



Title VI and Environmental Justice

Policies and Procedures

Accepted by the Policy Board

On

September 21, 2015

Oahu Metropolitan Planning Organization

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I. Overview

Nondiscrimination, including Title VI¹ compliance, is a major consideration for public outreach conducted by the Oahu Metropolitan Planning Organization (OahuMPO). OahuMPO endeavors to encourage and support active public participation throughout the planning and decision-making process related to the development of its plans, programs, and projects yielding a safe and efficient transportation system reflecting the needs and interests of all stakeholders.

The OahuMPO endeavors to involve the people traditionally underserved in transportation issues. In addition to the outreach activities listed in Part 3, *Participation Plan Administrative Guidelines*. OahuMPO staff may use untraditional outreach strategies that are tailored to fit the affected community.

The OahuMPO staff develops two Title VI and Environmental Justice (EJ)² reports that outline the steps taken to involve the people traditionally underserved in transportation issues in all planning products. The planning products outlined in the annual Title VI and EJ Compliance report are those that were developed throughout the preceding year. The two reports include:

1. The Annual Title VI and EJ Compliance Report
2. The Triennial FTA Compliance Report

The Title VI report is submitted to the Hawaii Department of Transportation (HDOT), fulfilling the requirements as outlined in HDOT's *Title VI Program Plan* (dated February 10, 2015).

"The Hawaii Department of Transportation (HDOT) is a recipient of Federal financial assistance. All Federal financial assistance recipients are required to comply with non-discrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 prohibits discrimination against anyone in the United States because of race, color, or national origin by any agency receiving Federal funds.

Furthermore, non-discrimination law is found in other statutes, regulations, and Executive Orders, detailed in this Title VI

¹ Title VI, 42 United States Code (U.S.C.) § 2000d et seq., known also as the Civil Rights Act of 1964.

² In 1994, President Clinton issued Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."

Program Plan. The Federal-Aid Highway Act of 1973 added the requirement that there be no discrimination based on sex. The Civil Rights Restoration Act of 1987 defined 'program' to make the distinction that discrimination is prohibited throughout an entire agency if any part of the agency receives any Federal financial assistance. All subrecipients are required to comply with Title VI and related nondiscrimination laws, and regulations.

*HDOT's Title VI Program is committed to implementing environmental justice strategies. Environmental justice is the fair treatment and involvement of people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies."*³

II. Federal Requirements

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 or activity receiving Federal financial assistance." Title VI bars intentional discrimination as well as disparate impact discrimination (i.e., a neutral policy or practice that has a disparate impact on protected groups).

The Environmental Justice (EJ) Orders further amplify Title VI by providing that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."⁴

In accordance with 23 CFR Part §450.334, OahuMPO staff conducts self-evaluations of its programs for compliance with T6/EJ. A summary of the findings of the self-certification that were conducted by OahuMPO during the reporting period follows.

Metropolitan Transportation Planning Process Certification

Self-Certification: In August 2014, HDOT and OahuMPO certified that the transportation planning process on Oahu is being carried out in accordance with all applicable requirements. Title VI is one of the requirements. A self-certification is federally required at least every four years.

³ Title VI Program, Title VI & Environmental Justice Program, [www.http://hidot.hawaii.gov/administration/ocr/title-vi-program/](http://hidot.hawaii.gov/administration/ocr/title-vi-program/)

⁴ USDOT Federal Highway Administration, Environmental Justice, Implementing Title VI Requirements in Metropolitan and Statewide Planning, October 7, 1999

OahuMPO TMA Certification Review: In September 2014, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) finalized the “TMA Certification Review of the Oahu Area Metropolitan Transportation Planning Process” for FFY 2014.⁵ This review and evaluation was conducted in accordance with 23 CFR 450.334. The FHWA and FTA jointly certified the Federal transportation planning process of the OahuMPO as carried out by OahuMPO staff and member agencies for the Island of Oahu. However, it is contingent upon the resolution of specific Corrective Actions within the timeframes outlined in the TMA Certification Review report.

Funding for the development of the annual Title VI and EJ Compliance report and the Triennial FTA Compliance report is charged to the appropriate work element. For example, the time taken to develop the ORTP portion of the report, is charged to the ORTP work element in accordance with the current, approved OWP.

See Appendix A: OWP Work Element from the FYs 2015-2016 OWP

III. Planning Priorities

The planning products within the annual Title VI and EJ Compliance report and the Triennial FTA Compliance report are prioritized by the year in which the Policy Board approved the product. They are presented in ascending order.

The criteria presented in the report come from HDOT’s current, approved Title VI Program. The following is a list of contents from the report:

1. Policy Statement
2. Organizations, Staffing, Structures
3. Title VI Monitoring and Review Process
4. Complaints
5. Accomplishment Report for each Program area (Planning, Project Selection, and Administration).

IV. Performance Metrics

The early input and public outreach criteria on all planning products are recorded. The public involvement strategies are listed and the number of

⁵ <http://www.oahumpo.org/wp-content/uploads/2014/09/OMPO-2014-TMACertRpt-092614.pdf>

minorities and number of women that attend meetings and supplied comments are logged. The reports also incorporate comments and responses to comments tables for each planning product.

The results of Title VI and EJ analyses are described in detail. Screenshots of the OahuMPO Web site are taken to show that announcements and all planning products were posted in a timely manner to give stakeholders sufficient time to review and make comments.

The annual Title VI and EJ Compliance report is started near the end of the Federal Fiscal Year (FFY), September 30th. All planning products from the preceding year are assessed and all information is gathered. The report is then sent to HDOT for approval and FHWA, for review.

The triennial FTA Compliance report is developed every 3 years. As a subrecipient of FTA funds, the OahuMPO *Title VI and Environmental Justice Triennial Compliance Report* documents how OahuMPO complies with the United States Department of Transportation (USDOT) Title VI regulations based on the guidelines provided in FTA Circular 4702.1A (October 1, 2012).

V. Agency Responsibilities

HDOT is a direct recipient of Federal assistance and OahuMPO is a subrecipient of these funds. Thus, HDOT Title VI program requirements are followed. However, OahuMPO can develop and follow its own. The Title VI and EJ Compliance reports need HDOT's approval every year in order to receive funding. Thus, OahuMPO cooperates and coordinates with HDOT Division of Civil Rights in the development of these reports.

HDOT Title VI and EJ Program Activities Include

- Conducting internal and external compliance reviews
- Conducting Title VI/EJ Program Implementation training to HDOT managers, program officers, suppliers, vendors, contractors, local governments and other HDOT subrecipients of federal funds
- Developing Title VI/EJ compliance information for internal and external dissemination
- Processing the disposition of Title VI complaints received by HDOT
- Providing technical support to subrecipients developing Title VI/EJ Programs
- Approving subrecipients' Title VI Policy, Assurances, and Plans

FHWA and FTA oversee the Title VI program. The Compliance reports are sent to them for review. The Annual Title VI and EJ Compliance report is sent to the Office of Civil Rights for review and approval.

VI. Workflow

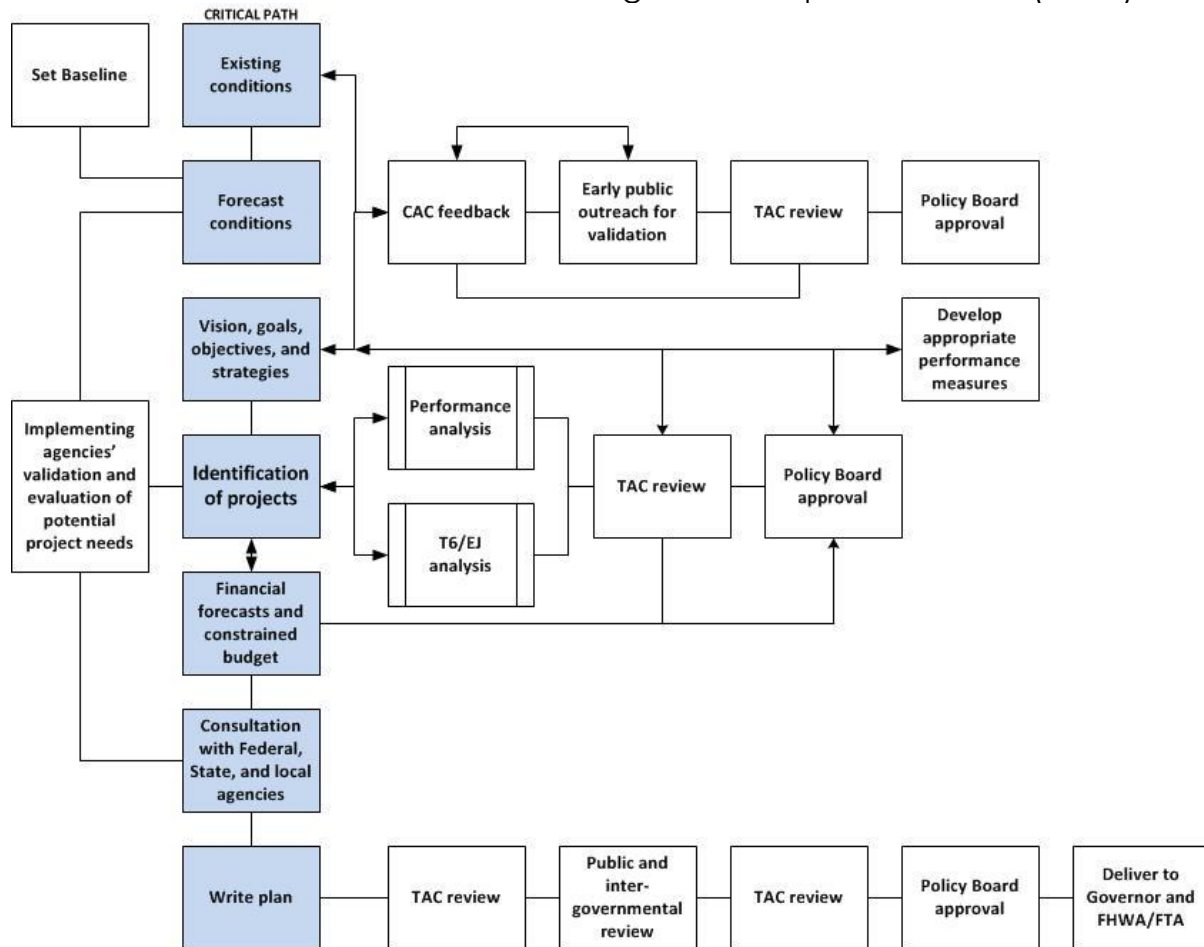
The following are the public involvement flowcharts of the main planning products:

Oahu Regional Transportation Plan

The following procedures, in conjunction with the public involvement administrative guidelines described in, are used to facilitate the timely development of the ORTP. Participation opportunities in the development of the ORTP are highlighted in Figure 1.

1. Early in the development of the scope-of-work for the development of the ORTP, the CAC will be offered the opportunity to prioritize the public involvement activities. These priorities will guide the ORTP public outreach program.
 - a. For example, in the past, the CAC has been asked where public outreach dollars should be focused: identification of public involvement strategies, identification of goals and objectives, identification of transportation problem areas, identification of potential transportation solutions, prioritization of proposed transportation solutions, or review of the draft plan.
 - b. This information will be considered in the development of the ORTP public outreach program.
2. An ORTP public outreach process will be developed that is consistent with the public involvement administrative guidelines described herein and federal metropolitan transportation planning requirements.
3. Regardless of whether the ORTP is completed primarily by a consultant or by OahuMPO staff, OahuMPO will have primary responsibility for the development and implementation of an ORTP public outreach process.
 - a. This process will provide early and continuous public involvement, notably at project milestones.

Figure 1
Public Involvement in the Oahu Regional Transportation Plan (ORTP)



- b. The public outreach process will identify potential public involvement strategies and survey instruments to solicit input from Title VI and EJ populations; groups which have been traditionally underserved by existing transportation (e.g., young, elderly, disabled, etc.); and the “silent majority” who do not attend public meetings.
- c. The public outreach process will identify all consultant tasks that would require public involvement and/or outreach and the public involvement strategy(ies) that would best meet the objectives of each task.
- d. The public outreach process will identify appropriate visualization techniques to describe the ORTP and its various components.

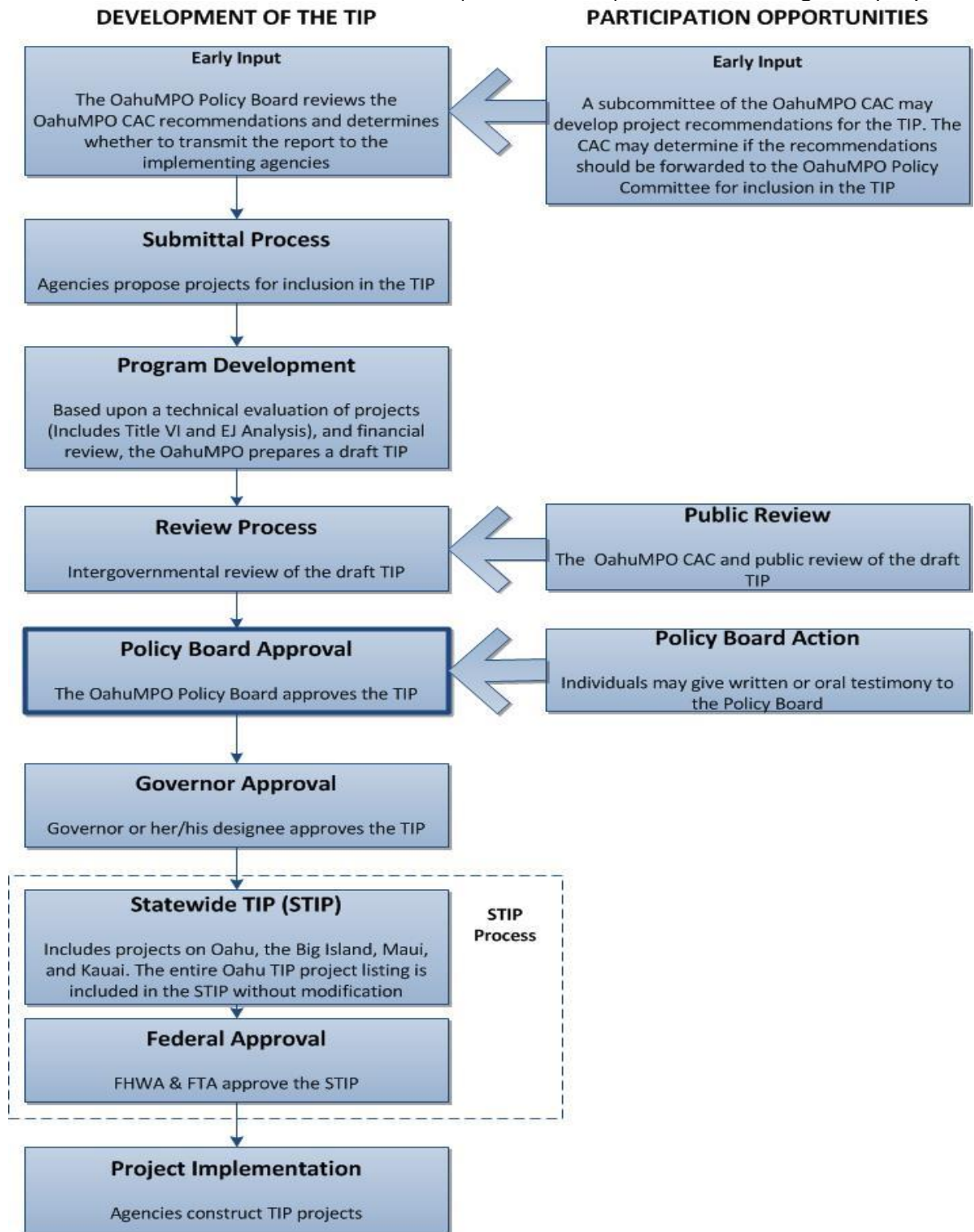
4. The CAC will assist OahuMPO staff in the development and implementation of a public outreach process.
 - a. The CAC will meet with OahuMPO staff throughout the development and implementation of the ORTP public outreach process.
 - b. The CAC will have the opportunity to review and comment on various work products supporting the public outreach process.
5. OahuMPO staff will make presentations and give status reports about the development of the ORTP to the CAC throughout the project.
6. Should the OahuMPO Policy Board wish to act to endorse a final document that differs significantly from the public review draft, an additional opportunity for public comment will be provided prior to finalizing the ORTP.
7. Significant written and oral comments received on the public review draft document and their disposition will be documented as part of the ORTP process.

Transportation Improvement Program

The following procedures, in conjunction with the public involvement administrative guidelines described in Part 3, shall be used to facilitate the timely development of the TIP. Participation opportunities in the development of the TIP are highlighted in Figure 2.

1. Prior to a “call for projects” to the agencies for input into the TIP, the CAC will be offered the opportunity to develop a list of recommended projects for inclusion in the TIP.

Figure 2
Public Involvement in the Oahu Transportation Improvement Program (TIP)



For example, in the past, the CAC formed a subcommittee to identify criteria for project selection and prioritization. They then reviewed the list of projects in the ORTP and the current TIP, and applied the criteria to produce a list of recommended projects.

2. The CAC's recommendations will be provided to the Policy Board for their consideration in selecting projects for the TIP.

In the past, the Policy Board has directed that the CAC's recommendations be transmitted to the implementing agencies for their consideration.

- c. Should the Policy Board wish to act to endorse a final document that differs significantly from the public review draft, an additional opportunity for public comment will be provided prior to finalizing the TIP.
- d. Significant written and oral comments received on the public review draft document and their disposition will be documented as part of the TIP process.
- e. The City and County of Honolulu is using the TIP public involvement process, as outlined in the Federal Highway Administration/Federal Transit Administration metropolitan transportation planning regulations (23 CFR 450/49 CFR 613), to satisfy the public hearing requirements for the Federal Transit Administration's Urbanized Area Formula Program (49 USC Section 5307) program-of-projects.

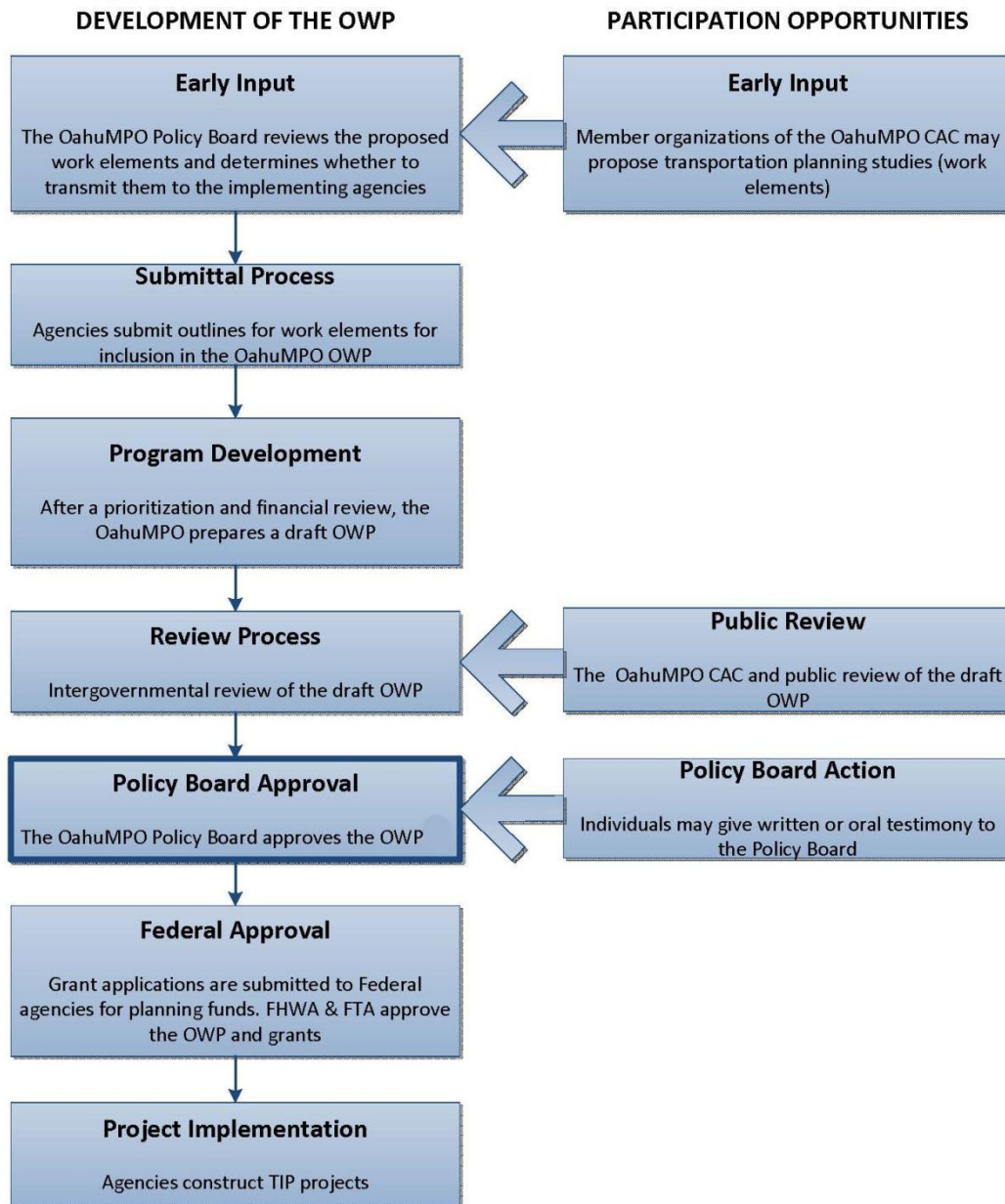
Overall Work Program

The following procedures will be used to facilitate the timely development of the OWP. Participation opportunities in the development of the OWP are highlighted in Figure 3.

