



**Photo: Powhatan County Welcome Sign.**

## **RRTPO and PlanRVA Equity Working Group**

### NOTES

This meeting is open to the public. Members of the public are invited to attend virtually. Please alert the RRTPO at [RRTPO@PlanRVA.org](mailto:RRTPO@PlanRVA.org) if electronic transmission of this meeting fails for the public. Please refer to our [Statement Regarding Virtual Meeting Participation by Members of the Public](#) for more information.

Check out our complete [Public Participation Guide](#) online to learn about the different ways you can stay connected and involved.

Meetings are also live streamed and archived on our YouTube Channel at [Plan RVA - YouTube](#).

Members of the public are invited to submit public comments either verbally or in writing. Written comments can be submitted through the Q&A/Chat function on Zoom by email to [RRTPO@PlanRVA.org](mailto:RRTPO@PlanRVA.org). Written comments will be read aloud or summarized during the meeting when possible and will be included in the meeting minutes. Verbal comments will be taken during the Public Comment Period on the agenda.

Powered By:

e: [RRTPO@PlanRVA.org](mailto:RRTPO@PlanRVA.org)

p: 804.323.2033

w: [www.PlanRVA.org](http://www.PlanRVA.org)

## AGENDA

### RRTPO/PlanRVA Equity Working Group

May 30, 2025, 9:00 a.m.

Zoom Meeting

If you wish to participate in this meeting virtually, please register here:

[\*\*ZOOM WEBINAR LINK\*\*](#)

#### 1. Welcome and Introductions

**Facilitator:** Martha Shickle

**Estimated time:** 5 minutes

#### 2. Proposed Policies Update

**Facilitator:** Martha Shickle

**Estimated time:** 5 minutes

#### 3. [Title VI Plan Review \(linked\)](#)

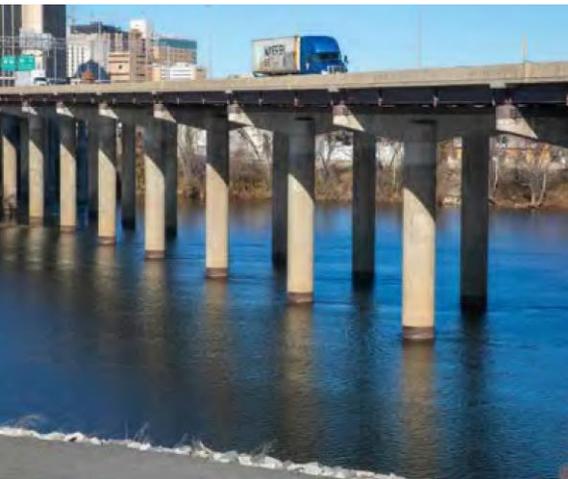
**Objective:** working group members will review possible edits to the Title VI Plan that staff has identified along with an A.I. generated executive order and language review of the plan.

**Facilitator:** Martha Shickle

**Estimated time:** 50 minutes

- a. [Title VI Plan – Redlined Version with Staff’s Identified Possible Changes](#) – page 3
- b. [A.I. Generated Executive Order and Language Review with Suggested Changes](#) – page 81

#### 4. Upcoming Meetings/Next Steps



# Title VI Plan

## Limited English Proficiency Plan

May 2021



424 Hull Street, Suite 300  
Richmond, Virginia 23224  
Phone: 804-323-2033 | [www.PlanRVA.org](http://www.PlanRVA.org)

Deleted: ,

## Richmond Regional Transportation Planning Organization

### Supported by PlanRVA

**Our Mission:** To provide an independent yet cooperative forum for regional transportation planning and direct the allocation of annual federal transportation funding to support transportation options for all.

Deleted: ¶

Deleted: equitable

**Our Vision:** Our work will reliably and safely connect people, prioritize opportunities for all to thrive and live healthy lives, promote a strong economy, and respect environmental stewardship.

Deleted: more equitable

**The Richmond Regional Transportation Planning Organization (RRTPO)** coordinates transportation plans and polices as the Metropolitan Planning Organization (MPO) for the Richmond region. The RRTPO covers nine local jurisdictions including the Town of Ashland, the counties of Charles City, Chesterfield, Goochland, Hanover, Henrico, New Kent, and Powhatan, and the City of Richmond. The RRTPO is supported through a Memorandum of Understanding for staff support services by the Richmond Regional Planning District Commission (PlanRVA).

**PlanRVA** promotes regional cooperation and collaboration between government, private sector, and community organizations to improve the quality of life for citizens in the Richmond Region. PlanRVA provides staff support to the RRTPO and assumes the administrative responsibility for assuring Title VI compliance for all federally funded programs administered by the agency.

*This report was prepared by PlanRVA on behalf of the Richmond Regional Transportation Planning Organization (RRTPO). Resource materials used in preparing this document include information from the U.S. Department of Transportation (USDOT), the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Virginia Department of Transportation (VDOT), the Virginia Department of Rail and Public Transportation (DRPT), RRTPO, and PlanRVA.*



This Title VI Plan and accompanying documents can be found on the PlanRVA website: [PlanRVA.org/compliance](http://PlanRVA.org/compliance)

Physical copies of the PlanRVA Title VI Plan can also be accessed at [PlanRVA's office](#), located at 424 Hull Street, Suite 300 Richmond, Virginia 232234.

Additionally, we are here to support you in accessing this information anytime you need it. We will support your access through:



## Accessing this Plan

### Public Records Requests

Anyone wishing to access records maintained by PlanRVA with regard to the business of the organization, the Richmond Regional Transportation Planning Organization, or any other body to which PlanRVA provides staff support should submit a request to Martha, Executive Director via email at [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org), in writing by mail to 424 Hull Street, Suite 300 Richmond, Virginia 23224, or through the PlanRVA online contact form: [planrva.org/home/contact-form](http://planrva.org/home/contact-form).

Deleted: Heeter

### ADA Accommodations

If you need any reasonable accommodation for attending our public meetings or if you need this document in another format, please provide our office with at least 48 hours advance notice. If less than 48 hours advance notice is provided, we will make every effort to accommodate you but cannot guarantee all accommodations. Please contact [Title VI@ PlanRVA.org](mailto:TitleVI@PlanRVA.org) or submit a request through the PlanRVA online contact form: [planrva.org/home/contact-form](http://planrva.org/home/contact-form).

### Limited English Proficiency (LEP) Policy (still applicable?)

PlanRVA takes all reasonable steps to provide timely and meaningful access for LEP individuals in contact with PlanRVA. Individuals needing assistance with translation services may contact [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org) or submit a request through the PlanRVA online contact form: [planrva.org/home/contact-form](http://planrva.org/home/contact-form).

### Política sobre el dominio limitado del inglés (LEP por sus siglas en ingles)

Formatted: Spanish (Spain)

PlanRVA toma todas las medidas razonables para brindar acceso oportuno y significativo a las personas con dominio limitado del idioma Ingles en contacto con PlanRVA. Las personas que necesiten ayuda con servicios de traducción pueden comunicarse con [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org) o enviar una solicitud a través del formulario de contacto en línea de PlanRVA: [planrva.org/home/contact-form](http://planrva.org/home/contact-form).

Formatted: Spanish (Spain)

Formatted: Spanish (Spain)

Field Code Changed

## Letter from the Executive Director

PlanRVA is a legally constituted public agency created by the Virginia General Assembly and chartered locally in 1969. Over the last 50 years, PlanRVA has evolved to respond to the growing needs of the Richmond Region and its member jurisdictions. Today, PlanRVA manages various regional programs and initiatives in partnership with member local governments, state and federal agencies, and organizations across the region with specific focus in core areas of community development, emergency management, the environment, and transportation.

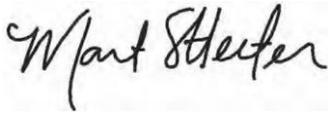
PlanRVA serves as the lead convener of and provides staff support to several affiliate organizations and entities with similar missions of planning and carrying out the vision for the region's continued growth and prosperity.

One of the primary entities to which PlanRVA provides support is the federally designated MPO for the Richmond Region, the Richmond Regional Transportation Planning Organization (RRTPO).

While it's important to note that the decision-making process for transportation planning priorities and investments is made at the sole discretion of the Policy Board of the RRTPO, PlanRVA assumes the administrative responsibility for assuring compliance with all local, state, and federal requirements of the program, including Title VI, and operating in a manner necessary to fulfill these requirements.

The following Title VI Plan was created to meet the specific federal and state requirements necessary for the RRTPO, but the commitment to non-discrimination applies to all PlanRVA's programming, processes, and operations.

This letter confirms the adoption of this plan by PlanRVA and will serve as the guide for assuring consistent practice of Title VI activities across all affiliate organizations and entities to which PlanRVA provides staff support.



Martha Heeter, PlanRVA Executive Director

Formatted: Portuguese (Brazil)

[Add CVTA Logo?](#)



## Section 1: Understanding this Document

1a. The Purpose of this Document.....	3
1b. Notice to the Public.....	4
1c. Our Commitment.....	5
1d. What's Title VI?.....	5
Title VI Discrimination Complaint Process.....	7
1f. Title VI Complaint Form.....	11

Deleted: . . .

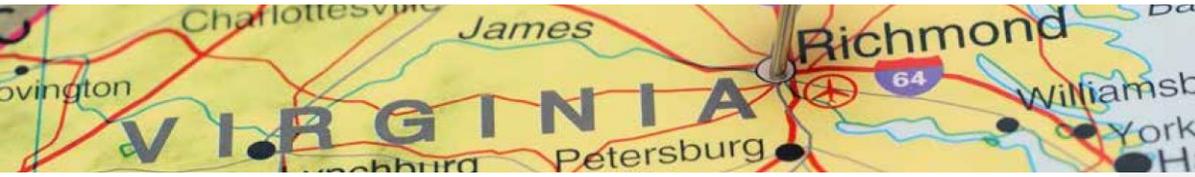
Deleted: ..

Deleted: . . 5

Deleted: .

## Section 2: Getting to Know RRTPO

2a. Overview of RRTPO.....	13	2b.
Mission, Vision, Values, and Key Contacts.....	15	
2c. Organizational Structure.....	16	2d.
RRTPO's Title VI Responsibilities.....	17	
2e. RRTPO's Programs & Processes.....	18	2f.
RRTPO's Data Collection Process.....	19	
2g. Community Characteristics and Analysis.....	20	



## Table of Contents

### Section 3: How RRTPO Facilitates Nondiscrimination

3a. Title VI Coordinator, Role, Responsibilities . . . . .	30
3b. Staff Training. . . . .	31 . 31
3c. Directives - Review and Processes . . . . .	32
3d. Sub-Recipient - Review and Processes . . . . .	32

Deleted: . . .

Deleted: .

Deleted: .3

### Section 4: Dissemination of Public Information

4a. Public Participation Plan (summary) . . . . .	34
4b. Environmental Justice. . . . .	35 . 35
4c. Limited English Proficiency . . . . .	36 <u>(still applicable?)</u>
4d. Language Assistance Plan . . . . .	40

### Appendices

Appendix A. Assurances . . . . .	43
Appendix B. Board Approval and Meeting Minutes. . . . .	44
Appendix C. Committee Membership . . . . .	46
Appendix D. Full Complaint Procedure, List of Title VI Investigations, and Template for Investigation Log. . .	57
Appendix E. Compliance Matrix. . . . .	60
Appendix F. Glossary of Terms . . . . .	61





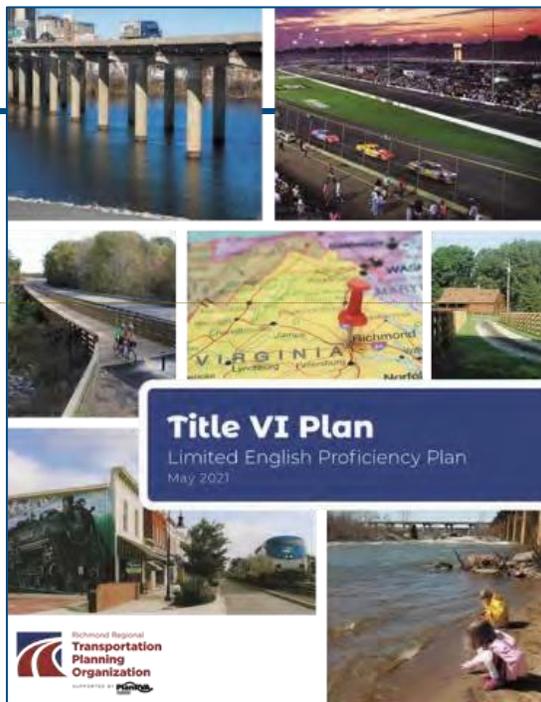
# Section 1. Understanding This Document

## Introduction

As a recipient of federal financial assistance, including our sub-recipients and consultants, we are obligated to adhere to and are committed to achieving full compliance with Title VI of the Civil Rights Act of 1964 and all related nondiscrimination laws.

Read more about the specifics of Title VI and what is required in this plan in Section 1d.

Throughout this document, you will **find** many terms and abbreviations related to policies, programs, and our role in ensuring compliance with Title VI - maybe you've seen some of these terms and abbreviations before, maybe you'll learn some new ones.



Deleted: fnd

## Key

Use these icons to navigate this document by topic area.

Title VI	Language	Commitment	Processes	Structure	Community
Título VI	Adaptaciones Lingüísticas	Compromiso	Procesos	Estructura	Comunidad



For a glossary of terms, definitions, and applicable laws and statutes, you can check out Appendix F or contact us directly at [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org) with any questions you may have.

Keep in mind that the RRTPO Title VI Plan is a *living*

information. Because of the living nature of some of that information, we include some of it in appendices. But the one piece that doesn't change is our clear and consistent commitment to Title VI compliance and nondiscrimination.

document, meaning there is information here that may get updated from time to time to assure responsiveness to our federal, state, and local partners and most importantly our community. If we're doing our job correctly, two things should happen: 1) you should recognize a clear and consistent commitment from us regarding Title VI compliance, and 2) you should be informed of updates and changes to important information related to Title VI – whether it is how we evaluate Title VI impact in directives, our region's demographic data, or updated contact

## Introducción

Como beneficiario de ayuda financiera federal, incluidos nuestros subreceptores y consultores, estamos obligados a cumplir y estamos comprometidos a lograr el pleno cumplimiento del Título VI de la Ley de Derechos Civiles de 1964 y todas las leyes relacionadas con la no discriminación.

Para obtener más recursos e información en español, por favor visite [PlanRVA.org](http://PlanRVA.org) o contáctenos directamente a [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org) con cualquier pregunta que pueda tener.

Tenga en cuenta que el Plan Título VI de RRTPO es un documento *dinámico*, lo que significa que hay información que puede actualizarse de vez en cuando para garantizar la capacidad de respuesta a nuestros socios federales, estatales y locales y, lo más importante, a nuestra comunidad. Si estamos haciendo nuestro trabajo correctamente, deben suceder dos cosas: 1) Usted debe poder reconocer un compromiso claro y consistente de nuestra parte con respecto al cumplimiento del Título VI, y 2) Usted debe estar informado de las actualizaciones y cambios en la información importante relacionada con el Título VI - ya sea cómo evaluamos el impacto del Título VI en las directivas, los datos demográficos de nuestra región o la información de contacto actualizada. Debido a la naturaleza dinámica de alguna de esta información, incluimos parte de ella en apéndices. Pero la única pieza que no cambia es nuestro compromiso claro y constante con el cumplimiento del Título VI y la no discriminación.

Let's get started.

To understand RRTPO's Title VI Requirements, let's first talk about [transportation planning](#).

Transportation planning is the process of looking at the current state of transportation in the region, designing for future transportation needs, and combining all of that with the elements of budgets, goals, and policies. It helps shape how a community or city grows by evaluating everything from streets and highways to cargo ships to public transit and bike lanes. It can influence everything from business to recreation to quality of life.

Formatted: Spanish (Spain)

Formatted: Spanish (Spain)

Formatted: Spanish (Spain)

Field Code Changed

Formatted: Spanish (Spain)

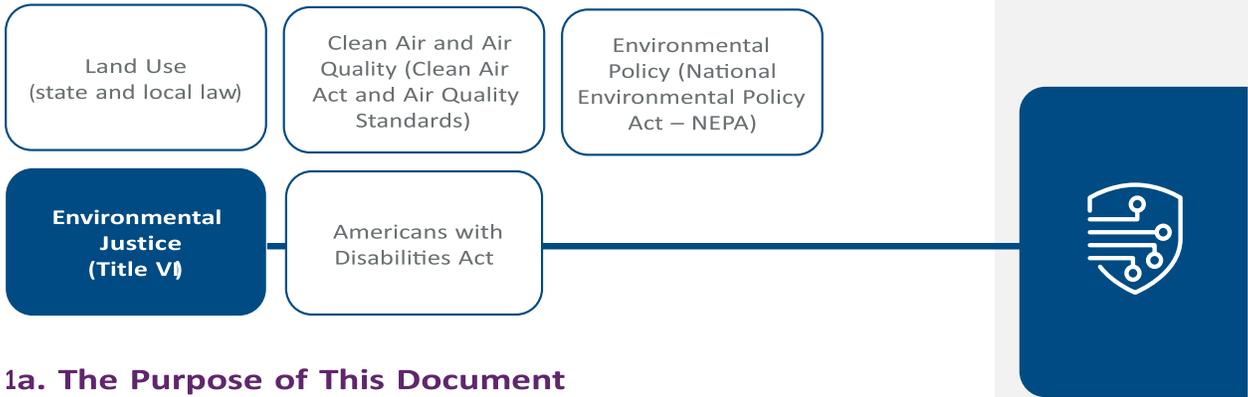
# 1

Planning also includes multiple factors outside of transportation. It focuses on:

The purpose of this plan is to assure compliance with Title VI in our urban transportation planning program(s) and to demonstrate RRTPO and PlanRVA's commitment to nondiscrimination.

In this plan, you'll find a brief discussion of Title VI as well as the concepts of Environmental Justice (EJ) and Limited English Proficiency (LEP). (still applicable?)

