

Title VI Plan

LEWIS COUNTY PUBLIC WORKS

April 2024



Josh Metcalf, Lewis County Public Works Director

Title VI Coordinator:

Zelma Hammer, Administrative Assistant Sr.

Prepared by:



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DOT Order 1050.2A (Standard Title VI Non-Discrimination Assurances)

Organizational Structure – Public Works Management

I. Title VI Policy Statement

It is the policy of Lewis County Public Works that no person shall on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of Lewis County Public Works as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of Lewis County Public Works, including its contractors and anyone who acts on behalf of Lewis County Public Works. This policy also applies to the operations of any department or agency to which Lewis County Public Works extends federal financial assistance. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly, neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 USC § 2000d and related statutes, 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3 and 49 CFR part 21.

Signed: 
Lewis County Public Works Director

April 25, 2024
Date

II. Organization, Staffing, and Structure

Lewis County Public Works Director, Josh Metcalf, is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all LPA employees, contractors, and agents pursuant to 49 CFR Part 21.

Lewis County Public Works has created the position of Administrative Assistant Sr./Title VI Coordinator to perform the duties of the Title VI Coordinator and ensure implementation of their Title VI program. The position of Administrative Assistant Sr./Title VI Coordinator is located within Lewis County Public Works Administration Division.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency’s behalf,
- Developing procedures for the prompt processing and disposition of complaints,
- Investigating complaints, compiling a complaint log, and reporting to WSDOT,
- Developing procedures for the collection and analysis of statistical data,
- Developing a program to conduct Title VI reviews of program areas,
- Conducting annual Title VI assessments of pertinent program areas,
- Developing Title VI information for dissemination, and
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

****Organizational Chart attached hereto.***

III. Primary Program Area Descriptions & Review Procedures

Title VI Coordinator’s Responsibilities and Program Administration – As authorized by the Agency Administrator, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring Lewis County Public Works compliance with Title VI requirements as follows:

Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
<p><i>Contract Management</i></p>	<ul style="list-style-type: none"> ● Development and management of contracts and purchasing, including hiring of consultants and contractors. ● Work with Roads Division to assemble Requests for Proposals and Bid Packages, ensure competitive selection of consultant firms, recommend award of consultant firms, recommend award of construction contracts based on lowest responsive and responsible bidders, assist with final negotiation, award, and execution. 	<ul style="list-style-type: none"> ● Include applicable Disadvantaged Business Enterprise (DBE) goals in designated projects and seek to have contractor proactively achieve the goal(s). ● Include Title VI assurance and provision language in all federally funded construction contracts. Documents and language shall be periodically reviewed to ensure compliance with current laws and regulations. ● Ensure prime contractors and prime consultants with DBE requirements award contracted work to qualified DBEs, which 	<ul style="list-style-type: none"> ● Maintain necessary data and documentation required for completion of the department’s Title VI annual Report. ● Review of directives and operational guidelines to ensure Title VI compliance. ● Review and ensure all appropriate Title VI language is placed in bid announcements, requests for proposals and applicable contract documents.

	<ul style="list-style-type: none"> Responsible for administering Roads contracts and for ensuring compliance with contract provisions, including DBE goals and Equity and Social Justice Requirements. 	perform commercially useful functions.	
Communications	<ul style="list-style-type: none"> Lewis County Public Works does not have a communications division, the necessary communication efforts are completed by other divisions associated with project tasks. 		
Real Estate Services	<ul style="list-style-type: none"> Manages and coordinates the appraisal and acquisition, disposition, inventorying, and management of real property and Relocations Services. Ensure the property acquisition process follows the 5th Amendment of the Constitution, WSDOT Right of Way Manual, and Local Agency Guidelines Manual. 	<ul style="list-style-type: none"> Ensure equal opportunity in all aspects of procuring real estate consultant services and appraisal contracting and follow adopted Lewis County vendor procurement policies in the acquisition of contracted services. Utilize the current OMWBE directory identifying organizations and WSDOT's list of certified fee appraisers when seeking services; maintain data on awards to minority and female appraisers and provide data to the department Title VI Specialist. Adhere to departmental policy for informing affected property owners, tenants, and others involved in right-of-way acquisition of their rights and options regarding negotiation, relocation, condemnation, and other aspects of the acquisition process. Ensure appraisal standards 	<ul style="list-style-type: none"> Incorporate Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business. Ensure regulatory standards and communications associated with real property acquisition and relocation advisory assistance services result in equitable treatment. Ensure relocation advisory assistance services are provided to all eligible displaced persons, tenants, and entities. Ensure preparation of deeds, permits and leases contain the appropriate Title VI clauses. Apprise property owners and tenants of their rights and options under eminent domain acquisition including appraisal, negotiation,