Prior to a "call for work elements" to the agencies for input into the OWP, the CAC will be offered the opportunity to suggest work elements for inclusion in the OWP.

The CAC's recommendations will be provided to the Policy Committee for their consideration in selecting work elements for the OWP.

Figure 3
Public Involvement in the Overall Work Program (OWP)



Additionally, both the TIP and ORTP project groupings are analyzed for Title VI and Environmental Justice population investment equity. An example of the analysis is shown in Appendix E: Sample TITLE VI / ENVIRONMENTAL JUSTICE EQUITY ANALYSIS. Title VI and EJ Census Block Groups were identified in the *Environmental Justice in the OAHU Planning Process: Defining Environmental Justice Populations* report published in March 2004. An updated listing of Title VI and EJ Census Block Groups was proposed in the Geographic Distribution of Minority and Poverty Populations on Oahu: 2010 in January 2015. Funding for consultant support is available to document the T6/EJ evaluation procedures and provide OahuMPO staff with sufficient training to use of the revised analysis tools in FFY 2016/17.

VII. Approval and Status Reporting

HDOT is a recipient of Federal assistance and OahuMPO is a subrecipient of these funds. The OahuMPO staff cooperates and coordinates with HDOT Division of Civil Rights in the development of the Title VI and EJ Compliance reports. The reports are updated in accordance with the updated Title VI program requirements. The Annual Title VI and EJ Compliance report is sent to the Office of Civil Rights for review and approval.

An OahuMPO staff representative attends a quarterly Title VI Interdisciplinary meetings every year. These meetings introduce new updates to Title VI requirements and facilitates discussion on Title VI and EJ issues between different departments.

Status reports are not applicable to these reporting products. Databases or GIS files are taken from the specific planning product development process.

VIII. Project Close-out

The following steps are made to ensure the reports are properly closed out:

1. In-house review of draft reports
2. HDOT approval of draft reports
3. FHWA and FTA review of the final reports

Appendix A: OWP Work Element from the FYs 2015-2016 OWP

FYs 2015 & 2016 Overall Work Program
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Overall Work Program

WE Number	301.03-15/16	Time Period	July 1, 2014 – June 30, 2016
Agency	OahuMPO	Phone Number	808-587-2015
Coordinator	Brian Gibson	Fax Number	808-587-2018
Position	Executive Director	Email Address	Brian.gibson@oahumpo.org

Objectives:

- To develop an OWP in FYs 2016 and 2017 within which planning priorities for the metropolitan area are addressed.
- To track and document the progress of FYs 2015 and 2016 planning studies and the still active work elements from previous years.

Project Description:

The OWP identifies the transportation planning activities of the OahuMPO and its participating agencies for the upcoming biennium.¹⁶ It includes transportation and transportation-related planning activities; identifies individual planning projects or work elements; and, provides a record of objectives, anticipated products, related work, tasks, and costs. As a result, it allows for the coordinated, interrelated review of the proposed transportation planning activities on Oahu by Federal officials, policy makers, and the general public. Specifically, it is designed to achieve the following:

- Eliminate duplication of transportation-related planning studies.
- Develop interrelationships among transportation planning; land use planning; and/or urban design/beautification, environmental, and other elements of the metropolitan planning process.
- Ensure coordinated phasing and implementation of State and City transportation planning activities.
- Provide the technical justification for future transportation projects and programs through planning studies conducted as part of the OWP.
- Qualify applicable planning activities for Federal reimbursement.

Work Products/Outcomes:

- An overall work program for FYs 2016-2017 and FYs 2017-2018.
- Review and documentation of the progress of work elements.
- Revisions to existing approved OWPs, as necessary.

Project Justification:

The OWP serves as the key management tool for monitoring State and City transportation activities on Oahu. It describes transportation-related planning studies to be conducted in a given year. The OWP defines project objectives, priorities, and tasks; and identifies budgetary and staff requirements needed to carry out the projects. In addressing current transportation issues and problems, the OWP responds to local planning requirements, Federal transportation priorities, and Federal planning requirements. The OWP also includes land use studies as they relate to transportation needs.

Previous or Ongoing Work Related to Proposed Planning Study or Project:

The OahuMPO is responsible for preparing the OWP. The OWP is developed with the active involvement and assistance of the State and City transportation and planning departments, as well as intergovernmental agencies, FHWA, FTA, TAC, and CAC.

In the current fiscal year, the OahuMPO will continue working with its participating agencies to review formats, debrief on the OWP process, and revise written procedures.

¹⁶ 23 CFR 450-318(a)



FY 2015 Staff Labor Commitment to the Work Element

☐ Staff Labor to be Used as Match

☒ Staff Labor to be Reimbursed

Task #	Position/Agency	STAFF LABOR			FUNDING SOURCES		Total
		Hrs	Avg. \$/Hr*	Additive 0.0%	Non-Federal	Federal FTA	
1 - 7	OahuMPO Planners	1,140	\$50.78		\$11,577	\$46,309	\$57,886
1 - 7	OahuMPO Support Staff	665	\$34.41		\$4,577	\$18,305	\$22,882
STAFF LABOR SUB-TOTAL EXPENDITURES					\$16,154	\$64,514	\$80,768

*Dollar figure products may not be precise due to rounding of average hourly rates

FYs 2015 & 2016 Work Element Tasks

Task #	Staff Labor Commitment	Estimated Completion Date	FUNDING SOURCES		Total
			Non-Federal	Federal FTA	
1	State and City agencies and the OahuMPO identify planning needs, approaches, and funding requirements for the FYs 2016-2017 OWP and the FYs 2017-2018 OWP	6/2015 6/2016			
2	OahuMPO to follow the Process and Procedures document and Participation Plan in the development and revision of the OWP	Ongoing			
3	OahuMPO to evaluate compliance with the T6/EJ Federal regulations	Ongoing			
4	OahuMPO to coordinate revision of the OWP Process and Procedures Manual, as necessary	Ongoing			
5	OahuMPO to provide the necessary support and coordination for OWP work elements	Ongoing			
6	OahuMPO and its participating agencies to monitor and document progress of all OWP activities	Ongoing			
7	OahuMPO to revise the OWP, as necessary	Ongoing			
STAFF LABOR SUB-TOTAL EXPENDITURES			\$16,154	\$64,514	\$80,768
Task #	Consultant Services				
	N/A				
CONTRACT SERVICE SUB-TOTAL EXPENDITURES			\$0	\$0	\$0
Other Costs (e.g., software, travel, equipment, etc.)					
OTHER COSTS SUB-TOTAL EXPENDITURES			\$0	\$0	\$0
TOTAL WORK ELEMENT COST			\$16,154	\$64,514	\$80,768



FY 2016 Preliminary Staff Labor Commitment to the Work Element

☐ Staff Labor to be Used as Match

☒ Staff Labor to be Reimbursed

Task #	Position/Agency	STAFF LABOR			FUNDING SOURCES		Total
		Hrs	Avg. \$/Hr*	Additive 0.0%	Non-Federal	Federal FTA	
1 - 7	OahuMPO Planners	990	\$51.18		\$10,134	\$40,536	\$50,670
1 - 7	OahuMPO Support Staff	665	\$34.41		\$4,576	\$18,305	\$22,881
STAFF LABOR SUB-TOTAL EXPENDITURES					\$14,710	\$58,841	\$73,551
*Dollar figure products may not be precise due to rounding of average hourly rates							

Prepared by: Brian Gibson
Approved by: Brian Gibson

Date: January 2, 2014
Date: January 2, 2014

Appendix B: Annual Title VI and EJ Compliance Report

TITLE VI AND ENVIRONMENTAL JUSTICE COMPLIANCE REPORT TO THE HAWAII DEPARTMENT OF TRANSPORTATION

October 2013 through September 2014

October 2014



Oahu Metropolitan Planning Organization
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Appendices:

Appendix I:	Metropolitan Transportation Planning Process Certification: (1) OahuMPO Self-Certification (2014) (2) TMA Certification Review (2014) (3) Federal Transit Administration and Federal Highway Administration Certification Review letter (2011)
Appendix II:	Title VI & Environmental Justice Monitoring: FYs 2014 & 2015 Overall Work Program Revision #2
Appendix III:	Title VI & Environmental Justice Monitoring: FFYs 2011-2014 Transportation Improvement Program Revision #28
Appendix IV:	Title VI & Environmental Justice Monitoring: FYs 2015 & 2016 Overall Work Program
Appendix V:	Title VI & Environmental Justice Monitoring: FFYs 2011-2014 Transportation Improvement Program Revision #30
Appendix VI:	Title VI & Environmental Justice Monitoring: FFYs 2015-2018 Transportation Improvement Program

Purpose

This report is submitted to the Hawaii Department of Transportation (HDOT), fulfilling the requirements as outlined in HDOT's *Title VI Program Plan* (dated January 18, 2009). Unless otherwise noted, the time-period covered in this report follows federal fiscal year 2014 – from October 1, 2013 through September 30, 2014.

This report is presented in the format described in the *Title VI Program Plan*, Attachment B, "Format for Annual Accomplishments Report." It covers OahuMPO's administration and planning processes. In addition, Appendices II through VI provide individual self-assessments of Title VI and environmental justice (T6/EJ) monitoring for each of the following program areas that were either updated or revised during federal fiscal year 2014:

Overall Work Program (OWP)

Transportation Improvement Program (TIP)

Each of the monitoring documents in the appendices is a "stand-alone" report. As such, each documents the impacts of the individual program on T6/EJ populations.

Annual Accomplishments Report

I. Policy Statement

If the Title VI policy statement was updated during the reporting period, provide a copy of the new or revised policy statement. Explain how it was disseminated throughout the State.

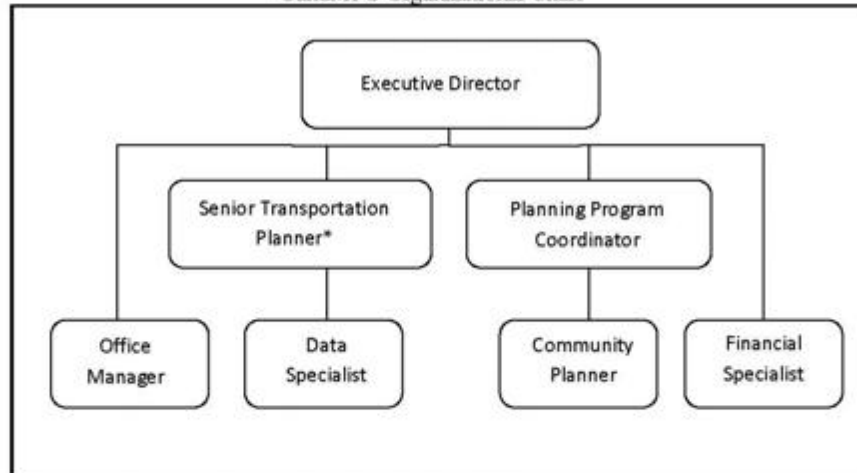
OahuMPO's Title VI policy statement was not updated during the reporting period.

II. Organization, Staffing, Structures

Update, as necessary, any changes in officials responsible for Title VI. An organizational chart should be provided in each report.

OahuMPO's Executive Director is the official responsible for Title VI. Refer to Figure 1 below for OahuMPO's organizational chart.

Figure 1
OahuMPO Organizational Chart



*The Senior Transportation Planner Position has been vacant in FFY 2014

Title VI Monitoring and Review Process

Provide a summary of all Sections of Title VI activities where Title VI reviews were conducted, including findings, recommendations, action items, and status thereof.

In accordance with 23 CFR Part §450.334, OahuMPO conducts self-evaluations of its programs for compliance with T6/EJ. A summary of the findings of the self-evaluations that were conducted by OahuMPO during the reporting period follows.

Metropolitan Transportation Planning Process Certification

Self-Certification: In August 2014, HDOT and OahuMPO certified that the transportation planning process on Oahu is being carried out in accordance with all applicable requirements. Title VI is one of the requirements. A self-certification is federally required at least every four years.

OahuMPO Federal Certification Review: In May 2013, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) finalized the "Joint Certification Review of the Oahu Area Metropolitan Transportation Planning Process" for FFY 2011. This review and evaluation was conducted in accordance with 23 CFR 450.334. The FHWA and FTA partially certified the transportation planning process used by the OahuMPO. Full certification was contingent upon OahuMPO meeting the conditions of a corrective action to bring State statutes, local ordinances, and the Comprehensive Agreement into alignment with the current Federal statute and regulations.

OahuMPO TMA Certification Review: In September 2014, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) finalized the “TMA Certification Review of the Oahu Area Metropolitan Transportation Planning Process” for FFY 2014. This review and evaluation was conducted in accordance with 23 CFR 450.334. The FHWA and FTA jointly certified the federal transportation planning process of the OahuMPO as carried out by OahuMPO staff and member agencies for the Island of Oahu. However, it is contingent upon the resolution of specific Corrective Actions within the timeframes outlined in the TMA Certification Review report.

There were twelve corrective actions and five process improvement recommendations that were identified. The corrective actions were broken down into three tiers. The deadline to complete the three tiers is as follows: 1) Tier 1 corrective actions are to be completed by July 2015, 2) Tier 2 corrective actions are to be completed by September 2015, and 3) Tier 3 corrective action are to be completed by the next planning document approval.

Altogether, the OahuMPO was given 206 days to address the corrective actions and the process improvement recommendations. The action plan to correct the specified planning processes was presented to both the Technical Advisory Committee and the Policy Committee on September 19, 2014.

Refer to Appendix I for additional information.

FYs 2014-2015 Overall Work Program Revision #2

Public Involvement and Outreach: The Title VI and environmental justice analysis of the Overall Work Program indicates that the public involvement process for the FYs 2014 & 2015 OWP Revision #2 complied with Title VI and environmental justice guidelines. Minority and low-income populations were provided the opportunity to participate in the transportation planning process. Public outreach began early in the development of the OWP and continued throughout the process. Through mailings, a special effort was made to reach out to Title VI and environmental justice populations and encourage their comments.

Refer to Appendix II for additional information.

FFYs 2011-2014 TIP Revision #28

Public Involvement and Outreach: The Title VI and environmental justice analysis of FFYs 2011-2014 TIP Revision #28 indicates that minority and low-income populations were provided the opportunity to participate in the transportation planning process. Through mailings, a special effort was made to reach out to environmental justice populations and encourage their comments on FFYs 2011-2014 TIP Revision #28.

Equity: Recent TIP revisions have resulted in T6/EJ block groups receiving a smaller share of the investments compared to non-T6/EJ block groups. However, there are a number of projects that are not completely located within T6/EJ block groups, but have indirect benefits to T6/EJ communities.

Refer to Appendix III for additional information.

FFYs 2011-2014 TIP Revision #30

Public Involvement and Outreach: The Title VI and environmental justice analysis of FFYs 2011-2014 TIP Revision #30 indicates that minority and low-income populations were provided the opportunity to participate in the transportation planning process. Through mailings, a special effort was made to reach out to environmental justice populations and encourage their comments on FFYs 2011-2014 TIP Revision #30.

Equity: Recent TIP revisions have resulted in T6/EJ block groups receiving a smaller share of the investments compared to non-T6/EJ block groups. However, there are a number of projects that are not completely located within T6/EJ block groups, but have indirect benefits to T6/EJ communities.

Refer to Appendix IV for additional information.

FYs 2015-2016 Overall Work Program

Public Involvement and Outreach: The Title VI and environmental justice analysis of the Overall Work Program indicates that the public involvement process for the FYs 2015 & 2016 OWP complied with Title VI and environmental justice guidelines. Minority and low-income populations were provided the opportunity to participate in the transportation planning process. Public outreach began early in the development of the OWP and continued throughout the process. Through mailings, a special effort was made to reach out to Title VI and environmental justice populations and encourage their comments.

Refer to Appendix V for additional information.

FFYs 2015-2018 TIP

Public Involvement and Outreach: The Title VI and environmental justice analysis of FFYs 2015-2018 TIP indicates that minority and low-income populations were provided the opportunity to participate in the transportation planning process. Through mailings, a special effort was made to reach out to environmental justice populations and encourage their comments on FFYs 2015-2018 TIP.

Equity: T6/EJ block groups and non-T6/EJ block groups receive about equal shares of the investments. In terms of average per capita investment of projects located directly within T6/EJ block groups, however, non-T6/EJ block groups receive about \$1,289, or 28% more per capita in TIP expenditures than T6/EJ block groups. This difference is offset by a number of projects that are not completely located within T6/EJ block groups, but have indirect benefits to T6/EJ communities.

Refer to Appendix VI for additional information.

Complaints

Provide a summary of each complaint filed. Include the basis, status, and actions proposed and/or taken by the State and current disposition.

No complaints were filed against OahuMPO during the reporting period.

Accomplishment Report for Each Program Area¹

A. Planning

How many consultant projects for planning were awarded during the period? Dollar value?

OahuMPO awarded two contracts during the fiscal period of FFY 2014. One of the contracts is currently active. The second contract has not been issued a Notice to Proceed; OahuMPO is waiting for Department of Accounting and General Services (DAGS) to complete the contract encumbrance. Total contracts awarded were \$363,263.

What efforts were made to utilize minority and female consultants and subcontractors?

OahuMPO's Disadvantaged Business Enterprise (DBE) Triennial (FFY 2014-FFY 2016) goal is incorporated with HDOT's goal, which currently is 53.43%. Although this goal is very difficult to attain, OahuMPO continues to be active participants in its activities annually. OahuMPO uses of a race-conscious overall contract goal and encourages prospective contractors to take all necessary and reasonable steps to ensure that firms owned by disadvantaged individuals have an equal opportunity to compete for and perform on contracts. OahuMPO also utilizes HDOT's DBE directory to incite interest for submitting proposals among registered DBE firms.

Were there any studies conducted which provided data relative to minority persons, neighborhoods, income levels, physical environment, and travel habits? If so, what type of assistance did those individuals responsible for Title VI provide, to ensure that Title VI considerations were included in the studies.

There were no studies done in FFY 2014. The last study was done in 2010. According to FHWA, HDOT is due for an updated study.

¹ Accomplishments for the Planning and Administration program areas are provided. OahuMPO is not involved in the Design, Environmental Considerations, Right-of-Way, Research, Construction, Education and Training, and Motor Vehicle Safety Program areas that are included in HDOT's *Title VI Program Plan* Annual Accomplishments Report request.

Number of public input opportunities or strategies used during the reporting period. What efforts were utilized to ensure citizen participation in the hearings, particularly minorities and women? Were minorities and women, both individually and through their organizations, represented in the citizen participation effort? How many, and in what capacity?

Agendas for all OahuMPO meetings were sent to the City Clerk's office and the Lieutenant Governor's office for posting and viewing by the general public. Meeting notices were also posted on the OahuMPO website and the State Calendar.

As an example, as part of the FYs 2015-2016 OWP development process, T6/EJ populations were informed of the development of the OWP through mailings and were given the ability to comment during the public comment period and at meetings. Also, the CAC prioritized a list of project selections for the OWP on September 18, 2013. There were 30 minority members involved in the decision-making process.

In addition to the above, OahuMPO CAC meeting notices were sent to the State libraries and to the CAC mailing list, which includes over 576 CAC member representatives and interested parties, including minorities and women.

Policy Committee meeting notices were mailed to the Policy Committee mailing list, which includes all current CAC members and anyone who requested to be placed on the list. Technical Advisory Committee meeting notices were sent to anyone who requested to be placed on the mailing list. The general public has the opportunity to join the mailing list through OahuMPO's website, or by contacting staff by phone or mail.

The following tables summarize public involvement opportunities and/or strategies that were used in the outreach to citizens on Oahu for each of the following plans and programs that were developed during FFY 2014:

- Table 1: FYs 2014-2015 Overall Work Program Revision #2
- Table 2: FFYs 2011-2014 TIP Revision #28
- Table 3: FYs 2015 & 2016 OWP
- Table 4: FFYs 2011-2014 TIP Revision #30
- Table 5: FFYs 2015-2018 TIP

Refer to Appendices II through VI for additional details.