Summarized in the plan is how these concepts, along with Title VI, are incorporated into the metropolitan transportation planning process in the areas of:



## 1a. The Purpose of This Document



The plan provides specific information on the responsibilities of the Title VI Coordinator and includes direction on filing and processing complaints of discrimination.

## 1b. Notice to the Public

RRTPO's Title VI/Nondiscrimination Notice to the Public is provided in English and Spanish. It is posted in the PlanRVA office lobby at 424 Hull Street Suite 300, Richmond, Virginia, 23224.

It can also be found on the PlanRVA website at [PlanRVA.org/compliance](http://PlanRVA.org/compliance).

**English Version:** The Richmond Regional Transportation Planning Organization (RRTPO) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes, executive orders, and regulations in all programs and activities and assigns these responsibilities for compliance to PlanRVA as appropriate. The RRTPO operates

# 1

without regard to race, color, national origin, income, gender, age, and disability. Any person who believes themselves or any specific class of persons, to be subjected to discrimination prohibited by Title

## 1b. Aviso al público:

El Aviso al Público del Título VI / No Discriminación de RRTPO se proporciona en inglés y español. Está publicado en el vestíbulo de la oficina de PlanRVA en el 9211 Forest Hill Avenue, Suite 200, Richmond, Virginia, 23235.

También puede encontrarlo en el sitio web [PlanRVA.org/compliance](http://PlanRVA.org/compliance).

**Versión en español:** La Organización Regional de Planificación de Transporte de Richmond (RRTPO) cumple plenamente con el Título VI de la Ley de Derechos Civiles de 1964 y los estatutos, órdenes ejecutivas y reglamentos relacionados en todos los programas y actividades y asigna estas responsabilidades de cumplimiento a PlanRVA según corresponda. La RRTPO opera sin distinción de raza, color, nacionalidad, ingresos, género, edad o discapacidad. Cualquier persona, o cualquier clase específica de personas, que crea que está siendo objeto de discriminación prohibida por el Título VI puede, por sí misma o por medio de un representante, presentar una queja por escrito ante el Coordinador del Título VI designado por la RRTPO. La queja debe presentarse a más tardar 180 días después de la fecha del supuesto hecho de discriminación. Comuníquese con el Coordinador del Título VI por teléfono al (804) 323-2033 para obtener más información. Las reuniones de la RRTPO se llevan a cabo en lugares accesibles y los materiales se pueden proporcionar en formatos accesibles y en idiomas distintos del inglés. Si desea accesibilidad o adaptaciones lingüísticas, comuníquese con el Coordinador del Título VI al (804) 323-2033. Si desea asistir a una función de RRTPO y necesita adaptaciones especiales, notifique a PlanRVA con 48 horas de anticipación.

VI may by themself/themselves or by representative file a written complaint with the RRTPO's designated Title VI Coordinator. A complaint must be filed no later than 180 days after the date of the alleged discrimination. Please contact the Title VI Coordinator via phone at (804) 323-2033 for more information. The RRTPO meetings are conducted in accessible locations and materials can be provided in accessible formats and in languages other than English. If you would like accessibility or language accommodation, please contact the Title VI Coordinator at (804) 323-2033. If you wish to attend a RRTPO function and require special accommodations, please give PlanRVA 48 hours' notice.

## 1c. Our Commitment

RRTPO and PlanRVA are guided by federal Title VI and EJ mandates, [\(still applicable?\)](#) and we strive not only to meet these mandates, but to create a planning process that is transparent and inclusive overall. As the designated Metropolitan Planning Organization for the Richmond region, RRTPO is committed to making Title VI and EJ [\(still applicable?\)](#) part of our planning process, integrated throughout our programs and plans, and serving as a guide for our public participation efforts. This Title VI Plan establishes a framework for our efforts to ensure compliance with Title VI and related statutes regarding nondiscrimination and EJ. [\(still applicable?\)](#)

Formatted: Spanish (Spain)

Formatted: Spanish (Spain)

Formatted: Spanish (Spain)

Field Code Changed

Formatted: Spanish (Spain)



Formatted: Spanish (Spain)



### 1c. Nuestro compromiso

RRTPO y PlanRVA se guían por los mandatos federales del Título VI y EJ, y nos esforzamos no solo por cumplir con estos mandatos, sino también por crear un proceso de planificación que sea transparente e inclusivo en general. Como la Organización de Planificación Metropolitana designada para la región de Richmond, RRTPO se compromete a hacer que el Título VI y EJ formen parte de nuestro proceso de planificación, integrados en todos nuestros programas y planes, y sirviendo como guía para nuestros esfuerzos de participación pública. Este Plan del Título VI establece un marco para nuestros esfuerzos para garantizar el cumplimiento del Título VI y los estatutos relacionados con respecto a la no discriminación y EJ.



Formatted: Spanish (Spain)

### 1d. What's Title VI?

The basic philosophy of Title VI of the Civil Rights Act of 1964 (Title VI) is that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance” (42 USC 2000d).

*“...no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”*

listing of discrimination on other grounds. Those laws include: 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324), which prohibits discrimination based on sex; Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, which provide protections for disabled persons; and the Age Discrimination Act of 1975, which applies to age.

In addition to Title VI, there are laws that prohibit discrimination on other grounds. Those laws include: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324), which prohibits discrimination based on sex; Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, which provide protections for disabled persons; and the Age Discrimination Act of 1975, which applies to age.

On February 11, 1994, President Clinton signed Executive Order 12898: Federal Action to Address Environmental Justice in Minority and Low-Income Populations. Its purpose is to focus federal attention on the environmental and human health effects of federal actions on minority and low-income populations. The goal of this Executive Order is to achieve environmental protection for all communities.

On August 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency. RRTPO, supported by PlanRVA, is required to examine the services we provide and identify any need for services to people who speak English as a second language. (revoked)

Deleted: Proficiency

# 1

## Timeline of laws that prohibit discrimination

Title VI also forbids intentional discrimination as well as disparate impact. Disparate impact is the adverse effect of a practice that unintentionally has a disproportionate effect on a group of people.

Learn more about RRTPO's Title VI compliance in Appendix E.

RRTPO regularly reviews information in the Title VI Plan to keep it up to date and formally updates the Title VI Plan every three years to

ensure compliance with Title VI requirements and other laws.

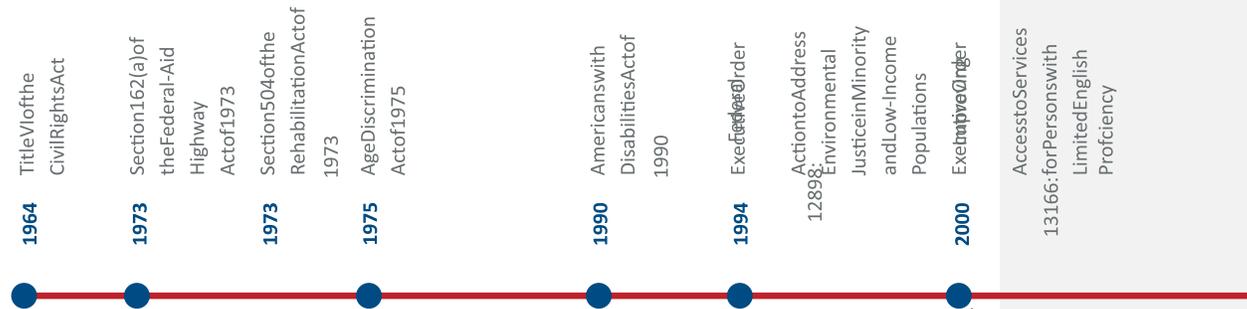
### 1e. How do you file a Title VI Complaint?

Any person who believes they—or a specific class of persons—were subject to discrimination on the basis of race, color, or national origin in RRTPO's programs and activities may file a Title VI complaint.

complaint is about as the recipient. must file the discrimination complaint Appendix D.

We refer to the person who submitted the discrimination complaint as the complainant and refer to the person/agency the complaint is about as the recipient. The complainant must file the discrimination complaint no later than 180 days after the date of the alleged act of discrimination.

Where there has been a continued course of conduct, the 180-day timeframe begins after the date on



- which that conduct stopped.
- In either case, the recipient or their designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for doing so.



### 1e. ¿Cómo se presenta una queja de Título VI?

Cualquier persona, o una clase específica de personas, que crea que fue objeto de discriminación por motivos de raza, color o nacionalidad en los programas y actividades de RRTPO pueden presentar una queja según el Título VI.

Nos referimos a la persona que presentó la queja por discriminación como el denunciante y nos referimos a la persona / agencia de la que se trata la queja como el destinatario.

El denunciante debe presentar la queja por discriminación a más tardar 180 días después de la fecha del presunto acto de discriminación.

- Cuando ha habido un curso de conducta continuo, el plazo de 180 días comienza después de la fecha en que cesó esa conducta.
- En cualquier caso, el destinatario o su designado puede extender el tiempo de presentación de la queja o renunciar al límite de tiempo para que se haga justicia, especificando por escrito la razón para hacerlo.

### Anyone filing a complaint can do so in the following ways: IN WRITING

#### i. On Paper:

1. To download the Complaint form from the PlanRVA website please click on the following link or copy and paste it into your web browser: [PlanRVA.org/TitleVI](http://PlanRVA.org/TitleVI)
2. To obtain a paper copy of the Complaint Form, you can:
  - a. Request a copy and postage-paid envelope by mail by emailing [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org)
  - b. Go to the PlanRVA Offices located at 424 Hull Street , Suite 300, Richmond, Virginia 23224.
3. Mail or deliver the completed form to:

Title VI Coordinator – Richmond Regional Transportation Planning Organization c/o PlanRVA  
424 Hull Street , Suite 300  
Richmond, VA 23224

Completed complaint forms can also be [e-mailed to TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org), to:

#### (804) 323-2033 ii. Electronically:

1. Through the PlanRVA Online Title VI Form. Click on the following link or copy and paste it into your web browser: [PlanRVA.org/TitleVI](http://PlanRVA.org/TitleVI)
2. The online form does not automatically file a formal complaint. Upon receipt of your completed form, PlanRVA's Title VI Coordinator will review your form and contact you to finalize the process.

Formatted: Spanish (Spain)

Formatted: Spanish (Spain)



### VERBALLY

1. If a person makes a verbal complaint of discrimination to an

Deleted:

Deleted: 35

of the recipient, the person shall be interviewed by the Title VI Coordinator

Deleted: faxed

2. If necessary, the Title VI Coordinator will assist the person in putting

1

the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.

Find a copy of RRTPO's Title VI Complaint Form in Section 1f.

Explore more information and resources at [PlanRVA.org](http://PlanRVA.org).

### Cualquiera que presente una queja puede hacerlo de las siguientes maneras:

#### POR ESCRITO

##### i. En papel:

1. Para descargar el formulario de queja del sitio web de PlanRVA, haga clic en el siguiente enlace o cópielo y péguelo en su navegador [webPlanRVA.org/TitleVI](http://webPlanRVA.org/TitleVI)
2. Para obtener una copia impresa del Formulario de queja, puede:
  - a. Solicitar una copia y un sobre con estampilla prepagada enviando un correo electrónico a [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org)
  - b. Acérquese a las oficinas de PlanRVA ubicadas en 9211 Forest Hill Avenue, Suite 200, Richmond, Virginia 23235

3. Envíe por correo o entregue el formulario diligenciado a:

Title VI Coordinator – Richmond Regional Transportation Planning Organization  
c/o PlanRVA  
9211 Forest Hill Avenue, Suite 200, Richmond, VA23235

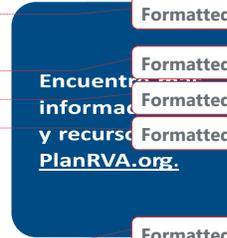
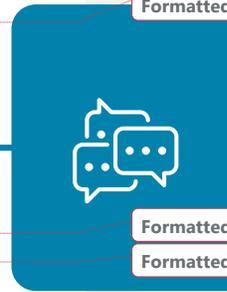
Los formularios de quejas diligenciados también se pueden enviar por fax al:  
(804) 323-2033

##### ii. Electrónicamente:

1. A través del formulario de Título VI en línea de PlanRVA. Haga clic en el siguiente enlace o cópielo y péguelo en su navegador de internet: [PlanRVA.org/TitleVI](http://PlanRVA.org/TitleVI)
2. El formulario en línea no presenta automáticamente una queja formal. Al recibir su formulario completo, el Coordinador del Título VI de PlanRVA revisará su formulario y se comunicará con usted para finalizar el proceso.

#### VERBALMENTE

1. Si una persona presenta una queja verbal de discriminación a un funcionario o empleado del destinatario, la persona será entrevistada por el Coordinador del Título VI.
2. Si es necesario, el Coordinador del Título VI ayudará a la persona a presentar la queja por escrito y enviará la versión escrita de la queja a la persona para que la firme. Luego, la queja se manejará de manera habitual.



Formatted: Spanish (Spain)

## What happens when a Title VI Complaint is filed?

As part of our commitment to ensuring adherence to Title VI and other nondiscrimination authorities, the RRTPO follows a detailed Discrimination Complaint Procedure.

1. **WITHIN 10 DAYS** the Title VI Coordinator shall:
  - a. acknowledge receipt of the allegation in writing
  - b. inform the complainant of action taken or proposed action to process the allegation
  - c. advise the respondent of their rights under Title VI and related statutes, and
  - d. advise the complainant of other avenues of redress available.
  
2. **WITHIN 10 DAYS** a letter will be sent to the appropriate state and federal transportation organizations. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator.
  - a. *What if it's a complaint against RRTPO?*
    - i. In that case, a state transportation department investigator will prepare a final investigative report and send it to the complainant, respondent (RRTPO person listed), the RRTPO Title VI Coordinator, and appropriate federal agency.
  
3. **WITHIN 60 DAYS** the Title VI Coordinator:
  - a. will conduct and complete an investigation of the allegation(s), and based on the information obtained,
  - b. will render a recommendation for action in a report of findings to the Executive Director of the recipient of federal assistance.
  - c. Note: The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
  
4. **WITHIN 90 DAYS** the Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter.
  - a. *What happens if the complainant is dissatisfied with the decision?*
    - i. The Title VI Coordinator will notify the complainant of their appeal rights with the state and federal transportation organizations along with the correspondence on the final decision.
  - b. *Who else is notified of the final decision?*
    - i. The Title VI Coordinator will also provide to the appropriate state transportation department a copy of the determination and report findings.
  - c. *What happens if the decision is turned over to a state or federal organization for further investigation?*
    - i. In this case, the Title VI Coordinator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations and policies and procedures of state transportation departments. At any time during the investigation, the complainant will be able to communicate with the Title VI coordinator.

RRTPO has not been subject of any Title VI investigations, complaints, or lawsuits between the 2015 Title VI Plan and the adoption of the 2021 Title VI Plan. [Need to confirm this statement](#)



## Title VI Complaint Form

Title VI Coordinator – Richmond Regional Transportation Planning Organization c/o PlanRVA  
4241 Hull Street , Suite 300  
Richmond, VA 23224

Please provide the following information in order to process your complaint. Assistance is available upon request by contacting the Title VI Coordinator Monday-Friday from 8:00 a.m. to 4:30 p.m. at (804) 323-2033.

<b>Section 1:</b>			
Name:			
Address:			
Phone (Home):		Phone (Mobile):	
Phone (Work):		Email:	
Accessible Format Requirements? (check all that apply):			
<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section 2:</b>			
Are you filing this complaint on your own behalf?		<input type="checkbox"/> Yes*	<input type="checkbox"/> No
*If you answered "yes", go to Section III.			
If you answered "no", please supply the name and relationship of the person for whom you are filing a complaint.		Name:	Relationship:
Please explain why you have filed for a third party:			
Please confirm you have obtained the permission of the third party.		<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section 3:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	
Date of Alleged Discrimination (MM/DD/YEAR):			

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) whom discriminated against you (if known), as well as the names and contact information of any witnesses. If more space is needed, please attach pages.

**Title VI Complaint Form**

Title VI Coordinator – Richmond Regional Transportation Planning Organization c/o PlanRVA  
 424 Hiull Street , Suite 300  
 Richmond, VA 23224

**Section 4:**

Have you preciously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

**Section 5:**

Have you filed this complaint with any other agency or court?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

If yes, check all that apply.

<input type="checkbox"/> Federal Agency:	<input type="checkbox"/> Federal Court:
--	---

<input type="checkbox"/> State Agency:	<input type="checkbox"/> State Court:
--	---------------------------------------

<input type="checkbox"/> Local Agency:
--

Please provide information about a contact person at the agency or court where the complaint was filed.

Agency/Court:

Address:

Contact Name:

Title:

Phone:

**Section 6:**

Agency the complaint is against:

Contact Name:
Title:
Phone:

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

Signature *(required)*

Date *(required)*

To download the Complaint form from the PlanRVA website please click on the following link or copy and paste it into your web browser: [PlanRVA.org/TitleVI](http://PlanRVA.org/TitleVI)

## Section 2. Getting to Know RRTPO

### 2a. Overview of RRTPO

What is an MPO? A Metropolitan Planning Organization (MPO) is an organization in charge of transportation planning and policy for areas with a collective population of 50,000 or more. The responsibility of an MPO is to provide comprehensive, cooperative, and continuing transportation planning for the safe and efficient movement of people and goods throughout the region. The policies created through the MPO are consistent with the region's overall economic, social, and environmental goals and seek to provide equal access to a variety of transportation choices.

**What is the Richmond Regional Transportation Planning Organization?** The Richmond Regional Transportation Planning Organization (RRTPO) coordinates transportation plans and policies as the MPO for the Richmond region. The RRTPO covers nine local jurisdictions including the Town of Ashland, the counties of Charles City, Chesterfield, Goochland, Hanover, Henrico, New Kent, and Powhatan, and the City of Richmond.