		<p>and communications associated with the appraisal and negotiation operations result in equitable treatment.</p> <ul style="list-style-type: none"> • Ensure relocation advisory assistance services are provided equitably to all displaced persons and entities. 	<p>relocation, condemnation, and other aspects of the acquisition process.</p> <ul style="list-style-type: none"> • Follow the guidelines in the WSDOT Local Agency Guidelines manual for property acquisition as well as the WSDOT Right of Way Manual and all applicable local, state, and federal laws and regulations, including Title VI and Section 504 of the Rehabilitation Act of 1973. • Provide copies of relocation assistance literature produced by WSDOT and any information produced concerning Lewis County's Title VI compliance efforts.
GIS	<ul style="list-style-type: none"> • Manage and update demographic and other community census data for Lewis County. • Preparation of maps and other graphics to illustrate census data within the county. 	<ul style="list-style-type: none"> • Assist project design, environmental, and other staff with data gathering and documentation, determining community composition, and communications with property owners, lessees, renters, and others, as appropriate, to help ensure compliance with Limited English Proficiency and Environmental Justice requirements for projects. 	<ul style="list-style-type: none"> • Review and study current demographic data from the U.S. Census/American Community Survey and other available sources in support of budget evaluation, investment decisions and assessment of project impacts and benefits to the overall community; thus, addressing specific language barriers and needs within the community that will aid in providing equal access with public outreach and involvement.
Engineering and Planning Services	<ul style="list-style-type: none"> • Responsible for design and construction of Capital Improvement (CIP) transportation projects, including 	<ul style="list-style-type: none"> • Maintain required Title VI compliance documentation and statistical data. • Work Closely with 	<ul style="list-style-type: none"> • Review activities associated with public hearings to enhance the participation of all communities.

	<p>design of roadways and bridges; overseeing A&E consultants; and working with Project and Program Support Services in assembling Requests for Proposals and Bid Packages.</p> <ul style="list-style-type: none"> • Administration of Department's grants; legislative review; policy review; review of development proposals under review by other jurisdictions and agencies, with respect to impacts to the Lewis County road system; business and transportation planning. • Responsible for transportation planning, including preparing the Annual Construction Plan, updating the 5-year capital plan for the County road system; and annual reporting to CRAB and WSDOT. 	<p>Environmental Services and Communication Services to ensure that all aspects of the location selection process comply with the Title VI requirements.</p> <ul style="list-style-type: none"> • Work Closely with Environmental Services and GIS to consult and seek input from affected populations. • Coordinate with other agencies, local, state, federal, regional organizations, and the public to address transportation in Lewis County, while accounting for all users of the unincorporated road system. • Work closely with all divisions within Public Works and the Clerk of the Board of County Commissioners to prepare and distribute notice of public hearings and meetings in minority newspapers and newsletters. 	<ul style="list-style-type: none"> • Develop and update operational manuals and directives to ensure the inclusion of Title VI language and provisions.
<p>Environmental Services</p>	<ul style="list-style-type: none"> • Responsible for analyzing environmental issues, acquiring permits and approvals, and evaluating pending regulations to achieve cost-effective regulatory compliance and avoid or minimize adverse project/program impacts. • Provide technical 	<ul style="list-style-type: none"> • Support public notification and make information accessible to public hearings and outreach meetings to review proposed project and subsequent impact. • Develop mechanisms to identify population affected by a project. • Support the distribution of information to the public confirming their rights to 	<ul style="list-style-type: none"> • Monitor compliance with Title VI requirements in all aspects of the environmental process associated with construction projects/programs. • Review environmental information to assess economic and social impacts to ensure compliance with Title VI and Executive Order 12898, and to assist the