Table 1
FYs 2014-2015 OWP Revision #2
Public Input Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
11/20/13	Website Posting: Posted draft on website and solicited comments	14 hits recorded to OnuMPO's OWP webpage	N/A	N/A
11/20/13	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	414 CAC member representatives and interested parties. Includes over 50 T6/EJ organizations.		
11/20/13	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
11/20/13-12/13/13	Public comments received	4		
11/20/13-11/29/13	Government agency comments received: 3 received from 2 agencies	N/A	N/A	N/A
11/20/13	Announcement to CAC	37	23	18
12/2/13	Presentation to TAC and TAC recommendation			
	Public Attendees	2	2	1
	Written testimony received	0	0	0
	Oral testimony received	0	0	0
2/10/14	Presentation to Policy Committee and Policy Committee action			
	Public Attendees	16	3	5
	Written testimony received	4	0	3
	Oral testimony received	4	3	3
02/14/14	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A

N/A=Not applicable

Table 2
FFYs 2011-2014 TIP Revision #28
Public Input Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
12/31/2013	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	521 CAC members and interested parties. Includes over 40 T6/EJ organizations.		
12/31/2013	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
12/31/13-1/31/14	Public comments received	0	0	0
12/31/13-1/28/14	Government agency comments received: 3 comments from 3 agencies	N/A	N/A	N/A
12/31/13-1/31/14	Website Posting: Posted draft revision #28 on website and solicited comments	174 hits to the OahuMPO TIP webpage	N/A	N/A
2/03/2014	Presentation to TAC	5	2	3
	- Public Attendees	0	0	0
	- Written testimony received	0	0	0
2/10/2014	Presentation of draft of TIP Revision #28 to Policy Committee and Policy Committee action	16	2	5
	- Public Attendees	1	0	0
	- Written testimony received	1	0	0
2/14/2014	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

Table 3
FYs 2015-2016 OWP
Public Input Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
9/18/13	CAC to develop a list of transportation related studies to suggest for inclusion in the OWP	49	30	24
2/10/14	Technical Advisory Committee to review initial draft of the OWP			
	Public Attendees	5	2	3
	Written testimony received	0	0	0
2/10/14	Policy Committee meeting to discuss the OWP			
	Public Attendees	16	3	5
	Written testimony received	0	0	0
3/3/14	Oral testimony received	0	0	0
	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	Over 576 CAC member representatives and others interested in transportation. Includes over 50 organizations representing T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
	Website Posting: Posted draft OWP on website and solicited comments	79 hits to OahuMPO's OWP webpage	N/A	N/A
3/3/14-5/9/14	Public Review comments received: 4 comments from 322 individuals and organizations	N/A	N/A	N/A
3/3/14-5/2/14	Government agency comments received: 10 comments from 6 agencies	N/A	N/A	N/A
4/10/14	CAC subcommittee meeting to discuss the lack of feedback provided by HDOT on the CAC's suggested work elements	5	1	0
6/12/14	Presentation to Technical Analysis Committee and Technical Analysis Committee action			
	Public Attendees	4	1	3
	Written testimony received	0	0	0
6/19/14	Oral testimony received	0	0	0
	Presentation to Policy Committee and Policy Committee action			
	Public Attendees	11	4	7
7/23/14	Written testimony received	0	0	0
	Oral testimony received	1	0	1
7/23/14	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A

N/A=Not applicable

Table 4
FFYs 2011-2014 TIP Revision #30
Public Input Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
5/21/2014	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	548 CAC members and interested parties. Includes over 40 T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
5/21/14-7/01/14	Public comments received: 2 comments from 1 individual	1	0	1
5/21/14-6/27/14	Government agency comments received: 4 comments from 2 agencies, 24 responses with no comments	N/A	N/A	N/A
12/31/13-7/01/14	Website Posting: Posted draft revision #30 on website and solicited comments	49 hits to the OahuMPO TIP webpage*	N/A	N/A
7/11/2014	Presentation to TAC			
	- Public Attendees	5	3	2
	- Written testimony received	0	0	0
8/11/2014	- Oral testimony received	0	0	0
	Presentation of draft of TIP Revision #30 to Policy Committee and Policy Committee action			
	- Public Attendees	10	2	2
8/13/2014	- Written testimony received	5	1	1
	- Oral testimony received	1	0	0
8/13/2014	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A= Not applicable

*The accuracy of this number is questionable due to the recent maintenance of the OahuMPO website. However, the revision was viewable throughout the public and intergovernmental comment periods.

Table 5
FFYs 2015-2018 TIP
Public Input Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
5/06/2014-7/03/2014	Public comments received	12	3	3
5/06/2014-6/20/2014	Government agency comments received: 4 comments from 3 agencies	N/A	N/A	N/A
5/06/2014	Direct Mail and Email: Solicited comments from CAC members, interested parties, and organizations representing T6/EJ organizations/individuals.	548 CAC member representatives and interested parties. Includes 56 T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
	Website Posting: Posted draft on website and solicited comments	72 hits to the OahuMPO TIP webpage*	N/A	N/A
6/19/2014	Presentation to Policy Committee			
	- Public Attendees	11	4	7
	- Written testimony received	0	0	0
7/11/2014	Presentation to Technical Advisory Committee			
	- Public Attendees	5	3	2
	- Written testimony received	0	0	0
8/18/2014	Presentation to Policy Committee			
	- Public Attendees	17	4	7
	- Written testimony received	1	0	0
8/22/2014	- Oral testimony received	7	1	3
	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

*The accuracy of this number is questionable due to the recent maintenance of the OahuMPO website. However, the revision was viewable throughout the public and intergovernmental comment periods.

B. Project Selection

How are Title VI considerations addressed through stakeholder involvement mechanisms?

Stakeholder involvement is usually done as part of our public outreach process for the Transportation Improvement Program (TIP) which is updated every four years. As part of the TIP Revision #28 and TIP Revision #30, the public, CAC member organizations, and government agencies were notified and given a chance to comment. The following lists the planning documents and the public review periods. Stakeholders and the public were encouraged to make comments.

- a) Draft FFYs 2011-2014 TIP Revision #28 was posted on our website from December 31, 2013 to January 31, 2014,
- b) Draft FFYs 2011-2014 TIP Revision #30 was posted on our website from May 21, 2014 to July 1, 2014,
- c) Draft FFYs 2015-2018 TIP was posted on our website from May 22, 2014 to June 28, 2014,
- d) Draft FYs 2014-2015 OWP Revision #2 was posted on our website from November 20, 2013 to December 13, 2013,
- e) Draft FYs 2015-2016 OWP was posted on our website from March 3, 2014 to May 9, 2014.

Describe how minorities and low-income populations were provided opportunities to be involved in project selection processes.

Through mailings, a special effort was made to reach out to T6/EJ populations and encourage their comments on the draft TIP revision. As part of the TIP development processes, T6/EJ populations were informed of the development of the TIP through mailings and were given the ability to comment during the public comment period and at meetings.

The agenda for the meetings which included the TIP were sent to the City Clerk's office and the Lieutenant Governor's office for posting and viewing by the general public. Meeting notices were also posted on the State Calendar.

The following table summarizes early public involvement opportunities and/or strategies that were used in the outreach to citizens on Oahu for the FFYs 2015-2018 TIP which was developed during federal fiscal year 2014:

Table 6
FFYs 2015-2018 TIP
Early Public Input

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
7/25/2013	Freight mover's survey finalized and sent to Hawaii Transportation Authority to post announcement and link to the survey in their newsletter.*	N/A	N/A	N/A
8/21/13	Using the CAC online survey data gathered over the past month, the CAC was led through a prioritization process. The results of the survey were also passed out as handouts at this meeting and presented.	37	12	10
9/18/13	The draft CAC Early Input project prioritization list was distributed for the consideration of the CAC members. It was approved and recommended to forward to the agencies.	39	14	14
10/30/2013	Transmitted CAC early public input to City and State agencies and requested responses. Call to City and State agencies for their proposed projects.	N/A	N/A	N/A
2/10/2014	Policy Committee received a presentation on the draft TIP prior to it going out for public and intergovernmental reviews Public Attendees Written testimony received Oral testimony received	16 0 0	3 0 0	5 0 0
5/21/2014	The CAC was presented the Draft FFYs 2015-2018 TIP	49	23	19

N/A=Not applicable

Describe what project selection decisions, if any, were affected by Title VI or Environmental Justice Issues.

To date, no Title VI or environmental justice issues have come up.

How many public hearings, and in what locations, were held on adoption of the STIP or in making other project selection decisions?

The public meetings held on the TIP were located in Downtown Honolulu.

C. Administration

Provide a list of employees by ethnicity, sex, and title in each of the Title VI program areas.

Table 7
OahuMPO Staff

Position	Race	Gender
Executive Director	White	Male
Senior Transportation Planner*	Vacant	Vacant
Planning Program Coordinator	White	Male
Community Planner	White	Female
Data Specialist	Asian	Female
Financial Specialist	Asian	Female
Office Manager	Asian	Female

Summarize all activities undertaken during the reporting period, which provide for assurances of Title VI compliance by contractors (i.e., Are Title VI requirements included in all contracts and consultant agreements; were reviews made to ensure contractors and consultants are adhering to Title VI requirements?).

Title VI requirements are included in all of OahuMPO's contracts and consultant agreements. This information is also included in OahuMPO's requests for solicitations for consultant contracts. Contractors are notified of the requirement to incorporate the provisions of the Title VI Assurances in all sub-contracts awarded in connection with OahuMPO contracts. OahuMPO's consultant procedures and products are reviewed based on Title VI requirements, as well as other requirements.

Was any Title VI training provided during the reporting period? If so, how many participants attended, titles, etc.? Was any other kind of civil rights training conducted? If so, what type of training (course content)? Provide a list of participants by job title (i.e., supervisor, manager, etc.).

Yes, the HDOT Civil Rights Specialist has recently gathered an Interdisciplinary Team that meets quarterly to discuss all civil rights issues, including equal employment opportunities. The OahuMPO data specialist participates in these meetings and updates OahuMPO staff on the information discussed.

Appendix I

Metropolitan Transportation Planning Process Certification

- (1) OahuMPO Self-Certification (2014)**
- (2) Joint Federal Transit Administration and Federal Highway Administration Certification Review Letter (2011)**
- (3) TMA Federal Certification Review (2014)**

METROPOLITAN TRANSPORTATION PLANNING PROCESS CERTIFICATION AUGUST 2014

In accordance with 23 CFR 450.334, the Hawaii Department of Transportation and the Oahu Metropolitan Planning Organization hereby certify that the transportation planning process is being carried out in accordance with all applicable requirements. Examples are cited in the following table.

	SELF-CERTIFICATION CRITERIA	OahuMPO ACTIONS
1	23 CFR 450.334 (a)(1): 23 U.S.C. 134, 49 U.S.C. 5303, and 23 CFR Part 450 Subpart C	OahuMPO carries out a continuing, cooperative, and comprehensive multimodal transportation planning process. <i>The Oahu Regional Transportation Plan, Transportation Improvement Program, and Overall Work Program</i> include a section within each document that describes how the MAP-21 planning factors are addressed.
2	23 CFR 450.334 (a)(2): In nonattainment and maintenance areas, sections 174 and 176 (c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 (c) and (d) and 40 CFR part 93	Not applicable; Oahu is in attainment.
3	23 CFR 450.334 (a)(3): Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR part 21	<p>OahuMPO's efforts to engage low-income and minority populations are identified in OahuMPO's Public Participation Plan. The Plan was amended in April 2013 to include an outreach plan to engage minority and limited English proficient populations on Oahu. OahuMPO assesses the performance of its transportation plans and programs based on the Title VI and Environmental Justice performance measures documented in the Environmental Justice in the OahuMPO Planning Process report.</p> <p>Results of the Title VI analyses on each of OahuMPO's transportation plans and programs are provided to the Technical Advisory Committee and Policy Committee prior to action taken on those documents. Title VI compliance reports are provided annually to FHWA and triennially to FTA.</p> <p>In each Request for Qualifications, consultants are provided with OahuMPO's Title VI Assurance and are notified that OahuMPO will strictly enforce compliance with all the requirements of OahuMPO's Title VI plan with respect to the project. OahuMPO's Title VI Assurance is also included in each consultant contract.</p> <p>OahuMPO takes part in the Title VI Interdisciplinary Quarterly meetings held by HDOT. These meetings are held to discuss, update and educate agencies on Title VI issues.</p>

4	23 CFR 450.334 (a)(4): 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity	<p>OahuMPO fully complies with its Title VI and Environmental Justice policy statement, which states, in part, that OahuMPO "will not discriminate on the basis of race, color, gender, national origin, age, or low-income. OahuMPO will not exclude anyone from participation in, deny the benefits of, or otherwise discriminate under any of its programs or activities." OahuMPO opens its public input process to all residents of Oahu; this is reflected in our Citizen Advisory Committee membership.</p> <p>There are no past or pending lawsuits against OahuMPO alleging discrimination or civil rights violations.</p>
5	23 CFR 450.334 (a)(5): Section 1101 (b) of the MAP-21 (Pub. L. 109-59) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT-funded projects	<p>OahuMPO has adopted the Hawaii Department of Transportation's Disadvantaged Business Enterprise (DBE) Program.</p> <p>Information on the DBE program is included in each Request for Qualifications as well as each contracting document. Consultants are encouraged to take all necessary and reasonable steps (a good faith effort) to ensure that DBE firms have an equal opportunity to compete for and perform on each contract.</p> <p>In addition, whenever OahuMPO needs to purchase supplies, equipment, and services, we review the most recent list of DBE firms supplied by the State of Hawaii to see if any of the businesses listed are able to satisfy our needs.</p> <p>OahuMPO has been setting an annual DBE program goal; but, in response to the recent Federal Register Notice amending 49 CFR Part 26 effective March 5, 2010, we developed a triennial goal this year. We will however, continue to review and evaluate our DBE program goal annually. OahuMPO also submits a Uniform Report of DBE Commitments/ Awards and Payments semi-annually to FTA and FHWA through HDOT.</p>
6	23 CFR 450.334 (a)(6): 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts	Not applicable; OahuMPO does not have any construction contracts.

7	23 CFR 450.334 (a)(7): The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and 49 CFR parts 27, 37, and 38	<p>OahuMPO developed a Special Needs Guide to help staff address the special needs of individuals requesting information or attending meetings. OahuMPO also follows the State of Hawaii Disability Access to Programs and Services Manual.</p> <p>Our office is located in an accessible building; and we hold public meetings in accessible locations. Notices are placed on our public meeting agendas to contact our office to request language interpretation, or an auxiliary aid or service (i.e., sign language interpreter, accessible parking, or materials in alternative format).</p> <p>Also, as stated in our employment ads, OahuMPO is an equal opportunity employer.</p>
8	23 CFR 450.334 (a)(8): The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance	Refer to #4 above.
9	23 CFR 450.334 (a)(9): Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender	Refer to #4 above.
10	23 CFR 450.334 (a)(10): Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities	Refer to #7 above.
11	49 CFR Part 20: New Restrictions on Lobbying	Contractors sign this certification as part of the contract document.
12	49 CFR Part 29, sub-part F: Drug-Free Workplace Requirements	A drug-free workplace directive is signed by all OahuMPO employees, certifying that they will abide by this directive as a condition of continued employment.
13	Recommendation from the 2011 Joint Certification review: OahuMPO is encouraged to provide a list of hyperlinks or a top level hyperlink to planning projects and activities currently under way in a more readily accessible public place on OahuMPO's website. Many of the plans and projects are buried within other documents posted to the website but are difficult to find.	OahuMPO has an updated website that is more user-friendly than the previous one. Plans and projects are easier to find due to the new toolbar located at the top of the homepage. There are specific tabs for "Plans and Programs" and "Projects" on that toolbar. There is also a "News & Announcements" section on the homepage that notifies users of current activities that are under way.
14	Recommendation from the 2011 Joint Certification review: OahuMPO should evaluate what changes are needed for a more effective and flexible Policy Board structure; to evaluate voting procedures and processes; and to ensure that the processes and practices of the Policy Board are open to review by partner agencies and the public. The composition of the Policy Board is fixed by State statute (HRS279E) which is written does not allow flexibility in adjusting appointed members to meet changing needs.	<p>In 2012, OahuMPO began a comprehensive Planning Process Review to evaluate existing procedures and processes and make recommendations for improvement. As of July 2014, that review is still underway.</p> <p>Additionally, OahuMPO has solicited statements of interest from qualified firms to complete a Legal Review for the agency, identifying inconsistencies between State laws, local ordinances, and Federal regulations, and making recommendations to resolve those inconsistencies.</p>

15	Recommendation from the 2011 Joint Certification review: OahuMPO should consider how to formally review the effectiveness of current public involvement efforts to identify what is working, what is not, and to identify changes to improve results.	An evaluation of OahuMPO's Public Participation Plan was approved as part of the agency's FY 2014 work plan.
16	Recommendation from the 2011 Joint Certification review: OahuMPO is encouraged to move forward aggressively and thoroughly to improve the 3-C planning process. In particular, it is valuable to consider national best practices in technical and institutional approaches to planning at peer MPOs, including performance based planning as required under MAP-21 and incorporating sustainability and climate change goals alongside traditional transportation goals.	In 2012, OahuMPO began a comprehensive Planning Process Review to evaluate existing procedures and processes and make recommendations for improvement. As of July 2014, that review is still underway. Best practice interviews with peer MPO's is part of the scope of the project. Additionally, in June 2014, the OahuMPO Policy Committee did approve regional transportation goals that include climate change.
17	Recommendation from the 2011 Joint Certification review: OahuMPO should develop user friendly information to assist stakeholders and the public to understand and interpret the project listings in the Transportation Improvement Program (TIP). This could involve clear presentation of information on the website, perhaps in an interactive and visual platform, and possible citizens' guides. It is necessary to include clear presentation of the assumptions and risks included in the revenue and cost estimation within the financial plans for the Oahu Regional Transportation Plan (ORTP) and TIP, in particular. These assumptions should be developed cooperatively and presented in clear and readable fashion to assist decision-makers, stakeholders, and the public to understand trade-offs involved in decisions. Additionally, OahuMPO is encouraged to explore the value of an eTIP as a versatile tool both for communications for streamlined program management. This should be done in coordination with Hawaii Department of Transportation (HDOT) and the City.	Staff time constraints are limiting OahuMPO's ability to address some of these nice-to-have additions, such as an interactive web-based TIP and citizens' guides. As of July 2014 OahuMPO is developing a Request for Proposals to develop the ORTP revenue estimate forecast along with an exploration of alternative funding sources. OahuMPO began, with the assistance of the Hawaii Division office of the Federal Highway Administration, exploring the development of an eTIP.
18	Recommendation from the 2011 Joint Certification review: OahuMPO is encouraged to continue to update and refine its standard operating procedures for its program areas as need arises. This should include enhancing staff capacity to conduct core functions, including planning studies, in coordination with partners, as well as the CMP and ORITSA updates	In 2012, OahuMPO began a comprehensive Planning Process Review to evaluate existing procedures and processes and make recommendations for improvement. As of July 2014, that review is still underway. OahuMPO continues to budget for staff professional development, and is in the process of hiring a new Senior Planner. The CMP update was approved as part of the FY 2015 work plan. The ORITSA update is a proposed element of the FY 2016 work plan.

19	Recommendation from the 2011 Joint Certification review: Continue forward momentum to undertake multimodal, systems-level corridor or subarea planning studies in coordination with HDOT and the City and County of Honolulu (DTS, DPP, and HART). As the regional transportation planning agency, Federal regulations encourage cooperative, coordinated planning by the MPO. Also, the OahuMPO CMP and ORITSA is recommended to be updated as soon as can be accommodated in the OWP workload.	OahuMPO's first subarea study was approved as part of the FY 2014 work plan. Additionally, a corridor study was approved for FY 2015. The CMP update was approved as part of the FY 2015 work plan. The ORITSA update is a proposed element of the FY 2016 work plan.
20	Corrective action from the 2011 Joint Certification review: OahuMPO is to work with the appropriate agencies and legislative bodies to bring State statutes, local ordinances, and the Comprehensive Agreement into alignment with current Federal statute and regulations	As of July 2014, OahuMPO was in the process of finalizing a contract with a qualified consultant to complete the Legal Review which will identify any inconsistencies in the laws at the various levels of government and make recommendations regarding how best to align them.