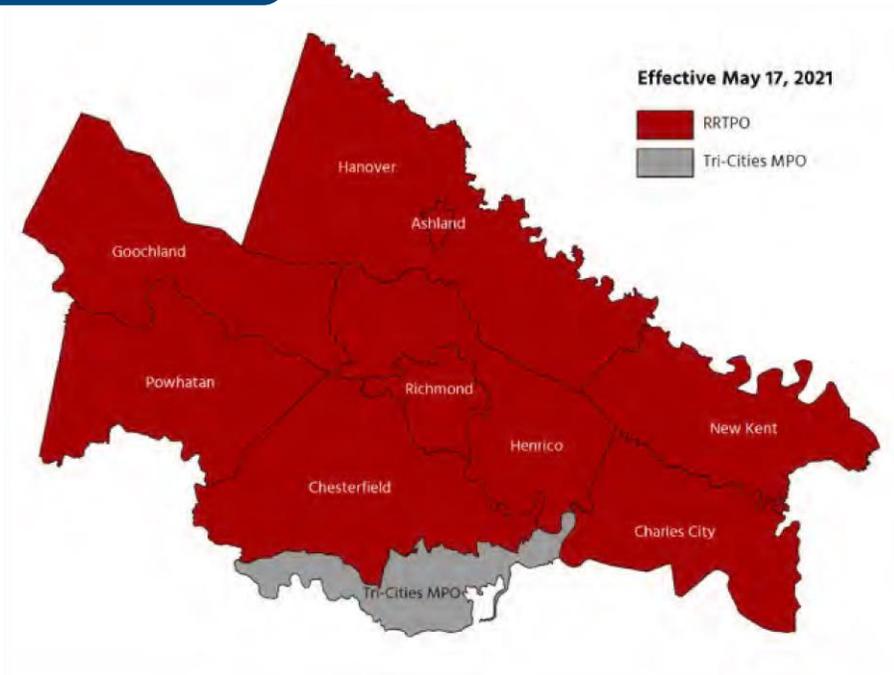
Deleted:



RRTPO is supported by the Richmond Regional Planning District Commission (PlanRVA).



See more in Appendix F.  
Glossary of Terms



Page

# 2

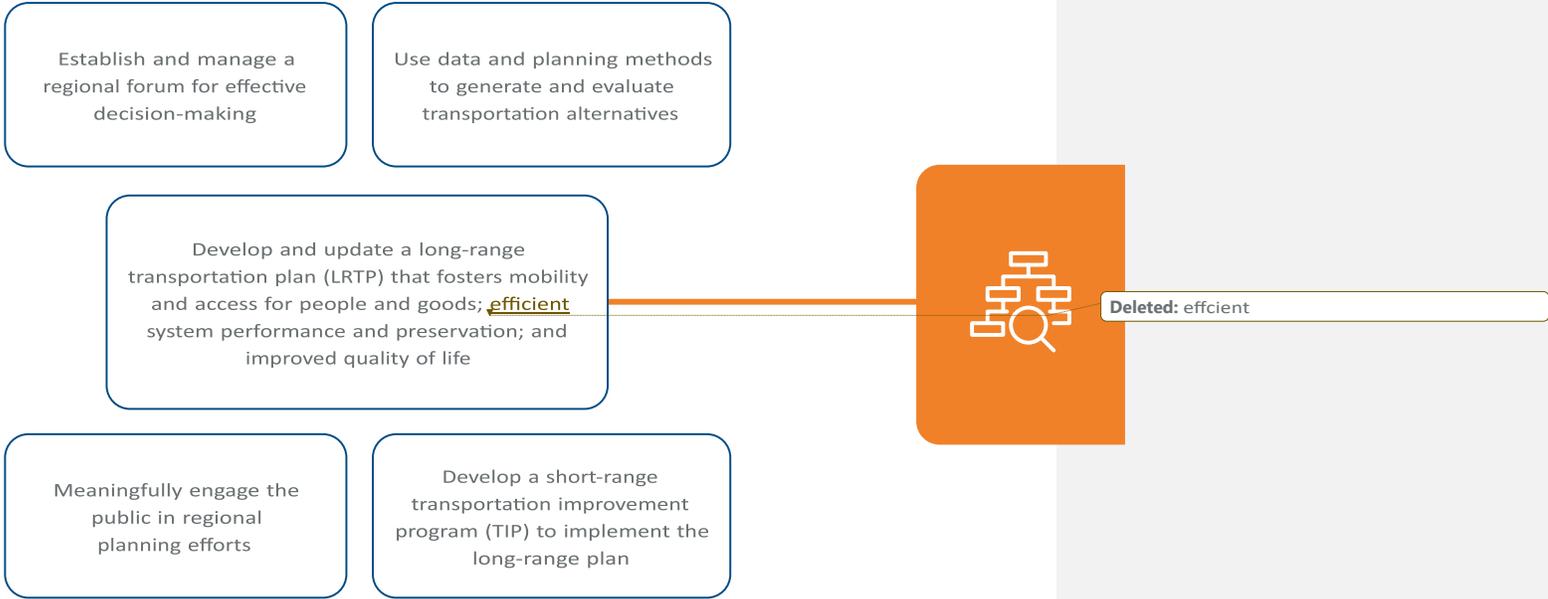
**What is the relationship between RRTPO and PlanRVA?** PlanRVA provides staff support to several affiliate organizations and entities with a similar mission of planning for and carrying out the vision for the Richmond region's continued growth and prosperity. One of the primary entities to which PlanRVA provides support is the RRTPO, the federally designated MPO for the Richmond Region.

While it's important to note that the decision-making process for transportation planning priorities and investments is made at the sole discretion of the RRTPO's Policy Board, PlanRVA assumes the administrative responsibility for assuring compliance with all local, state, and federal requirements of the program and operating in a manner necessary to fulfill these requirements.

As such, PlanRVA's Executive Director is responsible for ensuring implementation of the RRTPO's Title VI program and serves as its Title VI Coordinator, coordinating the overall administration of the Title VI program, plan, and assurances. The Executive Director is responsible for ensuring that PlanRVA staff supporting the RRTPO understand and adhere to Title VI requirements.

**Learn more in Section 3a. Title VI Coordinator, Role, Responsibilities.**

**The RRTPO's Core Functions are to:**



## 2b. Mission, Vision, Values, and Key Contacts

**Our Mission:** To provide an independent yet cooperative forum for regional transportation planning and direct the allocation of annual federal transportation funding to support fair transportation options for all.



Deleted: equitable

**Our Vision:** Our work will reliably and safely connect people, prioritize more just opportunities for all to thrive and live healthy lives, promote a strong economy, and respect environmental stewardship.

Deleted: equitable

**Our Values:**

- Transportation decisions must be made on a regional level because people and goods cross jurisdictional boundaries every day.
- Safe and reliable transportation should be available to all regardless of their race, gender, age, ability, or socioeconomic status.
- Transportation is an essential part of our community. Transportation planning should lead to safer, smarter, faster, and more convenient options for the Richmond region.
- The best plans come from regional collaboration and meaningful engagement with the people who will be most impacted, and the best solutions are those that provide a system of integrated travel modes that are balanced among the environmental, economic, and community development goals of our region.

**Key Contacts:**

For RRTPO Questions and Concerns:  
 Myles Busching  
 RRTPO Secretary  
 PlanRVA Director of Transportation  
[mbusching@PlanRVA.org](mailto:mbusching@PlanRVA.org)

For Title VI Questions and Concerns:  
 Martha Heeter  
 PlanRVA Executive Director and designated Title VI Coordinator  
[TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org)

Explore more information and resources at [PlanRVA](#).

## 2c. Organizational Structure

The RRTPO is overseen by:

# 2

- **Policy Board** is made up of elected officials from each of the nine jurisdictions as well as representatives from the Capital Region Airport Commission, Greater Richmond Transit Company (GRTC) Transit System, Richmond Metropolitan Transportation Authority, and the Virginia Secretary of Transportation. The governing board also includes the following nonvoting member agencies and organizations: Federal Highway Administration, Federal Transit Administration, RideFinders, Virginia Department of Aviation, Department of Rail and Public Transportation, and the RRTPO Community Transportation Advisory Committee chairman.
- **Executive Committee** is a subset of the Policy Board, made up of elected officials from each of the nine jurisdictions.
- **Technical Advisory Committee (TAC)** made up of technically qualified representatives of member localities and agencies responsible for planning, maintaining, controlling, developing, and improving the transportation system within the Richmond region.
- **Community Transportation Advisory Committee (CTAC)** made up of citizen representatives of RRTPO jurisdictions and community organizations as designated by the RRTPO board.

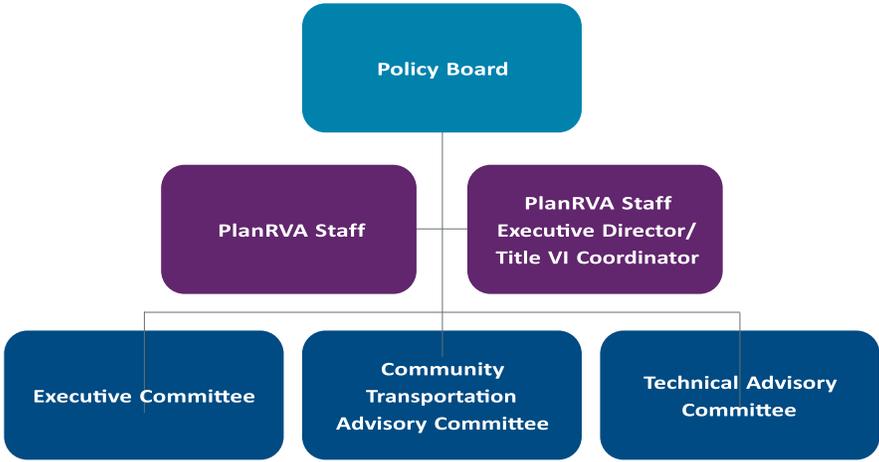


**Deleted:** qualified

**Deleted:** with a focus on equity, inclusion, and community diversity.

Learn more in Section 3a. Title VI Coordinator, Role, Responsibilities.

PlanRVA provides staff support to RRTPO for the development of transportation plans and programs. PlanRVA's Executive Director also oversees the administration of the Title VI program for the RRTPO.



When considering appointments to committees, maintaining a varied group of individuals is a priority of the RRTPO. PlanRVA staff, in support of RRTPO, work with the Policy Board to ensure they are aware of community members of various races and ethnicities who may have an interest in serving on the Community Technical Advisory Committee and understand the importance of having committees that are representative of the Richmond region's various populations. Staff also work proactively with community-based organizations and departments across the nine localities to identify minority individuals memb who have expertise or an interest in transportation and ethnicity in Appendix C. make the names of those individuals available to the Board for possible appointment to committees.

Deleted: diverse

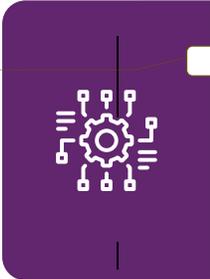
Deleted: diverse

### 2d. Title VI Program Responsibilities

The following is a list of general Title VI responsibilities that are applicable to all RRTPO program areas. The Title VI Coordinator is responsible for ensuring that these elements are appropriately implemented and maintained.

1. Data Collection Statistical data on race, ethnicity, Limited English Proficiency (LEP) (delet this modifier?), and other population groups will be collected on a regular basis.
  - a. The process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements

Deleted: Proficiency



#### Learn more about the role of the Title VI Coordinator in Section 3

of the Title VI program, conducting EJ analyses, (delete this reference?) and guiding public participation efforts.

2. Disseminate Information Related to the Title VI Program
  - a. Information on the Title VI program is to be disseminated to staff, subrecipients, and beneficiaries, as well as to the public.

#### Read more about RRTPO's commitment to Environmental Justice and LEP persons in Section 4

- b. (delete heading above?)
3. Audit by Virginia DOT and/or Federal Partners on Title VI Compliance
  - a. As required, RRTPO and PlanRVA will participate in Title VI and EJ audits (delete?) conducted by the

#### Learn more about Staff Training and Sub Recipient Processes in Section 3

- Virginia DOT and/or federal planning partners.
4. Title VI Statement
  - a. This text will remain permanently on the PlanRVA website, PlanRVA.org, as well as in publications and other public documents:

RRTPO fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The RRTPO will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. For more information on meeting accessibility or to obtain a Title VI Complaint Form, email [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org) or call the Title VI Coordinator at (804) 323- 2033.

5. Complaints

- a. Any individual may exercise their right to file a complaint or have a legal representative file a claim on their behalf, if that person believes that they or any other program beneficiaries have been subjected to unequal treatment or discrimination on the grounds of race, color, national origin, sex, or disability in any program administered by RRTPO, PlanRVA, and/or its sub-recipients, consultants, or contractors.

See the Title VI Complaint Procedure and Form in Section 1.

Deleted: diverse and inclusive

## 2e. Program Areas and Processes

The following are a selection of RRTPO’s major program areas that reflect Title VI and Environmental Justice (EJ) ~~issues~~ most clearly, as well as the recent steps taken to ensure nondiscrimination and to foster a more encompassing process.

### Unified Planning Work Program (UPWP)

A complete listing of RRTPO’s projects and programs can be found in the Unified Planning Work Program. The UPWP details the planning tasks and studies to be conducted, any transportation-related air quality planning tasks, all federally funded studies, state/local planning activities conducted without federal funds, funding sources, identified for each project, a schedule of activities, and who the responsible party is for each task/study.



Deleted: identified

### Long-Range Transportation Plan (LRTP)

RRTPO scheduled and planned the LRTP process to achieve adoption by October 2021. We assembled the Advisory Committee (AC) to oversee the development of the plan and created naming and brand identity for the LRTP – ConnectRVA 2045. We crafted a specific ConnectRVA 2045 outreach plan to engage and educate the public throughout the process and developed a unique website to host public engagement tools and share information and data. This outreach helped identify transportation-related issues that impact travel in the region and uniform needs that should be addressed in the planning process. In response, the RRTPO began development on the universe of projects that address identified needs and the development of the project prioritization process.

### Transportation Improvement Program (TIP)

The TIP, the agreed-upon list of priority projects for the region, manages funding for the reconstruction, improvement, and expansion of the region’s transportation system. The TIP lists all capital projects that are federally and state funded. It includes traditional highway and public transit projects, as well as bicycle-, pedestrian-, and freight-related projects. The RRTPO recently developed and adopted the FY21-24 TIP with a focus on insight from impacted citizens. (update adoption date?)

### Transportation Planning Organization (TPO) Citizen Participation

RRTPO developed an all-new Public Engagement Plan to allow RRTPO to be flexible in how stakeholders can participate in the planning practice. We strengthened the role of the Community Transportation Advisory Committee (CTAC) and grew its ability to advise other RRTPO committees and the public. We included a greater focus on public engagement on the [PlanRVA.org website](http://PlanRVA.org) and fully embraced the use of ESRI Storymaps to communicate project work.

In addition to the general responsibilities listed in Section 2D, the RRTPO, staffed and supported by PlanRVA, will work to evaluate and monitor compliance with Title VI requirements in these activities by:

- Preparing and updating a demographic profile of the region using the most current and appropriate statistical information available on race, income, and other pertinent data,
- Making the data available to the public and member agencies on PlanRVA’s website and in other formats by request,
- Analyzing the data and information collected and eliminating discrimination if found, and
- Continuing to work to guarantee that all residents in the region are represented in the planning process.

### 2f. Data Collection Process

Studying the changes in demographic data over time helps us measure the impacts of decisions. We can see where historical investments have been made and analyze whether they improved the efficient movement of people and goods, expanded financial opportunity, and improved safety for the traveling public.

RRTPO analyzes compiled data:

- To ensure the level and quality of transportation service is provided without regard to race, color, or national origin.
- To avoid or minimize high and adverse human health and environmental effects on low income and minority populations.
- To ensure the full and fair participation by low income and minority populations.
- To prevent the denial of benefits to low income and minority populations.
- To ensure meaningful access to programs and activities by persons with limited English proficiency. [\(delete?\)](#)

Collected and analyzed data is used as the basis for all RRTPO programs.

### 2g. Community Characteristics and Analysis

Thinking long-term when it comes to transportation planning for the Richmond Region can be difficult, but data helps tell the story.

Needs can be quantified through demographic information, tying data like population and employment to geography. It helps us identify underserved populations, such as minority populations, LEP populations, [\(delete?\)](#) low-income communities, and those with limited education.

The socioeconomic data for this Title VI Plan was collected through decennial census counts from the U.S. Census Bureau, American Community Survey data, Socioeconomic Data Report for the 2017 Base Year, the PlanRVA 2045 Forecast Year Report and similar sources related to the urban transportation planning process.



Learn more about the Dissemination of Public Information in Section 4.

Deleted:

**Demographic information for the Richmond Region Limited English Proficiency found Minority and Low-Income populations along with special populations**

**Demographic Profile**

Disadvantaged groups highlighted in the Region’s Title VI demographic profile include: the social planning factors for

including Individuals with Disabilities, Zero Car Households, Elderly populations, Limited English Proficiency (LEP) (delete?) populations, and Tribal Nations. The datasets for each category were accessed from 2013-2017 American Community Survey 5-Year Estimates from the U.S. Census Bureau.

**Minority Populations**

Minority populations are defined by the U.S. Census as persons who identify themselves as Black or African American, American Indian, and Alaska Native, Asian, Hawaiian, and Other Pacific Islanders, Hispanic or Latino and Native, Some other race alone, and Two or More races. In other words, Minority Population includes all people who have not identified themselves as White (Non- Hispanic or Latino and Single Race Alone) in U.S. Census race and ethnicity questions. The average percentage of minority population within the Richmond Region is 41.4 percent as of 2017 and the total minority population was 440,000. The Black or African American population makes up 70 percent of the total minority population. Hispanic or Latino of any race is the second largest minority population group with 65,000 people, or 15 percent of the total.

