input of all residents are given equal consideration.

Guidelines

a. Techniques

There are numerous and varied techniques/activities to provide the opportunity for public involvement. Any combination and number of these may be used depending on the scope of the specific plan, program, or project. These techniques/activities are defined in detail in Table 1. As funding permits, SEAGO will select from the various activities to provide the most effective public participation in each particular situation.

b. Welcoming Attitude

Public participation is welcomed and encouraged by SEAGO. All questions and statements are valuable and will be treated as such. Participants will be treated with respect. Meetings will conducted with basic ground rules that enforce civil discussion. Anyone who feels that these rules have not been followed should contact SEAGO staff at (520) 432-5301.

c. Meeting Schedules and Locations

Meetings and hearings, which are open for public participation, will be scheduled to allow the best opportunity for attendance by the general public and other entities whenever possible. The meeting locations will be convenient and ADA accessible. In addition to general meetings, events and activities, reasonable efforts will be made to reach those who are particularly affected, the underserved or others who request SEAGO come to them. These options are open to any group or individual and it is the policy of SEAGO to go where people are whenever possible. Locations and meeting times for these activities will be designed according to the specific needs.

d. Notification

Notices will follow the general Open Meeting Law of the State of Arizona. Information about meetings, events and other opportunities for participation will be made in a timely manner. This is especially important for the physically and mentally challenged as extra time may be needed to arrange for accommodations to meet their needs. This notification will be easy to understand and provide adequate information or explain where the information can be obtained.

e. Presentation of Information

In order to help citizens better understand Transportation Planning, efforts will be made to show how presented information specifically relates to the public in both the near future as well as long-term. Visualization enhancements such as color, animation, physical props, pictures, 3-D models, etc. will be incorporated as appropriate and as budgets allow.

f. Written and Personal Communications from SEAGO

Technical and policy information from SEAGO will be written so that it is clear and understandable to the public. All relevant information will be open for public consideration. Staff will be available to answer questions at meetings and respond to phone questions in a timely manner.

g. Ongoing Communications

SEAGO will use mailings, media, and electronic technology such as e-mail and web sites to have ongoing communication with the public and other entities. Members of the staff are also available via the phone for questions, concerns, and suggestions.

h. Other Entities

The needs and interests of other public and governmental entities will be solicited as appropriate. Coordination, cooperation, and teamwork among all the agencies are vital to the success of any plan, program, or project.

i. Transportation Interests

SEAGO will solicit input from transportation-related groups such as professional organizations, freight interests, private providers of transportation, chambers of commerce, and others.

j. Opportunities for Input

Opportunities for input will vary depending on the project, program, or plan. For larger projects, such as a regional transportation plan, several rounds of public participation may be appropriate. Opportunity for initial comments on what projects citizens would like their transportation system to include, prior to the start of any work may be desired. Comments on the first draft would be collected and incorporated as appropriate in the final draft. Finally, if there were significant changes to the final draft, there could possibly be another call for input. In each of these stages a variety of techniques would be used to

involve all the stakeholders. Techniques would be determined by the extent and nature of the project as well as available funds to do so.

k. Use of Public Comments

A complete record of public comments will be retained for public review. In specific cases, identified by federal regulations, public comments would be a part of the final document. Additionally, individual questions will receive a response in a timely manner.

l. Decision Making

All final transportation decisions (other than those requiring a vote of the people) are made by one or more groups of elected or appointed officials. Public meetings allow comments to be collected and may identify a consensus. The final decision, however, will be up to the elected and/or appointed officials based on a consideration of all related information. Prior to each key decision point, ample opportunity will be offered for input and that input will be shared with the decision-makers.

Evaluating Public Involvement Activities

A continuing focus on evaluation and enhancement of the public participation process should help to improve the outcome of each new SEAGO plan, project, or program. Evaluating public participation is a multi-dimensional task. First, there is the quantitative aspect which uses measurements such as the number of activities held, the number of notices sent, and/or the number of people who participated. While valid and important, these factors may not show the complete picture.

Second, it is important to evaluate the qualitative aspects relating to perceptions, attitudes, and effectiveness. Did the people who participated feel they were heard? Were all the potentially affected interests (including the underserved) actually represented? Were the materials provided easy to understand? Were announcements received in a timely manner?

Third, is the question of how the public input was used. This information needs to be recorded and made available. It also needs to be considered in the decision-making process. Fourth, is the need to evaluate the reason something happened. Understanding why there was good (or poor) participation is important to assessing effectiveness.

The ultimate point to consider in an evaluation is the existence of respect and trust. It is not possible to please everyone, but it should be possible to proceed forward with an atmosphere of respect and trust and SEAGO intends to earn this by being fair and open with everyone at all times.

Development, Adoption, and Revision of the Public Participation Plan

This PPP and the associated Title VI Implementation Plan has gone through several stages during its development:

- Preparation of a preliminary draft plan.
- Evaluation of this plan to ensure compliance with all federal regulations.

- Review of the plan by SEAGO's Technical Advisory Committee.
- Review of the plan by stakeholders including the general public, governmental entities, and transportation professionals/businesses.
- Revision of the plan based on the above reviews.
- Completion of a final draft plan.
- Circulation of the draft plan for at least 45 calendar days. This includes notice to all potentially affected interests that this final draft plan is available for review, including placement at public libraries throughout the region.
- Review and evaluation of any further recommended changes.
- Ongoing implementation of the plan by SEAGO.
- Availability of alternative formats i.e. large prints, Braille, audio/video cassettes (as appropriate) upon request for individuals who are blind or individuals with hearing/vision impairments. Due to the time and expense required to develop such materials, this will only be done upon request and a minimum of two weeks' notice must be provided to ensure timely preparation of such materials.

The plan will be officially reviewed at a minimum of every 5 years. (The first review would be in 2017.) Public input would be solicited for future revisions and a minimum 45 calendar day review period prior to adopting any changes. Efforts to involve the public and other organizations will follow the steps outlined in the adopted plan.

Other periodic revisions may occur, as new and better approaches are determined. Each time any significant content revisions are made (other than technical or grammatical revisions) the public will be given a 45-calendar day review and comment period prior to implementing the changes. SEAGO will update the plan annually and submit an annual accomplishment report to ADOT.

SEAGO Commitment

This plan contains background material, guidelines, and commitments that SEAGO is undertaking to incorporate an effective public process into future plans, projects, and programs.

Specifically SEAGO is committed to:

- Inclusive and meaningful public involvement.
- Open and honest communications with all individuals and entities.
- Timely public notice.
- Full public access to information and key decisions.
- Creating a sense of shared responsibility and ownership for regional transportation/congestion problems and a shared sense of pride in the development of solutions to those problems.
- Helping form partnerships between member entities, and the private and public sectors to plan and implement transportation/congestion solutions.
- Establishing policies and prioritizing needs based on valid data and using objective, fair, and consistent processes.
- Providing information and gathering input so that decision makers will be able to make informed decisions.
-

Table 1 – Public Participation Toolbox

Activity	Description	Comments
Brochure	Written material to distribute generally contains more information than a flyer. It is often folded to create a small piece for distribution.	
Charrette	An intensive brainstorming session using visual methods to define alternatives.	These can last anywhere from a few hours to a few days.
Conference	A meeting with two or more people where the participants confer and discuss. (This can also be a series of meetings and/or events focused on a unifying subject.)	
Contact lists	Create contact lists for interested parties.	
Display	Information and materials are displayed in an informal setting where people are free to move about and consider whatever is of interest to them.	These are typically held at malls, city halls, banks, etc.
E-mail	Using the Internet to contact people with electronic mail addresses.	This is very inexpensive and a quick way to contact people. It is, however, important to find other ways to communicate with people who do not have access to computers.
Flyer	A written communication piece that provides the most basic information.	Multiple flyers can be produced for one event, plan or project with each flyer designed to communicate with different groups. These can be produced in various languages when resources are available to do so.
Focus Group	A small carefully selected group of individuals who meet together to give feedback to the organizer on a specific topic.	Because this is a selected group, people who are not selected may be suspicious of the information gathered.
Games and Contests	These include a wide variety of activities including such things as board games, role playing, computer simulations, etc.	Use of these is an unusual and creative way to actively involve people.
Forum	A public meeting that is designed to help attendants better understand a subject by hearing different points of view. Usually several people with differing opinions, each make a short presentation and then answer questions. It is not designed for decision making.	It is most helpful if a disinterested party moderates. It also helpful, especially in some communities, if some of the “experts” were local and trusted by the community. If a forum is used, it may need to be in Spanish for Spanish speaking community members.