Oahu Metropolitan Planning Organization


OahuMPO Policy Committee Chair

8/18/14
Date

Hawaii Department of Transportation


Director of Transportation

8.18.14
Date



U.S. Department
of Transportation

**Federal Transit
Administration**

**Federal Highway
Administration**

May 16, 2013

FTA - Region 9
201 Mission St Suite 1050
San Francisco CA 94105-1839

FHWA - Hawaii Division
300 Ala Moana Blvd #3306
Honolulu, HI 96850-3306

In Reply Refer To: HDA-III

Mr. Brian Gibson, Director
OahuMPO
707 Richards St #202
Honolulu, HI 96813

Subject: 2011 Oahu Metropolitan Planning Organization Certification Review Report

Dear Mr. Gibson:

The final report for the 2011 Oahu Metropolitan Planning Organization (OahuMPO) Certification Review is enclosed. This review and evaluation was conducted in accordance with 23 CFR 450.334. The Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) partially certify the transportation planning process used by the OahuMPO.

There is one corrective action identified along with a number of process improvement recommendations. An action plan, as outlined in the enclosed report, is required of OahuMPO within 90 days of this letter.

We thank OahuMPO for its cooperation during this review process. The professionalism of your staff made it a rewarding experience. If you have any questions on the report, please call either Ted Matley of FTA- Region IX at (415) 744.2590 or Liz Fischer of the FHWA- Hawaii Division at (808) 541-2325.

Sincerely yours,

Leslie T. Rogers
Regional Administrator
Federal Transit Administration

Abraham Wong
Division Administrator
Federal Highway Administration Hawaii

Enclosure

By email:

HDOT: Okimoto, Urasaki, Takeshita, Tatsuguchi
FTA: Rogers, Sukys, Matley
RITA-Volpe: Lyons
OahuMPO: Sykes, Arakaki, Yasuda



September 26, 2014

FTA - Region 9
201 Mission St Suite 1650
San Francisco CA 94105-1839

FHWA - Hawaii Division
300 Ala Moana Blvd #3306
Honolulu, HI 96850-3306

In Reply Refer To:
HDA-111

Senator Will Espero, Chairman
OahuMPO Policy Committee
707 Richards St, #200
Honolulu, HI 96813

Subject: 2014 Oahu Planning Certification Review Report Release

Dear Senator Espero:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) held a planning certification review of the Oahu metropolitan area over the summer of 2014. Combined with document review and participating agency interviews, the federal team evaluated the planning process for the Oahu metropolitan area.

The enclosed 2014 planning certification review report identifies specific actions, deadlines, and consequences for non-compliance with federal planning rules. The findings, corrective actions, and recommendations in three tiers based on what the review team felt was most important to establish a viable, fully functioning, and continuing, cooperative, comprehensive multi-modal metropolitan planning process. Each corrective action provides a list of agencies and committees responsible for addressing or resolving that corrective action. Each corrective action also has a compliance deadline – if the deadline is not met for a given corrective action, the consequence listed for that tier will take effect.

Based on the overall findings of the independent review team, FHWA and FTA jointly certify the federal planning processes of the OahuMPO as carried out by its staff and member agencies for the Island of Oahu, contingent upon the resolution of specified corrective actions within the timeframes outlined in this report. This certification will remain in effect until July 26, 2015, the first date on which several Tier 1 corrective action deadlines are identified. This certification remains in effect unless otherwise voided by FHWA and FTA due to failure to appropriately address the corrective actions.

2014 OMPPO CertReview
v. 2 (09/26/14)

If you have any questions, please contact Liz Fischer, FHWA Hawaii, at (808) 541-2325 or glizabeth.fischer@dot.gov, or Ted Matley, FTA Region IX, at (415) 744-2590 or ted.matley@dot.gov.

Sincerely yours,

Leslie T. Rogers
Regional Administrator
Federal Transit Administration

Mayela Sosa
Division Administrator
Federal Highway Administration Hawaii

By Email:
OahuMPO: Gibson, Sykes, Yasuda, Kong, Toyonaka, Ching
HDOT: Fuchigami Urasaki, Takeshita, Tatsuguchi, Nakagawa
C/C Honolulu: Formby, Garrity, Suzuki, Atta, Sokugawa
HART: Grabauskus, Morioka, Scanlon
FHWA: Fischer, Lau, Lairet, Turner, Stevens, Miller, Petty
FTA: Sukys, Matley, Weeks

Appendix II

Title VI & Environmental Justice Monitoring: FYs 2014 & 2015 OWP Revision #2

TITLE VI AND ENVIRONMENTAL JUSTICE MONITORING

FYs 2014 & 2015 Overall Work Program Revision #2

February 2014



Oahu Metropolitan Planning Organization
707 Richards Street, Suite 200
Honolulu, Hawaii 96813-4623
(808) 587-2015
www.OahuMPO.org

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1.0 BACKGROUND

The purpose of the environmental justice analysis of the Overall Work Program (OWP) is to ensure that minority and low-income populations are provided the opportunity to participate in the OWP development process.

Environmental justice has its roots in Title VI of the Civil Rights Act of 1964, which 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 or activity receiving Federal financial assistance.”

In 1994, President Bill Clinton issued Executive Order 12898, directing all Federal agencies to implement environmental justice by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

1.1 Policy Statement

The following Oahu Metropolitan Planning Organization (OahuMPO) Policy Statement for Title VI and Environmental Justice was approved by the OahuMPO Policy Committee on July 19, 2001:

It is the policy of the OahuMPO to adhere to the following Federal regulations:

- *The Civil Rights Act of 1964*
- *Environmental Justice (Executive Order 12898)*
- *Civil Rights Restoration Act of 1987*
- *Age Discrimination Act of 1975*

OahuMPO will fully comply with the above statutes and their implementing regulations and will not discriminate on the basis of race, color, gender, national origin, age, or low-income. OahuMPO will not exclude anyone from participation in, deny the benefits of, or otherwise discriminate under any of its programs or activities.

1.2 Title VI and Environmental Justice in the OahuMPO Planning Process

In October 2001, OahuMPO finalized its report, *Environmental Justice in the OMPPO Planning Process*.¹ The report documented how OahuMPO implemented a process to analyze the distribution of benefits and disproportionate impacts of planned investments. In 2004, OahuMPO completed its effort to refine and update the population database and performance

¹ Available on the OahuMPO website (www.OahuMPO.org).

measures derived from the October 2001 effort.² The updated information is reflected in this report.

1.3 Title VI and Environmental Justice Populations

The Title VI and environmental justice populations include both minority and low-income populations. For the purposes of this analysis, these populations are referred to as Title VI/Environmental Justice (T6/EJ) block groups. The data are based on U.S. Census income, minority, and ethnicity data from the 2000 Census. OahuMPO plans to update the T6/EJ block groups based on the 2010 Census in the FY 2015 timeframe.

A total of 78 block groups are identified as T6/EJ block groups. However, 20 of the 78 block groups are located on military bases, on which roadway projects and transit routes are controlled by respective base commanders. Therefore, OahuMPO's analysis removes from the set of T6/EJ block groups any block group that is located completely on a military base. Figure 1 identifies the OahuMPO-designated T6/EJ block groups; 58 (13%) are designated as T6/EJ and the remaining 374 (87%) are designated as non-T6/EJ.

² The analysis of the Census data and resulting designation of T6/EJ block groups is detailed in the OahuMPO *Environmental Justice in the OahuMPO Planning Process: Defining Environmental Justice Populations* report, (March 2004). This report is available on the OahuMPO website (www.OahuMPO.org).

Figure 1
Environmental Justice Block Groups



2.0 OVERALL WORK PROGRAM

The OWP serves as the key management tool for monitoring State and City transportation planning activities on the island of Oahu. It identifies transportation planning priorities and activities to be conducted on Oahu in a given year. The OWP defines project objectives and tasks and identifies budgetary and staff requirements needed to carry out the projects. In addressing current transportation issues and problems, the OWP responds to local planning requirements, federal transportation priorities, and federal requirements. The OWP also includes land use studies as they relate to transportation needs.

This report updates the *Title VI and Environmental Justice Monitoring, FYs 2014 & 2015 OWP* report (July 2013). The report describes the opportunities that were given to minority and low-income populations to participate in the development of the FYs 2014 & 2015 OWP.

2.1 Title VI and Environmental Justice Performance Measures

The public involvement and outreach performance measure was used in the evaluation of the OWP for compliance with Title VI and environmental justice principles. It measures the degree to which OahuMPO outreached to targeted environmental justice populations.

3.0 PUBLIC INVOLVEMENT AND OUTREACH

The public involvement methods used for the OWP are documented in the *OahuMPO Participation Plan (April 2013)*.³

3.1 Public Outreach

The FYs 2014 & 2015 OWP Draft Revision #2 was mailed to the Technical Advisory Committee (TAC) and Policy Committee with an invitation to submit comments. A total of 414 Citizen Advisory Committee (CAC) members and others interested in transportation received the FYs 2014 & 2015 OWP Draft Revision #2 or instructions on how to view the draft. The mailing list included Title VI and environmental justice organizations, private transportation providers, social service providers, and organizations representing people with disabilities. In addition, over 50 government agencies were provided the FYs 2014 & 2015 OWP Draft Revision #2 and a form for comment submittal.

An announcement of the FYs 2014 & 2015 OWP Draft Revision #2 was made to the CAC at its November 20, 2013 meeting. A presentation was provided to the TAC at its December 2, 2013 meeting, and to the Policy Committee at its February 10, 2014 meeting. The Policy Committee was presented with the results of the public outreach, agency comments, and TAC recommendations on FYs 2014 & 2015 OWP Draft Revision #2. All of these meetings were open to the general public. Members of the TAC and CAC were also provided the opportunity to submit written testimonies and/or present oral testimonies at the time of the Policy Committee's deliberations to approve the FYs 2014 & 2015 OWP Draft Revision #2. The Policy Committee approved the FYs 2014 & 2015 OWP Draft Revision #2 at its February 10, 2014 meeting. Following the approval of FYs 2014 & 2015 OWP Draft Revision #2, an announcement was posted on the OahuMPO web page. Table 1 below provides additional details of the meetings, website postings, and mailings.

³ Available on the OahuMPO website (www.OahuMPO.org).

Table 1
Response to Public Outreach

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
11/20/13	Website Posting: Posted draft on website and solicited comments	14 hits recorded to OahuMPO's OWP webpage	N/A	N/A
11/20/13	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	414 CAC member representatives and interested parties. Includes over 50 T6/EJ organizations.		
11/20/13	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
11/20/13-12/13/13	Public comments received	4		
11/20/13-11/29/13	Government agency comments received: No comments received	N/A	N/A	N/A
11/20/13	Announcement to CAC	37	23	18
12/2/13	Presentation to TAC and TAC recommendation			
	Public Attendees	2	2	1
	Written testimony received	0	0	0
	Oral testimony received	0	0	0
2/10/14	Presentation to Policy Committee and Policy Committee action			
	Public Attendees	16	3	5
	Written testimony received	4	0	3
	Oral testimony received	4	3	3
02/14/14	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A

3.2 Oral and Written Comments Received

There were 14 hits recorded to the OahuMPO OWP webpage. Four comments were received from the public during the 24-day comment period. There were no comments received during the 10-day comment period for the intergovernmental review. Comments on the FYs 2014 & 2015 OWP Draft Revision #2 were accepted up until the Policy Committee action on February 10, 2014. There were no oral testimonies presented at the Policy Committee meeting.

OahuMPO provided responses to project-specific comments that were received during the public comment period. All comments received, as well as the responses, were provided to the Policy Committee for their consideration prior to taking action on FYs 2014 & 2015 OWP Draft Revision #2. Table 2 contains the comments received during the public comment period and the response provided to the public. Table 3 contains the comments received during the intergovernmental comment period and the list of government agencies that responded with no comments.

Table 2
Public Review Comment

Work Element	Comment provided by:	Summary of Comment	Response
202.84-11 Waikiki Regional Circulator Study	Waikiki Improvement Association	Organization supports the increase in budget for this project and any other effort to fully fund the budget needed to continue the planning identified by the study.	OahuMPO appreciates this support.
202.02-14 Central Oahu Transportation Study	Al Frenzel	Strongly opposes the deletion of this study from the OWP. Elements within the scope of the study are essential for improving the long-range traffic conditions in central Oahu and the traffic that flows through this area from Ewa, West Oahu, and the North Shore.	OahuMPO appreciates the comments. Federal funds for the project can only be obligated if there is sufficient local match. Without local match, the project must be removed from the work plan.
202.02-14 Central Oahu Transportation Study	Mona Neill	Opposes the deletion of this study from the OWP.	
202.02-14 Central Oahu Transportation Study	Wahiawa- Whitmore Village Neighborhood Board #26	Opposes the deletion of this study from the OWP.	

Table 3
Intergovernmental Review Comments

Work Element	Comment provided by:	Summary of Comment	Response
202.02-14 Central Oahu Transportation Study	Department of Accounting and General Services	Agency asks if the study will be performed at a later date. Agency is developing the Waiuwa Civic Center which, combined with the Transit Center, may impact traffic in the area.	Possibly. It will depend upon budgeting of local match and administrative support within participating agencies.
203.75-09 Ewa Impact Fees for Traffic and Roadway Improvements Update		Agency manages the Kapolei State Office Building as well as assists other State departments, such as Judiciary and Hawaii State Public Library System, that have facilities in Kapolei. DAGS would like to be included as a stakeholder and kept apprised of the progress of this work element as it may impact facilities managers.	OahuMPO will request that the Department of Transportation Services include DAGS as a stakeholder and keep DAGS informed.
202.02-14 Central Oahu Transportation Study	Honolulu Authority for Rapid Transportation	Agency states that the conceptual planning and evaluation of transit and roadway improvements should be timed to address development in Central Oahu.	OahuMPO staff agrees.
<i>The following agencies had no comments:</i>			
Department of Budget and Fiscal Services			
Department of Health - Disability and Communication Access Board			
Department of Labor and Industrial Relations			
Department of Parks and Recreation			
Department of Planning and Permitting			
University of Hawaii - Manoa Chancellor's Office			

3.3 Website Postings

Announcements, soliciting comments on the FYs 2014 & 2015 OWP Draft Revision #2, were posted on OahuMPO's website. The following are screen captures of the website announcements:

[\(PDF 400K\) !\[\]\(ff1f7d8219d02d524c6f11d06b013128_img.jpg\)](#)

[Public Review – Draft Revision #28 to the FY's 2011-2014 TIP](#)
 Posted on December 11, 2013
 Caltrans is soliciting comments on Draft Revision #28 to the FY's 2011-2014 TIP. In TIP Revision #28, four projects are added to the TIP; six projects are deleted from the 4 year...
[Read More](#)

[Policy Committee Meeting CANCELLED – December 19, 2013](#)
 Posted on December 19, 2013
 Cancellation Notice

[Policy Committee Meeting – December 19, 2013](#)
 Posted on December 11, 2013
 A meeting of the OAHU METROPOLITAN PLANNING ORGANIZATION POLICY COMMITTEE HAS BEEN CANCELLED Thursday, December 19, 2013 at 1:00 p.m. Honolulu City Council Committee Meeting Room, room 200, 505 South...
[Read More](#)

[CAC Meeting – December 18, 2013](#)
 Posted on December 10, 2013
 Meeting of the Citizens Advisory Committee is scheduled for Wednesday, December 18, 2013 - 9:30 a.m. Mayor's Conference Room Honolulu Hale, Room 301 500 South King Street, Honolulu, Hawaii (Agenda)

[Review of Draft Revision 2 to the FY's 2014-2015 OWP](#)
 Posted on December 10, 2013
 Public review of the draft Revision #2 to the FY's 2014-2015 Overall Work Program (OWP) is underway. The draft Revision #2 may be downloaded here. Revision #2 to the FY's...
[Read More](#)

The screenshot shows the Oahu Metropolitan Planning Organization (MPO) website. The header includes the Oahu MPO logo and navigation links: Home, About OahuMPO, Projects, Plans and Programs, Resources, and Get Involved. A search bar is located in the top right corner. The main content area is titled "Review of Draft Revision 2 to the FYs 2014-2015 OWP". Below the title, there is a public review notice stating that the draft revision is under review and can be downloaded. A list of proposed components for the draft revision is provided, including deleting the Central Oahu Transportation Study (COTS) element, amending the Waikiki Transit Circulator Study, and amending the Five Impact Areas for Traffic & Roadway Improvements Update Study. The page also includes a calendar, a category key, and a list of links.

Oahu MPO
Metropolitan Planning Organization

Home About OahuMPO Projects Plans and Programs Resources Get Involved

SEARCH

Calendar

Month: January
Year: 2014

Mo	Tu	We	Th	Fr	Sa	Su
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Category Key

CAC PG TAC

General Listening Session

Full

What brings you to the OahuMPO website?

- ☐ Researching the OahuMPO
- ☐ interested in a specific project
- ☐ linked from another website
- ☐ looking for ways to become involved
- ☐ None of the above

View Results

Oahu Metropolitan Planning Organization
257 Richards Street, Suite 200
Honolulu, Hawaii 96813-4623
Fax: 587-2018
Email: OwMPO@OahuMPO.org

Home * About OahuMPO * News and Announcements * Announcements * Review of Draft Revision 2 to the FYs 2014-2015 OWP

Review of Draft Revision 2 to the FYs 2014-2015 OWP

Posted on September 25, 2013

Public review of the draft Revision #2 to the FYs 2014-2015 Overall Work Program (OWP) is underway. The draft Revision #2 may be downloaded [here](#).

Revision #2 to the FYs 2014-2015 OWP consists of three proposed components:

- Deleting the Central Oahu Transportation Study (COTS) element (202 01-14) due to lack of administration support and lack of local matching funds
- Amending the Waikiki Transit Circulator Study (202 04-11) to include additional federal and local funds to expand the public outdoor park
- Amending the Five Impact Areas for Traffic & Roadway Improvements Update Study (203 75-08) to include additional federal and local funds to expand the advisory committee task

Comments on the draft Revision #2 may be submitted via fax, mail, or email no later than **Friday, December 13, 2013** to:

OahuMPO OWP Webpage: July 28, 2014

estimated revenues and available staff time, projects are put into a draft OWP, generally starting at the top of the prioritized list of work elements and working downward until available resources are spent. Occasionally, a lower-priority work element may be programmed instead of a higher-priority work element because there is sufficient budget or staff time for the lower-priority element, but not for the higher-priority element.

OahuMPO's CAC, TAC, and other government agencies are asked to review and comment on the draft OWP. The general public is also invited to review and comment on proposed work elements during the review period. The final decision for programming work elements is made by the Policy Committee prior to Federal approval.

NEW – A public review of the draft FYs 2015-2016 OWP is underway. The draft can be downloaded [here](#). Please submit comments on the draft FYs 2015-2016 OWP no later than Friday, May 9, 2014 to:

Oahu Metropolitan Planning Organization
707 Richards Street, Suite 200
Honolulu, Hawaii 96813-4623
Fax: 507-2018
Email: OahuMPO@OahuMPO.org

This [Regional Planning Coordination](#) table lists other studies used by the OahuMPO and its partner agencies for transportation planning. When reviewing and selecting planning projects for the OWP, OahuMPO attempts to coordinate, to the maximum extent possible, with other related planning activities so as to not duplicate planning efforts and/or to leverage and build-upon work that has been or is being completed by others.

To provide feedback click on the button below.

[Feedback Form](#)

Latest Links

[Revision #2 to the FYs 2015-2016 OWP](#)

[FYs 2015-2016 OWP](#)

[FYs 2014-2015 OWP as of Revision 2](#)

[FYs 2013-2014 OWP](#)

Archives

[FYs 2015-2016 OWP](#)

[FYs 2014-2015 OWP as of Revision 2](#)

[FYs 2013-2014 OWP](#)

4.0 CONCLUSIONS ON OWP COMPLIANCE

The T6/EJ analysis of the FYs 2014 & 2015 OWP Draft Revision #2 indicates that minority and low-income populations were provided the opportunity to participate in the transportation planning process. Through mailings, a special effort was made to reach out to T6/EJ populations and encourage their comments. The 14 hits to the OWP webpage and the four comments received during the 24-day public comment period indicate that the public was aware of the FYs 2014 & 2015 OWP Draft Revision #2 and of their opportunity to comment.

Appendix III

Title VI & Environmental Justice Monitoring:

FFYs 2011-2014 TIP Revision #28

TITLE VI AND ENVIRONMENTAL JUSTICE MONITORING

Federal Fiscal Years 2011-2014 Transportation Improvement Program Revision #28

July 2014



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1.0 BACKGROUND

The purpose of the Title VI and environmental justice analysis of the TIP is to ensure that transportation benefits are not disproportionately distributed with respect to minority and low-income populations.

Environmental justice has its roots in Title VI of the Civil Rights Act of 1964, which 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 or activity receiving Federal financial assistance.”

In 1994, President Bill Clinton issued Executive Order 12898, directing all Federal agencies to implement environmental justice by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

1.1 Policy Statement

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- *Civil Rights Restoration Act of 1987*
- *Age Discrimination Act of 1975*

OahuMPO will fully comply with the above statutes and their implementing regulations and will not discriminate on the basis of race, color, gender, national origin, age, or low-income. OahuMPO will not exclude anyone from participation in, deny the benefits of, or otherwise discriminate under any of its programs or activities.

