



SIERRA VISTA METROPOLITAN PLANNING ORGANIZATION FY 2021 TITLE VI/EJ ANNUAL REPORT

August 2, 2021

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For More Information about SVMPO Title VI and Environmental Justice activities, please contact the SVMPO Title VI Coordinator/SVMPO Administrator, Karen L. Lamberton, AICP. She can be reached at 520-515-8525 or Karen.Lamberton@SierraVistaAZ.gov

The current SVMPO Title VI Plan is available on the SVMPO website at www.svmppo.org

INTRODUCTION

The Sierra Vista Metropolitan Planning Organization, known as the SVMPO, is the Federal and State designated Regional Transportation Planning Organization for the southwestern portion of Cochise County, located in southeast Arizona. The SVMPO receives both Federal Highway Administration and Federal Transit Administration funds through agreements with Arizona Department of Transportation (ADOT).

The SVMPO is committed to ensuring the full participation in regional planning activities by all area residents. This agency has a nondiscrimination policy that addresses Title VI, Environmental Justice and other relevant federal and state statutes. No person, on the grounds of race, color, national origin, gender, age, disability, income status or limited English Proficiency, shall be excluded from participation in, be denied the benefits or, or be otherwise subjected to discrimination under any SVMPO sponsored program of activity. Public outreach and data analysis are two tools used to provide equal opportunity to participate and ensure that equal benefits and disproportionate burdens are assessed during project development.

This report sets out the SVMPO activities for Fiscal Year 2021 and goals for Fiscal Year 2022 to ensure that policies and projects are in compliance with Title VI of the Civil Rights Act of 1964 and the 1994 Presidential Executive Order 12898 in accordance with 23 CFR § 200.9(b)(7)(11) and FTA C 4702.1B.

ACCOMPLISHMENTS: Program Areas

Since the last annual report SVMPO has completed the following FY21 accomplishments:

- ✚ Updated the FY22 Title VI and Environmental Justice Plan; adopted by the SVMPO Board on March 31, 2021.
- ✚ Maintained a website presence that provided information regarding any public meetings and provided access to information about Title VI and the Rights of the Public under Title VI, Environmental Justice and Americans with Disabilities Act.
- ✚ Provided access to Title VI Complaint Forms along with contacts for submitting complaints to the SVMPO, Arizona Department of Transportation (ADOT); Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).
- ✚ Held eighteen Board and Committee meetings and one Joint TAC/Board Work Session and ensured that meetings rooms were accessible, and the opportunity made available for translation or other accommodations, if needed.
- ✚ Posted the official Title VI Notice to the Public at every scheduled meeting.
- ✚ The FY21 Transportation Improvement Plan was released for public comment during the 4th quarter. Paid media advertainment was used as one method of public notification. Although no public comments were received, this was not unexpected as no new construction projects had been added to the updated TIP (all funds



fully programmed into the North Garden/Fry Blvd Project). Given the small amount of regional construction funding it is anticipated that it will be several years before another project can be initiated.

- ✦ Provided Spanish language materials related to Title VI Rights and provided Spanish language Complaint Forms on the SVMPO website.
- ✦ Provided language translator option on the SVMPO website.
- ✦ Identified meeting spaces fully accessible to those with mobility impairments.
- ✦ Updated the Title VI demographic maps to reflect the more recently released American Community Survey data for 2015-2019.
- ✦ It was acknowledged that FY21 experienced unique challenges in outreach due to a global health crisis that resulted in national, state and local declarations of emergency. The limitations necessary to protect the public posed unique challenges to typical outreach and the SVMPO worked rapidly to deploy innovative solutions for safe and socially distanced public outreach strategies with consultant teams working on both the Long-Range Transportation Plan and Short-Range Transit Plan during this time. Additional emphasis was placed on directing the public to virtual platforms for communicating and providing for real-time comments to be submitted as well as moving to a broader variety of virtual meeting formats.



Short-Range Transit Plan: Interactive Public Outreach Display

SUB-RECIPIENT REVIEWS

Each program area and sub-recipient is reviewed by the City of Sierra Vista’s (SVMPO’s fiscal agent) staff, the SVMPO Administrator, and the SVMPO contract attorney as contracts and planning agreements are developed. This would include a review of Title VI provision to ensure strict adherence.

In FY21, the only direct recipient of MPO funds was Cochise County, a government entity who routinely receive direct federal and state funds and is responsible to maintain all appropriate and required documentation related to Title VI Certifications and non-discrimination Assurances. (This direct payment was part of a joint partnership with Cochise County and the USGS to conduct updated aerial flights of the SVMPO region). There are no known deficiencies in compliance during this timeframe.

PROCUREMENT ACTIVITIES

Last Fiscal Year, the SVMPO developed a specific demographic data collection form for procurement activities undertaken by the MPO. Of selected firms for a reciprocal On-Call professional planning services contract, 78 percent provided demographic information and 22 percent declined to include this information. Of these firms 80% are owned by males; 20 percent by females; three (3) firms

indicated that they were registered as a DBE company. Consultant firm ownership is 93% white, five (5) percent black, and two (2) percent Asian. *(Note: some companies have multiple owners and/or are employee owned).* Of the 11 firms not selected for the On-Call Contract, over half, 55 percent declined to provide the information, and of those that did complete the form the majority were owned by white males, and none were registered DBE firms.