Activity	Description	Comments
Grocery Store	Contacting people at the grocery store, either by printing information on a grocery bag, dropping information into a grocery bag, staffed information tables, or by displaying flyers or posters in the store.	This is a way to reach a larger and possibly diverse group of people, but it will also require availability of the necessary level of resources.
Information Booths	Place an information exhibit at fair-type events.	
Key Person Interview	This question and answer session is with a specifically targeted person who has been identified as someone with whom it would be particularly important or useful to speak.	This may be useful as a first step in reaching minority or other interest groups.
Meetings	These are opportunities for larger groups of people to get together for a multitude of purposes. The general intent is to allow people to interact on a person-to-person basis. Meetings can be held for a wide variety of reasons from working on an issue to making a presentation	To be most effective, a meeting should inform the participant prior to coming: what type of meeting it will be, what their role will be, and the expected outcome of the meeting.
Modeling	Computer and/or physical modeling can be used to help people better visualize or better understand a particular concept or project.	
Newspaper Advertisement	Information that a newspaper prints in their paper that is not part of the news. The person/group placing the advertisement has control of the content.	These are generally purchased, and are used to announce meetings, events, etc.
Newsletter	A regular communication for a predetermined group of individuals/groups.	These can be mailed or sent electronically. This is a standard way to keep interested individuals and entities informed on a regular basis.
Open House	Information and materials are displayed in an informal setting where people are free to move about and consider whatever is of interest to them. Informed people are available to answer questions and take comments and suggestions.	This is a commonly used tool which has now been expanded to locations such as the local mall, in addition to places such as the lobby at city hall.
Organization Contact	Contact with an organization could take the form of a presentation, question & answer session, brainstorming, etc.	
Postcard Notices	A postcard mailed to a predetermined mailing list to announce an event or activity specific information.	
Posters	A large written announcement posted in a public place.	These can be placed at numerous locations and designed to appeal to different groups or underserved populations. Posters must be displayed in conspicuous and accessible locations.

Activity	Description	Comments
Presentation Meetings	These meetings allow the organizer to provide information and answer questions for a large group at once.	The presenter generally does not present any side of the issue other than their own.
Web Site	A series of "pages" on the Internet that relate to a specific subject. They can be reached by anyone who has access to the Internet by typing a particular address or by doing a search.	This is an easy and inexpensive place to keep the most recently updated information and it is becoming an increasingly popular way to communicate.
Public Hearings	This is a legal meeting that is often required to make sure there is some opportunity for public comment. It is normally done with elected officials sitting at the front and allowing community members very specific conditions to speak under.	These are a poor setting for getting input as they are generally late in the process and can easily erupt into confrontation.
Public Notice	These are official notices posted prior to meetings.	These are required for meetings where a quorum of elected officials from the same governing body will be present.
Public Service Announcements	These are short announcements usually on radio or television, for which there is no charge and announce something important for the public to know.	
Radio Talk Show	A longer discussion, on the radio, of a particular subject. It usually involves a talk show host and one or more additional people. Sometimes there is an opportunity for people to call in questions.	This is an opportunity for providing more in-depth information on a certain topic.
School TV/News Stations	Some schools have a local school TV station for sharing information with the students. This could be used to reach a larger spectrum of youth.	Presentations to students needs to be short and to the point with a source of additional information such as a web site.
School Presentations	In order to reach the youth, presentations can be made at the schools, including presentations to clubs, student council, and specific classes.	Suggested classes would be: civics, economics (or other senior level classes), and transportation classes. (Presentations to the students needs to be short and to the point with a source of additional information such as a web site.)
TV Advertisements	These are usually 30 or 60 second spots on TV during breaks in a regular show.	These would only be utilized if sufficient resources were available to do so.
Speakers' Bureau	This is an organized effort to provide speakers to various groups and events on one or more specific subjects. This generally consists of several speakers who are used as needed.	This allows more flexibility and a broader outreach.
Workshop	Meetings to inform and solicit input on specific issues, plans, or projects.	These usually allow a smaller group of people to participate more intensively.

Activity	Description	Comments
Survey – General	This type of survey is open to anyone who wants to participate. (This can be in traditional or electronic formats).	While the information is useful and important, it cannot be stated as representing a larger group. To be representative the survey must be statistically valid. (Surveys should be offered in Spanish as well as English.)
Survey - Statistically Valid	This is a survey that collects information from specific people who have been chosen on a random basis according to a specific formula. With this type of survey the results can be stated as representing the group from which the random sample was taken.	These are very expensive but can be useful in certain circumstances. (Any survey should be offered in Spanish as well as English.)
Town Meeting	This is usually a semi-formal meeting designed to be open to everyone in a community. It often includes both the public and elected officials with an opportunity for comments back and forth.	
Press Releases	This official release tells the press there is news they might be interested in reporting. It generally follows a specific format and includes who, what when, where and a contact for more information.	Information that is reported as "news" gets more attention and credibility than paid advertising.
Working Meetings	Generally these are meetings designed to work through issues when there can be give and take among all the participants.	

Importance of Public Participation

People need to understand that Transportation Planning is relevant to them. Maintaining public interest as decisions are made is critical to gathering effective public input. Therefore:

- With each contact, efforts will be made to present information that is relevant and show how this information relates to the public in both the near future as well as long-term.
- As any of the above tools are used, SEAGO will keep in mind the importance of making whatever the subject matter is as interesting as possible. Color, animation, physical props, pictures, visualization, 3-D models, etc. will be incorporated, as budget allows, to enhance the experience for the public.
- Public notices must include reasonable accommodations for individuals with disabilities with special needs, e.g. sign language interpreters. SEAGO will include point of contact person, telephone number, e-mail address, and timeframe for response from those with special needs.
- When the scope of a proposed project or plan has the potential to significantly impact individuals with special needs, pertinent materials will be available in alternative formats, i.e. large print, Braille, audio/video.

XV. ATTACHMENTS

Attachment A – SEAGO Organization Chart
Attachment B – SEAGO Population & Demographic Data
Attachment C – ADOT Title VI Complaint Form
Attachment D – Executive Board Approval

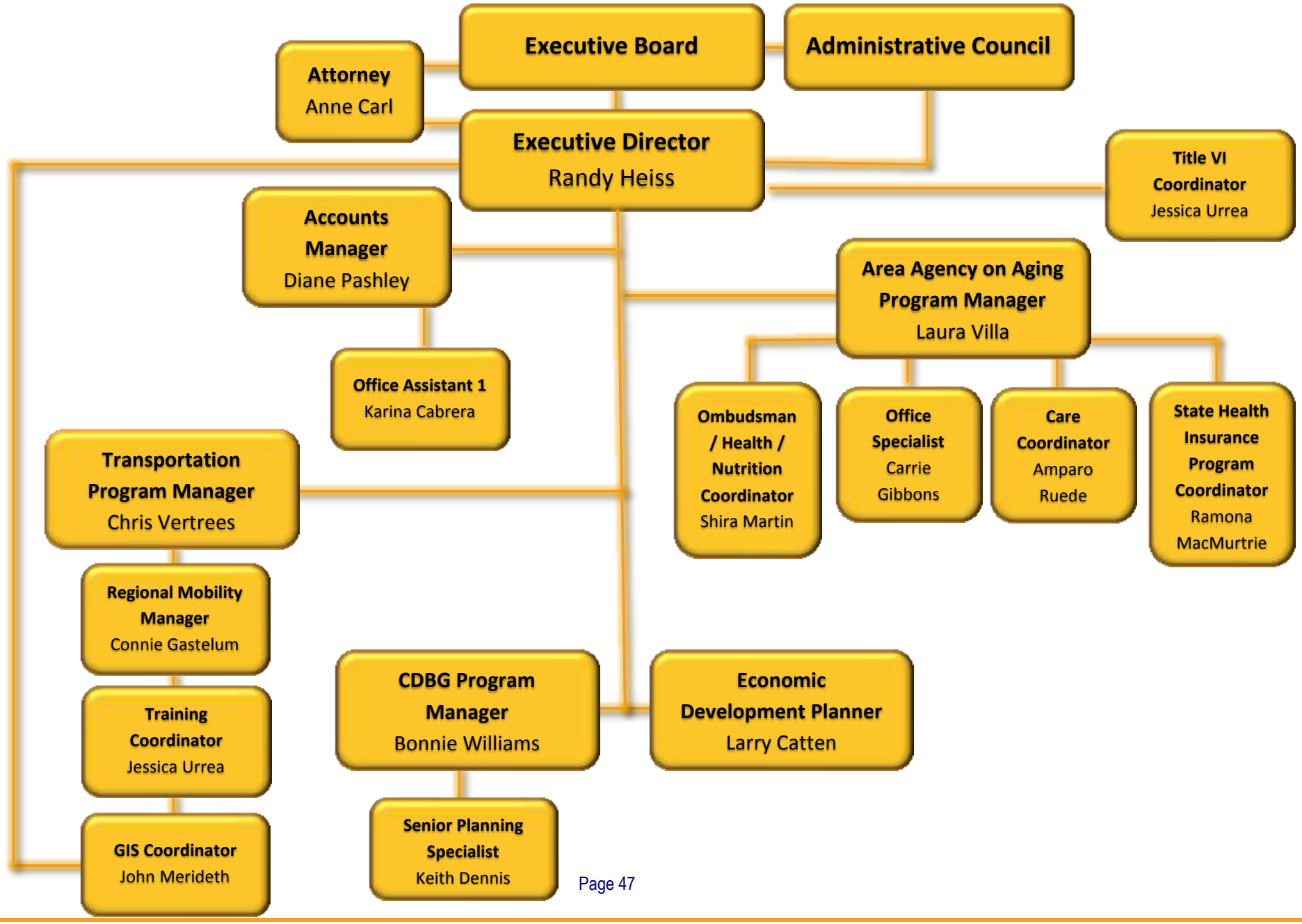
Attachment A



SEAGO Organization Chart

SouthEastern Arizona Governments Organization

Serving our member governments and their constituents since 1972



Attachment B



SEAGO Population & Demographic Data

(Courtesy of the Maricopa Association of Governments and their State Demographic Viewer)