1.2 Title VI and Environmental Justice in the OahuMPO Planning Process

In October 2001, OahuMPO finalized its report, *Environmental Justice in the OahuMPO Planning Process*.¹ The report documented how OahuMPO implemented a process to analyze the distribution of benefits and disproportionate impacts of planned investments. In 2004, OahuMPO completed its effort to refine and update the population database and performance measures derived from the October 2001 effort.² The updated information is reflected in this report.

¹ Available on the OahuMPO website (www.OahuMPO.org).

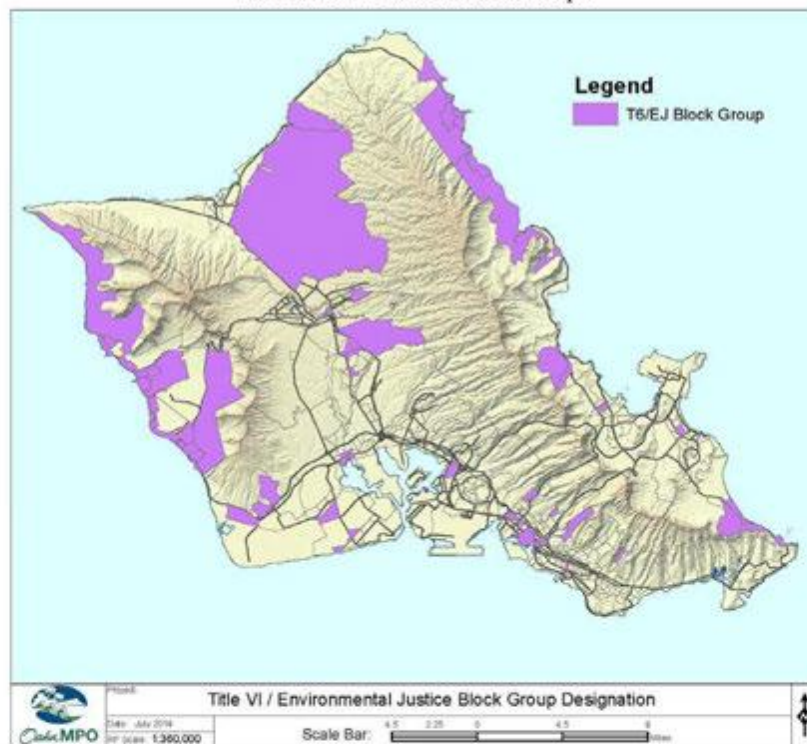
² The analysis of the Census data and resulting designation of T6/EJ block groups is detailed in the OahuMPO *Environmental Justice in the OahuMPO Planning Process: Defining Environmental Justice Populations* report, (March 2004). This report is available on the OahuMPO website (www.OahuMPO.org).

1.3 Title VI and Environmental Justice Populations

The Title VI and environmental justice populations include both minority and low-income populations. For the purposes of this analysis, these populations are referred to as Title VI/Environmental Justice (T6/EJ) block groups. The data are based on U.S. Census income, minority, and ethnicity data from the 2000 Census. OahuMPO plans to update the T6/EJ block groups based on the 2010 Census by December 2015.

A total of 78 block groups are identified as T6/EJ block groups. However, 20 of the 78 block groups are located on military bases, on which roadway projects and transit routes are controlled by respective base commanders. Therefore, OahuMPO's analysis removes from the set of T6/EJ block groups any block group that is located completely on a military base. Figure 1 identifies the OahuMPO-designated T6/EJ block groups; 58 (13%) are designated as T6/EJ and the remaining 374 (87%) are designated as non-T6/EJ.

Figure 1:
Environmental Justice Block Groups



2.0 TRANSPORTATION IMPROVEMENT PROGRAM

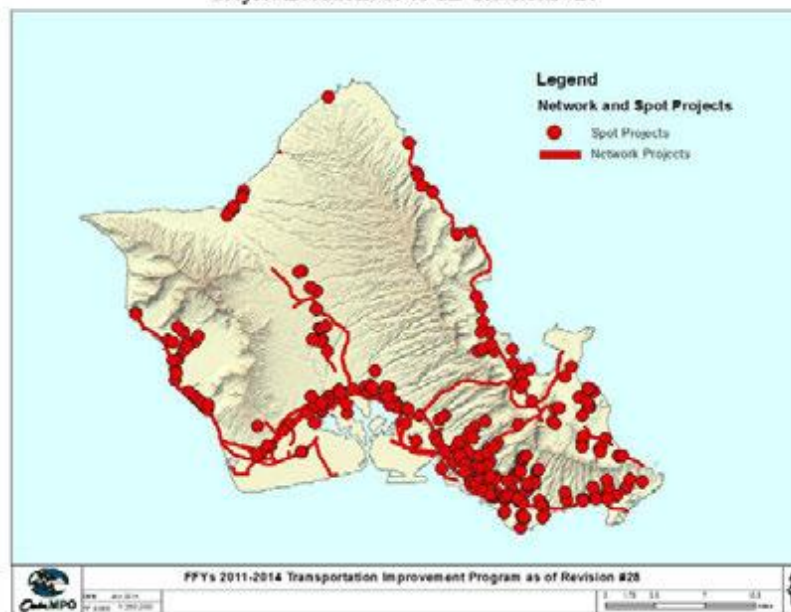
The Transportation Improvement Program (TIP) is a four-year programming document that identifies and establishes the implementation priority for State and County transportation projects to be funded in part with Federal highway and transit funds. The TIP is Oahu's element of the Statewide Transportation Improvement Program.

This report updates the *Title VI and Environmental Justice Monitoring, FFYs 2011-2014 TIP as of Revision #23* report (July 2013). The report describes the expected distribution of benefits and burdens of transportation investments as programmed in the FFYs 2011-2014 TIP, as revised, across Title VI and environmental justice populations.

2.1 TIP Project Locations

Figure 2 shows the location and distribution of TIP network projects (shown as lines) and spot projects (shown as dots) for the FFYs 2011-2014 TIP as of Revision #28. The map does not include projects programmed in the two informational years (FFY 2015 and FFY 2016).

Figure 2
Project Locations as of TIP Revision #28



2.2 Title VI and Environmental Justice Performance Measures

The following performance measures are used to evaluate the TIP for compliance with Title VI and environmental justice principles.

- **Public Involvement and Outreach:** This performance measure assesses the degree to which OahuMPO outreached to targeted environmental justice populations.
- **Equity:** This performance measure evaluates the distribution of transportation investments across T6/EJ and non-T6/EJ neighborhoods.

3.0 PUBLIC INVOLVEMENT AND OUTREACH

The public involvement methods used for the TIP are documented in the *OahuMPO Participation Plan (April 2013)*.³

3.1 Public Outreach on Draft TIP Revision #28

The FFYs 2011-2014 TIP draft Revision #28 was mailed to the Technical Advisory Committee (TAC) and Policy Committee on December 30, 2013. An announcement, including a link to the public review draft of the Revision, was posted on the OahuMPO website on December 31, 2013. It was mailed to the CAC and others interested in transportation with an invitation to submit comments on January 1, 2014. The mailing list included Title VI and environmental justice organizations, private transportation providers, social service providers, and organizations representing people with disabilities. A total of 521 CAC members and interested parties received the announcement of the draft Revision. In addition, 56 government agencies were provided the draft Revision and a form for comment submittal.

The draft Revision was presented at the TAC meeting on February 3, 2014. The TAC recommended approval of the draft Revision by the Policy Committee. At its meeting on February 10, 2014, the Policy Committee was presented with the draft Revision, the results of the public outreach, agency comments, technical evaluations, and TAC recommendations on the draft Revision; the Policy Committee approved Revision #28.

These meetings were open to the public. Members of the TAC and CAC, as well as the general public, were also provided the opportunity to submit testimony at the time of the Policy Committee's deliberation to approve the draft Revision. Following the Policy Committee's approval of Revision #28, an announcement was posted on the OahuMPO web page on February 14, 2014.

³ Available on the OahuMPO website (www.OahuMPO.org).

Table 1 below provides additional details of the meetings, website postings, and mailings.

Table 1
Public Outreach of Draft TIP Revision #28

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
1/01/2014	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	521 CAC members and interested parties. Includes over 40 T6/EJ organizations.		
1/01/2014	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
12/31/13-1/31/14	Public comments received	0	0	0
12/31/13-1/28/14	Government agency comments received: 3 comments from 3 agencies	N/A	N/A	N/A
12/31/13-1/31/14	Website Posting: Posted draft revision #28 on website and solicited comments	174 hits to the OahuMPO TIP webpage	N/A	N/A
2/03/2014	Presentation to TAC - Public Attendees - Written testimony received - Oral testimony received	5 0 0	2 0 0	3 0 0
2/10/2014	Presentation of draft of TIP Revision #28 to Policy Committee and Policy Committee action - Public Attendees - Written testimony received - Oral testimony received	16 1 1	2 0 0	5 0 0
2/14/2014	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

3.2 Oral and Written Comments Received

There were 174 hits made on the OahuMPO TIP website during the 32-day public comment period and 29-day Government agencies comment period for the draft Revision. As part of the intergovernmental review, three comments were received from three agencies and no public comments were received. Comments were accepted up until the Policy Committee action on February 10, 2014. There were five oral and one written testimonies submitted on the draft Revision at the Policy Committee meeting on February 10, 2014.

3.2.1 Responses to Comments Received on Draft TIP Revision #28

OahuMPO requested that the Hawaii Department of Transportation (HDOT) and the Department of Transportation Services (DTS) provide responses to project-specific comments that were received during the public and intergovernmental comment periods. All comments received, as well as responses to the comments, were provided to the Policy Committee for their consideration prior to taking action on draft TIP Revision #28. Table 2 contains the intergovernmental comments received and responses provided to those comments.

Table 2
Draft TIP Revision #28
Responses to Comments Received from the Intergovernmental Review

Project Number(s)	Agency	Summary of Comment	Response
Various	Department of Emergency Management	Agency notes the lack of projects involving Oahu emergency evacuation road plans. Agency requests consideration of additional funds from OahuMPO to complete the remaining portion of the Oahu Emergency Evacuation Plan. Agency also requests coordination with the Department of Transportation and the Department of Transportation Services to share information as well as possible implementation of emergency safeguards.	OahuMPO is in the process of developing its FYs 2015-2016 Overall Work Program, which is where the additional funds would be identified and budgeted.
Various	Department of Land and Natural Resources – Commission on Water Resource Management	Agency states that a Stream Channel Alteration Permit is required before any alteration can be made to the bed and/or banks of a stream channel.	OahuMPO will forward this comment to the Department of Transportation for their information.
OC7	Department of Planning and Permitting	Agency supports the addition of the Makakilo Drive Extension.	OahuMPO will forward this comment to the Department of Transportation Services for their information.
<i>The following agencies had no comments.</i>			
Board of Water Supply			
Department of Accounting and General Services			
Department of Budget and Finance			
Department of Community Services			
Department of Customer Services			
Department of Design and Construction			
Department of Facility Maintenance			
Department of Hawaiian Homelands			

Department of Human Services
Department of Land and Natural Resources-Division of Boating and Ocean Recreation
Department of Land and Natural Resources-Division of Forestry and Wildfire
Department of Land and Natural Resources-Engineering Division
Department of Land and Natural Resources-Land Division, Oahu District
Department of Labor and Industrial Relations
Department of Parks and Recreation
Department of Transportation Services
Honolulu Police Department
Marine Corps Base Hawaii
Oceanic Cable
Office of Hawaiian Affairs

3.3 Website Postings

Announcements were posted on the OahuMPO website soliciting comments on draft TIP Revision #28. The following are screen captures of the website announcements.

OahuMPO Home page: December 31, 2013



TIP Page: February 14, 2014

The screenshot shows a web page titled "TIP Page: February 14, 2014". The page content includes:

- Current TIP**: A section explaining that the FFY's 2011-2014 TIP covers a period of four years (FFY's 2011-2014) and contains two additional years (FFY's 2015 and 2016) for information only. It also mentions that the TIP will be updated at least every four years and revised as needed.
- TIP Project Resources**: A section with a link to "Interactive maps" and a description: "You can view information about specific TIP projects using the interactive maps. The maps show the location of each project and other information such as project location and construction dates."
- FFY's 2011-2014 TIP Revisions**: A section with a search bar and a table of revisions.

Revision	Revised	Revised
FFY's 2011-2014 TIP as of Revision #28	February 15, 2014	February 15, 2014
FFY's 2011-2014 TIP as of Revision #27	February 15, 2014	February 15, 2014

4.0 EQUITY

To assess the equity of funding allocations across the T6/EJ and non-T6/EJ neighborhoods, it was necessary to allocate the amounts programmed in the TIP to the various census block groups using a Geographic Information System (GIS) program. The analysis does not include projects programmed in the two informational years (FFY 2015 and FFY 2016).

Certain projects in the TIP, as of Revision #28, could not be mapped in a GIS because the project locations were not yet known or because programs were not based in specific locations. These projects total more than \$327 million. Table 4 is a list of TIP projects that were not included as part of the equity analysis:

Table 4
TIP projects not included as part of the equity analysis (in order of Project Number)

Project Number	Project Name	FFY's 2011-2014 Funds Programmed
• OC3	Bicycle Projects	\$5,170,000
• OC5	Computerized Traffic Control System	\$3,934,000
• OC9	Seismic Bridge Retrofit	1,500,000
• OC10	Traffic Improvements at Various Locations	\$6,247,000
• OC11	Traffic Signals at Various Locations	\$7,855,000
• OC12	Upgrade Pedestrian Signals at Various Locations	\$660,000
• OC13	Agency-Provided Tips	\$2,163,000
• OC14	Bus and Handi-Van Acquisition Program	\$89,782,000

• OC16	Local Shuttle Service	\$602,000
• OC18	Mobility Management	\$2,111,000
• OC19	Preventive Maintenance	\$183,157,000
• OC21	Transit Safety and Security Projects	\$2,045,000
• OC22	West Oahu Bus and Handi-Van Maintenance Facility	\$2,051,000
• OC23	Windward Transit Center	\$3,353,000
• OC24	Special Needs Transportation	\$146,000
• OC26	Traffic Signal Optimization	\$1,470,000
• OC27	Bus Stop ADA Access Improvements	\$898,000
• OC28	Bus Stop Pad Improvements	\$1,900,000
• OC29	Bus Stop Site Improvements	\$1,337,000
• OS12	Freeway Management System, Interstate H-1, H-2, and Moanalua Freeway (Routes H-201 and 78), System Manager	\$6,500,000
• OS79	Recreational Trails Program	\$1,436,000
• OS85	JARC (Small Urban)	\$455,000
• OS86	New Freedom (Small Urban)	\$496,000
• OS92	ITS Operation and Maintenance	\$285,000
• OS95	Transportation Assistance for Elderly and Disabled	\$1,744,000
Total Amount:		\$209,986,000.00

4.1 Analysis

The equity analysis allows for the determination of an average per capita investment, based on the total number of people who may be considered T6/EJ or non-T6/EJ. The following formulas were used to derive the data in the summary table below:

- Average investment by block group: $\frac{[\text{Sum of costs in T6/EJ block groups}]}{[\text{Number of total T6/EJ block groups}]}$
- Total Cost of Projects: $\begin{matrix} \text{Sum of costs in T6/EJ block groups} = X \\ \text{Sum of costs in non-T6/EJ block groups} = Y \end{matrix}$
- % Project Investment: $[100] * \frac{[\text{Sum of Costs in T6/EJ block groups}]}{[\text{Total Sum of Costs}]}$
- Total Population: $\begin{matrix} \text{T6/EJ population} = 152,112 \text{ people} = x \\ \text{Non-T6/EJ population} = 724,044 \text{ people} = y \end{matrix}$
- Average Per Capita Investment: $\frac{[X]}{[x]}; \frac{[Y]}{[y]}$

For projects that appear to be sited at a single location, referred to as "spot" projects, the entire value of the project is attributed to the T6/EJ or non-T6/EJ block groups in which the project falls. For projects that involve improvement or expansion of some length of route in the highway system, referred to as "network" projects, the value of the project is allocated by the mile, and then aggregated within the T6/EJ and non-T6/EJ block groups.

When the combined investment of both network and spot projects is allocated to T6/EJ and non-T6/EJ block groups, the average investment between the two favors non-T6/EJ block groups. As shown in Table 5, the percentage of project investment between T6/EJ and non-T6/EJ block groups in the TIP as of Revision #28 is 12% and 88%, respectively – indicating that the T6/EJ block groups receive about 12% of the TIP expenditures. Considering that about 13% of all block groups are designated as T6/EJ, this indicates a slightly lower share of the investments for T6/EJ block groups. In terms of average per capita investment, T6/EJ individuals receive about \$1,465, or 38% less per capita in TIP expenditures than non-T6/EJ individuals.

Table 5
Distribution of Network and Spot TIP Dollars between T6/EJ and Non-T6/EJ Block Groups

	T6/EJ Block Group	Non-T6/EJ Block Group
Average Investment by Block Group	6.3 M	7.5 M
Total Cost of Projects	367 M	2807.6 M
% Project Investment	12%	88%
Total Population	152,112	724,044
Average Per Capita Investment	\$2,413	\$3,878

The T6/EJ equity results changed significantly from the results of the last major TIP revision (FFYs 2011-2014 TIP Revision #23). As of Revision #23 to the FFYs 2011-2014 TIP, 13% of the projects were invested in T6/EJ block groups, and T6/EJ individuals received about \$1,750, or 31% less per capita in TIP expenditures compared to non-T6/EJ individuals. The major reasons for the difference in T6/EJ results compared to the TIP as of Revision #28 are as follows:

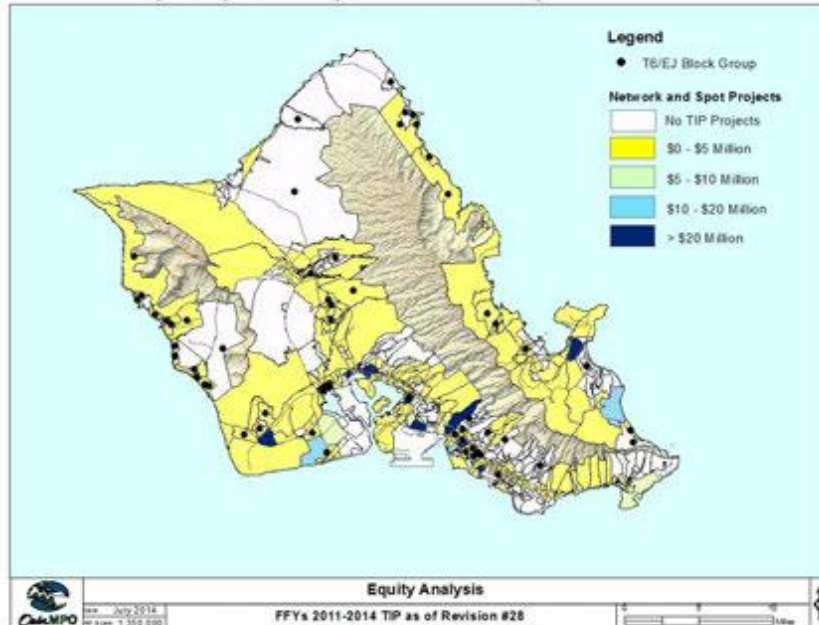
1. TIP Revision #23 resulted in a decrease in funding for Non-T6/EJ Block Groups.
 - a. OC15 (Honolulu High-Capacity Transit Corridor Project): Decreased in cost estimates by \$38,700,000 in FFY 2013 and \$110,199,000 in FFY 2014.
2. TIP Revision #23 also resulted in an increase in T6/EJ Block Groups:
 - a. OS93 (Interstate Route H-1 Safety Improvements, Beginning of H-1 (Palailai Interchange) to Waiawa Overpass): Added new project; estimated project cost is \$4,500,000.
 - b. OS87 (Bridge and Pavement Improvement Program, Oahu): Added new projects including Kalanianaʻole Highway (Route 72) Resurfacing, Hanauma Bay Road to West Hind Drive and Kamehameha Highway (Route 83) Resurfacing, Waihu Street to Ka Uka Boulevard. These two projects increased funds by \$34,000,000.
 - c. OS22 (Interstate Route H-1, Kapolei Interchange Complex): Increased in funds by \$18,500,000.
3. TIP as of Revision #28 resulted in an increase in funding in Non-T6/EJ Block Groups:
 - a. OS96 (Middle Street (Route 7415) Pavement Reconstruction, King Street (Route 7410) to Kamehameha Highway (Route 7401)): Added new project; estimated project cost is \$16,000,000.