Issued FY21 Cost Proposals resulted in three professional service contracts: of these consulting firms 100 percent were male, white owned companies. However, two of the three firms that were selected for a SVMPO contract did also sub-contract with a female, white owned DBE firm.

COMPLAINT PROCEDURES/FY21 Complaints

During Fiscal Year 2021, no formal Title VI or Environmental Justice complaints were filed with the SVMPO. A Title VI Complaint, Investigation and Lawsuit Log is maintained for each Fiscal Year.

Title VI Complaints, Investigations and Lawsuits: FY 21 Log					
Description/Name	Date Month, Day & Year	Funding Source (FHWA or FTA)	Summary (Basis of Complaint) *	Status	Actions / Final Findings
Complaints					
1)					
2)					
Investigations					
1)					
2)					
Lawsuits					
1)					
2)					

*Specific category, i.e. Race, Color or National Origin Report to be Submitted Annually to ADOT Title VI Department; a NIL Report is Required

TITLE VI TRAINING

ADOT Title VI Liaisons notify SVMPO staff of various Title VI training opportunities as they become available. These opportunities are then made known to staff of the member jurisdictions and, when appropriate, to members of the public. The SVMPO Administrator attended national workshops on Environmental Justice and Title VI issues and attended a webinar held on June 23rd that was conducted by ADOT’s Civil Rights Office and led by Joanna Lucero for MPO’s related to the update to FHWA and FTA Title VI/ADA Non-Discrimination Complaint Procedures.

The SVMPO Administrator provided Title VI education and training presentations to the SVMPO TAC and Board in March of 2021. Other minor references to elements within the Title VI Plan were made in context of the development of the FY23/24 Work Program and in reporting demographic data for planning activities that were underway in FY21.



**JOINT SVMPO TAC/BOARD
WORK SESSION**

**ON REGIONAL PLANNING
including a Demographic
Overview of SVMPO Region**

June 10, 2021

FY21 TRAINING LOG: June 2020-June 2021

FY21 Title VI TRAINING					
Name/Title	Month, Day & Year	Type of Training	Provided By	Cost	Comments
Staff					
1) Karen Lamberton /SVMPO Administrator	6-23-2021	CRO FHWA Title VI Training	ADOT Civil Rights Dept.	-	Virtual Interactive Meeting
2) Karen Lamberton /SVMPO Administrator	5-6-2021	Using Mental Health Considerations in Designing Spaces	National American Planning Conference	\$325.00	Virtual Conference
3) Karen Lamberton /SVMPO Administrator	5-7-2021	Fair Housing Mandates are Alive and Well	National American Planning Conference	\$325.00	Virtual Conference
Boards & Committees					
1) Technical Advisory Committee: FY22 Title VI Plan	3-10-2021	Discussion of FY22 Title VI Plan and Regional Title VI and ADA Maps	K.Lamberton SVMPO Administrator	-	13 attendees
2) SVMPO Board of Directors: FY22 Title VI Plan	3-31-2021	Discussion and Adoption of FY22 Title VI Plan and regional Title VI and ADA Maps	K.Lamberton, SVMPO Administrator	-	Adoption of FY22 Title VI Plan 10 attendees
3) SVMPO Board of Directors	1-28-2021	Discussion and review of FY22 Preliminary Title VI Plan and mandated requirements.	KLamberton, SVMPO Administrator	-	Review of draft FY22 Title Plan: explained regulatory requirements. 11 attendees
Others					
1)					

Report to be Submitted Annually to ADOT Title VI Department

GOALS FOR FY 2022

The SVMPO has identified the following goals to ensure full compliance with Title VI, Environmental Justice and related authorities. These goals were developed by the Title VI Coordinator/SVMPO Administrator and reviewed by ADOT’s Civil Rights Office.

- ✚ Document and address any submitted complaints received and promptly notify ADOT, and as appropriate, FHWA and FTA Civil Rights Offices, of the received complaint and any resolution reached.
- ✚ Fully and effectively respond to any requests for Limited English Proficiency services, translation requests, and special accommodations needed to engage communities of concern in the SVMPO’s regional planning area.
- ✚ Conduct outreach, such as surveys and formal and informal focus groups, to identify issues of concern for Title VI vulnerable population groups and include these observations in the deliberations of SVMPO committee deliberations and decisions regarding funding investments.
- ✚ The SVMPO Administrator will attend Title VI, Environmental Justice and ADA subject matter trainings and share those opportunities with member jurisdiction staff and committee members.
- ✚ Incorporate appropriate activities to enhance outreach to identified vulnerable population groups and limited English populations during the pending Theater Drive corridor study and any other regional planning activities.

- Update the demographic public outreach profile board when the full Census 2020 data is released.
- The FY21 challenges for outreach due to the health crisis experienced in the last year (and still ongoing) highlighted the challenges inherent in the lack of broadband access within the SVMPO region. According to the ACS 2015-2019 data, in some areas of the SVMPO region up to 20 percent of households did not have any form of internet access. Addressing this challenge has social justice implications as well as improving the opportunity for a enhancing a more diverse outreach into the SVMPO region for future planning efforts.
- Continue to improve and enhance the SVMPO website materials to expand potential virtual public involvement with vulnerable or isolated population groups.
- Proactively develop the FY23 Title VI Plan with interactive participation of the SVMPO Board, Technical Advisory Committee and Bicycle/Pedestrian Advisory Subcommittee.