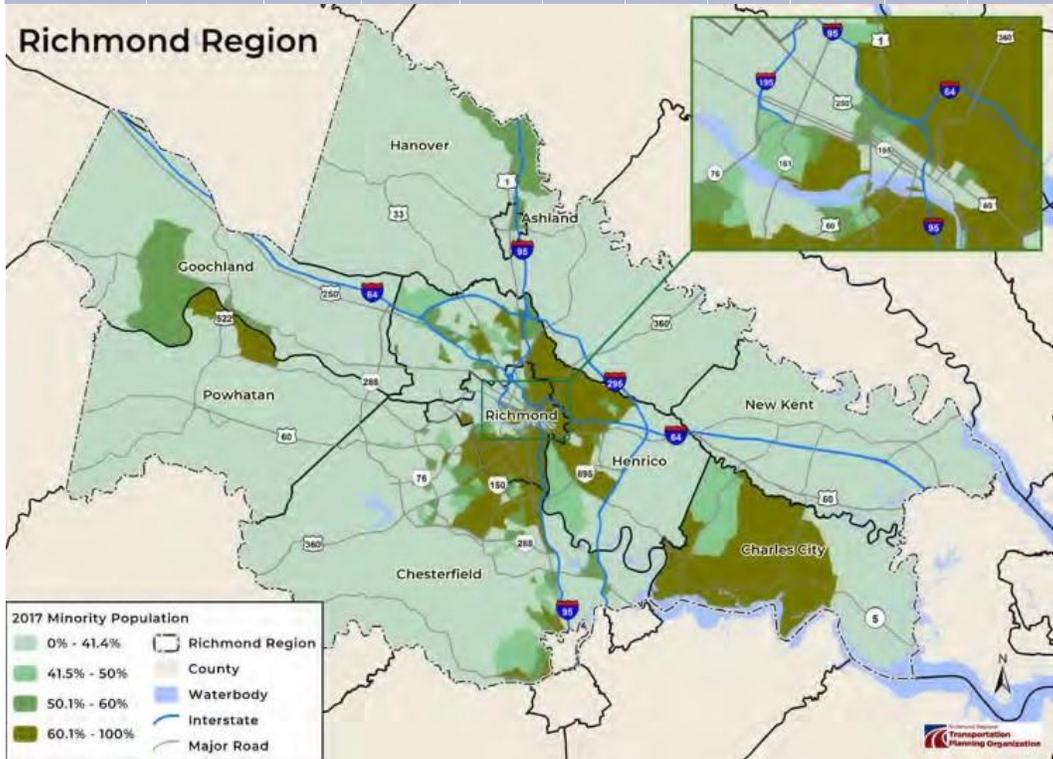


Richmond Region Population by Race by Locality 2017

Jurisdiction	Total Population	Not Hispanic or Latino and Single Race Alone							Hispanic/Latino	Minority
		White	Black or African American	American Indian and Alaskan Native	Asian	Native Hawaiian and other Pacific Islander	Some other race alone	Two or more races		
Charles City	7,022	2,915	3,224	456	62	-	13	226	126	4,107
		41.5%	45.9%	6.5%	0.9%	0.0%	0.2%	3.2%	1.8%	58.5%
Chesterfield	335,594	210,795	75,068	747	11,562	85	942	8,711	27,684	124,799
		62.8%	22.4%	0.2%	3.4%	0.0%	0.3%	2.6%	8.2%	37.2%
Goochland	22,148	17,186	3,642	40	261	-	44	407	568	4,962
		77.6%	16.4%	0.2%	1.2%	0.0%	0.2%	1.8%	2.6%	22.4%
Hanover	103,218	87,131	9,331	150	1,537	25	132	2,026	2,886	16,087
		84.4%	9.0%	0.1%	1.5%	0.0%	0.1%	2.0%	2.8%	15.6%
Henrico	324,073	175,647	95,051	596	25,782	141	811	8,489	17,556	148,426
		54.2%	29.3%	0.2%	8.0%	0.0%	0.3%	2.6%	5.4%	45.8%
New Kent	20,523	16,326	2,336	185	203	-	32	843	598	4,197
		79.5%	11.4%	0.9%	1.0%	0.0%	0.2%	4.1%	2.9%	20.5%

# 2

Powhatan	28,364	23,989	3,135	80	76	27	19	464	574	4,375
		84.6%	11.1%	0.3%	0.3%	0.1%	0.1%	1.6%	2.0%	15.4%
		88,320	105,878	356	4,552	32	518	6,893	14,343	132,572
Richmond	220,892	40.0%	47.9%	0.2%	2.1%	0.0%	0.2%	3.1%	6.5%	60.0%
Region	1,061,834	622,309	297,665	2,610	4,035	310	2,511	28,059	64,335	439,525
		58.6%	28.0%	0.2%	4.1%	0.0%	0.2%	2.6%	6.1%	41.4%



The map above illustrates minority population concentration areas at block group level. The areas with the highest concentration appear in Richmond City, eastern Henrico County, northwestern Chesterfield County, a small portion of northern Hanover County, and Charles City County.

For the localities, three minority population percentages are higher than the region’s average including Charles City County, Henrico County, and Richmond City. Richmond City and Charles City County have two of the highest minority population percentages, at roughly 60 percent. Henrico County has the largest minority

population, close to 150,000 people. Hanover County and Powhatan County have the lowest percentages of minority populations at approximately 15 percent.

RRTPO also uses the minority population data and other data sets to analyze the potential impacts of the distribution of state and federal funds.

**Low-Income Populations**

The average percentage of the population classified as being low income or falling below the poverty level in the Richmond Region is 11.62 percent. Richmond City has 53,000 people whose income in the past 12 months was below poverty level and has the highest poverty percentage in the region, 25 percent. Charles City County is another locality which has a higher poverty percentage than the regional level, 900 residents, or 13 percent. Henrico County has the second largest poverty population with 33,510 people, about 10 percent.

**Richmond Region Population Living in Poverty by Locality 2017**

Jurisdiction	Total Population <sup>1</sup>	Income in the past 12 months below poverty level	Percentage
Charles City	6,994	923	13.2%
<del>Chesterfield</del>	331,055	23,707	7.2%
Goochland	20,998	1,120	5.3%
Hanover	101,303	5,832	5.8%
Henrico	321,074	33,510	10.4%
New Kent	19,899	1,017	5.1%
Powhatan	25,725	1,423	5.5%
Richmond	210,151	52,942	25.2%
<b>Region</b>	<b>1,037,199</b>	<b>120,474</b>	<b>11.6%</b>

Deleted: Chesterfield

Household Median Income by locality is also used as a supplemental source to measure income levels. Since the Household Median Income of the Richmond Region is not directly available, the weighted mean of household median income by each locality was calculated. This amount is \$67,000. Charles City County, Henrico County and the City of Richmond are below this weighted mean.

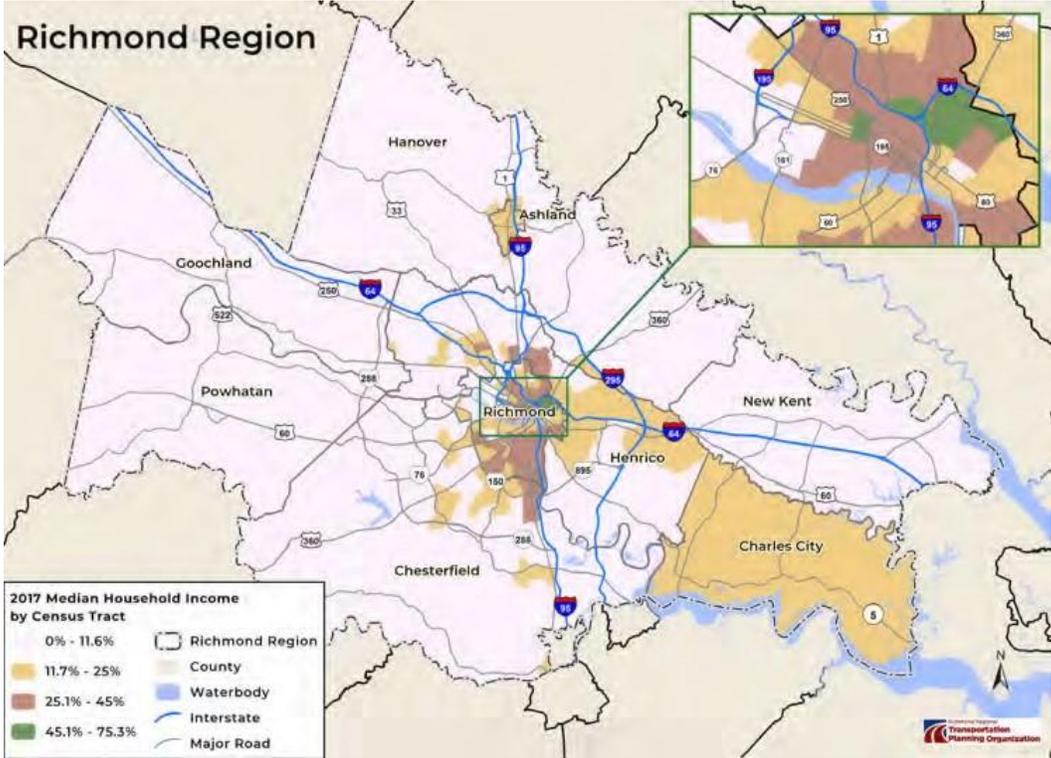
**Richmond Region Median Household Income by Locality 2017**

Jurisdiction	Total Households <sup>1</sup>	Household Median Income
Charles City	2,899	\$55,069
<del>Chesterfield</del>	120,907	\$76,969
Goochland	8,257	\$86,652
Hanover	38,208	\$84,955
Henrico	126,115	\$66,447
New Kent	7,555	\$78,429

Deleted: Chesterfield

Powhatan	9,974	\$80,441
Richmond	89,238	\$42,356
<b>Region</b>	<b>NA</b>	<b>\$ 66,927*</b>

\* Households for whom median household income in the past 12 months (in 2017 inflation-adjusted dollars) is determined



The map above shows how the low-income population is distributed in the region. The highest concentrations are in the central part of the City of Richmond, eastern Henrico County, the Town of Ashland, and Charles City County. **Individuals with Disabilities**

Disability Status is one of the crucial indicators to measure where the special transportation services are needed the most including public transit, paratransit, and services by other providers. The percentage of persons with at least one disability is around 11.6 percent for the region. Of the 121,000 persons with a disability, 90 percent live in Chesterfield County, Henrico County, and Richmond City.

Individuals with Disabilities by Locality Relative to Region 2017

Jurisdiction	Total Population <sup>1</sup>	Persons with a Disability	Percentage
Charles City	7,009	1,153	16.5%
Chesterfield	333,209	33,818	10.1%
Goochland	20,993	2,441	11.6%
Hanover	102,592	9,879	9.6%
Henrico	321,871	35,465	11.0%
New Kent	19,979	2,040	10.2%
Powhatan	25,757	2,661	10.3%
Richmond	218,218	33,923	15.5%
<b>Region</b>	<b>1,049,628</b>	<b>121,380</b>	<b>11.6%</b>



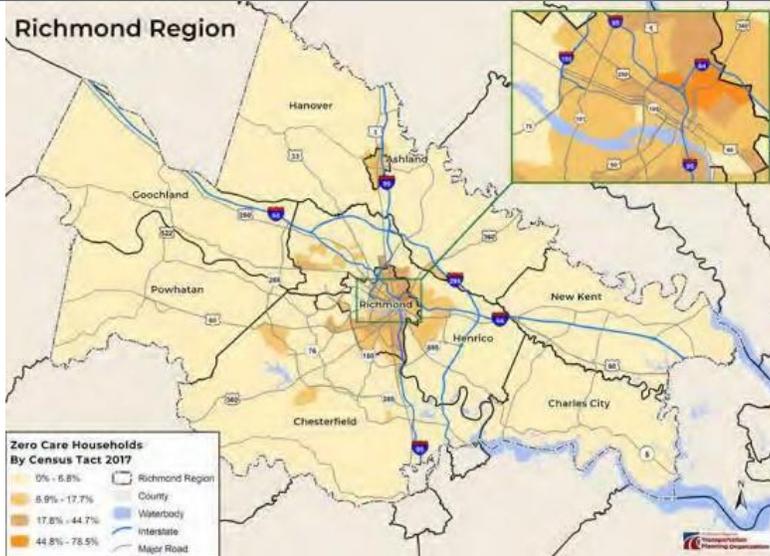
The map above indicates the areas with highest disability percentages are located along the boundary of Richmond City, eastern Henrico County, Charles City County, the Town of Ashland, western Goochland County and Powhatan County.

**Zero-Car Households**

Around 27,000 of the total 403,000 households in the Richmond region do not own a vehicle, an average regional percentage of Zero-Car Household of 6.8 percent. Richmond City has the highest proportion of zero-car households, at 15,000 households, or 16.9 percent. In addition to the limited financial capability for car ownership, residents of the City of Richmond have the opportunity for access to more transportation choices.

**Richmond Region Zero Car Households by Locality 2017**

Jurisdiction	Total Households <sup>1</sup>	Zero Car Households	Percentage of Zero Car Households
Charles City	2,899	131	4.5%
Chesterfield	120,907	3,497	2.9%
Goochland	8,257	169	2.0%
Hanover	38,208	1,174	3.1%
Henrico	126,115	7,042	5.6%
New Kent	7,555	173	2.3%
Powhatan	9,974	112	1.1%
Richmond	89,238	15,092	16.9%
<b>Region</b>	<b>403,153</b>	<b>27,390</b>	<b>6.8%</b>



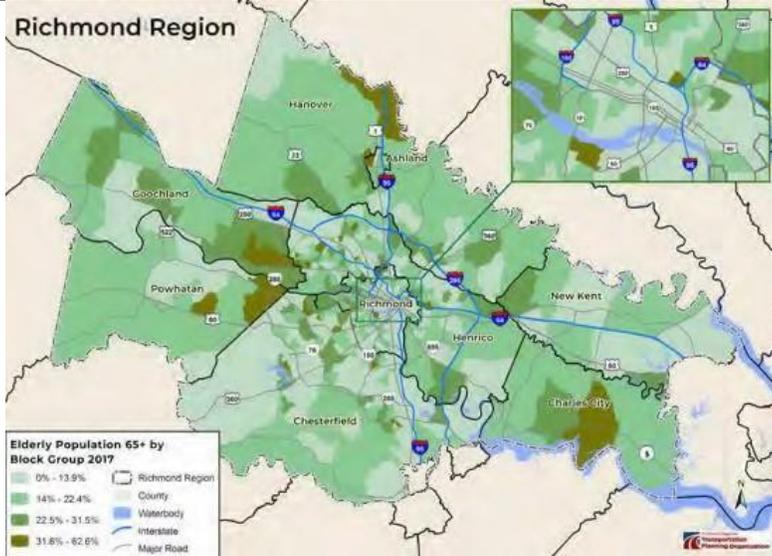
*The map above indicates that the City of Richmond and Town of Ashland have the highest proportion of Zero-Car Households.*

**Elderly Population**

The population older than 65 years in the region was nearly 148,000 people in 2017 and the average elderly population in 2017 was 13.9 percent of the region, which is slightly higher than it was in 2013. Except for Chesterfield County and Richmond City with younger population, all other localities' elderly population percentages exceed the regional average. The rural counties including Charles City County and Goochland County have a population with 20 percent in the elderly cohort.

**Richmond Region Elderly Population (Age ≥ 65) by Locality 2017**

Jurisdiction	Total Population <sup>1</sup>	Population for Age ≥ 65	Age ≥ 65 %
Charles City	7,022	1,546	22.0%
Chesterfield	335,594	44,886	13.4%
Goochland	22,148	4,428	20.0%
Hanover	103,218	16,526	16.0%
Henrico	324,073	45,872	14.2%
New Kent	20,523	3,260	15.9%
Powhatan	28,364	4,688	16.5%
Richmond	220,892	26,622	12.1%
<b>Region</b>	<b>1,061,834</b>	<b>147,828</b>	<b>13.9%</b>



The map above illustrates the elderly population distribution around the region. The highest concentration area of elderly population is mainly in the rural area of the region.

**Tribal Coordination**

The Richmond Region is home to the Pamunkey Indian Tribe, the Chickahominy Indian Tribe, and the Chickahominy Indians - Eastern Division. PlanRVA is committed to encompassing and culturally sensitive tribal outreach. PlanRVA undertakes every effort to incorporate Tribal input in the planning process and to assure appropriate connections are made within the urban transportation planning process and inclusion in matters addressed by the RRTPO.

Deleted: inclusive

**Mobility Needs Assessment**

In developing RRTPO's Public Engagement Plan and planning activities, RRTPO seeks out and considers the needs of those traditionally underserved by existing transportation systems, including minorities.

All minority and underserved populations will represent a major consideration for future transportation investments that effectively address inequitable access to jobs, community services, and other destinations throughout the region. A balanced project evaluation methodology is being developed as part of RRTPO's latest long-range transportation planning process (ConnectRVA 2045) carefully considering all factors as they relate to each other and provide indications of the degree of impact on specific marginalized populations.

- Deleted: Equity-based
- Deleted: criterion
- Deleted: EJ
- Deleted: and other equity considerations
- Deleted: potential to benefit
- Deleted: specific

The RRTPO organization includes a standing Community Transportation Advisory Committee (CTAC) appointed by the RRTPO board.

The CTAC membership includes representation from all the RRTPO local jurisdictions and community organizations, including an Equity Work Group (have we changed the name of this group?) reflecting consumers and organizations representing seniors, individuals with disabilities, persons with low income and all persons that are transportation disadvantaged. Engagement with CTAC provides an opportunity for citizens and interested parties to inform and advise the RRTPO on plans, studies, issues, and other matters related to the planning of transportation systems and services.

**Learn more in Section 2c Organizational Structure.**

RRTPO strives to include all stakeholders, including protected classes, in its planning activities.

**Analysis of Disparate Impact (does this section need to come out?)**

Taken as a whole, the transportation planning services provided by RRTPO do not pose disproportionate or adverse impacts on minority and low-income populations.

RRTPO also evaluates Title VI and Environmental Justice (delete?) by understanding the geographic distribution of funding relative to equity areas. This input is paired with public participation feedback on specific projects to evaluate potential impacts to specific communities.