ATTACHMENT A

Demographic Composition of the SEAGO Region

Geographic Area	Total Population	Race								Hispanic or Latino (of any race)
		One Race							Two or More Races	
		Population - One Race	White Alone	Black or African American, Alone	American Indian or Alaska Native, Alone	Asian, Alone	Native Hawaiian and Other Pacific Islander, Alone	Some Other Race, Alone		
Cochise County Total	**131,346**	**126,071**	**103,085**	**5,465**	**1,589**	**2,525**	**418**	**12,989**	**5,275**	**42,543**
PLACES										
Benson, City	5,105	4,922	4,481	51	49	37	8	296	183	1,126
Bisbee, City	5,575	5,370	4,696	80	81	26	8	479	205	2,019
Douglas, City	17,378	16,926	11,848	483	296	81	10	4,208	452	14,353
Huachuca City, Town	1,853	1,753	1,429	119	26	38	15	126	100	364
Sierra Vista, City	43,888	41,373	32,695	3,951	467	1,781	269	2,210	2,515	8,527
Tombstone, City	1,380	1,333	1,269	6	9	9	1	39	47	288
Willcox, City	3,757	3,643	2,539	43	48	25	7	981	114	1,883
TOTAL PLACES	**78,936**	**75,320**	**58,957**	**4,733**	**976**	**1,997**	**318**	**8,339**	**3,616**	**28,560**
Graham County Total	**37,220**	**36,172**	**26,827**	**683**	**5,376**	**200**	**52**	**3,034**	**1,048**	**11,320**
PLACES										
Pima, Town	2,387	2,300	2,086	9	15	3	3	184	87	500
Safford, City	9,566	9,210	7,789	116	153	85	5	1,062	356	4,166
Thatcher, Town	4,865	4,698	4,143	87	88	35	11	334	167	1,052
San Carlos Apache Tribe	4,780	4,612	19	1	4,591	0	1	0	16	152
TOTAL PLACES	**21,598**	**20,820**	**14,037**	**213**	**4,847**	**123**	**20**	**1,580**	**626**	**5,870**
Greenlee County Total	**8,437**	**8,117**	**6,514**	**89**	**195**	**46**	**5**	**1,268**	**320**	**4,040**
PLACES										
Clifton, Town	3,311	3,140	2,342	28	109	23	3	635	171	1,991
Duncan, town	696	671	563	8	12	0	1	87	25	235
TOTAL PLACES	**4,007**	**3,811**	**2,905**	**36**	**121**	**23**	**4**	**722**	**196**	**2,226**
Santa Cruz County Total	**47,420**	**46,467**	**34,835**	**179**	**328**	**255**	**15**	**10,855**	**953**	**39,273**
PLACES										
Nogales, City	20,837	20,338	14,933	75	140	126	4	5,060	499	19,793
Patagonia, Town	913	903	801	2	20	0	0	80	10	387
TOTAL PLACES	**21,750**	**21,241**	**15,734**	**77**	**160**	**126**	**4**	**5,140**	**509**	**20,180**
TOTAL SEAGO REGION	**224,423**	**216,827**	**171,261**	**6,416**	**7,488**	**3,026**	**490**	**28,146**	**7,596**	**97,176**

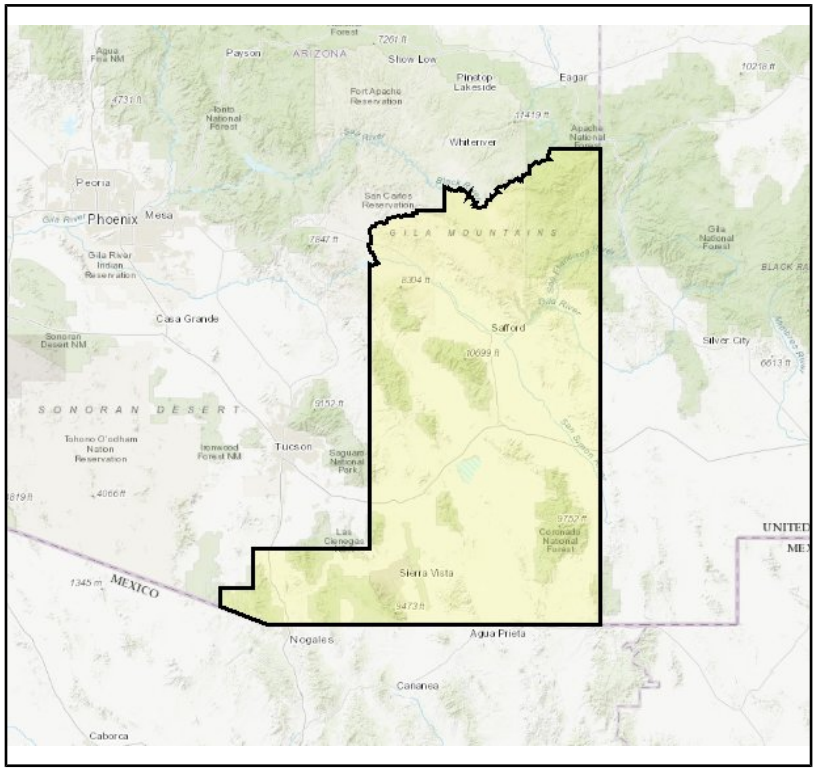
Source: U.S. Census Bureau, 2010 Census
2010 Census Redistricting Data
(Public Law 94-171) Summary File
Tables P1 and P2

Southeastern Arizona Governments Assoc.

ARIZONA COGs & MPOs

Southeastern Arizona Governments Assoc. has an area of **13,958.94** square miles. Southeastern Arizona Governments Assoc. has a population of **221,808** with a minority* population of **118,800** or **53.56%**.

Southeastern Arizona Governments Assoc. has **79,121** total households. Southeastern Arizona Governments Assoc. 's population density is **15.89** per square mile.



About the U.S. Census Bureau's 2012-2016 American Community Survey 5 year Estimates

The American Community Survey (ACS) is a nationwide survey that uses continuous, multi-year sampling to produce estimates for a variety of geographical areas, the smallest being the Census Block Group. MAG uses the 5-year estimates because they provide increased statistical reliability for less populated areas and small population groups. ACS is a sample, meaning that it is not a full census of the population. For the 5 year estimates, surveys are collected from a sample population over the 5 year period. These surveys are then used to create estimates for the whole population. And, because it is an estimate of the whole population, there is a degree of uncertainty in the results. This degree of uncertainty is reflected in the margins of error that are calculated and reported along with the results of the survey. The margins of error are calculated at the 90 percent confidence level, meaning that users of the data can be 90 percent confident that the range reflected in the margin of error contains the true value. The margins of error are not reported on this web site, but are available from the Census at http://factfinder.census.gov/or are available upon request from MAG. More information on the methodology of the American Community Survey is available at http://www.census.gov/acs/.

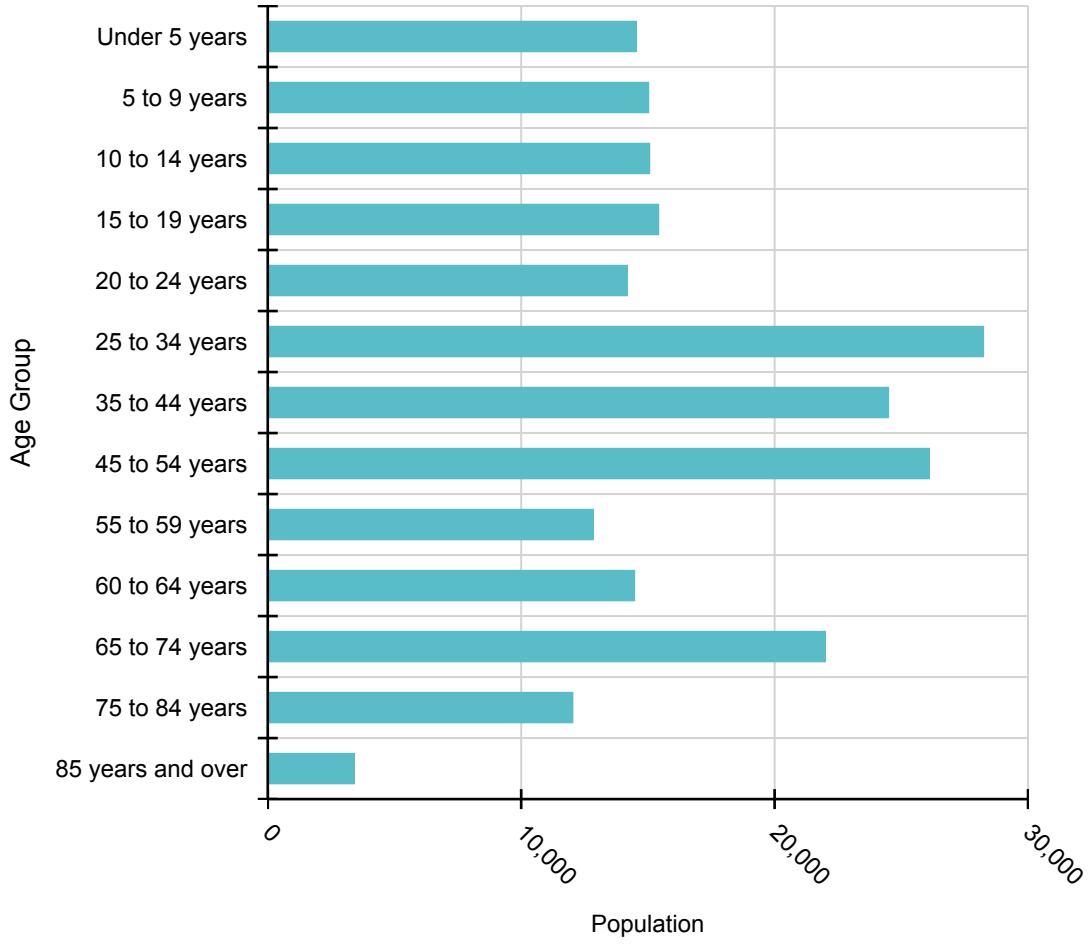
* Minority population is defined as the population that is of any race other than non-hispanic white.