	<p>expertise for project/program analyses, and develops environmental policies, procedures, manuals, and training, as well as criteria to reduce a project's resource consumption and environmental impacts.</p> <ul style="list-style-type: none"> • Assist in integrating environmental considerations and regulatory requirements into transportation program and construction projects. • Performs studies to assess various environmental factors as they relate to project development, which include social and economic elements. 	<p>call or write the department to view plans and discuss environmental problems.</p>	<p>Title VI Coordinator to identify any potential Title VI/Environmental Justice issues in the project/program development process.</p>
<p><i>Maintenance & Traffic Special Operations</i></p>	<ul style="list-style-type: none"> • Responsible for completing work that is planned and performed on a routine basis to maintain and preserve the condition of the road system including signs, drainage, paving, bridges and responding to specific conditions and events to restore the roadway system to an adequate level of service. • Works closely with Environmental Services to help avoid or minimize the environmental impact of a project during maintenance and operations. 	<ul style="list-style-type: none"> • Monitoring all maintenance operations and management practice to ensure nondiscrimination. • Coordinates the gathering of maintenance information regarding DBE participation for the Annual Title VI Report. 	<ul style="list-style-type: none"> • Review activities and programs to ensure maintenance efforts and resources are applied uniformly and fairly

Human Resources	<ul style="list-style-type: none"> • Works with Public Works in coordination with the Department of Human Resources, to provide training and enforcement of our hiring, nondiscrimination, harassment, violence prevention, and similar human resource related laws regulations, policies, procedures, and guidelines. 	<ul style="list-style-type: none"> • Assist with Title VI and other nondiscrimination related training, and the tracking of training statistical data for use by the Title VI Coordinator and preparation of our Annual Title VI Update Report. • Work with the Human Resources Department to obtain gender and racial/ethnic designation employee statistics for use in our Annual Reports. 	<ul style="list-style-type: none"> • Review activities and programs to assure that human resources are applied uniformly and fairly for county employees.
Training	<p>Lewis County Public Works provides equal opportunity for employees to attend training within the parameters established in the Department Budget.</p>	<ul style="list-style-type: none"> • Plan and Assist with Title VI and other nondiscrimination related training. • Ensure all employees have equal access to training. • Ensure staff is notified of training provided by the National Highway Institute (NHI), WSDOT, Office of the Title VI Coordinator and other agencies. • Ensure no one is denied participation or subjected to discrimination on the basis of race, color, or national origin. 	<ul style="list-style-type: none"> • Maintain program administration and data necessary for preparation of the annual Title VI Report, including attendance data. • Review operational guidelines and directives to ensure the inclusion of Title VI language and provisions.

A. Program Administration. Administer the Title VI program and coordinate implementation of the plan. Ensures compliance with the assurances, policy, and program objectives. Perform Title VI program reviews to assess administrative procedures, staffing and resources; provide recommendations as required to the Board of County Commissioners.

B. Complaints. Review written Title VI complaints that may be received by Lewis County Public Works following the adopted procedural guidelines (see Section V – Complaint Procedures). Ensure every effort is made to resolve complaints informally at the local or regional level.

C. Data Collection. Review statistical data gathered periodically to ensure sufficiency of data for meeting the requirements of Title VI program administration. (see Section VII – Special Emphasis Program Areas).

D. Environmental Impact Statements. Ensure that available census data are included as a part of all Environmental Impact Statements/Assessments (EIS/EIA) conducted by Lewis County Public Works for projects.

E. Training Programs. Conduct and/or facilitate training programs on Title VI issues and regulations for Lewis County Public Works employees; and facilitate Title VI training for appropriate staff, contractors and sub-recipients as needed.

F. Title VI Plan Update. Review on an annual basis and update Lewis County Public Works Title VI Plan as needed or required. Prepare and present updated plan to the Board of County Commissioners for approval; submit amended plan to WSDOT.

G. Public Dissemination. Work with Lewis County Public Works staff to develop and make available Title VI program information to Lewis County Public Works employees and sub-recipients, including contractors, subcontractors, consultants, and sub-consultants and beneficiaries, as well as the general public. This may include postings of official statements, inclusion of Title VI language in contracts or other agreements, websites postings, and annual publication of Lewis County Public Works Title VI Policy Statement in newspaper(s) having a general circulation. Ensure public service announcements of notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards in newspaper(s) or other media reaching the affected community. Ensure the full utilization of available minority publication(s) or media; and, where appropriate, provide written or verbal information in languages other than English.