This process includes:

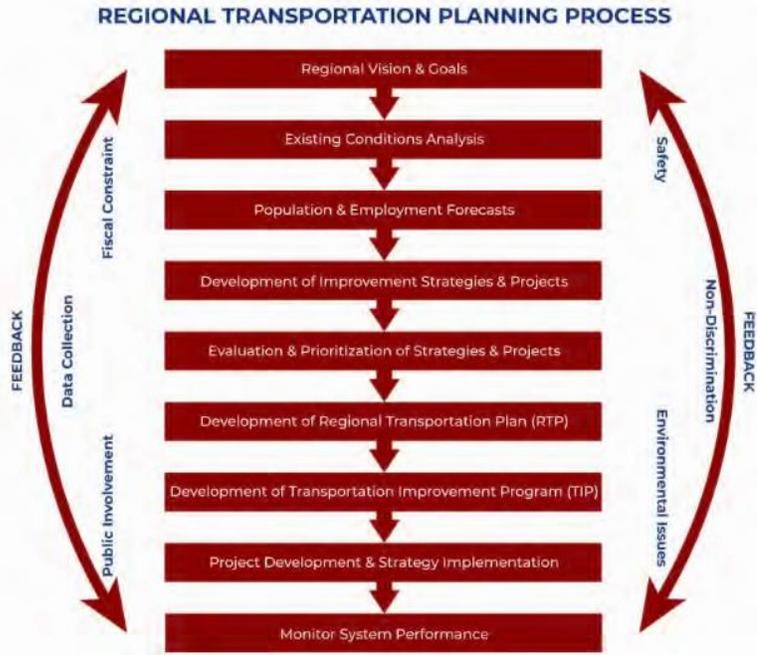
- Creating maps to identify low-income and minority populations, among other protected population groups, within the project's study area.

2

- Incorporating income information to assess the impacts of existing and planned transportation system investments on low-income populations and minority populations.
- Strengthening outreach efforts in the communities most directly impacted by transportation projects.

RRTPO actively considers and promotes Environmental Justice within projects and groups of projects, across comprehensive plans, and in policy decisions.

(delete this sentence?)



Learn more about RRTPO’s commitment to Environmental Justice in Section 4b.



## Section 3. How RRTPO Facilitates Nondiscrimination

### 3a. Title VI Coordinator, Role, Responsibilities

The PlanRVA Executive Director is responsible for ensuring implementation of the RRTPO's Title VI Plan. The Title VI Coordinator, is generally responsible for coordinating the overall administration of the Title VI Plan and assurances and overseeing compliance with applicable nondiscrimination authorities in each of the metropolitan transportation planning and programming areas. Other staff assist the Title VI Coordinator in conducting this work.

**Deleted:** under supervision of the Executive Director,

On December 16, 2015, Martha Heeter was designated as the Title VI Coordinator for RRTPO, as well as all other PlanRVA supported programs.

General responsibilities of the designated Title VI Coordinator include:

- Identifying, investigating, and mitigating instances or patterns of discrimination when found to exist

For any questions or issues, please contact our Title VI Coordinator:

Martha Heeter  
 Executive Director & Title VI Coordinator  
 TitleVI@PlanRVA.org  
 (804) 323-2033



- Processing discrimination complaints received by the RRTPO
- Meeting with appropriate staff members to monitor and discuss progress, implementation, and compliance issues related to the RRTPO Title VI Plan
- Periodically reviewing the RRTPO's Title VI Plan to assess whether administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance

**For the complaint process and form, see Section 1.**

- Working with staff involved with consultant contracts to ensure contracts are solicited in accordance with federal and state laws and regulations and that contracts awarded include appropriate language on non-discrimination requirements

Page

# 3

- Working with staff to monitor consultants and, in cases of Title VI deficiencies, to investigate, resolve, and implement a remedial action plan
- Assessing communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs, as appropriate
- Developing and maintaining a contact list of interpretation and translation service providers (as a supplement to currently available staff resources for conducting needed interpretation and translation services)
- Maintaining and updating the Title VI Plan every three years and disseminating it to appropriate parties including the RRTPO board, committees, staff, and to the general public through PlanRVA's website
- Coordinating with appropriate federal, state, and regional entities to periodically provide PlanRVA employees (i.e., RRTPO assigned staff) with training opportunities regarding nondiscrimination and Title VI
- Reviewing important nondiscrimination-related issues as needed

The Title VI Coordinator, with staff support, is responsible for ensuring that all elements of the Title VI Plan are appropriately implemented and maintained. If this information is needed in another language or if there are questions about the information contained within this document, please contact Martha Heeter, Title VI Coordinator, at [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org) or (804) 323-2033.

### 3b. Staff Training

PlanRVA provides staff support to several affiliate organizations and entities with a similar mission of planning for and carrying out the vision for the Richmond Region's continued growth and prosperity, including RRTPO. That means when it comes to training staff on Title VI compliance, PlanRVA ensures that:

- Staff are provided with self-directed and on-demand access to Title VI training and development opportunities throughout their employment. Wherever possible, PlanRVA leverages the Virginia Department of Transportation (VDOT), the Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA) existing resources on Title VI.
- Staff take advantage of any additional available Title VI training opportunities provided by the Virginia Department of Transportation (VDOT), the Federal Highway Administration (FHWA), and/or the Federal Transit Administration (FTA). Active participation in any and all available training opportunities is not just encouraged but required.
- The Title VI Coordinator is accessible for staff for any questions or concerns related to Title VI training and development.
- Every member of staff has access to the RRTPO Title VI Plan for continued reference throughout their employment.
- RRTPO hosts at least one annual Title VI training event for staff, board, and committees.
- RRTPO provides additional training as needed for staff, board, and committees.

Deleted: o



Deleted: equity-focused

### 3c. Annual Review and Reporting Processes

The designated Title VI Coordinator employs the following process to review PlanRVA’s directives, policies, and practices, specifically regarding the RRTPO and Title VI compliance:

- The Title VI Coordinator is included in the review process when PlanRVA and RRTPO directives are drafted and polices implemented. This gives the Title VI Coordinator an opportunity to review any possible Title VI issues ahead of implementation.
- The Title VI Coordinator advises staff working with the RRTPO’s decision-making committees to ensure directives are in accordance with the federal and state nondiscrimination laws, rules, and regulations.
- The Title VI Coordinator works to review documents, materials, and public meeting transcripts, to ensure staff is aware of any potential Title VI issues.
- The Title VI Coordinator works cooperatively with FHWA Division Civil Rights staff to implement federal nondiscrimination directives.

For any questions or issues, please contact our Title VI Coordinator:

Martha Heeter  
 Executive Director & Title VI Coordinator  
 TitleVI@PlanRVA.org  
 (804) 323-2033



### 3d. Sub-Recipient Review and Processes

PlanRVA, on behalf of the RRTPO, will conduct Title VI compliance reviews and monitoring of its sub-recipients of federal-aid highway or other federal funds, including consultants and contractors, to ensure adherence to Title VI requirements.

PlanRVA is responsible for selection, negotiation, and administration of consultant contracts that may be required during RRTPO’s urban transportation planning work. PlanRVA operates under its internal contract procedures as well as all relevant federal and state laws. PlanRVA will periodically review operational guidelines provided to consultants, contractors, and sub-recipients, including Title VI language, provisions, and related requirements, as applicable.

The designated Title VI Coordinator is responsible for evaluating and monitoring compliance with nondiscrimination authorities in all aspects of the agency’s consultant contracts process.

The Coordinator will:

- Ensure inclusion of specific Title VI nondiscrimination language in contracts and Requests for Proposals (RFPs).
- Review consultants for compliance: o Ensure that all consultants verify their compliance with nondiscrimination authorities, procedures, and requirements.

### 3

o If a recipient or sub-recipients is found to be not in compliance with nondiscrimination authorities, the Title VI Coordinator and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and write a remedial action if necessary.

o Review outreach activities to ensure small, disadvantaged, minority, women, and veterans with disabilities businesses have the opportunity to compete for consulting contracts.(delete this point?)

If irregularities occur at sub-recipient levels, PlanRVA will take corrective action to resolve the identified Title VI issues. PlanRVA will seek the cooperation of the consultant, contractor, or other sub-recipient in correcting deficiencies found during periodic reviews and will provide technical assistance and guidance, upon request, to support voluntary compliance by the sub-recipient.

If a sub-recipient fails or refuses to voluntarily comply with requirements, PlanRVA will submit copies of the case file and a recommendation that the sub-recipient be found in noncompliance to VDOT's Civil Rights Administrator - Title VI Coordinator.

A follow-up review will be conducted to ascertain if the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, PlanRVA and VDOT may, with FHWA's concurrence, initiate sanctions per 49 CFR 21.



## Section 4. Dissemination of Public Information

The RRTPO recognizes that meaningful citizen planning requires effective citizen involvement activities, open and accessible information, and opportunities for engagement. While broad citizen input and representation have long been the goal, the RRTPO recognizes that not all interested citizens and groups have had their voices heard in the planning process.

The RRTPO is committed to being open and accessible to all people in the Richmond region. This section of the RRTPO's Title VI Plan highlights its processes and plans for public outreach. ~~(delete?)~~

### 4a. Public Participation Plan

The RRTPO, supported by PlanRVA, strives to engage as many members of the public and affected stakeholders in the decision-making process as possible. Through a constructive and engaged dialogue, decision-makers, planners, and the public can cooperatively develop a vision for our community and region. The RRTPO's Public Engagement Plan (PEP) guides public involvement and serves as a blueprint to gather public comments on the study process, recommendations, and potential projects.

The goals of the PEP are:

#### Goal 1 – Robust and Creative Opportunities to Engage

Provide robust and creative opportunities for education the public toward our public planning for transportation, including people in the region who are not easily engaged because of their age, ability, language, lack of financial resources, lack of planning process. [PlanRVA.org](http://PlanRVA.org), other reasons.

#### Goal 2 Informing – and Educating the Public

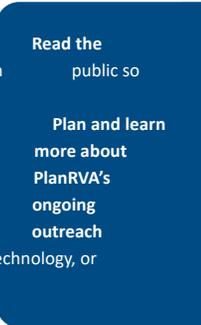
Inform and evaluate our progress. **Engagement** can purposefully engage and provide feedback in the transportation public involvement.

#### Goal 3 – Continuous Evaluation and Improvement

Continuously **full Public** all residents to engage in engagement goals and make changes to this plan's strategies and metrics as needed to increase **activities at** of access technology, or



**Deleted:** , including and accounting for Environmental Justice communities, and ensuring meaningful access for Limited English Proficiency populations



Page

### Public Participation Evaluation Process

RRTPO, through support provided by PlanRVA, assesses the public participation techniques used in all projects and initiatives. All public participation plans developed for projects and initiatives undertaken by RRTPO require an evaluation section to allow the project team to make as-needed mid-course corrections in its public participation approach. The evaluation process must include a review of public participation activities to ensure effective engagement with Title VI populations identified within the study area. Additionally, RRTPO, supported

by PlanRVA, made a commitment in 2020 to publish an annual report on progress toward its public engagement strategies and metrics by the end of July each year.

**4b. Environmental Justice (EJ) Does this section need to be deleted?**

On February 11, 1994, President Clinton signed Executive Order 12898: Federal Action to Address Environmental Justice in Minority and Low-Income Populations. Its purpose is to focus federal attention on the environmental and human health effects of federal actions on minority and low-income populations. The goal of this Executive Order is to achieve environmental protection for all communities.

Title VI and EJ are similar in that they:

- address nondiscrimination
- identify minorities as protected populations
- are rooted in the constitutional guarantee that all citizens are created equal
- address involvement of affected citizens in the decision-making process

However, Title VI prohibits discrimination by law, while EJ mandates a process for inclusive decision-making.

The RRTPO, through support provided by PlanRVA, meets that standard in three phases:

Environmental Justice seeks to ensure equal access to transportation systems and transportation planning process inputs for everyone regardless of race, color, creed,

or national origin. In the past, minority and low-income populations have been identified as the largest disenfranchised group, both in terms of equal access to transportation supply and citizen input.

Recently, persons with limited English proficiency (LEP) have been added to the disadvantaged groups. Richmond Environmental Justice is incorporated through all phases of RRTPO's transportation planning and programming.

**4c. Limited English Proficiency**

On August 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Services for Persons with Limited English

1. Assess – Assess potential benefits and impacts of transportation system investments related to Environmental Justice populations through demographic data collection and geographic analysis.

Deleted: **benefits**

2. Identify – Using the information gathered, identify any disparate impacts to EJ populations.

3. Address – Offer recommendations for action to the Policy Board to address adverse or disparate impacts.

Proficiency (LEP). RRTPO, supported by PlanRVA, is required to examine the services we provide and identify any need for services to

Deleted: Proficiency



# 4

individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Like the Environmental Justice Executive Order, the Limited English Proficiency Executive Order is structured to avoid adversely affecting these populations, to develop strategies to better engage these populations in their community, and to ensure meaningful access to benefits, services, information, and other important portions of programs and activities.

In considering how to access these populations, four factors need to be addressed:

- **Demographics:** Knowing where the populations are located.
- **Frequency:** Determining how often the populations are contacted or engaged by the agency.
- **Importance:** Determining if the issues under consideration are important to these communities.
- **Resources:** Keeping an inventory of the resources available to engage these populations.

This four-factor analysis is used to determine which language assistance services are appropriate to address the identified needs of the LEP population. **Four-Factor Analysis for the Richmond Region**

## Region

**Factor 1 - Demographics:** The RRTPO has reviewed census data on the number of individuals in its service area that have Limited English Proficiency, as well as the languages they speak. [This data comes from the American Community Survey \(2015\)](#). This data indicates the extent to which translations into other languages are needed to meet the needs of LEP persons.

It should be noted that the estimated figures below cover all the Richmond Region Planning District Commission



**See the full language breakdown on pages 38-39 and note the location of LEP populations on page 40.**

jurisdictions (which includes rural areas outside of the TPO study area) and includes people who “Speak Non-English at home –Speak English not well.” “People who Speak Non-English at home –Speak English well” were not taken into consideration.

Language Group	Population	Percentage of Total Population
Spanish	22,130	2.26%
Indo-European	6,798	0.70%
Asian and Pacific Island Languages	9,808	1.00%
Other and unspecified languages	2,808	0.29%
<b>Total Population</b>	<b>41544</b>	<b>4.25%</b>

*Note: Spanish is an Indo-European language but considered a separate category because of the number of speakers in the Region. Indo-European languages consist of European languages and languages of the Indian subcontinent. Asian and Pacific Island languages include East Asian languages like Chinese and Japanese, as well*

# 4

as and languages spoken on Pacific islands. The other languages category includes West Asian, African, and Native American languages.

**Factor 2 - Frequency:** The RRTPO is rarely approached for information by any populations who do not have a reasonable grasp of the English language; however, staff will provide such services when requested. The RRTPO conducts regular board meetings, committee meetings, and public hearings throughout the year. Community outreach and the PlanRVA website are the main sources of potential contact between RRTPO and LEP persons. As a result, the frequency of contact is difficult to anticipate and is instead evaluated on a project-by-project basis.

**Factor 3 - Importance:** The impact of proposed transportation investments on underserved and under-represented populations, including LEP persons, is part of the Environmental Justice evaluation process. RRTPO provides translated materials, interpreters, and other assistance appropriate for limited English-speaking populations

if it is needed for the project. RRTPO desires input from a comprehensive and representative group of stakeholders, and every effort is taken to make the planning process as inclusive as possible.

**Factor 4 - Resources:** RRTPO does not have a standalone budget for marketing or communicating with LEP persons in their language about planning processes, services, and resources. However, we are committed to including funding for interpretation and translation services, as well as multilingual outreach, to the greatest extent practicable. Expenditures related to marketing and communications with LEP persons are available through our Unified Planning Work Program task aligned with Public Outreach, Equity and Environmental Justice Analysis and are programmed annually to meet the needs and priorities for the year.

Given the size of the LEP population in the Richmond Region, the frequency of requested translation, and current financial constraints, the four-factor analysis determined that full-language translations of all documents and interpreter services at all meetings are not warranted or cost-feasible at this time. However, RRTPO will conduct outreach to the Spanish-speaking population, the largest LEP group, as a part of our general community outreach and evaluate other language accommodations on a project-by-project basis. RRTPO will do its utmost to engage all stakeholder groups and meet all translation and interpretation requests.