ARIZONA COGs & MPOs

American Community Survey 2012-2016 5yr Estimates

Age		
Name	Total	Percent
Total	217,925	N/A
Under 5 years	14,544	6.6 %
5 to 9 years	15,034	6.8 %
10 to 14 years	15,073	6.8 %
15 to 19 years	15,427	7.0 %
20 to 24 years	14,191	6.4 %
25 to 34 years	28,248	12.7 %
35 to 44 years	24,499	11.0 %
45 to 54 years	26,111	11.8 %
55 to 59 years	12,850	5.8 %
60 to 64 years	14,477	6.5 %
65 to 74 years	22,009	9.9 %
75 to 84 years	12,041	5.4 %
85 years and over	3,421	1.5 %

Universe: Total Population



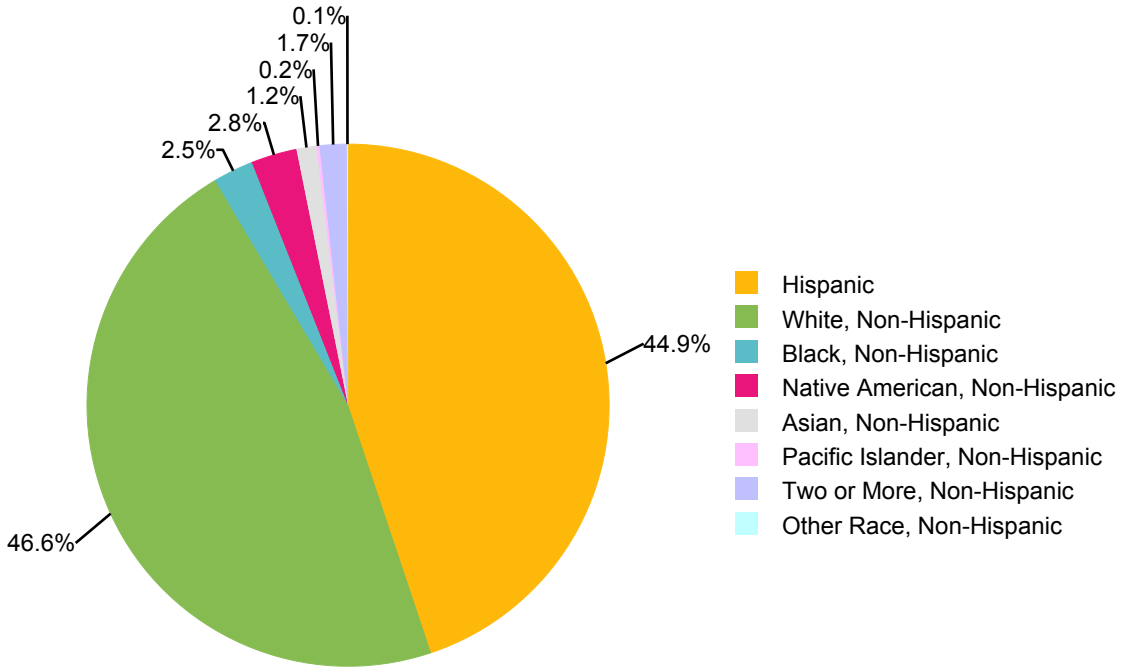
Source: U.S. Census Bureau American Community Survey 2012 - 2016

Race and Ethnicity

American Community Survey 2012-2016 5yr Estimates

Race and Ethnicity		
Name	Total	Percent
Total	220,881	N/A
Hispanic	99,101	44.7 %
White, Non-Hispanic	102,995	46.4 %
Black, Non-Hispanic	5,525	2.5 %
Native American, Non-Hispanic	6,267	2.8 %
Asian, Non-Hispanic	2,732	1.2 %
Pacific Islander, Non-Hispanic	406	0.2 %
Two or More, Non-Hispanic	3,692	1.7 %
Other Race, Non-Hispanic	163	0.1 %

Universe: Total Population



Source: U.S. Census Bureau American Community Survey 2012 - 2016

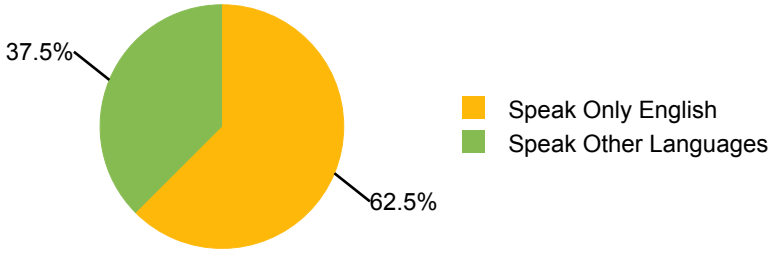
Ability to Speak English / Veterans Status by Age

ARIZONA COGs & MPOs

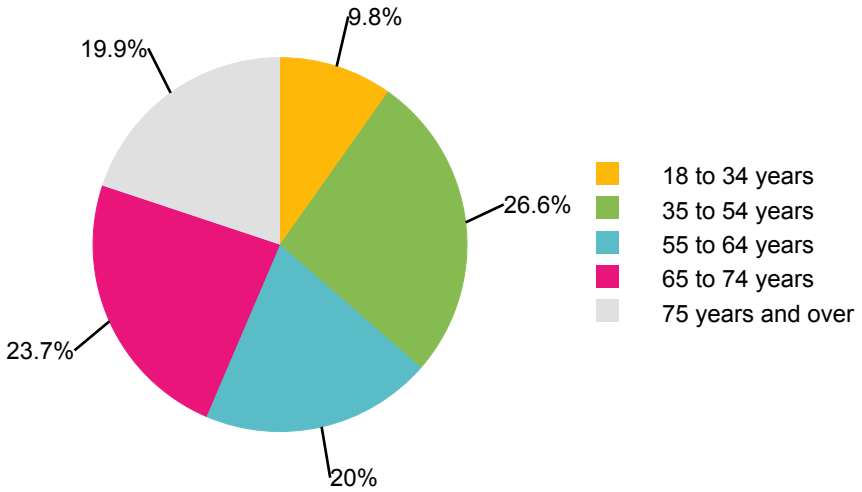
American Community Survey 2012-2016 5yr Estimates

Ability to Speak English		
Name	Total	Percent
Speak Only English	129,300	62.5 %
Speak Other Languages	77,521	37.5 %
Speak English "very well"	52,506	N/A
Persons with Limited English Proficiency (LEP)	24,694	N/A
Speak English "well"	12,051	N/A
Speak English "not well"	7,406	N/A
Speak English "not at all"	4,758	N/A

Veterans Status		
Name	Total	Percent
Civilian Population 18 years and over	162,711	N/A
Civilian veterans	22,579	13.9 %
Male	19,885	N/A
Female	2,394	N/A
18 to 34 years	2,068	9.2 %
35 to 54 years	5,616	24.9 %
55 to 64 years	4,223	18.7 %
65 to 74 years	4,996	22.1 %
75 years and over	4,196	18.6 %



Universe: Population 5 years and over



Universe: Civilian Population 18 years and over

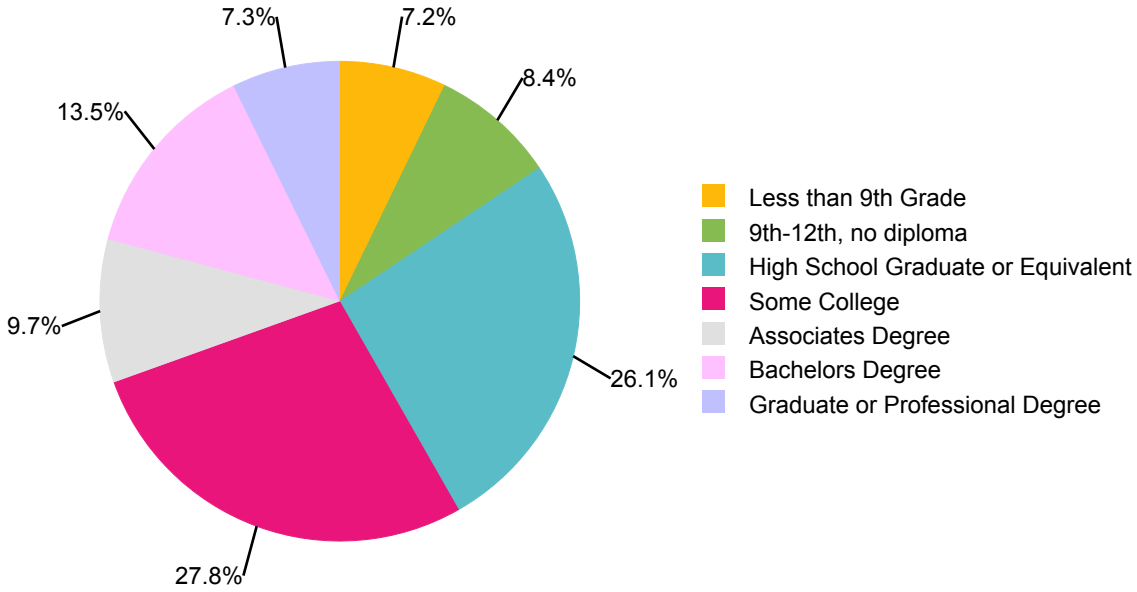
Source: U.S. Census Bureau American Community Survey 2012 - 2016