H. Maintain Legislative and Procedural Information. Federal laws, rules and regulations, WSDOT guidelines, the current Lewis County Public Works Title VI Plan, Annuals Accomplishment Report, and other resource information pertaining to the implementation and administration of the Lewis County Public Works Title VI program will be maintained and updated by the Title VI Coordinator. Information will be made available to other agency departments or the general public as requested or required.

IV. Review Procedures

Lewis County Public Works assures that every effort will be made to ensure non-discrimination in all programs and activities whether those programs are federally funded or not. Lewis County Public Works continues to review and monitor requirements through regular internal protocols which include, but are not limited to, bid evaluations, weekly progress meetings and project submittals.

1. Title VI Review of Sub-recipients of Federal-Aid Highway Funds. The Title VI Coordinator will assist WSDOT to periodically conduct Title VI compliance reviews in which staff will review select recipients of Federal-aid highway or other Federal funds, to ensure adherence to Title VI requirements (see Section VI). Lewis County Public Works will work cooperatively to periodically confirm operational guidelines provided to consultants, contractors, and sub-recipients, including Title VI language, provisions, and related requirements, as applicable.

2. Environmental Impact Statements. Ensure that available census data are included as a part of all Environmental Impact Statements/Assessments (EIS/EIA) conducted by Lewis County Public Works for projects.

3. Training Programs. Conduct and/or facilitate training programs on Title VI issues and regulations for Lewis County Public Works employees; and facilitate Title VI training for appropriate staff, contractors and sub-recipients as needed.

4. Title VI Plan Update. Review on an annual basis and update Lewis County Public Works Title VI Plan as needed or required. Present updated plan to the Board of County Commissioners for approval; submit amended plan to WSDOT.

5. Annual Accomplishment Report. Prepare an annual report of Title VI accomplishments and changes to the program in the preceding fiscal year; identify goals and objectives for the upcoming year as required; and submit by May 1st.

6. Public Dissemination. Work with Lewis County Public Works staff to develop and disseminate Title VI program information to Lewis County Public Works employees and sub-recipients, including contractors, subcontractors, consultants, and sub-consultants and beneficiaries, as well as the general public. This may include postings of official statements, inclusion of Title VI language in contracts or other agreements, websites postings, and annual publication of Lewis County Public Works Title VI Policy Statement in newspaper(s) having a general circulation. Ensure public service announcements of notices are posted of proposed projects, hearings, meetings, or formation of public advisory boards in newspaper(s) or other media reaching the affected community. Ensure the full utilization of available minority publication(s) or media; and, where appropriate, provide written or verbal information in languages other than English.

7. Maintain Legislative and Procedural Information. Federal laws, rules and regulations, WSDOT guidelines, the current Lewis County Public Works Title VI Plan, Annual Accomplishment Report, and other resource information pertaining to the implementation and administration of the Lewis County Public Works Title VI program will be maintained and updated by the Title VI Coordinator. Information will be made available to other agency departments or the general public as requested or required.

8. Post-Grant Reviews. The Title VI Coordinator will collaborate with staff to conduct periodic post grant reviews of select recipients of Federal highway funds or other Federal funds, for roads, sidewalks, bridges, municipal construction, etc. to ensure adherence to Title VI requirements (see

Section VI). Appropriate staff will periodically confirm that operational guidelines provided to consultants, contractors and sub-recipients include Title VI language and provisions and related requirements, where applicable.

9. Remedial Action. When irregularities occur in the administration of Federal-aid highway programs at either the Lewis County Public Works or sub-recipient levels, corrective action will be taken to resolve identified Title VI issues. Lewis County Public Works will seek the cooperation of the consultant, contractor or other sub-recipient in correcting deficiencies found during periodic reviews. Lewis County Public Works will provide technical assistance and guidance, upon request, to support voluntary compliance by the sub-recipient. When conducting Title VI compliance reviews, Lewis County Public Works will reduce to writing any recommended remedial action agreed upon by Lewis County Public Works and sub-recipient and provide a copy of the letter within a period not to exceed 45 calendar days.

Sub-recipients placed in a deficiency status will be given a reasonable time, not to exceed 90 calendar days after receipt of the deficiency letter, to voluntarily correct deficiencies. When a sub-recipient fails or refuses to voluntarily comply with requirements within the allotted time frame, Lewis County Public Works will submit to WSDOT and FHWA copies of the case file and a recommendation that the sub-recipient be found in noncompliance.