**Languages Spoken at Home by the ability to speak English for Population 5 and above in ACS 2015-2019 5 Year estimates**

Languages	CharlesCity	Chesterfield	Goochland	Hanover	Henrico	Newkent	Powhatan	Richmond	Richmond Region	Percentage
Total (Age 5 And above)	6,867	30,852	20,869	96,507	298,491	18,533	27,066	200,345	977,198	
Speak only English	6,729	274,57	19,769	92,394	254,373	17,962	26,184	180,731	872,717	89.31%

# 4

Speak Non English at Home	138	33,945	1,100	4,113	44,118	571	882	19,614	104,481	10.69%
---------------------------	-----	--------	-------	-------	--------	-----	-----	--------	---------	--------

Speak Non English at Home (Speak English Well)	119	20618	755	2685	26893	469	702	10696	62937	6.44%
--	-----	-------	-----	------	-------	-----	-----	-------	-------	-------

Speak Non English at Home (Speak English Not Well)	19	13327	345	1428	17225	102	180	8918	41544	4.25%
--	----	-------	-----	------	-------	-----	-----	------	-------	-------

### Native speakers of other languages who "Speak English Less Than Very Well"

Language	Charleston	Chesapeake	Gooseland	Hanover	Henrico	New Kent	Powhatan	Richmond	Richmond Region	Percentage
<b>Total:</b>	<b>6,867</b>	<b>308,520</b>	<b>20,869</b>	<b>96,507</b>	<b>298,491</b>	<b>18,533</b>	<b>27,066</b>	<b>200,345</b>	<b>977,198</b>	
Spanish or Spanish Creole:	2	8,591	179	770	5,942	36	129	6,481	22,130	2.26%
French (incl. Patois, Cajun):	0	244	19	3	261	21	0	226	774	0.08%
French Creole:	0	9	0	0	38	0	0	4	51	0.01%
Italian:	0	47	0	28	82	0	0	68	225	0.02%
Portuguese or Portuguese Creole:	3	15	0	0	252	0	0	82	352	0.04%
German:	2	244	29	61	67	17	0	48	468	0.05%
Yiddish:	0	0	0	0	0	0	0	0	0	0.00%
Other West Germanic languages:	0	22	0	0	43	0	0	0	65	0.01%
Scandinavian languages:	0	0	0	0	13	12	0	0	25	0.00%
Greek:	0	0	24	0	271	0	0	0	295	0.03%
Russian:	0	111	0	0	608	0	16	39	774	0.08%
Polish:	0	0	0	0	9	0	0	0	9	0.00%
Serbo-Croatian:	0	33	0	0	457	0	0	0	490	0.05%
Other Slavic languages:	0	0	0	6	97	0	0	7	110	0.01%
Armenian:	0	0	0	0	0	0	0	0	0	0.00%
Persian:	0	82	0	49	217	0	0	163	511	0.05%
Gujarati:	0	158	0	19	265	0	0	11	453	0.05%
Hindi:	0	170	0	22	372	0	0	13	577	0.06%
Urdu:	0	220	0	0	137	0	0	28	385	0.04%
Other Indic languages:	0	108	0	17	916	0	0	70	1,111	0.11%
Other Indo-European languages:	0	39	0	0	46	0	0	38	123	0.01%
Chinese:	0	541	23	138	1,284	14	16	364	2,380	0.24%
Japanese:	0	135	0	22	120	0	0	13	290	0.03%
Korean:	12	524	34	62	360	0	0	294	1,286	0.13%
Mon-Khmer, Cambodian:	0	320	0	0	353	0	0	32	705	0.07%
Hmong:	0	0	0	0	0	0	0	0	0	0.00%
Thai:	0	53	0	18	58	0	0	24	153	0.02%
Laotian:	0	34	0	0	27	0	0	0	61	0.01%
Vietnamese:	0	914	0	71	1,701	0	0	92	2,778	0.28%
Other Asian languages:	0	234	0	0	1,354	0	0	30	1,618	0.17%
Tagalog:	0	129	0	47	245	0	0	46	467	0.05%

# 4

Other Pacific Island languages:	0	4	0	12	54	0	0	0	70	0.01%
Navajo:	0	0	0	0	0	0	0	0	0	0.00%
Other Native American languages:	0	1	0	0	0	0	7	1	9	0.00%
Hungarian:	0	9	0	57	15	0	0	1	82	0.01%
Arabic:	0	195	11	8	940	2	0	194	1,350	0.14%
Hebrew:	0	0	0	0	4	0	0	0	4	0.00%
African languages:	0	141	26	18	615	0	12	333	1,145	0.12%
Other and unspecified languages:	0	0	0	0	2	0	0	216	218	0.02%
<b>Total:</b>	<b>19</b>	<b>13327</b>	<b>345</b>	<b>1428</b>	<b>17225</b>	<b>102</b>	<b>180</b>	<b>8918</b>	<b>41,544</b>	<b>4.25%</b>



The map above shows the LEP population is mainly distributed within the suburbanized area, in the north-west of Henrico County, south of Richmond City, and the northeast of Chesterfield County.

#### 4d. Language Assistance Plan Does this section need to be deleted?0

Using the four-factor analysis as a foundation, RRTPO, supported by PlanRVA, created a Language Assistance Plan to ensure timely and meaningful access for LEP individuals encountering PlanRVA.

The RRTPO currently undertakes the following to ensure that LEP persons have access to important information:

# 4

- Interpretation Services – RRTPO provides Spanish-language interpreters for public meetings if given at least 48 hours’ notice. RRTPO will do its utmost to provide translators for other languages if requested to do so.
- Material Translation – Documents and materials are translated depending on project needs and the impacted populations. Additional documents can be translated upon request. We aim to complete document translation within a reasonable time frame.
- Website Translation – RRTPO has a built-in translation function on its homepage that translates its website content into Spanish.
- TDD/TTY capabilities – Deaf and hard of hearing persons can call the Virginia Relay Center at 1-800-828-1120 (our number is (804) 323-2033). This information is listed on the PlanRVA website.
- Assistive Technology - RRTPO and PlanRVA meetings are held in locations with hearing loop technology installed. Deaf and hard of hearing persons can use their own devices and connect to the assistive listening system. A limited supply of compatible devices is also available on site for those without their own equipment.
- Bilingual Staff – PlanRVA regularly assesses the language capabilities of its staff and their comfort level with providing interpretation and translation services to community members. Language services currently offered by staff include Spanish, French, and Korean. [Is this statement still correct?](#)

It is important to notify LEP persons of services available free of charge in a language the LEP persons would understand. The RRTPO will include the following language in English and Spanish (where appropriate) on meeting notifications and other informational materials.

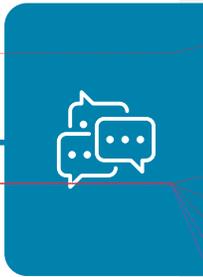
**English Version:** RRTPO and PlanRVA fully comply with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The RRTPO and PlanRVA will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. For more information on meeting accessibility, or to obtain a Title VI Complaint Form, see [PlanRVA.org](#) or call the Title VI Coordinator at (804) 323-2033.

Learn more about the notification process in Section 1.

**Versión en Español:** RRTPO y PlanRVA cumplen completamente con el Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y reglamentos relacionados en todos los programas y actividades. La RRTPO y el PlanRVA se esforzarán por brindar adaptaciones y servicios razonables para las personas que requieran asistencia especial para participar en esta oportunidad de participación pública. Para obtener más información sobre la accesibilidad a las reuniones o para obtener un Formulario de queja de Título VI, consulte [PlanRVA.org](#) o llame al Coordinador del Título VI al (804) 323-2033.

To ensure the Language Assistance Plan remains current, the RRTPO, supported by PlanRVA, will:

- Continue to update the plan and report progress every three years as part of its Title VI Program update
- Monitor current LEP populations in the service area and emerging populations affected or encountered [still required?](#)
- Document and monitor frequency of encounters with LEP language groups [\(still required?\)](#)



- Formatted: Spanish (Spain)
- Formatted: Spanish (Spain)
- Formatted: Spanish (Spain)
- Formatted: Spanish (Spain)
- Field Code Changed
- Field Code Changed

# 4

- Assess the effectiveness of public outreach programs for projects/plans targeting LEP populations through the annual public engagement report
- Communicate the goals and objectives of the LEP plan and evaluate the opportunity for community involvement and planning
- Strive to identify sources of assistance and opportunities to implement LEP goals

PlanRVA will ensure staff supporting RRTPO understand:

- where to find the Language Assistance Plan on the PlanRVA website
- how to handle verbal and written requests for interpretation or translation services
- their responsibility to notify the Title VI Coordinator about any LEP persons' unmet needs

Learn more in Section 3b: Staff Training.

The RRTPO, supported by PlanRVA, does not intend that its LEP Plan exclude anyone requiring language assistance and will try to accommodate requests. Anyone who requires special language services should contact Martha Heeter, Title VI Coordinator, at [TitleVI@PlanRVA.org](mailto:TitleVI@PlanRVA.org)



# Appendix A. Assurances



## Title VI/Nondiscrimination Assurances

The Richmond Regional Transportation Planning Organization will effectuate the provisions of Title VI of the Civil Rights Act of 1964 and other applicable directives. These authorities provide 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 which receives federal assistance.

Further, as a recipient of federal-aid funding, Richmond Regional Transportation Planning Organization strives to achieve nondiscrimination in all its programs and activities whether or not those programs and activities are federally funded. These efforts to prevent discrimination will address, but not be limited to, a program's impact upon access, benefits, participation, treatment, services, contracting opportunities, training opportunities, investigation of complaints, allocation of funds, prioritization of projects, and the functions of right-of-way, research, planning, design, construction, and project development. The Richmond Regional Transportation Planning Organization will ensure that every manager, supervisor, employee, and sub-recipient of federal aid funds administered is aware of and applies the intent and spirit of Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities in performing assigned duties.

Every representative of Richmond Regional Transportation Planning Organization shall perform all official duties and actions in full accord with Title VI of the Civil Rights Act of 1964, applicable statutes, executive orders, regulations, and policies enunciated there under.

Deleted: Every representative

June 3, 2021  
Date

A handwritten signature in blue ink, appearing to read "C. P. ...", is written over a horizontal line.

Richmond Regional Transportation Planning Organization Organization Administrator

**RRTPO | Plan RVA Title VI Plan Limited English Proficiency Plan**

## Appendix B. Board Approval



June 3, 2021

### RRTPO Policy Board Agenda Item B.3. RRTPO Title VI Plan Update

On motion of Patricia S. O'Bannon seconded by David T. Williams, the Richmond Regional Transportation Planning Organization (RRTPO) unanimously approved the following resolution:

**RESOLVED** that the RRTPO approves the Richmond Regional Transportation Planning Organization Title VI Plan as submitted; and

**BE IT FURTHER RESOLVED** that the RRTPO's action to approve the Title VI Plan as submitted meets all requirements noted in the VDOT/RRDPC Agreement for the Utilization of Federal and State Funds to Support Metropolitan Planning in the Richmond Area as provided in Article IX, Publication Provisions, which includes approval by the Virginia Department of Transportation (VDOT) and the Federal Highway Administration (FHWA) authorizing final publication and distribution of the Title VI document as submitted.

-----  
This is to certify that the Richmond Regional Transportation Planning Organization approved the above resolution at its meeting held June 3, 2021.

**WITNESS:**

*Nicole Mueller*

---

**Title:** MPO Program Coordinator  
**Organization:** Richmond Regional Transportation Planning Organization  
**Date:** June 3, 2021  
**BY:**

A handwritten signature in blue ink, appearing to read "Christy", is written over a horizontal line.

**Title:** MPO Secretary  
**Organization:** Richmond Regional Transportation Planning Organization **Date:** June 3, 2021

**RRTPO | Plan RVA Title VI Plan Limited English Proficiency Plan**



**RICHMOND REGIONAL TRANSPORTATION PLANNING ORGANIZATION POLICY BOARD**

**MINUTES OF ACTION MEETING  
Thursday, June 3, 2021 9:30 a.m.  
PlanRVA James River Board Room**

**MEMBERS and ALTERNATES (A) PRESENT:**

<b>Town of Ashland</b>		<b>Charles City County</b>		<b>Chesterfield County</b>	
John H. Hodges	x	Vice Chair William G. Coada		Kevin P. Carroll	x
Anita Barnhart (A)		Vacant (A)		James M. Holland (virtual)	x
				Christopher Winslow	
				Leslie Haley (A)	
<b>Goochland County</b>		<b>Hanover County</b>		<b>Henrico County</b>	
John L. Lumpkins Jr.	x	Sean M. Davis (virtual)	x	Patricia S. O'Bannon	x
Susan F. Lascolette	x	W. Canova Peterson (Virtual)	x	Frank J. Thornton	
Vacant (A)		Faye O. Prichard (A)		Thomas M. Branin (A)	
Vacant (A)		Vacant (A)		Vacant (A)	
<b>New Kent County</b>		<b>Powhatan County</b>		<b>City of Richmond</b>	
Chair Patricia A. Paige	x	David T. Williams	x	Andreas D. Addison (virtual)	x
C. Thomas Tiller Jr.		Karin M. Carmack (virtual)	x	Katherine L. Jordan (virtual)	x
Thomas W. Evelyn (A)		Vacant (A)		Stephanie A. Lynch	
Vacant (A)		Vacant (A)		Cynthia I. Newbille (virtual)	x
				Michael J. Jones (A)	
				Kristen Nye Larson (A)	
				Ellen F. Robertson (A)	
				Vacant (A)	
<b>Capital Region Airport Commission</b>		<b>GRTC Transit System</b>		<b>RIC Metropolitan Transp. Authority (RMTA)</b>	
John B. Rutledge		Julie E. Timm (virtual)	x	Joi Taylor Dean (virtual)	x
		Sheryl Adams (A)			
<b>Secretary of Transportation or Designee</b>		<b>CTAC</b>		<b>DRPT</b>	

## Appendix B

R. Shane Mann	x	Robert L. Basham Jr. (nonvoting)	Jennifer B. DeBruhl (non-voting) (virtual)	x
Mark E. Riblett (A)		Upton S. Martin (A) (non-voting)	Tiffany T. Dubinsky (A) (non-voting) (virtual)	x
<b>Federal Highway Administration (FHWA)</b>		<b>Federal Transit Administration (FTA)</b>	<b>RideFinders</b>	
Thomas L. Nelson Jr. (non-voting)		Daniel Koenig (Liaison)	Von S. Tisdale (non-voting)	
Richard Duran (A) (non-voting) (virtual)	x		Cherika N. Ruffin (A) (nonvoting) (virtual)	x
<b>VA Dept. of Aviation (DOAV)</b>				
P. Clifford Burnette Jr. (non-voting)				

Formatted: French (France)

The technology used for the RRTPO Policy Board meeting was a web-hosted service created by Zoom and was accessible for participation by members of the public. A recording of this meeting is available on our [Plan RVA YouTube Channel](#).

Ashland | Charles City | Chesterfield | Goochland | Hanover | Henrico | New Kent | Powhatan | Richmond  
 PlanRVA, 9211 Forest Hill Avenue, Suite 200, Richmond, VA 23235  
 RRTPO Policy Board Action Meeting Minutes – June 3, 2021 – page 1

## **CALL TO ORDER**

The Richmond Regional Transportation Planning Organization (RRTPO) Policy Board Chair, Patricia A. Paige, presided and called the June 3, 2021 RRTPO Policy Board action meeting to order at 9:31 a.m. in PlanRVA's James River Board Room.

## **WELCOME AND INTRODUCTIONS**

Chair Paige introduced Karin Carmack as the new policy board member representing Powhatan County.

## **ATTENDANCE ROLL CALL & CERTIFICATION OF MEETING QUORUM**

Nicole Mueller, Program Coordinator of the RRTPO, took attendance by roll call and certified that a quorum was present.

### **A. ADMINISTRATION**

**1. Consideration of Amendments to the Action Meeting Agenda** There were no requested changes to the meeting agenda. Seeing and hearing no objections, Chair Paige approved the June 3, 2021 agenda.

**2. Approval of May 6, 2021 RRTPO Policy Board Action Meeting Minutes**

On motion of David T. Williams, seconded by Cynthia I. Newbille, the RRTPO Policy Board unanimously approved the minutes of the May 6, 2021 meeting as presented (voice vote).

**5.d. MPO Boundary Expansion**

Staff submitted this agenda item with a recommendation to accept the boundary change approval from VDOT and set in motion a plan to implement that boundary change by October 15, 2021 with a full understanding of its impacts on PlanRVA as administering agency for RRTPO.

On motion of Patricia S. O'Bannon, seconded by David T. Williams, the new action item *MPO Boundary Expansion* was added and the June 3, 2021 agenda was approved by acclamation as amended (voice vote).

On motion of David T. Williams, seconded by Cynthia I. Newbille, the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board unanimously approved the following resolution as presented (see Appendix A):

**RESOLVED**, that the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board supports the update of the Metropolitan Planning Area boundary to include the entirety of Powhatan, Goochland, New Kent, and Charles City Counties;

**BE IT FURTHER RESOLVED**, that the RRTPO accepts the recognition of this boundary change by the Virginia Department of Transportation, Federal Highway Administration, and the Governor of Virginia;

**AND BE IT FURTHER RESOLVED**, that the RRTPO sets a date of October 15, 2021 for the boundary change to go into effect, allowing time for the agency to plan for impacts of the boundary change on its programs and practices.

Ashland | Charles City | Chesterfield | Goochland | Hanover | Henrico | New Kent | Powhatan | Richmond

**B. NEW BUSINESS**

**1. Action on RSTBG Budget Change and Allocation Correction**

On motion of W. Canova Peterson, seconded by David T. Williams, the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board unanimously approved the following resolution as presented (see Appendix A):

**RESOLVED**, that the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board approves the reallocation of \$524,630 in FY23 and \$231,471 in FY24 funding from the RSTBG balance entry to the #SMART18 - RTE 360 WIDENING project in Hanover County (UPC 13551) to restore funding on the project and fully fund the project to the Smart Scale estimate; and,

**FURTHER RESOLVED**, that the RRTPO Policy Board approves a decrease of \$91,004 in FY22 allocations to UPC 13551 and the reallocation of an additional \$91,004 in FY23 funding from the RSTBG balance entry to UPC 13551; and,

**FURTHER RESOLVED**, that the RRTPO Policy Board approves the allocation of the remaining unallocated RSTBG funds in FY23 – FY27 to the RSTBG balance entry.

**2. Action on FY22 Unified Planning Work Program (UPWP)**

On motion of David T. Williams, seconded by John H. Hodges, the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board unanimously approved the following resolution as presented (see Appendix A):

**RESOLVED**, that the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board approves the *RRTPO Fiscal Year 2022 Unified Planning Work Program* as presented.

**BE IT FURTHER RESOLVED**, that the RRTPO Policy Board action to adopt the UPWP, as submitted, meets all requirements noted in the VDOT/RRPDC Agreement for the Utilization of Federal and State Funds to Support Metropolitan Planning in the Richmond Area as provided in Article III, Statement of Work, which includes VDOT and FHWA approval of this RRTPO action.

Attachment as digital link: [Draft FY22 Unified Planning Work Program \(UPWP\)](#)

**3. Action on Title VI Plan Update**

On motion of Patricia S. O'Bannon, seconded by David T. Williams, the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board unanimously approved the following resolution by acclamation as presented (voice vote):

**RESOLVED**, that the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board approves the *Title VI Plan: Limited English Proficiency Plan* as presented.

Attachment as digital link: [Draft Title VI Plan: Limited English Proficiency Plan](#)

## Appendix B

### 7. Election of FY22 RRTPO Officers

On motion of Patricia S. O'Bannon, seconded by Kevin P. Carroll, the Richmond Regional Transportation Planning Organization (RRTPO) Policy Board unanimously approved the following resolution as presented (see Appendix A):

**RESOLVED**, that the Richmond Regional Transportation Planning Organization elects David T. Williams as FY22 Chair and Susan F. Lascolette as FY22 Vice Chair.

### C. AGENCY AND COMMITTEE REPORTS

#### 1. Transportation Agency Updates

- a. \*\* A copy of the Virginia Department of Transportation update provided by Shane Mann is available at: [VDOT Update](#)
- b. \*\* A copy of the Virginia Department of Rail and Public Transportation update provided by Jennifer DeBruhl, Chief of Public Transportation at DRPT, is available at: [DRPT Update](#)

2. **Community Transportation Advisory Committee Meeting Report** \*\* A copy of the CTAC meeting report can be found on pages 162-163 in the [June 3, 2021 RRTPO Policy Board agenda packet](#).