Educational Attainment

American Community Survey 2012-2016 5yr Estimates

Educational Attainment		
Name	Total	Percent
Population 25 and over	145,902	100.0 %
Less than 9th Grade	10,348	7.1 %
9th-12th, no diploma	12,133	8.3 %
High School Graduate or Equivalent	37,607	25.8 %
Some College	39,975	27.4 %
Associates Degree	13,895	9.5 %
Bachelors Degree	19,478	13.4 %
Graduate or Professional Degree	10,507	7.2 %

Universe: Population Age 25 Years and Over



Source: U.S. Census Bureau American Community Survey 2012 - 2016

Household Income and Households

ARIZONA COGs & MPOs

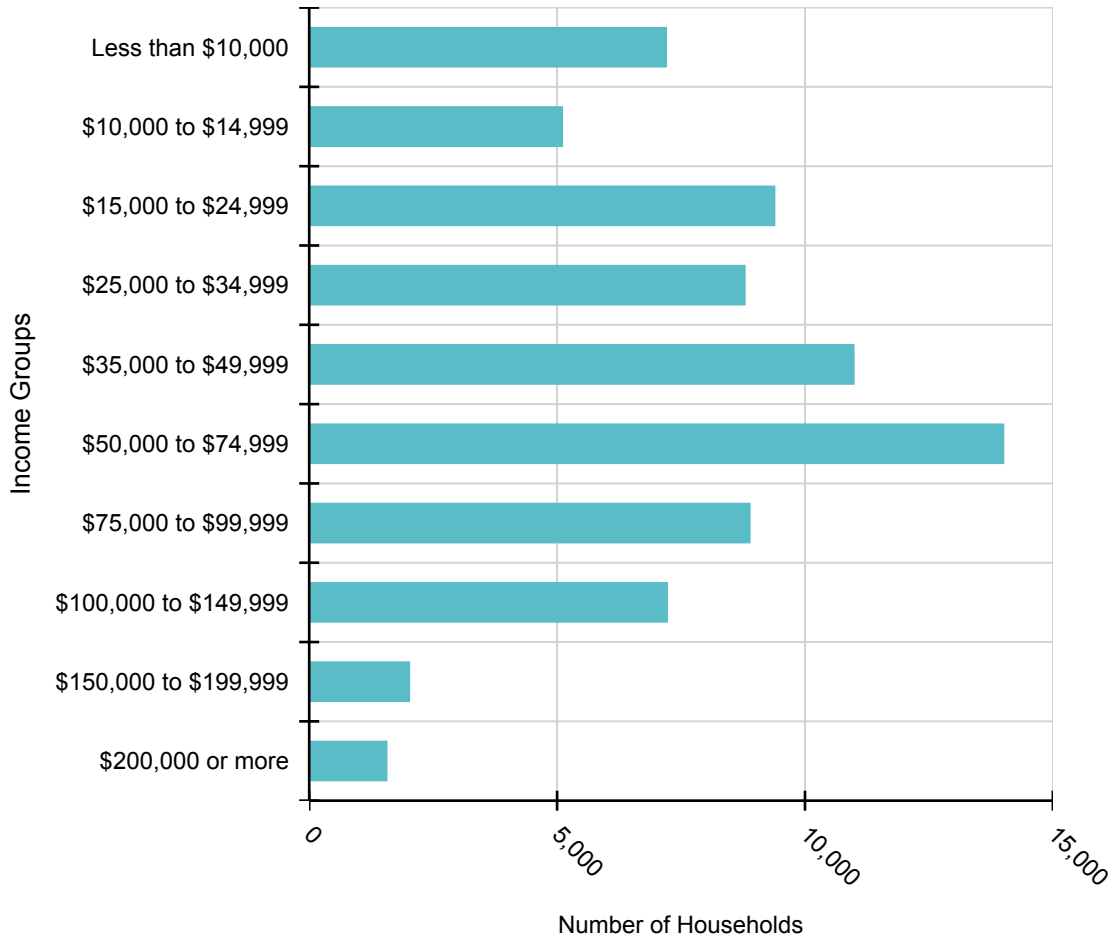
American Community Survey 2012-2016 5yr Estimates

Household Income (In 2015 inflation-adjusted dollars)		
Name	Total	Percent
Total Households	79,121	N/A
Median Household Income	$	N/A
Less than $10,000	7,207	9.1 %
$10,000 to $14,999	5,110	6.5 %
$15,000 to $24,999	9,393	11.9 %
$25,000 to $34,999	8,793	11.1 %
$35,000 to $49,999	10,991	13.9 %
$50,000 to $74,999	14,010	17.7 %
$75,000 to $99,999	8,893	11.2 %
$100,000 to $149,999	7,222	9.1 %
$150,000 to $199,999	2,026	2.6 %
$200,000 or more	1,569	2.0 %

Universe: Households

Households		
Name	Total	Percent
Total Households	79,121	N/A
Average Household Size		N/A
Family Households (Families)	54,377	68.7 %
Married-couple family	39,442	N/A
Female Householder, no husband present	10,264	N/A
with own children under 18 years	5,769	N/A
Nonfamily Households	24,578	31.1 %
Householder living alone	21,073	N/A

Universe: Households



Source: U.S. Census Bureau American Community Survey 2012 - 2016

Poverty Status

ARIZONA COGs & MPOs

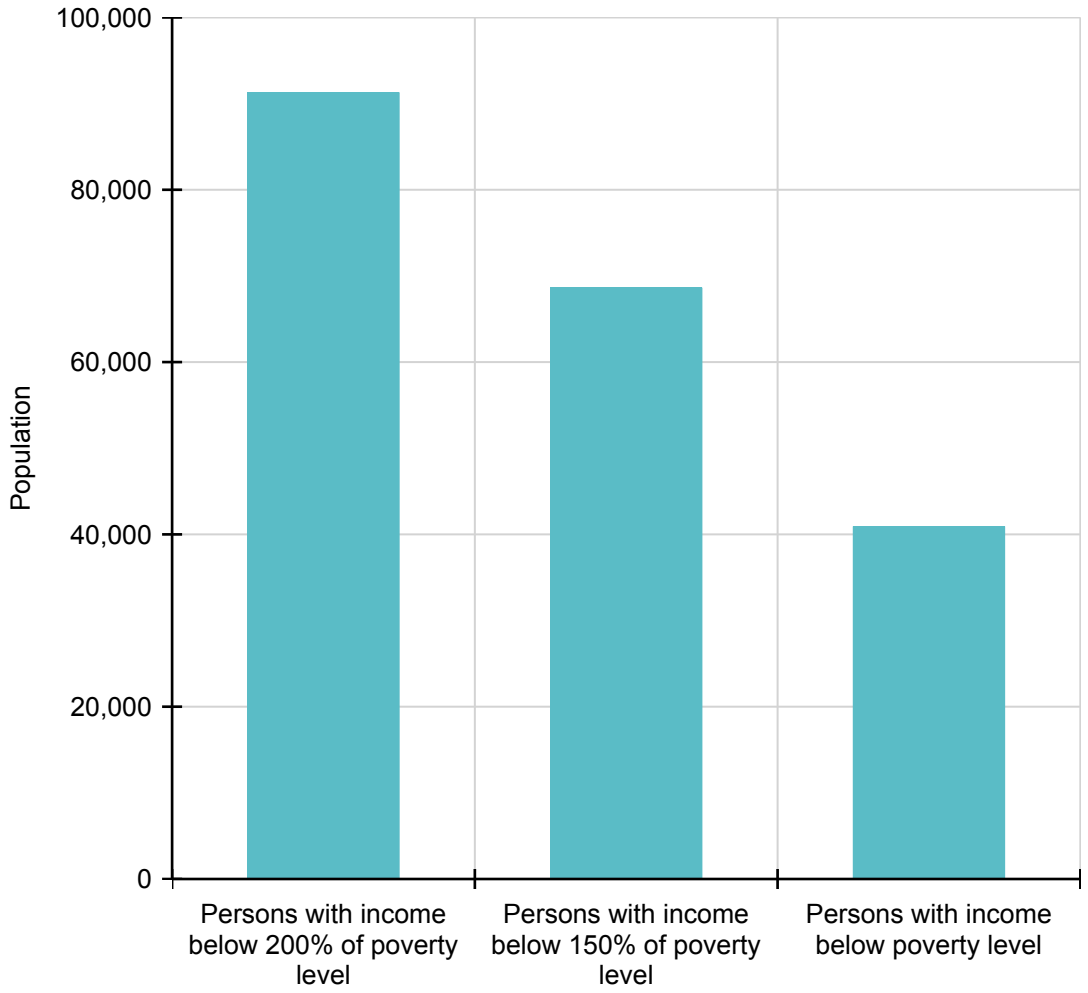
American Community Survey 2012-2016 5yr Estimates

Poverty Status in the Past 12 Months		
Name	Total	Percent
Persons for whom poverty status is determined	205,731	N/A
Persons with income below poverty level	40,911	19.9 %
Persons with income below 150% of poverty level	68,611	33.3 %
Persons with income below 200% of poverty level	91,273	44.4 %