A follow-up review will be conducted within 180 calendar days of the initial review to ascertain if the sub-recipient has complied with Title VI Program requirements in correcting deficiencies. If the sub-recipient refuses to comply, Lewis County Public Works and WSDOT may, with FHWA's concurrence, initiate sanctions per 49 CFR 21.

V. Data Collection/Reporting/Analysis

Lewis County Public Works conducts public hearings and meetings for various projects and programs. All project engagement opportunities are publicized to residents in the affected neighborhoods. All printed and electronic communications are written in plain, reader-friendly English, and include information on how to access the materials in alternative formats or different languages.

Lewis County Public Works engages in public meetings by:

- Expanding outreach and communication to a wide range of community organizations.
- Laying out the county's goals, services, and projects for that area as well as issues identified by area residents and/or businesses.
- Introducing the area's work plan, give residents opportunities to meet with Lewis County leaders, and address issues as needed.

Lewis County Public Works tracks US Census data and provides a sign-in form at all open public project meetings on populations impacted by our projects. The information collected is reliant

solely upon members voluntarily providing the requested information. The data collected during public meetings is provided in the annual accomplishments report.

VI. Title VI Training

In keeping with adopted Lewis County Public Works policy of nondiscrimination, departmental procedures will be established or followed for Public Works employees to have equal access to applicable educational and training opportunities. Public Works staff will maintain program administration documentation and data necessary for preparation of annual Title VI reports and will routinely supply the necessary data to the Title VI Coordinator.

The Title VI Coordinator is responsible for overall Title VI related training and staff development for Title VI Specialists and other employees. The Coordinator will organize or conduct a minimum of one internal Title VI training session annually. The Coordinator will organize and facilitate the provision of Title VI training sessions for consultants, contractors, and subcontractors periodically. WSDOT's Office of Equal Opportunity may be asked to provide applicable training.

VII. Title VI Complaint Procedures

Discrimination Complaint Procedure for Lewis County Public Works

Federal law prohibits discrimination on the basis of race, color, or national origin in any Lewis County Public Works program, service, or activity. This prohibition applies to all branches of Lewis County Public Works, its contractors, consultants, and anyone else who acts on behalf of Lewis County Public Works.

Complaints related to the Federal-aid programs may be filed with Lewis County Public Works and will be forwarded to Washington State Department of Transportation – Office of Equal Opportunity. If you need assistance to file your complaint or need interpretation services, please contact Zelma Hammer, Title VI Coordinator.

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Lewis County Public Works program, service, or activity because of their race, color, or national origin may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated in a discrimination investigation.

How do you file a complaint?

Complaints must be filed no later than 180 days from the last date of the alleged discrimination. Contact Zelma Hammer, Title VI Coordinator, if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact Zelma Hammer, Title VI Coordinator.

Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. If a complainant phones Lewis County Public Works with allegations, the allegations of the complaint will be transcribed as provided by phone and then the written complaint will be sent to the complainant for correction and signature.

A complaint should contain the following information:

- The complainant's contact information, including, if available: full name, mailing address, phone number (and best time to call), and email address (if available),
- The basis of the complaint (e.g., race, color, national origin),
- The names of specific person(s) and/or agencies/organizations alleged to have discriminated,
- A description of the alleged discriminatory actions, meaning sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance, and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

All Title VI complaints are logged. The Complaint log must contain the following information for each complaint filed:

- The name and address of the person filing the complaint.
- The date of the complaint.
- The basis of the complaint.
- The disposition of the complaint.
- The status of the complaint.

The Complaint Log and documentation are destroyed four years after the end of the fiscal year in which the case is closed.

Lewis County Public Works then forwards complaints to WSDOT-Office of Equal Opportunity for processing by FHWA. [WSDOT investigates complaints only if delegated by FHWA after acceptance of a complaint.] FHWA is responsible for all determinations regarding whether to accept, dismiss, or transfer the complaint and finding no violation or failure to comply.

Complainants have the right to file a complaint directly with the federal funding agency. The following address is where Title VI complaints may be filed directly with FHWA:

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

What happens after a complaint is filed?

If your complaint is forwarded to another agency, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

FHWA will render final decisions in all cases including those investigated by WSDOT. There are no administrative appeal forums in Title VI complaints. Once FHWA issues its final agency decision, a complaint is closed.