### D. OTHER BUSINESS

#### 3. Next RRTPO Policy Board Meeting: July 1, 2021

The next action meeting will be held on Thursday, July 1<sup>st</sup>, 2021, beginning at 9:30 a.m. in Richmond, Virginia.

### E. ADJOURNMENT:

Chairwoman Paige adjourned the meeting at approximately 11:17 a.m. on June 3, 2021.



**APPENDIX A**

**RRTPO Policy Board – Voting Record Tables**

**Item A.5.d. Action on MPO Boundary Expansion**

Jurisdiction/Agency (No. of Votes)	Member/Alternate	Aye	Nay	Abstain	Absent
Town of Ashland (1 )	John H. Hodges	x			
Charles City County (1)	William G. Coad				x
Chesterfield County (4)	Kevin P. Carroll	x			
	James M. Holland	x			
	Christopher Winslow				x
Goochland County (2 )	John L. Lumpkins	x			
	Susan Lascolette	x			
Hanover County (3 )	Sean M. Davis	x			
	W. Canova Peterso 1	x			
Henrico County (4)	Patricia S. O'Bannon	x			
	Frank J. Thornton				x
New Kent County (2 )	Patricia A. Paige	x			
	C. Thomas Tiller				x
Powhatan County (2)	David T. Williams	x			
	Karin Carmack	x			
City of Richmond (4 )	Andreas D. Addison	x			
	Katherine L. Jordan				x
	Stephanie A. Lynch				x
	Cynthia I. Newbille	x			
Capital Region Airport Commission (CRAC) (1)	John B. Rutledge				x
GRTC Transit System (1)	Julie Timm	x			

## Appendix B

<b>RIC Metropolitan Transp Authority (RMTA) (1)</b>	Joi Taylor Dean	x			
<b>Secty Trans Desig (1)</b>	R. Shane Mann	x			
<b>TOTAL</b>		25			

The bylaws of the RRTPO Policy Board define a quorum of the body to be 14 of the 27 total members.

Ashland | Charles City | Chesterfield | Goochland | Hanover | Henrico | New Kent | Powhatan | Richmond

PlanRVA, 9211 Forest Hill Avenue, Suite 200, Richmond, VA 23235

RRTPO Policy Board – Voting Record Tables – June 3, 2021 – page 1



### Item B.1. Action on RSTBG Budget Change and Allocation Correction

Jurisdiction/Agency (No. of Votes)	Member/Alternate	Aye	Nay	Abstain	Absent
<b>Town of Ashland (1)</b>	John H. Hodges	x			
<b>Charles City County (1)</b>	William G. Coad				x
<b>Chesterfield County (4)</b>	Kevin P. Carroll	x			
	James M. Holland	x			
	Christopher Winslow				x
<b>Goochland County (2)</b>	John L. Lumpkins	x			
	Susan Lascolette	x			
<b>Hanover County (3)</b>	Sean M. Davis	x			
	W. Canova Peterso 1	x			
<b>Henrico County (4)</b>	Patricia S. O'Bannon	x			
	Frank J. Thornton				x
<b>New Kent County (2)</b>	Patricia A. Paige	x			
	C. Thomas Tiller				x

## Appendix B

<b>Powhatan County (2)</b>	David T. Williams	x			
	Karin Carmack	x			
<b>City of Richmond (4)</b>	Andreas D. Addison	x			
	Katherine L. Jordan				x
	Stephanie A. Lynch				x
	Cynthia I. Newbille	x			
<b>Capital Region Airport Commission (CRAC) (1)</b>	John B. Rutledge				x
<b>GRTC Transit System (1)</b>	Julie Timm	x			
<b>RIC Metropolitan Transp Authority (RMTA) (1)</b>	Joi Taylor Dean	x			
<b>Secty Trans Desig (1)</b>	R. Shane Mann	x			
<b>TOTAL</b>		25			

The bylaws of the RRTPO Policy Board define a quorum of the body to be 14 of the 27 total members.

Ashland | Charles City | Chesterfield | Goochland | Hanover | Henrico | New Kent | Powhatan | Richmond

PlanRVA, 9211 Forest Hill Avenue, Suite 200, Richmond, VA 23235

RRTPO Policy Board – Voting Record Tables – June 3, 2021 – page 2



### Item B.2. Action on FY22 Unified Planning Work Program (UPWP)

Jurisdiction/Agency (No. of Votes)	Member/Alternate	Aye	Nay	Abstain	Absent
<b>Town of Ashland (1)</b>	John H. Hodges	x			
<b>Charles City County (1)</b>	William G. Coada			(1)	x
<b>Chesterfield County (4)</b>	Kevin P. Carroll	x			
	James M. Holland	x			

## Appendix B

	Christopher Winslow				x
<b>Goochland County (2)</b>	John L. Lumpkins	x			
	Susan Lascolette	x			
<b>Hanover County (3)</b>	Sean M. Davis	x			
	W. Canova Peterso 1	x			
<b>Henrico County (4)</b>	Patricia S. O'Bannon	x			
	Frank J. Thornton				x
<b>New Kent County (2)</b>	Patricia A. Paige	x			
	C. Thomas Tiller				x
<b>Powhatan County (2)</b>	David T. Williams	x			
	Karin Carmack	x			
<b>City of Richmond (4)</b>	Andreas D. Addison	x			
	Katherine L. Jordan	x			
	Stephanie A. Lynch				x
	Cynthia I. Newbille	x			
<b>Capital Region Airport Commission (CRAC) (1)</b>	John B. Rutledge				x
<b>GRTC Transit System (1)</b>	Julie Timm	x			
<b>RIC Metropolitan Transp Authority (RMTA) (1)</b>	Joi Taylor Dean	x			
<b>Secty Trans Desig (1)</b>	R. Shane Mann	x			
<b>TOTAL</b>		25			

The bylaws of the RRTPO Policy Board define a quorum of the body to be 14 of the 27 total members.



**Item B.7. Election of FY22 RRTPO Officers**

Jurisdiction/Agency (No. of Votes)	Member/Alternate	Aye	Nay	Abstain	Absent
Town of Ashland (1 )	John H. Hodges	x			
Charles City County (1)	William G. Coad				x
Chesterfield County (4)	Kevin P. Carroll	x			
	James M. Holland	x			
	Christopher Winslow				x
Goochland County (2 )	John L. Lumpkins	x			
	Susan Lascolette	x			
Hanover County (3 )	Sean M. Davis	x			
	W. Canova Peterso 1	x			
Henrico County (4)	Patricia S. O'Bannon	x			
	Frank J. Thornton				x
New Kent County (2 )	Patricia A. Paige	x			
	C. Thomas Tiller				x
Powhatan County (2)	David T. Williams	x			
	Karin Carmack	x			
City of Richmond (4 )	Andreas D. Addison				x
	Katherine L. Jordan	x			
	Stephanie A. Lynch				
	Cynthia I. Newbille				x
Capital Region Airport Commission (CRAC) (1)	John B. Rutledge				x
GRTC Transit System (1)	Julie Timm	x			
RIC Metropolitan Transp	Joi Taylor Dean	x			

# Appendix B

<b>Authority (RMTA) (1)</b>						
<b>Secty Trans Desig (1)</b>	R. Shane Mann	x				
<b>TOTAL</b>		25				

The bylaws of the RRTPO Policy Board define a quorum of the body to be 14 of the 27 total members.

Ashland | Charles City | Chesterfield | Goochland | Hanover | Henrico | New Kent | Powhatan | Richmond  
 PlanRVA, 9211 Forest Hill Avenue, Suite 200, Richmond, VA 23235  
 RRTPO Policy Board – Voting Record Tables – June 3, 2021 – page 4

**RRTPO Policy Board Members**

The Richmond Regional TPO’s voting members include the Town of Ashland, the counties of Charles City, Chesterfield, Goochland, Hanover, Henrico, New Kent, Powhatan, the City of Richmond, Capital Region Airport Commission, GRTC Transit System, Richmond Metropolitan Transportation Authority, and VA Department of Transportation.

Non-voting members include: Community Transportation Advisory Committee (CTAC), Federal Highway Administration, Federal Transit Administration, Ridefinders, Inc., VA Department of Aviation, VA Department of Rail & Public Transportation.

**Voting Members**

TOWN OF ASHLAND

John H. Hodges  
Anita Barnhart (Alternate)

CHARLES CITY COUNTY

William G. Coada - FY21 Vice Chair

CHESTERFIELD COUNTY

James Holland  
Christopher Winslow  
Kevin P. Carroll  
Leslie Haley (Alternate)

GOOCHLAND COUNTY

John L. Lumpkins, Jr. Susan Lascolette

HANOVER COUNTY

W. Canova Peterson  
Sean M. Davis  
Faye Prichard (Alternate)

HENRICO COUNTY

Patricia S. O’Bannon  
Frank J. Thornton  
Thomas Branin (Alternate)

NEW KENT COUNTY

Patricia Paige - FY21 Chair C.  
Thomas Tiller, Jr.

Thomas E. Evelyn (Alternate)  
POWHATAN COUNTY  
David T. Williams Vacant

CITY OF RICHMOND

Andreas D. Addison  
Katherine L. Jordan  
Stephanie A. Lynch  
Dr. Cynthia I. Newbille  
Michael J. Jones (Alternate)  
Kristen Nye Larson (Alternate) Ellen F. Robertson (Alternate)

CAPITAL REGION AIRPORT COMMISSION (CRAC) John R. Rutledge

GRTC TRANSIT SYSTEM  
Julie E. Timm  
Sheryl Adams (Alternate)

RICHMOND METROPOLITAN TRANSPORTATION AUTHORITY (RMTA)  
Joi Taylor Dean

VIRGINIA SECRETARY OF TRANSPORTATION OR DESIGNEE  
R. Shane Mann P.E.  
Mark E. Riblett (Alternate)

**Non-Voting Members**

RRTPO COMMUNITY TRANSPORTATION ADVISORY COMMITTEE

Robert L. Basham, Jr. - CTAC  
Chairman  
Upton S. Martin (Alternate)

FEDERAL TRANSIT  
ADMINISTRATION Daniel  
Koenig

AVIATION  
P. Clifford Burnette, Jr.

FEDERAL HIGHWAY  
ADMINISTRATION (FHWA)  
Thomas L. Nelson, Jr., P.E.  
Richard Duran (Nonvoting Alternate)

RIDEFINDERS, INC.  
Von S. Tisdale  
Cherika Ruffn (Nonvoting Alternate)

VIRGINIA DEPARTMENT OF RAIL  
AND PUBLIC TRANSPORTATION  
(DRPT)  
Jennifer B. DeBruhl  
Tiffany Dubinsky (Nonvoting  
Alternate)

VIRGINIA DEPARTMENT OF

## Appendix C. Committee Membership

When considering appointments to committees, maintaining a diverse group of individuals is a priority of RRTPO.

PlanRVA staff, in support of RRTPO, work with the Policy Board to ensure they are aware of community members of various races and ethnicities who may have an interest in serving on committees and understand the importance of having committees that are representative of the Richmond region's diverse population.

The RRTPO committee roster changes annually. PlanRVA, in support of RRTPO, conducts a voluntary annual survey of all committee members to gather race and ethnicity information. The following charts are based on the results of the 2021 survey.

**Racial Composition of RRTPO Committees**

Race	Policy Board	Executive Committee	Technical Advisory Committee	Community Transportation Advisory Committee
White	11	5	7	12
Black or African American	4	2		
American Indian and/ or Native Alaskan				
Asian				
Native Hawaiian/ Other Pacific Islander				
Other				
Information Not Provided				
<b>Total</b>				

**Ethnic Composition of RRTPO Committees**

<b>Ethnicity</b>	<b>Policy Board</b>	<b>Executive Committee</b>	<b>Technical Advisory Committee</b>	<b>Community Transportation Advisory Committee</b>
Hispanic or Latino				
Not Hispanic or Latino	14	7	7	13
Information Not Provided				
<b>Total</b>				

**RRTPO POLICY BOARD  
EXECUTIVE COMMITTEE**

**TOWN OF ASHLAND**

John H. Hodges - Vice Mayor  
Anita Barnhart (Alternate) -  
Town Council

**CHARLES CITY COUNTY**

William G. Coad, FY21 Vice  
Chair - Board of Supervisors  
Vacant (Alternate) - Board of  
Supervisors

**CHESTERFIELD COUNTY**

James M. Holland - Board of  
Supervisors  
Leslie Haley (Alternate) - Board of  
Supervisors

**GOOCHLAND COUNTY**

John L. Lumpkins, Jr. - Board of  
Supervisors  
Susan F. Lascolette (Alternate) - Board  
of Supervisors

**HANOVER COUNTY**

W. Canova Peterson, IV - Board of  
Supervisors  
Sean M. Davis (Alternate) - Board of  
Supervisors

**HENRICO COUNTY**

Patricia S. O'Bannon - Board of  
Supervisors  
Frank J. Thornton (Alternate) - Board of  
Supervisors

**NEW KENT COUNTY**

Patricia A. Paige, FY21 Chair - Board of  
Supervisors  
Thomas C. Tiller, Jr. (Alternate) -

**Board of Supervisors POWHATAN  
COUNTY**

David T. Williams - Board of Supervisors  
Vacant (Alternate) - Board of  
Supervisors

**CITY OF RICHMOND**

Cynthia I. Newbille - City Council  
Andreas D. Addison (Alternate) - City  
Council

**TECHNICAL ADVISORY  
COMMITTEE**

**TOWN OF ASHLAND**

Nora D. Amos, FY21 Chair - Director of  
Planning  
Will Tucker - Planner II  
(Alternate)

**CHARLES CITY COUNTY**

Vacant  
Vacant (Alternate)

**CHESTERFIELD COUNTY**

Barbara K. Smith - Principal Engineer  
Chessa D. Walker (Alternate) -  
Assistant Director

**GOOCHLAND COUNTY**

Thomas M. W. Coleman - Principal  
Planner  
Debbie Byrd, P.E. (Alternate) - Civil  
and Environmental Engineer

**HANOVER COUNTY**

Joseph E. Vidunas - Traffic Engineer  
J. Michael Flagg, P.E. (Alternate)  
- Director Department of

Public Works

**HENRICO COUNTY**

Sharon Smidler - Division Director  
E. Todd Eure (Alternate) - Assistant  
Director of Public Works

**NEW KENT COUNTY**

Kelli Le Duc, FY21 Vice Chair -  
Planning Manager

**POWHATAN COUNTY**

Bret Schardein AICP, CZA - Assistant  
County Administrator  
Andrew Pompei AICP, CZA  
(Alternate) - Planning Director

**CITY OF RICHMOND**

Dironna Moore Clarke - Multimodal  
Transportation Manager  
Travis A. Bridewell (Alternate) - Traffic  
Engineering Operations Manager

**CAPITAL REGION AIRPORT  
COMMISSION (CRAC)**

John B. Rutledge - Director of Planning  
and Engineering Vacant (Alternate)

**GRTC TRANSIT SYSTEM**

Adrienne Torres - Director of Planning  
and Scheduling  
Emily DelRoss (Alternate) -  
Planning Manager

**RICHMOND METROPOLITAN  
TRANSPORTATION  
AUTHORITY (RMTA)**

Theresa Simmons - Director of  
Operations

**Appendix C**

PLANRVA (RRPDC)  
Chet Parsons, AICP CTP - Director of  
Transportation  
Sulabh Aryal, AICP (Alternate) -  
Transportation Planner

RIDEFINDERS, INC.  
Von S. Tisdale - Executive Director  
John Okeeffe (Alternate) - Account  
Executive

VIRGINIA DEPARTMENT  
OF RAIL AND PUBLIC  
TRANSPORTATION  
Tiffany T. Dubinsky - Statewide Transit  
Planner  
Grant Sparks, AICP (Alternate) -  
Manager of Transit Planning and  
Corridor Development

VIRGINIA DEPT. OF  
TRANSPORTATION (VDOT) PLANNING  
DIVISION  
Liz McAdory - District Planning Manager  
Jacob Herrman (Alternate) -  
Transportation Planning

### COMMUNITY TRANSPORTATION ADVISORY COMMITTEE

TOWN OF ASHLAND  
Upton S. Martin - FY21 Vice  
Chair

CHARLES CITY COUNTY  
Vacant

## Appendix D. Title VI Procedure and

As part of its commitment to ensuring adherence to Title VI and other nondiscrimination authorities, the RRTPO follows a Discrimination Complaint Procedure. PlanRVA, as administrative staff to the RRTPO, handles Title VI complaints through the following process:

CHESTERFIELD COUNTY  
Herbert A. Richwine  
Susan Beals  
Starrie Jordan (Alternate)

GOOCHLAND COUNTY  
Robert L. Basham - FY21 Chair

HANOVER COUNTY  
Charles H. Rasnick

HENRICO COUNTY  
Amber B. Lancaster James R.  
Barrett

NEW KENT COUNTY  
Lisa M. Guthrie  
John P. Moyer (Alternate)

POWHATAN COUNTY  
Robert W. Powers  
Vacant (Alternate)

CITY OF RICHMOND  
Vacant  
Sera Erickson  
Devon Barnhart (Alternate) Hwan Hill  
(Alternate)

### AT-LARGE ORGANIZATIONS

VIRGINIA CONSERVATION NETWORK  
Wyatt Gordon  
Frederick S. Fisher (Alternate)

LEAGUE OF WOMEN VOTERS  
Virginia P. Cowles  
Mary Crutchfeld (Alternate)

## Discrimination Investigation Log

## Appendix C

CHAMBERRVA  
John Easter  
Sam Mayman (Alternate)

NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF  
COLORED PEOPLE  
James J. Minor, III  
Walter L. Johnson (Alternate)

RICHMOND AREA BICYCLING  
ASSOCIATION  
Lloyd Vye, 2021 Richmond  
History Maker for Improving Regional  
Transportation  
Champe M. Burnley (Alternate)

VIRGINIA ASSOCIATION OF RAILWAY  
PATRONS Michael Testerman

VIRGINIA COMMONWEALTH  
UNIVERSITY  
John D. Leonard

## Complaint

1. Any person who believes that they, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, or any nondiscrimination authority, may file a complaint with the RRTPO. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the RRTPO Title VI Coordinator for review and action.
2. To have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after: a) The date of the alleged act of discrimination; or b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued. In either case, the recipient or their designee may extend the time for filing or waive the time limit in the interest of justice, specifying in writing the reason for so doing.
3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of the recipient, the person shall be interviewed by the Title VI Coordinator. If necessary, the Title VI Coordinator will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.
4. Within 10 days, the RRTPO Title VI Coordinator shall acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the allegation, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available, such as state transportation departments [Virginia Department of Transportation (VDOT), the Virginia Department of Rail and Public Transportation (DRPT)], and federal transportation agencies [the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA)].
5. Within 10 days, a letter will be sent to the appropriate state and federal transportation organizations. This letter will list the names of the parties involved, the basis of the complaint, and the assigned investigator.
6. In the case of a complaint against the RRTPO, a state transportation department investigator will prepare a final investigative report and send it to the complainant, respondent (RRTPO person listed), the RRTPO Title VI Coordinator, and appropriate federal agency.