- b. OS97 (Sand Island Access Road (Route 64), Truck Weight Station, Kapalama Container Terminal): Added new project; estimated project cost is \$5,000,000.
 - c. OC7 (Makakilo Drive (Route 8810) Extension): Added project to the 4-year TIP from the illustrative list. The estimated total project cost is \$88,500,000.
4. TIP as of Revision #28 also resulted in an increase in funding for T6/EJ Block Groups:
- a. OS8 (Freeway Management System, Interstate H-1, H-2, and Moanalua Freeway (Routes H-201 and 78), Phase 1C)): Funding increased in FFY 2014 by \$1,000,000 and local share by \$4,000,000. This project is partially located in T6/EJ Block group.
 - b. OS96 (Middle Street (Route 7415) Pavement Reconstruction, King Street (Route 7410) to Kamehameha Highway (Route 7401)): Added new project; estimated total project cost is \$16,000,000. This project is partially located in T6/EJ Block groups.
 - c. OC7 (Makakilo Drive (Route 8810) Extension)): Added project to the 4-year TIP from the illustrative list. Added \$3,000,000 in local funds for design in FFY 2013. This project is partially located in T6/EJ Block groups.

Other projects that are located in Non-T6/EJ Block groups that account for the 38% difference in average per capita investments include Project OC15 (Honolulu High-Capacity Transit Corridor Project) and Project OC2 (Alapai Transportation Management Center). However, these projects have indirect benefits to T6/EJ Block groups. Project OC15 is anticipated to provide greater mobility for those in T6/EJ communities; and Project OC2 is expected to enhance agency cooperation and coordination during emergency responses.

Figure 3 shows the expenditures for network and spot projects in the FFYs 2011-2014 TIP as of Revision #28. As seen on the map, the block groups that have the most TIP dollars programmed are located in the Ewa and the Primary Urban Center areas. The alignment of Project OC15 (Honolulu High-Capacity Transit Corridor Project) spans from Ewa to the Primary Urban Center. Therefore, the \$3.3 billion programmed for this project is allocated along this alignment. Also, Project OC7 (Makakilo Drive Extension), with over \$3 million currently programmed in the TIP, is located in Ewa.

Figure 3
Network and Spot Project Costs by Census Block Group as of TIP as of Revision #28



5.0 CONCLUSIONS ON TIP COMPLIANCE

The analysis of the impacts of the FFYs 2011-2014 TIP as of Revision #28 indicates compliance with the principles of Title VI and environmental justice based on the qualitative performance measure of public participation.

The Title VI and environmental justice analysis of draft FFYs 2011-2014 TIP as of Revision #28 indicates that minority and low-income populations were provided the opportunity to participate in the transportation planning process. Through mailings, a special effort was made to reach out to environmental justice populations and encourage their comments on FFYs 2011-2014 TIP as of Revision #28. The public was given a 32-day comment period. The 174 hits to the TIP webpage during the public comment period indicate that the public was aware of the revision and of their opportunity to comment.

Recent TIP revisions have resulted in T6/EJ block groups receiving a smaller share of the investments compared to non-T6/EJ block groups. However, there are a number of projects that are not completely located within T6/EJ block groups, but have indirect benefits to T6/EJ communities.

TITLE VI AND ENVIRONMENTAL JUSTICE MONITORING

Fiscal Years 2015 & 2016 Overall Work Program

June 2014



Oahu Metropolitan Planning Organization
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Honolulu, Hawaii 96813-4623
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Appendix IV

Title VI & Environmental Justice Monitoring:

FYs 2015 & 2016 OWP

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1.0 BACKGROUND

The purpose of the environmental justice analysis of the Overall Work Program (OWP) is to ensure that minority and low-income populations are provided the opportunity to participate in the OWP development process.

Environmental justice has its roots in Title VI of the Civil Rights Act of 1964, which 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 or activity receiving Federal financial assistance.”

In 1994, President Bill Clinton issued Executive Order 12898, directing all Federal agencies to implement environmental justice by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.

1.1 Policy Statement

The following Oahu Metropolitan Planning Organization (OahuMPO) Policy Statement for Title VI and Environmental Justice was approved by the OahuMPO Policy Committee on July 19, 2001:

It is the policy of the OahuMPO to adhere to the following Federal regulations:

- *The Civil Rights Act of 1964*
- *Environmental Justice (Executive Order 12898)*
- *Civil Rights Restoration Act of 1987*
- *Age Discrimination Act of 1975*

OahuMPO will fully comply with the above statutes and their implementing regulations and will not discriminate on the basis of race, color, gender, national origin, age, or low-income. OahuMPO will not exclude anyone from participation in, deny the benefits of, or otherwise discriminate under any of its programs or activities.

1.2 Title VI and Environmental Justice in the OahuMPO Planning Process

In October 2001, OahuMPO finalized its report, *Environmental Justice in the OahuMPO Planning Process*.¹ The report documented how OahuMPO implemented a process to analyze the distribution of benefits and disproportionate impacts of planned investments.

In 2004, OahuMPO completed its effort to refine and update the population database and performance measures derived from the October 2001 effort.² The updated information is reflected in this report.

¹ Available on the OahuMPO website (www.OahuMPO.org).

² The analysis of the Census data and resulting designation of T6/EJ block groups is detailed in the OahuMPO *Environmental Justice in the OahuMPO Planning Process: Defining Environmental Justice Populations* report, (March 2004). This report is available on the OahuMPO website (www.OahuMPO.org).

1.3 Title VI and Environmental Justice Populations

The Title VI and environmental justice populations include both minority and low-income populations. For the purposes of this analysis, these populations are referred to as Title VI/Environmental Justice (T6/EJ) block groups. The data are based on U.S. Census income, minority, and ethnicity data from the 2000 Census. OahuMPO plans to update the T6/EJ block groups based on the 2010 Census by December 2015.

A total of 78 block groups are identified as T6/EJ block groups. However, 20 of the 78 block groups are located on military bases, on which roadway projects and transit routes are controlled by respective base commanders. Therefore, OahuMPO's analysis removes from the set of T6/EJ block groups any block group that is located completely on a military base. Figure 1 identifies the OahuMPO-designated T6/EJ block groups; 58 (13%) are designated as T6/EJ and the remaining 374 (87%) are designated as non-T6/EJ.

Figure 1
Environmental Justice Block Groups



2.0 OVERALL WORK PROGRAM

The OWP is the key management tool for coordinating State and City transportation planning activities on Oahu. It describes the planning projects to be undertaken during the programmed year. The OWP identifies transportation-related planning studies (called work elements) undertaken by the OahuMPO and its participating agencies. Also, project objectives and tasks are outlined with the budgetary and staff requirements needed to carry out each project. In addressing current transportation issues and problems, the OWP reflects local planning policies, and federal transportation priorities and requirements.

2.1 Title VI and Environmental Justice Performance Measures

The public involvement and outreach performance measure was used in the evaluation of the Fiscal Years 2015 & 2016 OWP. It measures the degree to which OahuMPO outreached to targeted environmental justice populations.

3.0 PUBLIC INVOLVEMENT AND OUTREACH

The public involvement methods used for the OWP are documented in the *OahuMPO Participation Plan (April 2013)*.³ The Participation Plan has been amended to include an outreach plan to engage minority and limited English proficient populations.

Table 1
Early Public Input

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
9/18/13	CAC to develop a list of transportation related studies to suggest for inclusion in the OWP	49	30	24
2/3/14	Technical Advisory Committee to review initial draft of the OWP			
	Public Attendees	5	2	3
	Written testimony received	0	0	0
	Oral testimony received	0	0	0
2/10/14	Policy Committee meeting to discuss the OWP			
	Public Attendees	16	3	5
	Written testimony received	0	0	0
	Oral testimony received	0	0	0
3/3/14	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	Over 576 CAC member representatives and others interested in transportation. Includes over 50 organizations representing T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
	Website Posting: Posted draft OWP on website and solicited comments	79 hits to OahuMPO's OWP webpage	N/A	N/A
3/3/14-5/9/14	Public Review comments received: 4 comments from 322 individuals and organizations	N/A	N/A	N/A
3/3/14-5/2/14	Government agency comments received: 10 comments from 6 agencies	N/A	N/A	N/A
4/10/14	CAC subcommittee meeting to discuss the lack of feedback provided by HDOT on the CAC's suggested work elements	5	1	0
6/12/14	Presentation to Technical Analysis Committee and Technical Analysis Committee action			
	Public Attendees	4	1	3
	Written testimony received	0	0	0
	Oral testimony received	0	0	0

³ Available on the OahuMPO website (www.OahuMPO.org).

6/19/14	Presentation to Policy Committee and Policy Committee action Public Attendees Written testimony received Oral testimony received	11 0 1	4 0 0	7 0 1
7/23/14	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A

N/A=Not applicable

3.1 Public Outreach on the Draft FYs 2015 & 2016 OWP

The draft FYs 2015 & 2016 OWP was mailed to the Technical Advisory Committee (TAC) and the Policy Committee. A link to the draft FYs 2015 & 2016 OWP was mailed to the CAC and others interested in transportation with an invitation to submit comments. The mailing list included Title VI and Environmental Justice organizations, private transportation providers, social service providers, and organizations representing people with disabilities. Over 576 CAC members and interested parties received the draft OWP or instructions on how to download the draft from the OahuMPO website. In addition, over 50 government agencies were provided the draft OWP and a form for comment submittal. The draft FYs 2015 & 2016 OWP was posted on the OahuMPO website on March 3, 2014.

On June 12, 2014, TAC recommended that the Policy Committee approve the FYs 2015 & 2016 OWP. The Policy Committee was presented with the results of the public outreach, agency comments, and TAC recommendation. The Policy Committee approved the FYs 2015 & 2016 OWP at its June 19, 2014 meeting. Following the approval of FYs 2015-2016 OWP, an announcement was posted on OahuMPO's webpage on July 23, 2014.

3.2 Oral and Written Comments Received

Solicitation of comments on the draft FYs 2015 & 2016 OWP resulted in the receipt of nine comments from 322 individuals and organizations during the 68-day public review period. The government agencies were provided with a 61-day comment period. There were 10 comments from six government agencies that commented on the draft FYs 2015 & 2016 OWP. Comments were accepted up until the Policy Committee action on June 19, 2014. There were no written or oral testimonies received at the Policy Committee meeting. There were 79 hits to the OahuMPO OWP website during the public and government agency comment period.

Responses to Comments Received on Draft OWP

OahuMPO responded to all comments. Table 3 contains a summary of comments received from the public, as well as their respective responses. Table 4 contains the same information for comments received from government agencies.

Table 3
Responses to Comments Received from the Public

Work Element	Comment Provided by:	Summary of Comment	Response
General	Honolulu Transportation Commission - Ad Hoc Committee	Supports inclusive multi-modal efforts that contribute to Complete Streets (CS) and an age-friendly city. Applauds the City's efforts to put CS philosophy into practice.	OahuMPO staff appreciates the support.
WE 30101.04 - CAC		Supports this work element, but notes that the majority of the CAC-initiated projects were not programmed.	OahuMPO staff appreciates the support, and understands the concern. Many of the CAC's candidate projects duplicated existing projects or services, or were not high enough priorities to program limited funding.
WE 202.05 - Kapalama Sub-Area Multimodal Circulation and Mobility Study		Requests that the public be added to the list of those participating in the public involvement process.	The requested change was made in the Final Draft document.
N/A - North Shore Corridor Study	Phone support - 3	Proper planning for our island is the first step toward building a sustainable future. Planning without fact-based studies of our infrastructure and environment is a disservice to residents and visitors of Oahu, particularly in rural regions where infrastructure is aging, access is limited, and impacts on the environment are more acutely felt. I write today to ask you to conduct a traffic carrying capacity study of Kamehameha Highway from Haleiwa to Kahaluu. The "North Shore Corridor Carrying Capacity Study" proposed in the Overall Work Project for Fiscal Year 2015 was deemed a first priority by the Citizen's Advisory Committee of OahuMPO. Please keep this proposed study as first priority for OMPO and appropriate the funds necessary to conduct it. *	OahuMPO has forwarded the comments to HDOT and DTS for their consideration.
	Organization support - Defend Oahu Coalition, Hanalei Community Association, Neighborhood Board 29, Neighborhood Board 31		
	Email support - 177		
	Petition signatures - 137		

Table 4
Responses to Comments Received from Intergovernmental Review Agencies

Work Element	Comment Provided by:	Summary of Comment	Response
General	DLNR - Engineering Division	Projects located in the Flood Hazard Zones must comply with the rules and regulations of the National Flood Insurance Program whenever development within a Special Flood Hazard Area is undertaken.	OahuMPO staff appreciates this important reminder and will forward it to the staff of its participating agencies.
201.05 - Congestion Management Process Update	City and County of Honolulu - Department of Transportation Services	Under MAP-21, this is a federal requirement that OahuMPO periodically updates. DTS may be participating in this study.	OahuMPO staff appreciates the cooperation of DTS.
202.05 - Kapalama Sub-Area Multimodal Circulation and Mobility Study		The City (DPP) recommends the revision of Item B of the Project Description to: "Develop a community involvement process that will coordinate various City and County departments, the public, private land-use developers, etc." Study proposal submitted by DTS/DPP.	This change was made in the Final Draft of the document.
202.06 - Intelligent Transportation System Architecture and Plan Update		DTS will participate in this update of the plan.	OahuMPO staff appreciates the cooperation of DTS.
301.15 - Travel Demand Forecasting Model		The City (DPP) recommends the reduction of the allocation to \$155,002 (50% of \$310,004). This would be used as needed for consulting services to troubleshoot problems that arise while the City does its forecasts and upgrades the land-use model.	OahuMPO staff will assess our traffic modeling needs, and, if possible, identify that portion of these funds that can be dedicated to supporting the land-use model through an administrative modification.

Work Element	Comment Provided by:	Summary of Comment	Response
301.16 - Oahu Regional Transportation Plan Regional Transportation Plan	City and County of Honolulu - Department of Transportation Services(continued)	This is a federal requirement that OahuMPO updates every five years. DTS will participate in this update of the plan.	OahuMPO staff appreciates the cooperation of DTS.
202.04-15 - Farrington Highway Realignment Feasibility Study	Department of Land and Natural Resources - Office of Conservation and Coastal Lands	Agency supports the intent of the proposed study and would like to serve as a resource for this effort. Agency shares regulatory authority with City and County of Honolulu Parks for management of the public beach fronting Makaha Beach Park. The two agencies have cooperatively been managing seasonal beach erosion problems in this area. This beach has been determined to be a relatively healthy system; characterized by seasonal changes and recovery after winter waves subside. Agency supports the intent of the proposed study	OahuMPO staff appreciates the support of DLNR, and will be sure to coordinate with DLNR and the Department of Parks and Recreation as the study moves forward.
	Department of Human Services	Agency reiterates previous comments regarding this study. Realignment of the mauka side of Farrington Highway may have future impact on child-care facilities within the vicinity.	OahuMPO will coordinate with DHS as the study moves forward.
N/A	Department of Emergency Management	Agency suggests the addition of funding for the 2014 study, Oahu Emergency Evacuation Plan Project, to allow for the installation of evacuation signage.	OahuMPO staff understands that DEM is seeking additional funding for the Oahu Emergency Evacuation Plan, but for an unknown amount. DEM is encouraged to work with staff from DTS to submit a formal request.
N/A	Hawaii Department of Transportation	Agency recommends that the OahuMPO, Federal Highway Administration, and HDOT meet in an attempt to resolve outstanding issues regarding the FYs 2014-2015 OWP to ensure the integrity of the planning process.	OahuMPO staff met with HDOT staff on May 29, 2014 to resolve any outstanding issues.

<i>The following agencies responded with no concerns</i>
Board of Water Supply
Department of Accounting and General Services
Department of Budget and Finance
Department of Community Services
Department of Design and Construction
Department of Environmental Services
Department of Information Technology
Department of Land and Natural Resources - Land Division
Department of Labor and Industrial Relations
Department of Parks and Recreation
Emergency Services Department
Honolulu Fire Department
Honolulu Police Department
Marine Corps Base Hawaii
Oceanic Cable

3.3 Website Postings

Announcements were posted on OahuMPO's website soliciting comments on the draft FYs 2015 & 2016 OWP. The following are screen captures of the website announcements.

OahuMPO News & Announcements: March 3, 2014

Contact Info
Ocean View Center
707 Richards Street, Suite 200
Honolulu, Hawaii 96813
Phone: (808) 587-2015
Fax: (808) 587-2018
E-mail:
OahuMPO@OahuMPO.org

[GET INVOLVED](#)

[Financial Audit of the OahuMPO for FY 2013 is Available](#)

Posted on March 5, 2014

The annual Financial Audit of the Oahu Metropolitan Planning Organization (OahuMPO) for fiscal year ending June 30, 2013 is available for download. The report and the Management Letter will be ...
[Read More.](#)

[Draft FYs 2015-2016 Overall Work Program – Public Review](#)

Posted on March 5, 2014

Public review of the draft Overall Work Program (OWP) for FYs 2015-2016 is underway. The draft OWP may be downloaded here. The OWP identifies transportation-related planning studies (called work elements) ...
[Read More.](#)

[Citizen Advisory Committee Meeting – February 12, 2014](#)

Posted on February 3, 2014

Meeting of the Oahu Metropolitan Planning Organization is scheduled for Wednesday, February 12, 2014 – 3:30 p.m. Mayor's Conference Room Honolulu Hale, Room 301 530 South King Street, Honolulu, Hawaii ...
[Read More.](#)

[Policy Committee Meeting – February 10, 2014](#)

Posted on January 30, 2014

Meeting of the Oahu Metropolitan Planning Organization POLICY COMMITTEE is scheduled for Monday, February 10, 2014 at 2:00 p.m. Hawaii State Capitol, Room 320 415 South Beretania Street, Honolulu, Hawaii ...
[Read More.](#)

OahuMPO OWP page: March 3, 2014

GET INVOLVED

draft OWP. The general public is also invited to review and comment on proposed work elements during the review period. The final decision for programming work elements is made by the Policy Committee prior to Federal approval.

NEW – A public review of the draft FYs 2015-2016 OWP is underway. The draft can be downloaded [here](#). Please submit comments on the draft FYs 2015-2016 OWP no later than **Friday, May 9, 2014** to:

Oahu Metropolitan Planning Organization
707 Richards Street, Suite 200
Honolulu, Hawaii 96813-4623
Fax: 587-2018
Email: OahuMPO@OahuMPO.org

This [Regional Planning Coordination](#) table lists other studies used by the OahuMPO and its partner agencies for transportation planning. When reviewing and selecting planning projects for the OWP, OahuMPO attempts to coordinate, to the maximum extent possible, with other related planning activities so as to not duplicate planning efforts and/or to leverage and build-upon work that has been or is being completed by others.

To provide feedback click on the button below:
[Feedback Form](#)

Latest Links

[Revision #2 to the FYs 2013-2014 OWP](#)

[All files in this category »](#)

Archives

[FYs 2014-2015 OWP](#)

[FYs 2014-2015 OWP as of Revision 2](#)

[FYs 2013-2014 OWP](#)

[FY 2012 OWP as of May 26, 2011](#)

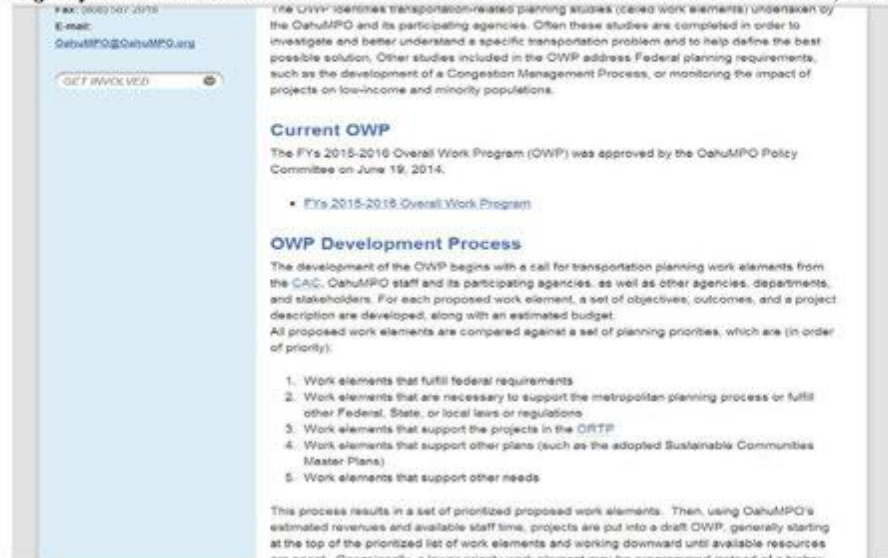
[FY 2011 OWP as of September 14, 2010](#)

[FY 2010 OWP as of May 26, 2009](#)

[FY 2009 OWP \(Revisions 2\) as of December 29, 2008](#)

[FY 2008 OWP \(Draft\) as of December 9, 2006](#)

OahuMPO OWP Webpage: The approval of the OahuMPO Policy Committee and the Federal Highway Administration and the Federal Transit Administration was announced on June 19, 2014.