Universe: Persons for whom poverty status is determined

Poverty Status for Families in the Past 12 Months		
Name	Total	Percent
Total Families	54,377	N/A
Families with income below poverty level	8,064	14.8 %
Married-couple family	3,230	N/A
with related children under 18 years	1,847	N/A
Female householder, no husband present	3,495	N/A
with related children under 18 years	3,119	N/A
Male householder, no wife present	866	N/A
with related children under 18 years	676	N/A

Universe: Families



Source: U.S. Census Bureau American Community Survey 2012 - 2016

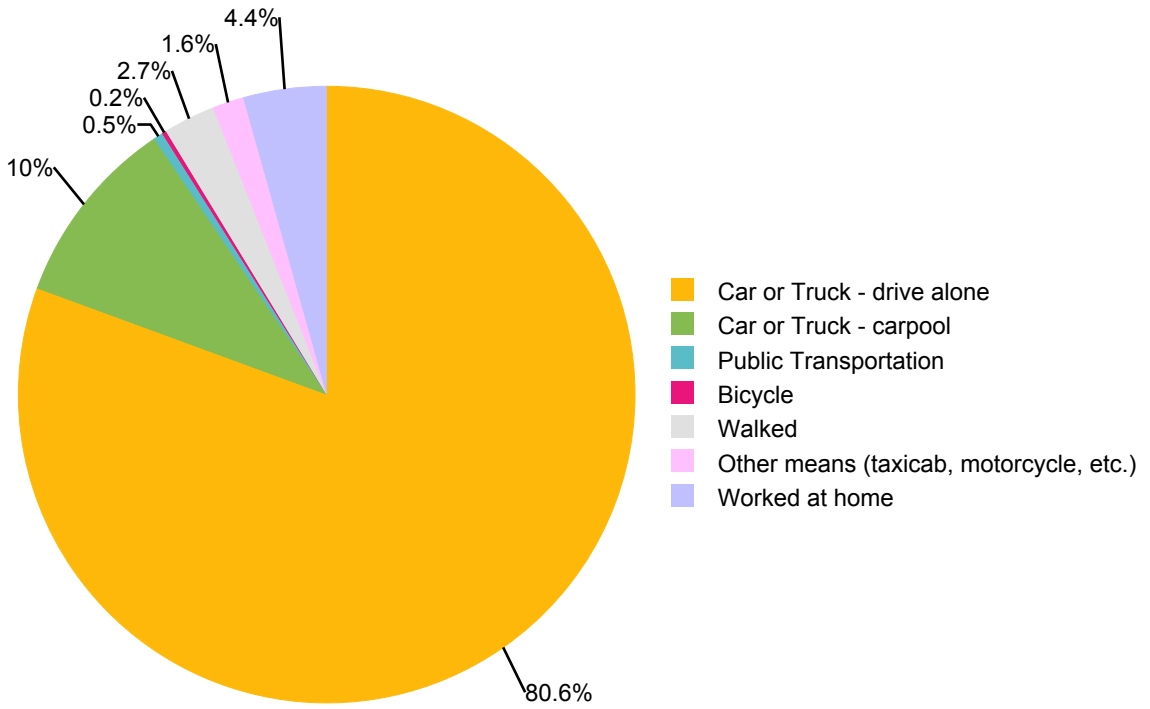
Modes of Transportation

ARIZONA COGs & MPOs

American Community Survey 2012-2016 5yr Estimates

Commuting to Work		
Name	Total	Percent
Workers 16 years and over	77,261	N/A
Car or Truck - drive alone	62,271	79.0 %
Car or Truck - carpool	7,697	9.8 %
Public Transportation	381	0.5 %
Bicycle	175	0.2 %
Walked	2,097	2.7 %
Other means (taxicab, motorcycle, etc.)	1,272	1.6 %
Worked at home	3,368	4.3 %

Universe: Workers age 16 years and over



Source: U.S. Census Bureau American Community Survey 2012 - 2016

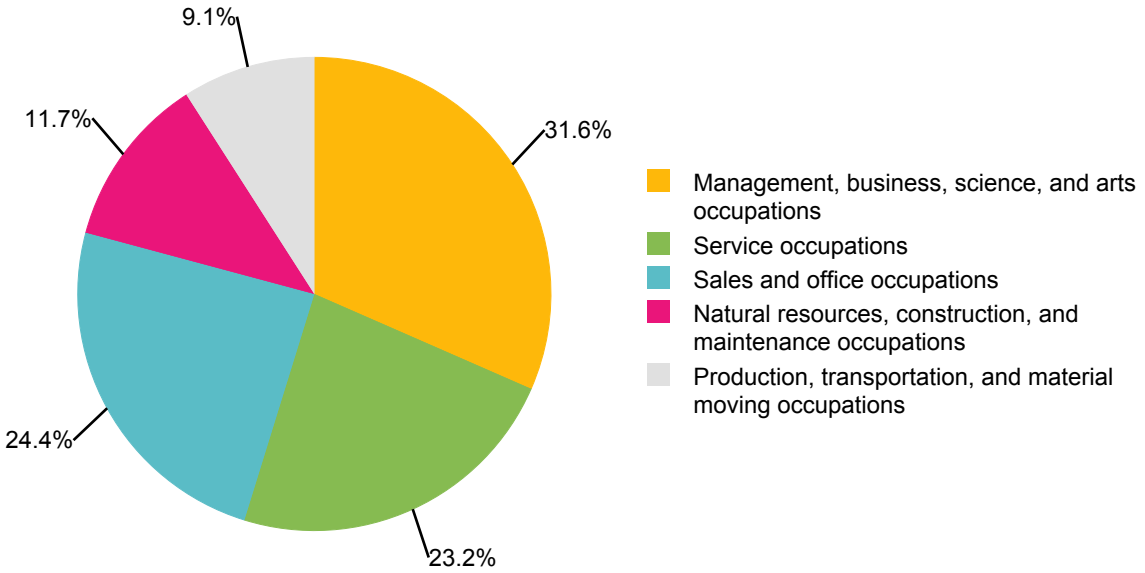
Occupation

ARIZONA COGs & MPOs

American Community Survey 2012-2016 5yr Estimates

Occupation		
Name	Total	Percent
Civilian employed population 16 years and over	74,351	N/A
Management, business, science, and arts occupations	23,469	30.9 %
Service occupations	17,262	22.7 %
Sales and office occupations	18,139	23.9 %
Natural resources, construction, and maintenance occupations	8,728	11.5 %
Production, transportation, and material moving occupations	6,753	8.9 %

Universe: Civilian employed population 16 years and over



Source: U.S. Census Bureau American Community Survey 2012 - 2016

Occupancy, Tenure, Value, and Rent

ARIZONA COGs & MPOs

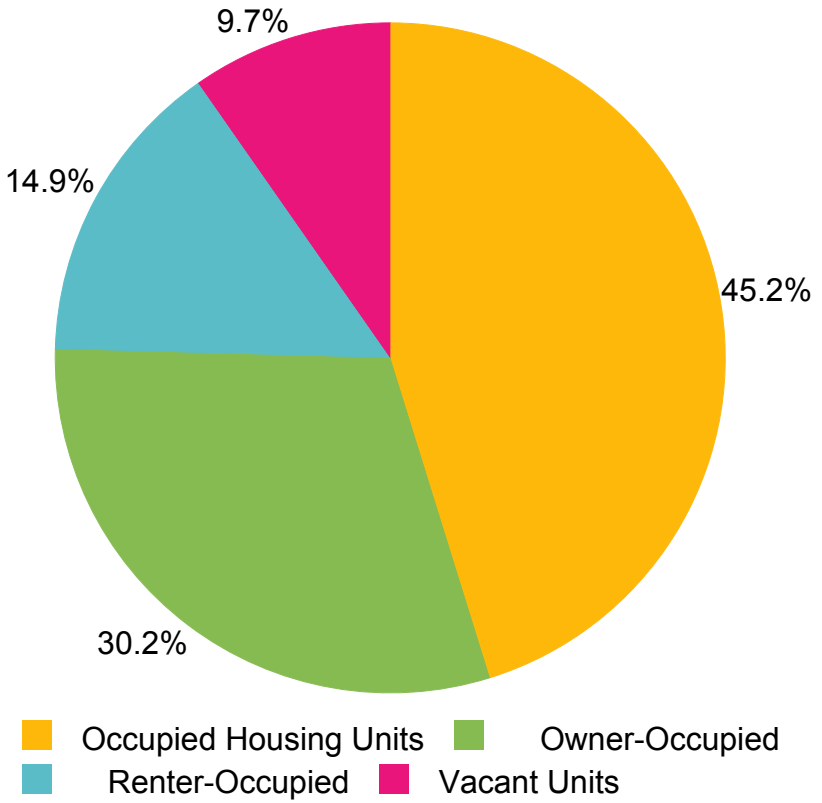
American Community Survey 2012-2016 5yr Estimates

Housing			
Name	Total	Percent	Per Sq Mile
Housing Units	96,152	N/A	6.9
Occupied Housing Units	79,121	82.3 %	5.7
Owner-Occupied	52,917	55.0 %	3.8
Renter-Occupied	26,029	27.1 %	1.9
Vacant Units	16,983	17.7 %	1.2
Median Housing Value	$	N/A	N/A
Median Rent	$	N/A	N/A

Universe: Housing Units

Housing		
Name	Total	Percent
Total Housing Units	96,152	N/A
1, detached	62,007	64.5 %
1, attached	2,032	2.1 %
2 to 9	6,300	6.6 %
10 or more	5,500	5.7 %
Mobile Home	19,178	19.9 %
Boat, RV, van, etc.	463	0.5 %