There is no prohibition against a complainant filing a Title VI complaint simultaneously with an LPA, WSDOT, and FHWA.

What remedy are you seeking for the alleged discrimination? Please note that this process will not result in the payment of punitive damages or financial compensation.

List any other persons that we should contact for additional information in support of your complaint. Please list their names, phone numbers, address, email address below.

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____

Status (pending, resolved, etc.) _____ Result, if known _____

Complaint number, if known _____

Do you have an attorney in this matter? _____

Name (print) _____

Phone _____ Address _____

City _____ Zip _____

Signed _____ Date _____

IX. Public Participation

- Lewis County Public Works identifies populations where English is a second language through review of current census data, demography maps and school demographics in order to ensure minority populations are addressed.
- Lewis County Public Works will contact WSDOT for translation of documents in order to offer written materials in languages other than English for projects to the affected population.
- To ensure greater participation, Lewis County Public Works holds public project meetings in the evening, in a variety of mobility accessible community buildings throughout the County, ensures translation services are available if anticipated, and held in predominantly minority communities when transportation projects will specifically impact those communities.

- Lewis County Public Works contracts with a state certified translator through Language Access, as needed, for communication needs between the presenter and Limited English Proficient individuals.

X. Limited English Proficiency

Limited English Proficiency (LEP) is used to define individuals who have limited ability to speak, read, write, or understand the English language.

Executive Order 13166 (E.O. 13166) – Improving Access to Services for Persons with Limited English Proficiency – requires recipients of federal funding to examine the services they provide, identify any need for services to LEP customers, and develop and implement a system to provide those services so LEP persons can enjoy meaningful access.

As a recipient of federal funding, Lewis County Public Works is required to take reasonable steps to ensure LEP individuals have meaningful access to the information, programs, and services they provide. While designed to be a flexible and fact-dependent standard, the following four factors are considered when assessing and determining reasonable steps for meaningful access:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.

Lewis County Public Works conducts a demographic profile of the LEP population in the surrounding community area to identify any LEP individuals. (US Census Data; 2021 Estimates) reflect 91.8% English Only and 6.4% being Spanish speaking. The remaining 1.8% spoke a language other than English.

2. The frequency with which LEP individuals come in contact with the program;

Lewis County Public Works monitors and evaluates the frequency of contact between staff and various language groups of LEP to assist in identifying additional language service needs. Lewis County Public Works has had no request for translated documents. Reception staff have had minimal contact with LEP individuals; the contacts that were made being Spanish speaking.

3. The nature and importance of the program, activity, or service provided by the program to people's lives.

Lewis County Public Works conducts regular review of demographic profiles, documents, correspondence and/or frequency of contact between Lewis County Public Works staff and LEP individuals contribute to the nature and importance of services and programs required. As reflected in the US Census Data 2022 Estimates, English is the primary language spoken with Spanish leading in LEP individuals.

4. **The resources available to the grantee/recipient or agency, and costs.**

To provide meaningful and equal access to LEP individuals, Lewis County Public Works will identify the level of language services that are provided, and any additional language services that are required through the use of demographics, frequency and importance of contacts.

Lewis County Public Works has two fluent Spanish speaking employees located at reception. When an interpreter or translator is required in person or on the telephone and other avenues have been exhausted, Lewis County Public Works will provide a state certified translator using Language Access.

The project’s website ensures project information is accessible by all within the community. An example of this can be found at:

<https://lewiscountywa.gov/departments/public-works/current-projects/reynolds-aveharrison-ave-corridor-improvements/>

Types of Language Spoken at Home:	2021 5yr. Estimate	2022 5yr. Estimate	2022 1yr. Estimate	Source
English Only	91.7%	91.8%	91.0%	DP02
Spanish	6.5%	6.4%	N/A	DP02
Other Indo-European languages	1.0%	1.0%	N/A	DP02
Asian and Pacific Islander languages	0.8%	0.8%	N/A	DP02
Other Languages	0.0%	0.0%	N/A	DP02

<https://www.census.gov/programs-surveys/acs/about.html>

Lewis County Public Works makes every effort to identify any vital documents requiring translation services. Outreach materials for projects are translated, if warranted based on the population of “English as a second language” speakers in the impacted communities.