## Appendix D

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

8. Within 60 days, the RRTPO Title VI Coordinator will conduct and complete an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Executive Director of the recipient of federal assistance. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
9. Within 90 days of receipt of the complaint, the RRTPO Title VI Coordinator will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the state and federal transportation organizations, if they are dissatisfied with the final decision rendered by the RRTPO. The RRTPO's Title VI Coordinator will also provide to the appropriate state transportation department a copy of the determination and report findings.
10. If a nondiscrimination complaint that originated at RRTPO is turned over to and investigated by a state or federal transportation organization or another agency, the RRTPO Title VI Coordinator will monitor the investigation and notify the complainant of updates, in accordance with applicable regulations and policies and procedures of state transportation departments.
11. In accordance with federal law, the RRTPO will require that applicants of federal assistance notify the RRTPO of any lawsuits filed against the applicant or sub-recipients of federal assistance or alleging discrimination and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.
12. The RRTPO will submit Title VI accomplishment reports to the state transportation planning departments as required by their established processes.
13. The RRTPO will collect demographic data on staff, committees, and program areas in accordance with 23 CFR, 49 CFR and state transportation departments' established procedures and guidelines.

## Appendix D

14. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the RRTPO will retain Discrimination Complaint Forms and a log of all complaints filed with or investigated by the RRTPO. The log will include the following information: Name of Complainant; Name of Respondent; Basis of Complaint (i.e., race, color, national origin, sex, age, disability, or retaliation); Date complaint received by the TPO; Date the TPO forwarded the complaint to state/federal agency's Title VI Program Manager if so forwarded; Statement of the complaint, including specific details, relevant facts and documentation; Final disposition of the complaint.
15. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act.

RRTPO was not subject to any Title VI investigations or lawsuits and did not receive any Title VI complaints between 2015 and 2020.

If the RRTPO were to receive any complaints or be subject to a lawsuit or investigation, RRTPO, supported by PlanRVA, would use the following logs for tracking purposes.

**Investigation Log**

Investigations	Date	Summary (include basis of complaint: race, color, national origin, or other protected class)	Status	Actions Taken

**Lawsuit Log**

Lawsuits	Date	Summary (include basis of complaint: race, color, national origin, or other protected class)	Status	Actions Taken

**Complaint Log**

Complaints	Date	Summary (include basis of complaint: race, color, national origin, or other protected class)	Status	Actions Taken

## Appendix E. Compliance Matrix

The following table lists the Title VI reporting requirements as described in FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients.

The first section of the checklist includes the general requirements that apply to all recipients of Federal funding assistance. The second section refers to requirements specific to MPOs. These requirements guide RRTPO's compliance and enforcement of Title VI.

General Requirements	Section
Requirement to provide Title VI assurances	Appendix A
Title VI Notice to the public, including list of locations where notice is posted	Section 1B
Title VI complaint procedures	Section 1E, Appendix D

Title VI complaint form	Section 1F
List of Title VI investigations, complaints, and lawsuits	Appendix D
Public Participation Plan and summary of outreach efforts	Section 4A, Appendix E
Meaningful access to Limited English Proficiency (LEP) persons	Section 4C
Non-elected committee racial composition	Section 2C, Appendix C
Subrecipient compliance & monitoring procedures	Section 3D
Board approval of Title VI Program	Appendix B
<b>Requirements for Metropolitan Planning Organizations</b>	<b>Section</b>
Demographic profile	Section 2G
Description of procedures by which mobility needs of minority population are identified and considered within the planning process	Section 2G
Demographic maps that show impacts of the distribution of State and Federal funds in aggregate for public transportation projects	Section 2G
Analysis of the MPO's transportation system investments that identifies and addresses any disparate impacts	Section 2G

## Appendix F. Glossary

## Acronyms and Terms

We try to avoid using technical jargon and acronyms without explanations. In case we missed any, here are some commonly used acronyms and terms in transportation planning for the Richmond Region.

CTAC – Community Transportation Advisory Committee

GRTC – Greater Richmond Transit Company

LRTP – Long-Range Transportation Plan

MPO – Metropolitan Planning Organization

RRTP – Richmond Regional Transportation Planning Organization

TAC – Transportation Advisory Committee

TIP – Transportation Improvement Program

UPWP – Unified Planning Work Program

PlanRVA – Richmond Region Planning District Commission

## Environmental Justice Definitions

Low-Income - a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines.

Minority - a person who is:

- Black: a person having origins in any of the black racial groups of Africa;
- Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
- Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent;
- American Indian and Alaskan Native: a person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or
- Native Hawaiian and Other Pacific Islander: people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

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

Minority Population - any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

## Appendix E

Adverse effects - the totality of significant individual or

## Appendix E

cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.

### Title VI and Other Nondiscrimination Authorities

Title VI of the Civil Rights Act of 1964

Nondiscrimination in Federally Assisted Programs and Activities is one of eleven titles included in the Civil Rights Act. Section 42.104 of Title VI states "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program" that receives federal funding.

Related statutes have been enacted to expand the range and scope of Title VI coverage and applicability to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal funding on the basis of race, color, national origin, income, gender, age, and disability.

US Department of Transportation's Federal Transit Administration issued Circular FTA C 4702.1A dated May 13, 2007 lists the following references to use as guidance for Title VI implementation and administration:

Federal Transit Laws, as amended (49 U.S.C. Chapter

53 et seq.). Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.)

Department of Justice regulation, 28 CFR part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs" (December 1, 1976, unless otherwise noted)

DOT regulation, 49 CFR part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964" (June 18, 1970, unless otherwise noted)

Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, "Environmental Impact and Related Procedures" (August 28, 1987)

Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, "Planning Assistance and Standards," (October 28, 1993, unless otherwise noted)

DOT Order 5610.2, "U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations," (April 15, 1997)

DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, (December 14, 2005)

Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006)

## Appendix E

### Statutory, Regulatory, or Departmental

# Appendix E

## Requirements

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

The Federal Aid Highway Act of 1973 states that no person shall, on the grounds of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.

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

The Age Discrimination Act of 1975 states that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This act prohibits age discrimination in Federally Assisted Programs.

The Civil Rights Restoration Act of 1987, P.L.100209 clarifies that discrimination is prohibited throughout all programs and activities of federal aid recipients, sub-recipients and contractors including those activities and programs that are not federally funded.

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

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

49 CFR Part 21–Nondiscrimination in Federally Assisted Programs.

23 CFR Part 450–Federal Highway Administration planning regulations.

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

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

FHWA/FTA Memorandum Implementing Title VI Requirements in Metropolitan and Statewide Planning (October 7, 1999) -This memorandum provides clarification for field offices on how to ensure that environmental justice is considered during current and future planning certification reviews. The intent of this memorandum was for planning officials to understand that environmental justice is equally as important during the planning stages as it is during the project development stages.

Deleted: benefits  
Deleted: financial

## Appendix E

Executive Orders we may be able to delete

### some of these summaries since some EOs have been repealed

Executive Order 12898 –Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994) -presidential mandate to address equity and fairness toward low-income and minority persons/ population by requiring each federal agency to make environmental justice part of its mission; to review its procedures and identify and address all programs, policies and activities that affect human health or the environment so as to identify and avoid disproportionately high and adverse effects on low-income and minority populations. Further it required federal, state, local and tribal agencies to be proactive when it comes to determining better methods to serve the public, who rely on transportation systems and services to increase their quality of life.

U.S. DOT Order 5610.2 (April 15, 1997) expands upon Executive Order 12898 requirements to include all policies, programs, and other activities that are undertaken, funded, or approved by the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or other U.S. DOT components; and describes the process for incorporating Environmental Justice principles into DOT programs, policies, and activities.

FHWA Order 6640.23 (December 2, 1998) –FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations -mandates the FHWA and all its subsidiaries to implement the principles of Executive Order 12898 and U.S. DOT Order 5610.2 into all of its programs, policies and activities.

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

## **RRTPO Title VI Plan AI-Generated Review**

**May 6, 2025 – Gemini LLM**

### **Long-form Revision Suggestions / Executive Order & Language Review**

**Executive Order 1 #14173 (April 23, 2025) RESTORING EQUALITY OF OPPORTUNITY AND MERITOCRACY:** Focuses on eliminating disparate-impact liability, emphasizing equal opportunity, and treating individuals as individuals without consideration of race or group affiliation.

**Executive Order 2: # 14541 (January 20, 2025): ENDING ILLEGAL DISCRIMINATION AND RESTORING MERIT-BASED OPPORTUNITY**

Aims to terminate DEI/DEIA/EJ programs, characterizing them as discriminatory, and emphasizes "equal dignity and respect."

Given the potentially contradictory nature of these two orders (one aiming to eliminate disparate impact considerations often used in EJ and DEI, and the other aiming to eliminate the programs themselves), the approach will be to:

1. **Prioritize the elimination of DEI and EJ language and programmatic** as per the second Executive Order.
2. **Ensure that any remaining discussions of potential disparities or impacts are framed in terms of intentional discrimination** and not solely on disparate outcomes, aligning with the first Executive Order's stance against disparate-impact liability.
3. **Utilize the banned words list and suggested replacements** throughout the revisions.

Here is the section-by-section analysis and recommendations:

#### **Section 1b. Notice to the Public (Page 4)**

- **E.O. 1 Alignment:** Supports equal opportunity.
- **E.O. 2 Alignment:** Remove EJ references.
- **Banned Words:** disabilities, discrimination
- **Replacement Suggestions & Recommendations:**

- Remove EJ commitment. Revise to: "RRTPO fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities, ensuring operation without regard to race, color, national origin, income, gender, age, and **impairments**."
- Replace "discrimination" with "unfavorable treatment": "...subjected to **unfavorable treatment** prohibited by Title VI..."

### **Section 1c. Our Commitment (Page 5)**

- **E.O. 1 Alignment:** Should emphasize equal opportunity.
- **E.O. 2 Alignment:** Remove EJ references.
- **Banned Words:** inclusion, inclusive
- **Replacement Suggestions & Recommendations:**
  - Modify to: "RRTPO and PlanRVA are guided by federal Title VI and related statutes and regulations mandating non-discrimination and the principle of treating every person with equal dignity and respect."
  - Remove the reference to EJ.
  - Replace "inclusive" with "all-encompassing": "...a planning process that is transparent and **all-encompassing** overall."
  - Replace "inclusion" with "integration": "This Title VI Plan establishes a framework for our efforts to ensure compliance with Title VI and related statutes regarding non-discrimination, promoting **integration** throughout our programs and plans..."

### **Section 1d. What's Title VI? (Page 5)**

- **E.O. 1 Alignment:** Requires removal of disparate impact discussion.
- **E.O. 2 Alignment:** Requires removal of EJ connection.
- **Banned Words:** discrimination, minorities
- **Replacement Suggestions & Recommendations:**
  - Remove the definition and discussion of "disparate impact."
  - Remove the reference to Executive Order 12898 (Environmental Justice).
  - Replace "discrimination" with "unfavorable treatment."

- Avoid "minorities"; use "individuals of specific race, color, or national origin" if necessary.

#### **Section 2d. RRTPO's Title VI Responsibilities (Page 17)**

- **E.O. 1 Alignment:** Focus on preventing discriminatory practices, not just disparate outcomes.
- **E.O. 2 Alignment:** Remove EJ-related responsibilities.
- **Banned Words:** minorities, groups
- **Replacement Suggestions & Recommendations:**
  - Revise to focus on data collection for non-discrimination based on race, color, and national origin, and LEP. Remove EJ analysis.
  - Remove responsibility for EJ-related public participation. Focus on ensuring access for all.
  - Avoid "minorities" and "groups"; use more specific language.

#### **Section 2e. Program Areas and Processes (Page 18)**

- **E.O. 1 Alignment:** Ensure evaluation focuses on discriminatory practices.
- **E.O. 2 Alignment:** Remove EJ integration references.
- **Recommendation:** Review each program area and remove EJ mentions. Ensure the focus is on Title VI non-discrimination.

#### **Section 2f. Data Collection Process (Page 19)**

- **E.O. 1 Alignment:** Focus on discriminatory practices leading to adverse effects.
- **E.O. 2 Alignment:** Remove EJ framing.
- **Banned Words:** minority
- **Replacement Suggestions & Recommendations:**
  - Revise bullet points to focus on equal access and preventing unfavorable treatment based on race, color, and national origin. Remove EJ framing.
  - Replace "minority populations" with "individuals of specific race, color, or national origin" if necessary.

#### **Section 2g. Community Characteristics and Analysis (Page 20)**

- **E.O. 1 Alignment:** Focus on barriers to equal access.
- **E.O. 2 Alignment:** Reframe away from EJ and disadvantaged groups.
- **Banned Words:** minority, populations, underserved
- **Replacement Suggestions & Recommendations:**
  - Reframe the purpose to ensuring equal access and preventing unfavorable treatment based on protected categories.
  - Replace "Minority Populations" with "Demographic Data Related to Race, Color, and National Origin."
  - Avoid "underserved"; focus on access challenges without equity labeling.

**Section 2e. Program Areas and Processes - Analysis of Disparate Impact (Page 28)**

- **E.O. 1 Alignment:** Directly contradicts the order.
- **E.O. 2 Alignment:** Aligns with the need to move away from impact-based analysis for EJ.
- **Recommendation:** Remove this entire section.

**Section 3a. Title VI Coordinator, Role, Responsibilities (Page 30)**

- **E.O. 1 Alignment:** Focus on investigating discriminatory intent or practice.
- **E.O. 2 Alignment:** Role should focus on core Title VI compliance.
- **Banned Words:** discrimination
- **Replacement Suggestions & Recommendations:**
  - Refine responsibilities to focus on investigating "unfavorable treatment" based on race, color, or national origin. Remove explicit EJ reference.

**Section 4b. Environmental Justice (EJ) (Page 35)**

- **E.O. 1 Alignment:** The concept of addressing disparate impacts is relevant but needs to be framed carefully.
- **E.O. 2 Alignment:** This entire section is contrary to the order.
- **Recommendation:** Remove this entire section. Any considerations about community impacts should be framed under core Title VI non-discrimination.

**Section 4c. Limited English Proficiency (Page 36)**

- **E.O. 1 Alignment:** Supports equal opportunity.
- **E.O. 2 Alignment:** Review for DEI framing.
- **Recommendation:** Ensure language focuses on providing access, not "equity."

**Section 4d. Language Assistance Plan (Page 40-42)**

- **E.O. 1 Alignment:** Supports equal opportunity.
- **E.O. 2 Alignment:** Review for DEI framing.
- **Recommendation:** Ensure language focuses on providing access, not "diversity" or "equity."

**General Recommendations (Integrating Both Executive Orders):**

1. **Prioritize E.O. 2 Directives:** The immediate priority is to eliminate all explicit references to "Environmental Justice" and any programmatic elements associated with it, as per the second Executive Order.
2. **Align with E.O. 1 on Disparate Impact:** Ensure that any remaining discussions of potential disparities or adverse effects are explicitly linked to intentional discriminatory practices based on race, color, or national origin, and not solely on the existence of disparate outcomes.
3. **Systematic Word Replacement:** Continue to use the banned word list and suggested replacements throughout the document.
4. **Narrow Focus:** Center the plan strictly on preventing discrimination based on race, color, and national origin, and ensuring equal access.
5. **Legal Review (Crucial):** Given the significant and potentially conflicting nature of these directives, immediate and thorough legal review is absolutely essential to navigate compliance and potential funding implications.

<b>Terms of Issue</b>	<b>CHATGPT Replacement Words</b>
activism	social engagement
activists	change agents
advocacy	support efforts
advocate	supporter
barrier	hindrance
barriers	impediments
biased	prejudiced
bias	inclination
BIPOC	Americans
Black and Latinx	African and Latin American individuals
community diversity	variety in groups
community equity	fairness in communities
cultural differences	distinct customs
cultural heritage	legacy
culturally responsive	context-aware
disabilities	impairments
discrimination	unfavorable treatment
discriminatory	unjust
backgrounds	personal histories
groups	collectives
diversified	varied
diversify	broaden
enhancing	improving
equal opportunity	fair access to resources and positions
equality	uniformity
equitable	balanced
ethnicity	cultural background
excluded	omitted
female	child bearing adults
fostering	nurturing
gender	sex
hate speech	derogatory language
Hispanic minority	
historically	traditionally
implicit bias	unconscious preferences
inclusion	integration
inclusive	all-encompassing
increase	augment
indigenous community	native population
inequalities	discrepancies
inequities	imbalances
institutional	organizational
LGBTQ	sexual orientations

marginalize	diminish
minorities	smaller demographics
multicultural	more than one culture
polarization	separation
political	governmental
prejudice	preconceived notion
privileges	benefits
promoting	supporting
race	ethnic group
racial	ethnic
justice	fairness
sense of belonging	feeling of connection
sexual preferences	sexual orientations
social justice	fair treatment in society
sociocultural	social and cultural
socioeconomic	financial conditions
status	standing
stereotypes	generalizations
systemic	foundational
trauma	emotional injury
underappreciated	undervalued
underrepresented	inadequately depicted
underserved	insufficiently catered to
victim	affected person
women	child bearing adult