Universe: Housing Units



Source: U.S. Census Bureau American Community Survey 2012 - 2016

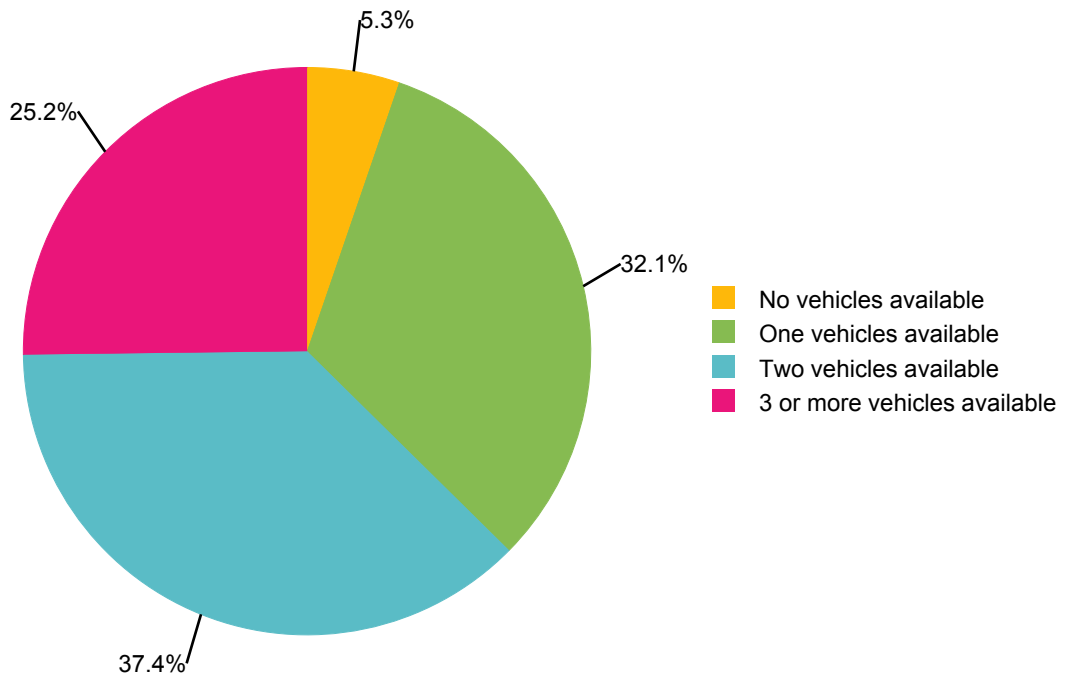
Vehicles Available

ARIZONA COGs & MPOs

American Community Survey 2012-2016 5yr Estimates

Vehicles Available		
Name	Total	Percent
Total Occupied Housing Units	77,998	N/A
No vehicles available	4,102	5.2 %
One vehicles available	25,059	31.7 %
Two vehicles available	29,189	36.9 %
3 or more vehicles available	19,648	24.8 %

Universe: Occupied Housing Units



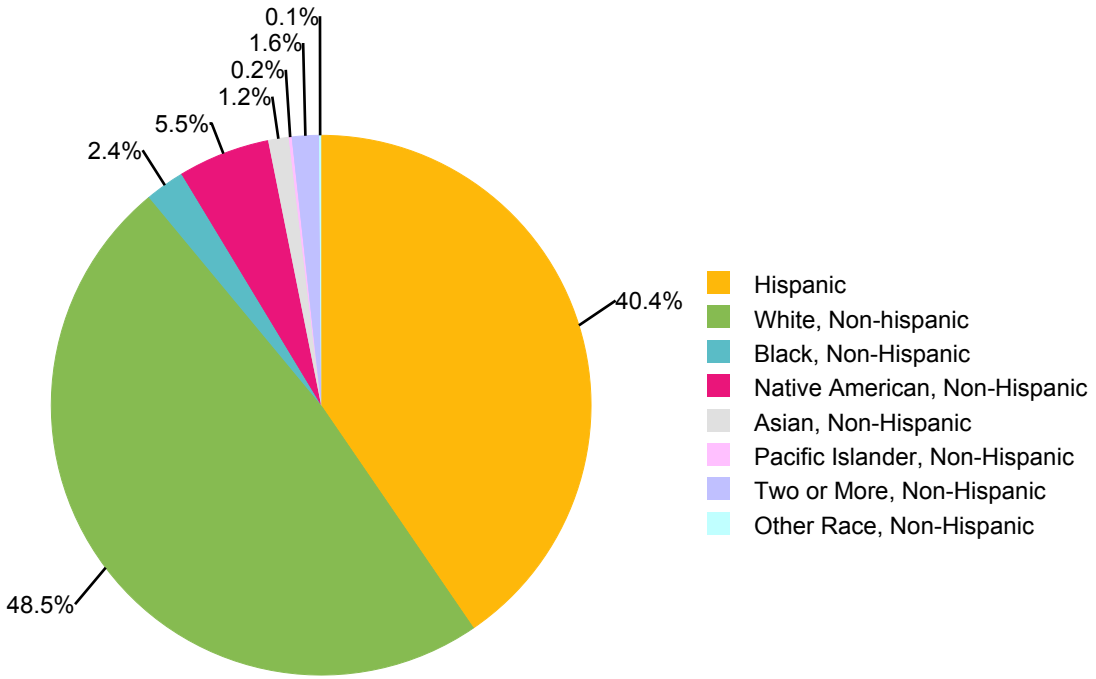
Source: U.S. Census Bureau American Community Survey 2012 - 2016

Race

U.S. Census Bureau, 2010 Decennial Census

Race		
Name	Total	Percent
Total Population	249,763	N/A
Hispanic	101,011	40.4 %
White, Non-hispanic	121,246	48.5 %
Black, Non-Hispanic	5,899	2.4 %
Native American, Non-Hispanic	13,746	5.5 %
Asian, Non-Hispanic	3,064	1.2 %
Pacific Islander, Non-Hispanic	448	0.2 %
Two or More, Non-Hispanic	4,048	1.6 %
Other Race, Non-Hispanic	301	0.1 %

Universe: Total Population



Source: U.S. Census Bureau, 2010 Decennial Census

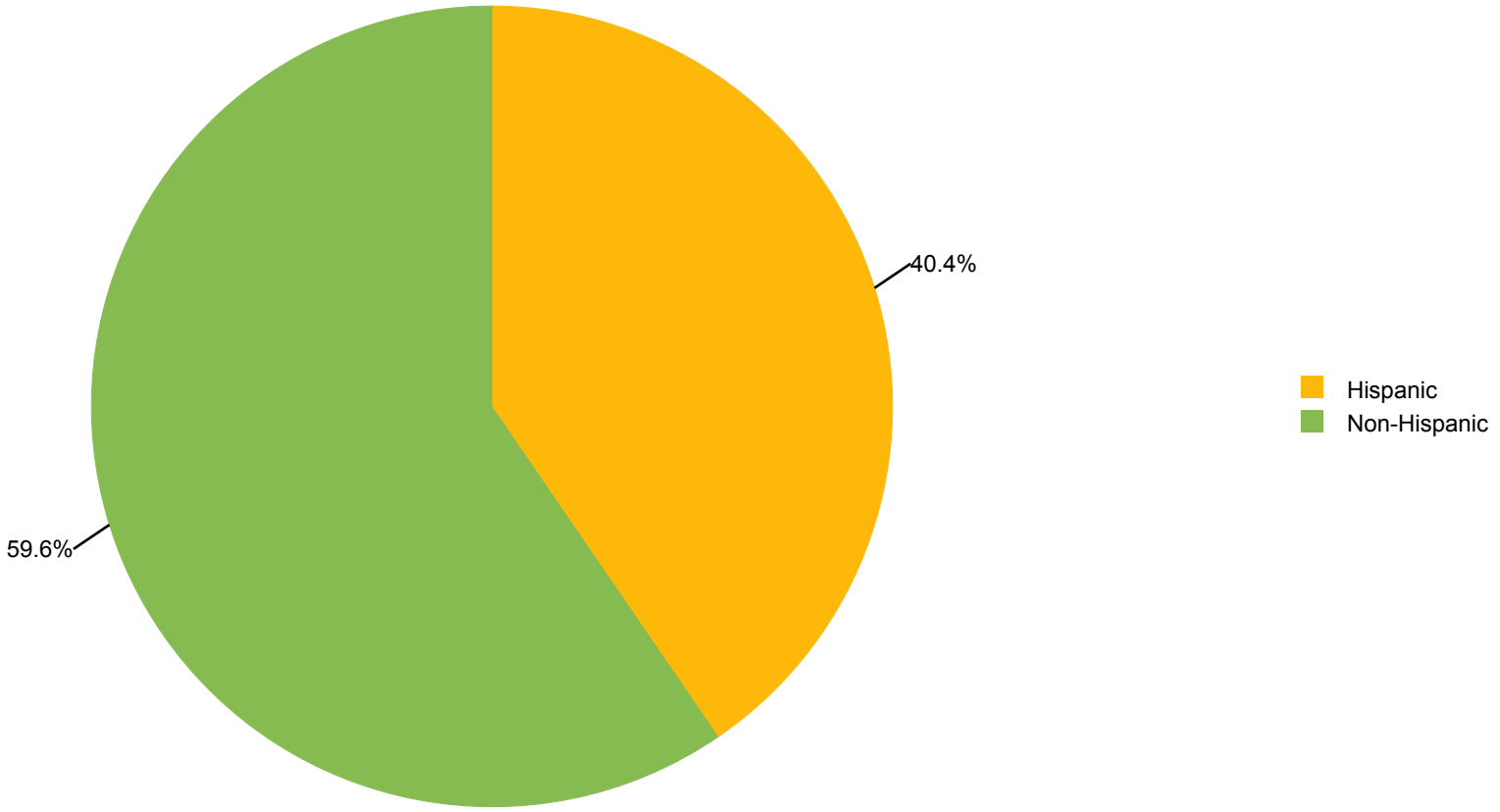
Ethnicity

ARIZONA COGs & MPOs

U.S. Census Bureau, 2010 Decennial Census

Ethnicity		
Name	Total	Percent
Total Population	249,763	N/A
Hispanic	101,011	40.4 %
Non-Hispanic	148,752	59.6 %