XI. Environmental Justice

As individual capital projects are authorized and initiated, a project review process is initiated early in the project preliminary design phase. Early and ongoing project review is informed by an evolving understanding of the project stakeholders, constituent interests and demographic information obtained by census data GIS data. As the project evolves, so does the project team’s understanding of the community and road users being served by the project and specific project products are informed by this data including the Project Charter, the Public Communications Plan, and Lewis County Building Ordinance documentation. For non-exempt projects with federal funds, additional stakeholder information is provided via Environmental Justice (EJ) documentation for NEPA.

The Environmental Justice review uses information within a half mile of the project from the U.S. environmental Protection Agency (EPA). The EPA provides an environmental justice

screening and mapping tool, known as EJSCREEN. The project EJ review also includes data from the nearest public school using the Washington State Office of Superintendent of Public Instruction Washington State Report Card. Project sites are visited to help identify potential sensitive receptors to minimize potential impacts. Physical environments are reviewed/documentated by environmental professional staff to identify critical/sensitive areas, potential project impacts, and future mitigation. Travel habits are studied by Traffic Safety Engineers to assess local and regional mobility, potential project impacts, and future mitigation. An Environmental Justice (EJ) report is completed for every federal aid project that

1. requires ROW acquisitions or relocations,
2. requires a traffic detour,
3. result in noise impacts to sensitive receptors, specific to EJ populations,
4. result in air quality impacts,
5. result in changes to the access of the existing roadway, adjacent residences, or businesses; divide the community, restrict access to services, or affect the overall cohesion of the community; and/or result in or increase exposure to hazardous materials or other health effects.

The EJ memorandum includes an analysis of potential impacts to minority and low-income peoples. EJ population's data for the project area is collected using census data from the Environmental Justice Screening Tool run by the US Environmental Protection Agency along with student demographics data from the Office of the Superintendent of Public Instruction. The completed EJ is sent to Local Programs for approval prior to construction approval.

XII. Notice of Title VI Rights

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

Lewis County Public Works hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which Agency receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with Lewis County Public Works. Any such complaint shall be filed with the Lewis County Public Works Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence. Title VI discrimination Complaint Forms may be obtained from the Title VI Coordinator at no cost to the complainant.

To file a Title VI discrimination complaint, contact:

Zelma Hammer, Title VI Coordinator
Lewis County Public Works
57 W Main St.
Chehalis, WA 98532
Zelma.hammer@lewiscountywa.gov

Washington Department of Transportation
Office of Equity and Civil Rights (OECR) – Title VI
Box 47314
Olympia, WA 98504-7314
TitleVI@wsdot.wa.gov
Phone: (800) 259-9143

ATTACHMENT: USDOT 1050.2A, Standard Assurances with Appendices

The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination

Assurances

DOT Order No. 1050.2A

The Lewis County Public Works (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 Washington State Department of Transportation (WSDOT), 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);

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 assurance 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 Washington State Department of Transportation.

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 Federally assisted 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 "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 Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The Lewis County Public Works, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 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 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 to 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, Lewis County Public Works also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Lewis County Public Works 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 Lewis County Public Works. You must keep records, reports, and submit the material for review upon request to Lewis County Public Works, or its designee in a 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.

Lewis County Public Works 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. This ASSURANCE is binding on Washington State Department of Transportation, 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.

Josh Metcalf
Director, Lewis County Public Works
(Name of Recipient)

by 
(Signature of Authorized Official)

DATED 04/25/2024

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, Washington State 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 performed 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 the 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 or the Washington State 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 or the Washington State 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 Washington State 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 respect to any subcontract or procurement as the Recipient or the Washington State 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 the Lewis County Public Works 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 Washington State Department of Transportation, and the policies and procedures prescribed by the Federal Highway Administration of 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 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the Lewis County Public Works 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 Lewis County Public Works 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 Lewis County Public Works, its successors and assigns.

The Lewis County Public Works, 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 Lewis County Public Works 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 Lewis County Public Works 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, Lewis County Public Works 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 a deed, in the event of breach of any of the above Non-discrimination covenants, the Lewis County Public Works 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 Lewis County Public Works 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 Lewis County Public Works 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, Lewis County Public Works will have the right to terminate the (license, permit, etc., as appropriate) and to 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, Lewis County Public Works will there upon revert to and vest in and become the absolute property of Lewis County Public Works 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 Non-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. 1681 et seq).



PUBLIC WORKS

Public Works Department

March 2024