4.0 CONCLUSIONS ON FYS 2015 & 2016 OWP COMPLIANCE

The Title VI and Environmental Justice analysis of the Overall Work Program indicates that the public involvement process for the FYs 2015 & 2016 OWP complied with Title VI and environmental justice guidelines. Minority and low-income populations were provided the opportunity to participate in the transportation planning process. Public outreach began early in the development of the OWP and continued throughout the process. Through mailings, a special effort was made to reach out to Title VI and environmental justice populations and encourage their comments. The 79 hits to the OWP webpage during the public comment period indicate the public was aware of the draft OWP and of their opportunity to comment.

Appendix C: The Triennial FTA Compliance Report

**TITLE VI AND ENVIRONMENTAL JUSTICE
TRIENNIAL COMPLIANCE REPORT
TO THE
FEDERAL TRANSIT ADMINISTRATION**

October 2014



Oahu Metropolitan Planning Organization
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Appendix A: OahuMPO Title VI Assurance

Purpose

49 CFR §21.9(b) requires that recipients of Federal Transit Administration (FTA) funds submit a Title VI compliance report to the FTA every three years. The Oahu Metropolitan Planning Organization (OahuMPO) is a subrecipient of FTA funds. The purpose of this report is to document how OahuMPO complies with the United States Department of Transportation (USDOT) Title VI regulations based on the guidelines provided in FTA Circular 4702.1B (October 1, 2012). OahuMPO's last report to FTA was submitted in October 2011.

General Requirements

This section addresses the requirements in Chapter III of FTA Circular 4702.1B.

A. Title VI Assurance

Refer to Appendix A for a copy of this document.

B. Title VI Program

1. Public Outreach and Involvement Activities

A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities.

Agendas for all OahuMPO meetings during the past three years were sent to the City Clerk's office, the Lieutenant Governor's office for posting and viewing by the general public. Meeting notices were also posted on the OahuMPO website and the State of Hawaii website.

In addition to the above, OahuMPO Citizen Advisory Committee (CAC) meeting notices were sent to the State libraries and to the CAC mailing list, which includes over 400 CAC member representatives and interested parties, including minorities and people with low incomes. Agendas were also faxed to minority publications such as:

- Hawaii Hochi
- Hawaii Filipino Chronicle
- Fil-Am Courier

OahuMPO Policy Committee meeting notices were mailed to the Policy Committee mailing list, which includes all current CAC members and anyone who requested to be placed on the list. In soliciting people to participate in the metropolitan transportation planning process, OahuMPO encourages minorities and people with low incomes to add their organizations and/or names to this mailing list. The OahuMPO's Participation Plan was amended and approved by the Policy Committee on April 10, 2013.

The Plan was amended to include an outreach plan to engage minority and limited English proficient populations.

OahuMPO Technical Advisory Committee meeting notices were sent to anyone who requested to be placed on the list.

The following tables summarize public involvement opportunities and/or strategies that were used in the outreach to citizens on Oahu for each of the following plans and programs that were updated since FFY 2011:

- October 2011 through September 2012
 - Table 1: FY 2012 Overall Work Program (OWP) Revision #2
 - Table 2: FFYs 2011-2014 Transportation Improvement Program (TIP) Revision #11
 - Table 3: FYs 2013-2014 OWP
- October 2012 through September 2013
 - Table 4: FFYs 2011-2014 TIP Revision #20
 - Table 5: Participation Plan Amendment
 - Table 6: FFYs 2011-2014 TIP Revision #23
 - Table 7: FYs 2014-2015 OWP
- October 2013 through September 2014
 - Table 8: FYs 2014-2015 Overall Work Program (OWP) Revision #2
 - Table 9: FFYs 2011-2014 TIP Revision #28
 - Table 10: FYs 2015-2016 OWP
 - Table 11: FFYs 2011-2014 TIP Revision #30
 - Table 12: FFYs 2015-2018 TIP

Table 1
FY 2012 OWP Revision #2
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
10/4/2011	Website Posting: Posted draft on website and solicited comments	75 hits recorded to OahuMPO's OWP webpage	N/A	N/A
10/4/2011	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	569 CAC member representatives and interested parties. Includes over 50 T6/EJ organizations.		
10/4/2011	Direct Mail: Solicited comments from over 50 government agencies	N/A	N/A	N/A
10/4/2011-11/30/2011	Public comments received	1	0	0
10/4/2011-11/30/2011	Government agency comments received	0	N/A	N/A
10/19/2011	Announcement to CAC	31	9	10
12/8/2011	Presentation to TAC	2	1	2
	-Public Attendees	0	0	0
	-Written testimony received	0	0	0
12/27/2011	Presentation to Policy Committee and Policy Committee action	4	0	1
	-Public Attendees	0	0	0
	-Written testimony received	3	0	0
1/23/2012	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A

N/A=Not applicable

Table 2
FFYs 2011-2014 TIP Revision #11
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
1/3/2012	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	492 CAC members and interested parties. Includes over 40 T6/EJ organizations.		
1/3/2012	Direct Mail: Solicited comments from 55 government agencies	N/A	N/A	N/A
1/3/12-2/10/12	Public comments received	1	0	0
1/3/12-2/10/12	Government agency comments received	4	N/A	N/A
1/3/12-2/10/12	Website Posting: Posted draft revision #11 on website and solicited comments	154 hits to the OahuMPO TIP webpage	N/A	N/A
2/10/2012	Presentation to TAC	1	0	0
	- Public Attendees	0	0	0
	- Written testimony received	0	0	0
2/27/2012	Presentation to Policy Committee and Policy Committee action	1	1	0
	- Public Attendees	0	0	0
	- Written testimony received	0	0	0
3/2/2012	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

Table 3
FYs 2013-2014 OWP
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
3/21/2012	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	Over 500 CAC member representatives and others interested in transportation.		
3/21/2012	Direct Mail: Solicited comments from over 50 government agencies	N/A	N/A	N/A
3/21/2012	Website Posting: Posted draft OWP on website and solicited comments	39 hits to OahuMPO's OWP webpage	N/A	N/A
3/21/2012-5/21/2012	Public comments received	2	0	0
3/21/2012-5/21/2012	Government agency comments received	N/A	N/A	N/A
5/16/2012	Announcement to CAC	34	18	8
5/29/2012	Presentation to TAC and TAC action			
	- Public Attendees	1	1	0
	- Written testimony received	0	0	0
	- Oral testimony received	0	0	0
6/13/2012	Presentation to Policy Committee and Policy Committee action			
	- Public Attendees	12	3	2
	- Written testimony received	0	0	0
	- Oral testimony received	0	0	0
6/14/2012	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A
6/29/2012	FHWA and FTA approved the FYs 2013-2014 OWP	N/A	N/A	N/A
7/02/2012	Website Posting: Announcement of FHWA and FTA action on OWP	N/A	N/A	N/A

N/A=Not applicable

Table 4
FFYs 2011-2014 TIP Revision #20
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
1/02/2013	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	512 CAC members and interested parties. Includes over 40 T6/EJ organizations.		
1/02/2013	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
1/02/13-2/01/13	Public comments received	0	0	0
1/02/13-2/01/13	Government agency comments received: 3 comments from 2 agencies	N/A	N/A	N/A
1/02/13-2/01/13	Website Posting: Posted draft revision #20 on website and solicited comments	184 hits to the OahuMPO TIP webpage	N/A	N/A
1/7/2013	Presentation of draft TIP Revision #20 to Policy Committee - Public Attendees - Written testimony received - Oral testimony received	2 0 0	0 0 0	0 0 0
1/28/13-2/01/13	Website Posting: Posted draft #2 revision #20 on website and solicited comments			
2/08/2013	Presentation to TAC - Public Attendees - Written testimony received - Oral testimony received	4 0 0	1 0 0	1 0 0
2/22/2013	Presentation of draft #2 TIP Revision #20 to Policy Committee and Policy Committee action - Public Attendees - Written testimony received - Oral testimony received	10 0 0	2 0 0	2 0 0
2/27/2013	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

Table 5
Participation Plan Amendment
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
1/16/2013	Direct Mail and Email: Solicited comments from CAC members, EJ organizations, and Interested Parties	<ul style="list-style-type: none"> Over 523 CAC member representatives and others interested in transportation. Over 40 organizations representing EJ organizations. 		
1/16/2013	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
1/16/13-2/28/13	Website Posting: Posted draft on website and solicited comments	97 hits to the OahuMPO OPP webpage	N/A	N/A
1/16/13-2/28/13	Public comments received	1	1	0
1/16/13-2/28/13	Government agency comments received	N/A	N/A	N/A
4/10/2013	Presentation to Policy Committee and Policy Committee action <ul style="list-style-type: none"> Public Attendees Written testimony received Oral testimony received 	8 0 0	2 0 0	1 0 0
4/12/2013	Website Posting: Announcement of Policy Committee action on the OPP	N/A	N/A	N/A

N/A=Not applicable

Table 6
FFYs 2011-2014 TIP Revision #23
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
5/22/2013	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	543 CAC members and interested parties. Includes over 40 T6/EJ organizations.	N/A	N/A
5/22/2013	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
5/22/2013	Website Posting: Posted draft on website and solicited comments	224 hits to the OahuMPO TIP webpage	N/A	N/A
5/22/2013-6/28/2013	Public comments received	1	0	0
5/22/2013-6/28/2013	Government agency comments received: 0	N/A	N/A	N/A
7/02/2013	Presentation to TAC			
	- Public Attendees	1	0	1
	- Written testimony received	1	0	0
	- Oral testimony received	0	0	0
7/09/2013	Presentation to Policy Committee and Policy Committee action			
	- Public Attendees	10	2	2
	- Written testimony received	1	0	0
	- Oral testimony received	1	1	1
7/15/2013	Website Posting: Announcement of Policy Committee action on TIP Revision	N/A	N/A	N/A

N/A=Not applicable

**Table 7
FYs 2014-2015 OWP
Public Involvement Opportunities**

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
7/18/2012	CAC OWP meeting – OWP project list development	28	11	15
10/22/2012	Transmit CAC-recommended and OahuMPO staff-recommended projects to Policy Committee for their review. Call to City and State agencies for their proposed work elements	N/A	N/A	N/A
2/22/2013	Policy Committee meeting to review CAC's OWP recommendations Public Attendees Written testimony received Oral testimony received	3 0 0 0	0 0 0 0	0 0 0 0
4/15/2013	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties Direct Mail: Solicited comments from over 50 government agencies Website Posting: Posted draft OWP on website and solicited comments	Over 544 CAC member representatives and others interested in transportation. Includes over 50 organizations N/A 59 hits to OahuMPO's OWP webpage	 N/A N/A	 N/A N/A
4/15/2013-5/24/2013	Government agency comments received: 21	N/A	N/A	N/A
4/15/2013-5/29/2013	Public comments received	9	2	2
4/17/2013	Announcement to CAC	31	19	10
6/3/2013	Presentation to TAC and TAC recommendations received Public Attendees Written testimony received Oral testimony received	4 0 0 0	2 0 0 0	3 0 0 0
7/2/2013	Presentation of revised OWP to the TAC and TAC action Public Attendees Written testimony received Oral testimony received	1 0 0 0	1 0 0 0	1 0 0 0
7/9/2013	Presentation to Policy Committee and Policy Committee action Public Attendees Written testimony received Oral testimony received	6 44 1	3 14 1	4 16 1

N/A=Not Applicable

9/6/2013	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A
	FHWA and FTA approved the FYs 2014-2015 OWP	N/A	N/A	N/A
	Website Posting: Announcement of FHWA and FTA action on OWP	N/A	N/A	N/A

N/A=Not applicable

Table 8
FYs 2014-2015 OWP Revision #2
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
11/20/13	Website Posting: Posted draft on website and solicited comments	14 hits recorded to OahuMPO's OWP webpage	N/A	N/A
	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	414 CAC member representatives and interested parties		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
11/20/13-12/13/13	Public comments received	4		
11/20/13-11/29/13	Government agency comments received: No comments received	N/A	N/A	N/A
11/20/13	Announcement to CAC	37	23	18
12/2/13	Presentation to TAC and TAC recommendation			
	Public Attendees	2	2	1
	Written testimony received	0	0	0
2/10/14	Oral testimony received	0	0	0
	Presentation to Policy Committee and Policy Committee action			
	Public Attendees	16	3	5
02/14/14	Written testimony received	4	0	3
	Oral testimony received	4	3	3
02/14/14	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A

N/A=Not applicable

Table 9
FFYs 2011-2014 TIP Revision #28
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
1/01/2014	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	521 CAC members and interested parties. Includes over 40 T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
12/31/13-1/31/14	Public comments received	0	0	0
12/31/13-1/28/14	Government agency comments received: 3 comments from 3 agencies	N/A	N/A	N/A
12/31/13-1/31/14	Website Posting: Posted draft revision #28 on website and solicited comments	174 hits to the OahuMPO TIP webpage	N/A	N/A
2/03/2014	Presentation to TAC			
	- Public Attendees	5	2	3
	- Written testimony received	0	0	0
2/10/2014	- Oral testimony received	0	0	0
	Presentation of draft of TIP Revision #28 to Policy Committee and Policy Committee action			
	- Public Attendees	16	2	5
2/14/2014	- Written testimony received	1	0	0
	- Oral testimony received	1	0	0
2/14/2014	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

Table 10
FYs 2015-2016 OWP
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
9/18/13	CAC to develop a list of transportation related studies to suggest for inclusion in the OWP	49	30	24
2/3/14	Technical Advisory Committee to review initial draft of the OWP			
	Public Attendees	5	2	3
	Written testimony received	0	0	0
	Oral testimony received	0	0	0
2/10/14	Policy Committee meeting to discuss the OWP			
	Public Attendees	16	3	5
	Written testimony received	0	0	0
	Oral testimony received	0	0	0
3/3/14	Direct Mail and Email: Solicited comments from CAC members, T6/EJ organizations, and interested parties	576 CAC member representatives and interested parties. Includes over 50 T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
	Website Posting: Posted draft OWP on website and solicited comments	79 hits to OahuMPO's OWP webpage	N/A	N/A
3/3/14-5/9/14	Public Review comments received: 4 comments from 322 individuals and organizations	N/A	N/A	N/A
3/3/14-5/2/14	Government agency comments received: 10 comments from 6 agencies	N/A	N/A	N/A
4/10/14	CAC subcommittee meeting to discuss the lack of feedback provided by HDOT on the CAC's suggested work elements	5	1	0
6/12/14	Presentation to Technical Analysis Committee and Technical Analysis Committee action			
	Public Attendees	4	1	3
	Written testimony received	0	0	0
	Oral testimony received	0	0	0
6/19/14	Presentation to Policy Committee and Policy Committee action			
	Public Attendees	11	4	7
	Written testimony received	0	0	0
	Oral testimony received	1	0	1
7/23/14	Website Posting: Announcement of Policy Committee action on OWP	N/A	N/A	N/A

N/A=Not applicable

Table 11
FFYs 2011-2014 TIP Revision #30
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
5/22/2014	Direct Mail and Email: Solicited comments from CAC members, organizations representing T6/EJ organizations/individuals, and interested parties	548 CAC members and interested parties. Includes over 40 T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A
5/21/14-7/01/14	Public comments received	0	0	0
5/21/14-6/27/14	Government agency comments received: 4 comments from 2 agencies, 24 responses with no comments	N/A	N/A	N/A
12/31/13-7/01/14	Website Posting: Posted draft revision #30 on website and solicited comments	49 hits to the OahuMPO TIP webpage*	N/A	N/A
7/11/2014	Presentation to TAC			
	- Public Attendees	5	3	2
	- Written testimony received	0	0	0
8/11/2014	- Oral testimony received	0	0	0
	Presentation of draft of TIP Revision #30 to Policy Committee and Policy Committee action			
	- Public Attendees	10	2	2
8/13/2014	- Written testimony received	5	1	1
	- Oral testimony received	1	0	0
8/13/2014	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

*The number of visits to the OahuMPO TIP webpage during the public and intergovernmental comment period is questionable. The OahuMPO website was undergoing maintenance during this period. However, the revision was viewable throughout the public and intergovernmental comment period.

Table 12
FFYs 2015-2018 TIP
Public Involvement Opportunities

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
7/25/2013	Freight mover's survey finalized and sent to Hawaii Transportation Authority to post announcement and link to the survey in their newsletter.*	N/A	N/A	N/A
8/21/13	Using the CAC online survey data gathered over the past month, Director Gibson led the CAC through a prioritization process. The results of the survey were also passed out as handouts at this meeting and presented.	37	12	10
9/18/13	The draft CAC Early Input project prioritization list was distributed for the consideration of the CAC members. It was approved and recommended to forward to the Agencies.	39	14	14
10/30/2013	Transmitted CAC early public input to City and State agencies and requested responses. Call to City and State agencies for their proposed projects.	N/A	N/A	N/A
2/10/2014	Policy Committee received a presentation on the draft TIP prior to it going out for public and intergovernmental reviews Public Attendees Written testimony received Oral testimony received	16 0 0	3 0 0	5 0 0
5/21/2014	The CAC was presented the Draft FFYs 2015-2018 TIP	49	23	19
5/06/2014-7/03/2014	Public comments received	12	3	3
5/06/2014-6/20/2014	Government agency comments received: 4 comments from 3 agencies	N/A	N/A	N/A
5/06/2014	Direct Mail and Email: Solicited comments from CAC members, interested parties, and organizations representing T6/EJ organizations/individuals.	548 CAC member representatives and interested parties. Includes 56 T6/EJ organizations.		
	Direct Mail: Solicited comments from 56 government agencies	N/A	N/A	N/A

Date	Public Involvement Strategy	Total Public	Number of Minorities	Number of Women
	Website Posting: Posted draft on website and solicited comments	72 hits to the OahuMPO TIP webpage*	N/A	N/A
6/19/2014	Presentation to Policy Committee - Public Attendees - Written testimony received - Oral testimony received	11 0 0	4 0 0	7 0 0
7/11/2014	Presentation to Technical Advisory Committee - Public Attendees - Written testimony received - Oral testimony received	5 0 0	3 0 0	2 0 0
8/18/2014	Presentation to Policy Committee - Public Attendees - Written testimony received - Oral testimony received	17 1 7	4 0 1	7 0 3
8/22/2014	Website Posting: Announcement of Policy Committee action on TIP revision	N/A	N/A	N/A

N/A=Not applicable

2. Limited English Proficiency

A copy of the agency's plan for providing language assistance for persons with limited English proficiency that was based on the DOT LEP Guidance or a copy of the agency's alternative framework for providing language assistance.

OahuMPO uses LEP guidance provided by HDOT. HDOT has contracted with a company to provide interpretation services for HDOT via telephone. HDOT's Language Access Plan may be found at <http://hidot.hawaii.gov/administration/files/2013/01/language-access-plan-2011.pdf>

The steps of evaluation that OahuMPO uses when considering the need for alternative outreach to LEP individuals include: 1) Determine the number or proportion of underserved individuals eligible to be served or likely to be encountered by the plan or program, 2) Determine the frequency with which underserved individuals come in contact with the plan or program, 3) Determine the nature and importance of the plan or program to the underserved individual, and 4) Determine the resources available and the costs.

If alternative outreaches or services are needed, the OahuMPO may employ the following:

- i. Use translators or interpreters at meetings where there is need and ensure that proper notice of translation service is publicized.
- ii. Provide translated informational materials in communities where there may be the highest need.
- iii. Ensure that the OahuMPO website provides translation to the best extent possible.
- iv. Enlist the assistance of agencies which provide services to LEP populations.

The following images include the instructions, on how to file a Title VI discrimination complaint and the complaint form posted on the OahuMPO website:

Title VI Investigation and Complaint Procedures

OahuMPO complies with the applicable Title VI requirements, and regularly monitors its plans and programs for compliance based on the Title VI performance measures documented in the reports below. However, any person who believes that he or she has been subjected to discrimination on the basis of race, color or national origin by OahuMPO may file a Title VI complaint by completing and submitting a Title VI Complaint Form. A complaint may also be filed by a representative on behalf of such a person.

A complaint form may be downloaded [here](#).

Completed complaint forms should be sent to:

Oahu Metropolitan Planning Organization
707 Richards Street, Suite 200
Honolulu, Hawaii 96813

OahuMPO follows the Title VI investigation and complaint procedures developed by the State of Hawaii Department of Transportation. Refer to the Hawaii Department of Transportation's website ([HDOOT](#)) for information on OahuMPO's nondiscrimination obligations and complaint procedures. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after the alleged incident.

Once a completed complaint form is received, OahuMPO will review it to determine if it is complete and if our office has jurisdiction. Within ten (10) working days of receiving a complaint form, OahuMPO will notify the complainant in writing, informing her/him of whether the complaint will be investigated by our office and of the anticipated timeline for completion.