Universe: Total Population

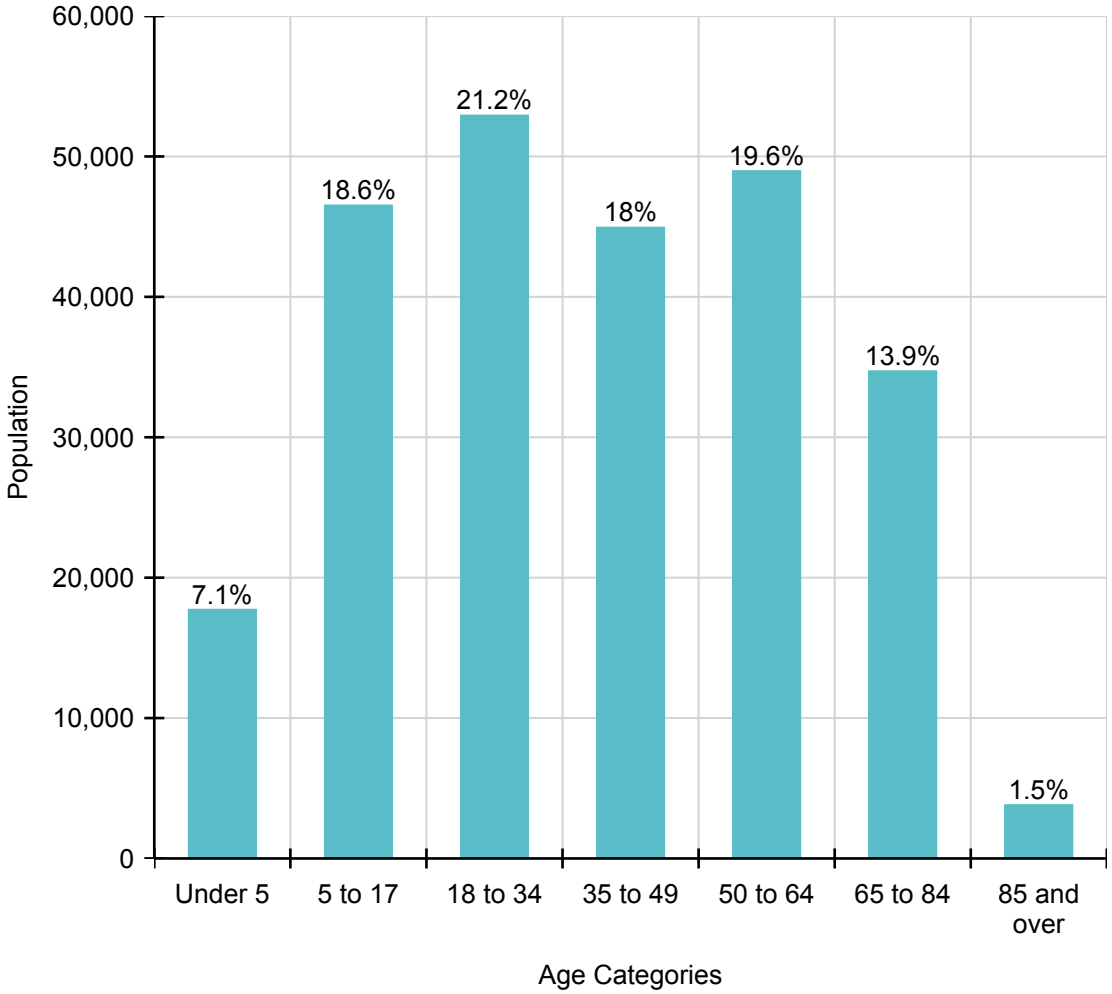


Source: U.S. Census Bureau, 2010 Decennial Census

U.S. Census Bureau, 2010 Decennial Census

Age		
Name	Total	Percent
Median Age		N/A
Under 05	17,750	7.1 %
5 to 17	46,544	18.6 %
18 to 34	52,946	21.2 %
35 to 49	44,965	18.0 %
50 to 64	48,991	19.6 %
65 to 84	34,734	13.9 %
85 and over	3,833	1.5 %
50 Plus	87,558	35.1 %
60 Plus	53,961	21.6 %
65 Plus	38,567	15.4 %
70 Plus	25,784	10.3 %
75 Plus	15,883	6.4 %

Universe: Total Population



Source: U.S. Census Bureau, 2010 Decennial Census

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To provide comments or report problems please contact: Jason Howard, GIS Program Manager

Attachment C



SEAGO
Title VI
Complaint Form

Discrimination Complaint Form

Note: *The following information is needed to assist in processing your complaint.*

Complainant's Information:

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Email: _____

Home Phone Number: _____ Alternate Phone Number: _____

Person discriminated against (someone other than complainant):

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Home Phone Number: _____ Alternate Phone Number: _____

Which of the following best describes the reason you believe the discrimination took place? Please be specific.

❑ Race _____ ❑ National Origin _____

❑ Color _____ ❑ Disability _____

On what date(s) did the alleged discrimination take place? _____

Where did the alleged discrimination take place? _____

_____

What is the name and title of the person(s) who you believe discriminated against you (if known)?

_____

_____

Describe the alleged discrimination. Explain what happened and who you believe was responsible. (If additional space is needed, add a sheet of paper).

List names and contact information of persons who may have knowledge of the alleged discrimination.

_____

_____

If you have filed this complaint with any other federal, state, or local agency, or with any federal or state court, check all that apply.

❑Federal Agency ❑Federal Court ❑State Agency ❑State Court ❑Local Agency

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone Number: _____ Alternate Phone Number: _____

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

_____ _____ Number of attachments:_____

Complainant Signature Date

Submit form and any additional information to:

SouthEastern Governments Organization
ATTN: Jessica P. Urrea, Title VI/Training Coordinator
jurrea@seago.org
1403 W. Hwy 92
Bisbee, AZ 85603
Phone: 520.432.5301 X215 Fax: 520.432.5858

Attachment D

SEAGO Executive Board Approval

SEAGO Member Entities

Cochise County
Benson
Bisbee
Douglas
Huachuca City
Sierra Vista
Tombstone
Willcox
Graham County
Pima
Safford
San Carlos
Apache Tribe
Thatcher
Greenlee County
Clifton
Duncan
Santa Cruz County
Nogales
Patagonia

SEAGO Main Office

Administration
CDBG
Economic Dev.
Housing
Transportation

1403 W. Hwy 92
Bisbee, AZ 85603
520-432-5301
520-432-5858 Fax

Area Agency on Aging Office

300 Collins Road
Bisbee, AZ 85603
520-432-2528
520-432-9168 Fax

www.seago.org

RESOLUTION NO. 2018-03

A RESOLUTION OF THE SOUTHEASTERN ARIZONA GOVERNMENTS ORGANIZATION APPROVING THE ORGANIZATION'S TITLE VI IMPLEMENTATION AND PUBLIC PARTICIPATION PLAN DATED AUGUST 1, 2018

WHEREAS, the SouthEastern Arizona Governments Organization (SEAGO) is a council of governments serving the four-county region of Cochise, Graham, Greenlee, and Santa Cruz Counties; and

WHEREAS, the SouthEastern Arizona Governments Organization is a subrecipient of funding from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) passed through Arizona Department of Transportation (ADOT), to carry out an annual work plan consisting of transportation and public transit planning activities; and

WHEREAS, Pursuant to 23 CFR 635.102, ADOT has the authority to delegate project administration and management to subrecipients and Local Public Agencies (LPAs) including any city, county, township, municipality, or other political subdivision that may be empowered to cooperate with the ADOT in highway matters; and

WHEREAS, as an LPA and subrecipient of FHWA and FTA funding, SEAGO is required to carry out its transportation planning duties and obligations in accordance with all applicable federal requirements, including but not limited to Title VI of the Civil Rights Act of 1964, which requires outreach to underserved groups; and

WHEREAS, in accordance with Title VI requirements, SEAGO has developed a Title VI Implementation and Public Participation Plan, the purpose of which is to describe how SEAGO intends to ensure that underserved individuals are provided meaningful opportunities to become involved in the transportation planning process within the SEAGO region; and

WHEREAS, FTA Circular 4 702.1 B, as revised, now requires Governing Board approval of Title VI plans.

NOW, THEREFORE, BE IT RESOLVED that the SEAGO Executive Board hereby approves the Title VI Implementation and Public Participation Plan dated August 1, 2018.

Passed and adopted by the SEAGO Executive Board on this 17th day of August 2018.

Randy Heiss, Executive Director
SouthEastern Arizona
Governments Organization

John Doyle, Chair
Executive Board