Environmental Justice in the OahuMPO Planning Process

In October 2001, the Oahu Metropolitan Planning Organization (OahuMPO) published its report

**OAHU METROPOLITAN PLANNING ORGANIZATION
TITLE VI COMPLAINT FORM**

SECTION I
Name: _____
Address: _____ Telephone (Home): _____ Telephone (Work): _____
E-mail Address: _____
Accessible Format Requirements? Large Print ☐ Audio Tape ☐
TDD ☐ Other (specify): _____

SECTION II
Are you filing this complaint on your own behalf? Yes ☐ No ☐
If you answered "yes" to the question above, go to Section IV below.
If you answered "no," please provide the name and relationship of the person for whom you are complaining: _____
Please explain why you have filed for that person: _____
Please confirm that you have obtained the permission of that person: Yes ☐ No ☐

SECTION III
I believe the discrimination I experienced was based on (check all that apply):
Race ☐ Color ☐ National Origin ☐
Date of Alleged Discrimination (Month, Day, 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) who discriminated against you (if known) as well as the names and contact information of any witnesses. If more space is needed, please attach a separate sheet of paper.

SECTION IV
Have you previously filed a Title VI complaint with OahuMPO? Yes ☐ No ☐

The image shows a screenshot of a PDF document titled "Title VI Complaint Form" with a page number of "Page 2 of 2". The form is titled "SECTION IV" and asks the respondent to indicate if they have filed the complaint with any other federal, state, or local agency, or with any federal or state court. It includes checkboxes for "Yes" and "No". Below this, there are fields for "Federal Agency", "State Agency", "Federal Court", and "State Court". A section titled "Please provide information about a contact person at each agency/court where the complaint was filed" includes fields for "Name", "Title", "Agency", "Address", and "Telephone". A note states: "You may attach any written materials or other information that you think is relevant to your complaint." There are lines for "Signature and date required below:" with separate fields for "Signature" and "Date". At the bottom, it says "Please submit this form in person at the address below, or mail this form to:" followed by the address: "Oahu Metropolitan Planning Organization, 707 Richards Street, Suite 200, Honolulu, Hawaii 96813".

4. Title VI Investigations, Complaints, or Lawsuits

A list of any Title VI investigations, complaints, or lawsuits filed with the agency since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to the agency submitting the report, not necessarily the larger agency or department of which the entity is a part.

OahuMPO has not received any Title VI investigations, complaints, or lawsuits. If any investigations, complaints, or lawsuits are received, OahuMPO will comply with the reporting requirements in 49 CFR §21.9(b).

5. Notice to the Public

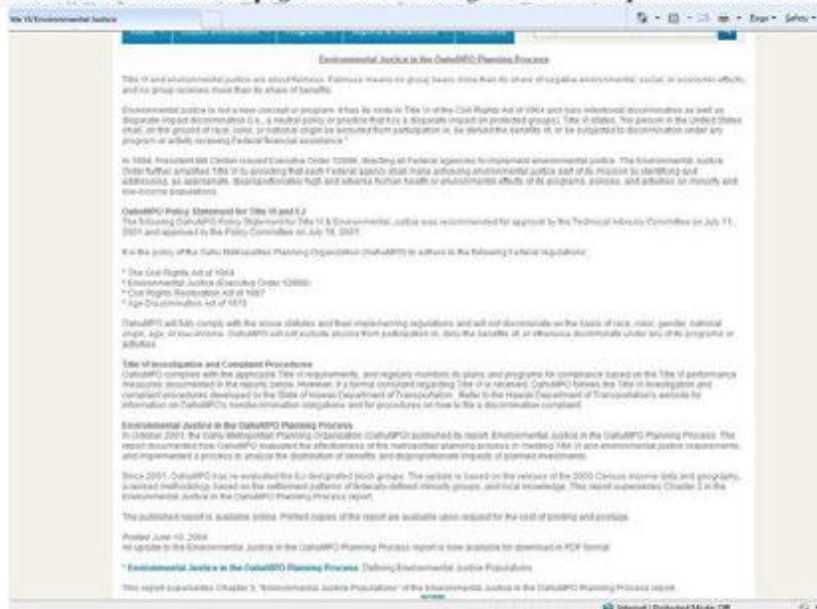
A copy of the agency's notice to the public that indicates the OahuMPO complies with Title VI and instructions to the public on how to file a discrimination complaint. Include a list of locations where the notice is posted.

The Title VI notice and instructions to the public on how to file a discrimination complaint is located in the following locations:

1. The OahuMPO website
2. The OahuMPO conference room
3. The OahuMPO entry way

The following is a screen capture of a portion of OahuMPO's Title VI webpage that provides OahuMPO's Title VI investigation and complaint procedures.

OahuMPO's Title VI webpage: Title VI Investigation and Complaint Procedures



The following notice is posted and visible in the OahuMPO conference room. It is also visible at the entrance way of OahuMPO's office:



6. Participation of Minorities on Committees or Councils

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

The OahuMPO's Citizen Advisory Committee (CAC) is a non-elected advisory committee. The following table depicts the membership of the CAC broken down by race:

OahuMPO Citizen Advisory Committee Membership (% of racial representation per monthly meeting)							
Month	White	African American	Native American	Asian American	Native Hawaiian/ Pacific Islander	Latino	Other
January	48%	0%	0%	34%	14%	0%	4%
February	44%	0%	0%	40%	16%	0%	0%
March	52%	0%	0%	31%	14%	0%	3%
April	48%	0%	0%	38%	10%	0%	4%
May	48%	0%	0%	36%	10%	0%	6%
June	47%	0%	0%	34%	13%	0%	6%
July	44%	0%	0%	36%	20%	0%	0%
August	54%	0%	0%	36%	10%	0%	0%
September	55%	0%	0%	35%	10%	0%	0%
October	59%	0%	0%	30%	7%	0%	4%
November	48%	0%	0%	38%	14%	0%	0%
December	42%	0%	0%	42%	10%	0%	6%
Annual Average	49.08%	0.00%	0.00%	35.83%	12.33%	0.00%	2.75%
Oahu Population*	21	2	0	47	9	0	1

99.99%

* as defined in the 2000 US Census

The table depicts the racial breakdown of the CAC membership in calendar year 2014. The table shows the main racial groups including White, African American, Native American, Asian American, Native Hawaiian/ Pacific Islander, Latino, and other. The Oahu population was taken from the 2000 US Census survey. It shows that 74% of Oahu's population is made up of minorities. The membership racial breakdown table reveals that the annual average of minorities on the advisory committee is over 50%.

The OahuMPO endeavors to involve the people traditionally underserved in transportation issues. In addition to the traditional outreach activities, OahuMPO may use untraditional outreach strategies that are tailored to fit Oahu's community, when reasonable.

The following is a list of public involvement techniques that cater to those for whom traditional outreaches are not effective:

- i. Employ more verbal and visual communication techniques
- ii. Conduct meetings in smaller and non-traditional venues at times that would meet the needs of shift workers.
- iii. Use community and religious organizations and their leaders in building communication.
- iv. Place announcements in minority or ethnic news media, both radio and print.

The following list of outreaches encourage participation of traditionally underserved populations on OahuMPO's Citizen Advisory Committee (CAC):

- i. Use community and religious organizations and their leaders to help educate about participation opportunities and benefits.
- ii. Encourage existing CAC members to reach out to their communities and act as liaisons for OahuMPO.
- iii. Target neighborhoods and communities which are underrepresented on the CAC for specific and tailored outreach.

Metropolitan Transportation Planning

This section addresses the guidance in Chapter VII of FTA Circular 4702.1B.

A. Demographic Profile of Oahu

A demographic profile of the metropolitan area that includes identification of the locations of socioeconomic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI.

OahuMPO has identified minority and low-income populations on Oahu based on income, minority, and ethnicity data from the 2000 Census.¹ OahuMPO plans to update the T6/EJ block groups based on the 2010 Census in the FFY 2015 timeframe.

A total of 78 block groups are identified as T6/EJ block groups. However, 20 of the 78 block groups are located on military bases, on which roadway projects and transit routes are controlled by respective base commanders. Therefore, OahuMPO's analysis removes from the set of T6/EJ block groups any block group that is located completely on a military base. Figure 1 identifies the OahuMPO-designated T6/EJ block groups; 58 (13%) are designated as T6/EJ and the remaining 374 (87%) are designated as non-T6/EJ.

¹ The analysis of the Census data and resulting designation of T6/EJ block groups is detailed in the OahuMPO *Environmental Justice in the OahuMPO Planning Process: Defining Environmental Justice Populations* report, (March 2004). This report is available on the OahuMPO website (www.OahuMPO.org).

Figure 1
Title VI and Environmental Justice Block Groups



B. Metropolitan Transportation Planning Process

A metropolitan transportation planning process that identifies the needs of low-income and minority populations.

OahuMPO's transportation planning process is aimed at developing programs to meet Oahu's transportation needs by analyzing the existing system and preparing plans and studies in a comprehensive, cooperative, and continuing manner. As noted in the previous section, OahuMPO has identified the locations of low-income and minority populations. OahuMPO has made a special effort to reach out to Title VI and EJ populations and encourage their comments. OahuMPO's mailing list is a dynamic one.

In FFY 2013, OahuMPO's Public Participation Plan was updated to include an outreach plan to engage minority and limited English proficient populations. Also, the Title VI notice on OahuMPO's website, www.oahumpo.org, was updated to inform the public that any discrimination complaints may be filed directly with OahuMPO. OahuMPO also posted Title VI notices and LEP information by the entry way and in the conference room in the OahuMPO office.

C. Analytical Process

An analytical process that identifies the benefits and burdens of metropolitan transportation system investments for different socioeconomic groups, identifying imbalances and responding to the analyses produced.

OahuMPO assesses the equity of TIP and ORTP funding allocations across the Title VI/EJ and non-Title VI/EJ neighborhoods. The amounts programmed in the TIP and ORTP are allocated to the various census block groups using Geographic Information System software.

The equity analysis allows for the determination of an average per capita investment, based on the total number of people who may be considered T6/EJ or non-T6/EJ. The following formulas are used to derive the data:

- Average investment by block group:
$$\frac{[\text{Sum of costs in T6/EJ block groups}]}{[\text{Number of total T6/EJ block groups}]}$$
- Total Cost of Projects:
$$\begin{aligned} \text{Sum of costs in T6/EJ block groups} &= X \\ \text{Sum of costs in non-T6/EJ block groups} &= Y \end{aligned}$$
- % Project Investment:
$$\frac{[100] * [\text{Sum of Costs in T6/EJ block groups}]}{[\text{Total Sum of Costs}]}$$
- Total Population:
$$\begin{aligned} \text{EJ population} &= x \\ \text{Non-EJ population} &= y \end{aligned}$$
- Average Per Capita Investment:
$$\frac{[X]}{[x]} : \frac{[Y]}{[y]}$$

For projects that appear to be sited at a single location, referred to as "spot" projects, the entire value of the project is attributed to the T6/EJ or non-T6/EJ Census block groups in which the project falls. For projects that involve improvement or expansion of some length of route in the highway system, referred to as "network" projects, the value of the project is allocated by the mile, and then aggregated within the T6/EJ and non-T6/EJ block groups. When the combined investment of both network and spot projects is allocated to T6/EJ and non-T6/EJ block groups, the average investment is compared between T6/EJ and non-T6/EJ block groups.

Appendix A
OahuMPO Title VI Assurance

**OAHU METROPOLITAN PLANNING ORGANIZATION
TITLE VI ASSURANCE**

The Oahu Metropolitan Planning Organization (hereinafter referred to as the "Subrecipient") HEREBY AGREES THAT, as a condition to receiving any federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally Assisted Programs of the U.S. Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations"), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, national origin, or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Subrecipient receives Federal financial assistance from the U.S. Department of Transportation, including the Federal Aviation Administration, Federal Highway Administration, and Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Subrecipient hereby gives the following specific assurances with respect to all programs and activities for which the Subrecipient received Federal financial assistance:

1. That the Subrecipient agrees that each "program" and each "facility", as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Subrecipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all programs and activities for which the Subrecipient received Federal financial assistance and, in adapted form in all proposals for negotiated agreements:

"OahuMPO, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4, and Title 49 Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation, and will not be discriminated against on the grounds of race, color, national origin, or sex in consideration for an award."

3. That the Subrecipient shall insert the clauses of Attachment I of this Assurance in every contract subject to the Act and the Regulations.
4. That the Subrecipient shall insert the clauses of Attachment II of this assurance as a covenant running with the land in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. That where the Subrecipient receives federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
6. That where the Subrecipient receives federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
7. That the Subrecipient shall include the appropriate clauses set forth in Attachment III of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Subrecipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal-aid Program; and (b) for the construction or use of or access to space, on, over, or under real property acquired or improved under the Federal-aid Program.
8. That this Assurance obligates the Subrecipient for the period during which federal financial assistance is extended to the program, except where the federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Subrecipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Subrecipient retains ownership or possession of the property.
9. That the Subrecipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other subrecipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.
10. That the Subrecipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts, or other federal financial assistance extended after the date hereof to the Subrecipient by the U.S. Department of Transportation under the Federal Aid Program and is binding on it, other subrecipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal Aid

Program. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Subrecipient.


BRIAN GIBSON
Executive Director

10/19/11
Date

(with Attachments I, II, and III)

ATTACHMENT I

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

1. Compliance with Regulations: The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter, "DOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the "Regulations"), which are herein incorporated by reference and made a part of this contract.
2. Nondiscrimination: The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, national origin, or sex in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by §21.5 of the Regulations, including employment practices when the contract covers a program set forth in Attachment II of the Regulations.
3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment: In all solicitations either by competitive bidding or negotiation made by the Contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, national origin, or sex.
4. Information and Reports: The Contractor shall provide all information and reports required by the Regulations, or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the State to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the State as appropriate, and shall set forth what efforts it has made to obtain the information.
5. Sanctions for Noncompliance: In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, the State shall impose such contract sanctions as it may determine to be appropriate, including, but not limited to:
 - a. Withholding of payments to the Contractor under the contract until the Contractor complies; and/or
 - b. Cancellation, termination, or suspension of the contract, in whole or in part.
6. Incorporation of Provisions: The Contractor shall include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto.

The Contractor shall take such action with respect to any subcontract or procurement as the State may direct as a means of enforcing such provisions including sanctions for noncompliance: provided, however, that, in the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request the State to enter into such litigation to protect the interests of the State, and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

ATTACHMENT II

The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

(GRANTING CLAUSE)

NOW, THEREFORE, the U.S. Department of Transportation, as authorized by law, and upon the condition that the State, will accept title to the lands and maintain the project constructed thereon, in accordance with (Name of Appropriate Legislative Authority), the Regulations for the Administration of (Name of Appropriate Program), The Federal Aid Program, and the policies and procedures prescribed by (Name of Appropriate Program) and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964, (78 Stat. 252, 42 U.S.C. 2000d to 2000-4), does hereby remise, release, quitclaim and convey unto the State all the right, title, and interest of the Department of Transportation in and to said lands described in Exhibit "A" attached hereto and made a part hereof.

(HABENDUM CLAUSE)

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

The State, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person 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 with regard to any facility located wholly or in part on, over, or under such lands hereby conveyed [] [and] (2) the State shall use the lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted program of the United States Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended [,] and (3) in the event of breach of any of the above-mentioned nondiscrimination conditions, the United States Department shall have a right to re-enter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the United States Department of Transportation and its assigns as such interest existed prior to this instruction.*

* Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

ATTACHMENT III

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the State, pursuant to the provisions of Assurance 6(a).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases and "as a covenant running with the land") that, in the event facilities are constructed, maintained, or otherwise operated on, the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]*

That in the event of breach of any of the above nondiscrimination covenants, the State shall have the right to terminate the [license, lease, permit, etc.] and to re-enter the repossess said land and the facilities thereon, and hold the same as if said [license, lease, permit, etc.] had never been made or issued.

[Include in deeds]*

That in the event of breach of any of the above nondiscrimination covenants, the State shall have the right to re-enter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the State and its assigns.

The following shall be included in all deeds, licenses, leases, permits or similar agreements entered into by the State, pursuant to the provisions of Assurance 6(b).

The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself, his personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds, and leases add "as a covenant running with the land") that (1) no person on the ground of race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination in the use of said facilities, (2) in the construction of any improvements on, over, or under such land and the furnishing of services thereon, no person on the ground of race, color, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) the (grantee, licensee, lessee, permittee, etc.) shall use the premises in compliance with all other requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

[Include in licenses, leases, permits, etc.]*

That in the event of breach of any of the above nondiscrimination covenants, the State shall have the right to terminate the [license, lease, permit, etc.] and to re-enter and repossess said land and the facilities thereon, and hold the same as if said [license, lease, permit, etc.] had never been made or issued.

(Include in deeds)*

That in the event of breach of any of the above nondiscrimination covenants, the State shall have the right to re-enter said lands and facilities thereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the State, and its assigns.

* Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purposes of Title VI of the Civil Rights Act of 1964.

Appendix D: Title VI Complaint form

Page 1 of 2

OAHU METROPOLITAN PLANNING ORGANIZATION TITLE VI COMPLAINT FORM

SECTION I			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
E-mail Address:			
Accessible Format	Large Print	<input type="checkbox"/>	Audio Tape
Requirements?	TDD	<input type="checkbox"/>	Other (specify):
SECTION II			
Are you filing this complaint on your own behalf? Yes <input type="radio"/> No <input type="radio"/>			
If you answered "yes" to the question above, go to Section III below.			
If you answered "no," please provide the name and relationship of the person for whom you are complaining.			
Please explain why you have filed for that person.			
Please confirm that you have obtained the permission of that person. Yes <input type="radio"/> No <input type="radio"/>			
SECTION III			
I believe the discrimination I experienced was based on (check all that apply):			
Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/>			
Date of Alleged Discrimination (Month, Day, 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) who discriminated against you (if known) as well as the names and contact information of any witnesses. If more space is needed, please attach a separate sheet of paper.			
SECTION IV			
Have you previously filed a Title VI complaint with OahuMPO? Yes <input type="radio"/> No <input type="radio"/>			

Title VI Complaint Form.docx
Revised November 2012

SECTION V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
Yes <input type="radio"/> No <input type="radio"/>	
If yes, check all that apply and name the agency:	
<input type="checkbox"/> Federal Agency: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> City Agency: _____
<input type="checkbox"/> State Court: _____	
Please provide information about a contact person at each agency/court where the complaint was filed.	
Name: _____	
Title: _____	
Agency: _____	
Address: _____	
Telephone: _____	

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

Signature and date required below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Oahu Metropolitan Planning Organization
707 Richards Street, Suite 200
Honolulu, Hawaii 96813

Appendix E: Sample TITLE VI / ENVIRONMENTAL JUSTICE EQUITY ANALYSIS

TITLE VI / ENVIRONMENTAL JUSTICE EQUITY ANALYSIS

FFYs 2015-2018 TIP as of Revision 6

Population in T6/EJ BG (1):	152,112		
Population in non-T6/EJ BG (0):	724,044		
T6/EJ BG:	70 BG selected based on race (minority)		
	17 BG selected based on low income		
	(9) BG counted as both minority & low income (double-counted)		
Less:	78 T6/EJ block groups		
	(20) T6/EJ BG located on military bases		
Less:	58 BG designated as T6/EJ		
Number of T6/EJ BG:	58		
Number of non-T6/EJ BG:	374		
Total Block Groups:	432		
Sum of Costs in T6/EJ BG:	516,441	x 1000 =	516,441,146
Sum of Costs in non-T6/EJ BG:	3,399,946	x 1000 =	3,399,946,470
Total Costs:			3,916,387,617

	T6/EJ Block Group	Non-T6/EJ Block Group	Difference	
Average Investment by Block Group	8.9 M	9.1 M		
Total Cost of Projects	516.4 M	3399.9 M		
% Project Investment	13%	87%		
Total Population	152112	724044		
Average Per Capita Investment	3,395	4,696	-28%	1301

Title VI and Environmental Justice Summary:

The FFYs 2015-2018 TIP as of Revision #6 Title VI and Environmental Justice (T6/EJ) analysis was compared to the T6/EJ analysis of FFYs 2015-2018 TIP as of Revision #3. The FFYs 2015-2018 TIP as of Revision #6 Title VI and Environmental Justice (T6/EJ) analysis results changed slightly from the results of the FFYs 2015-2018 TIP Revision #3 T6/EJ analysis. In draft TIP Revision #6, two new projects were added, one project was deleted, the federal portion of one project was increased by more than 50%, and the scope of one project was changed. The average per capita investment for the T6/EJ Block Groups is \$3,395 and for the Non-T6/EJ Block Groups is \$4,696. There was a difference of \$1,301 or 28% less investment in T6/EJ Block Groups. However, the percentage of project investment is proportionate with the number of T6/EJ Block Groups and Non-T6/EJ Block Groups.