



Draft Title VI Program Plan

Burlington – Graham Metropolitan Planning Organization

Amended November 2024

Date of Adoption:

Burlington – Graham MPO

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TITLE VI POLICY STATEMENT AND NOTICE OF NONDISCRIMINATION

It is the policy of the Burlington–Graham MPO (BGMPO), as a federal-aid recipient, to ensure that no person shall, on the ground of **race, color, national origin, Limited English Proficiency, sex, age, or disability, (and low-income, where applicable)**, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of our programs and activities, as provided by Title VI of the Civil Rights Act of 1964, Executive Orders 12898 and 13166, the Civil Rights Restoration Act of 1987, and other pertinent nondiscrimination authorities.

If you feel you have been subjected to discrimination, you may file a complaint. Allegations of discrimination should be promptly reported to our Title VI Coordinator.

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This policy is an expression of our commitment to nondiscrimination and support of the Title VI Program.

BGMPO Administrator

Date

Implementation (Dissemination)

- This Policy Statement contains contact information for the Title Coordinator, and it will also serve as our notice to public.
- This statement will be signed by the Transportation Advisory Board Chair of the BGMPO, and re-signed whenever a new person assumes that position.
- The signed statement will be posted on office bulletin boards, near the receptionist's desk, in meeting rooms, and disseminated within brochures and other written materials.
- The statement will be incorporated into Title VI training and acknowledgement activities.
- The statement will be posted or disseminated in languages other than English, when appropriate.
- Low-income will be applicable to our programs, policies and activities under Environmental Justice when determining if there will be disproportionately high and adverse effects.

STANDARD USDOT TITLE VI ASSURANCES

Please refer to Appendix A of this Plan for a copy of our completed, signed USDOT Title VI Assurances.

ORGANIZATION & STAFFING

A Metropolitan Planning Organization (MPO) is the policy board of an organization created and designated to carry out the metropolitan transportation planning process. MPOs are required to represent localities in all urbanized areas (UZAs) with populations over 50,000, as determined by the U.S. Census. MPOs are designated by agreement between the governor and local governments that together represent at least 75 percent of the affected population (including the largest incorporated city, based on population) or in accordance with procedures established by applicable state or local law. When submitting a transportation improvement program to the state for inclusion in the statewide program, MPOs self-certify that they have met all federal requirements.

The Burlington-Graham area was designated an “Urbanized Area” by the U.S. Bureau of Census in 1974. As a result of this designation, the Burlington-Alamance area formed the Burlington Graham Metropolitan Planning Organization (BGMPO) in 1975. With this new designation came the responsibility of adhering to federal continuing planning requirements. Furthermore, a revised Memorandum of Understanding (MOU) was executed between the Cities of Burlington, Graham, and Mebane; the Towns of Elon, Gibsonville, Whitsett, Green Level and Haw River, the Village of Alamance; Guilford County, Orange County and Alamance County; and the North Carolina Department of Transportation (NCDOT) in 2012. The memorandum delineated responsibilities in maintaining and continuing planning processes and established a Technical Coordinating Committee (TCC) with the responsibility for general review, guidance, and coordination of the continuing planning process. A Transportation Advisory Committee (TAC), comprised of representatives of the elected policy boards in the urban area, was also established to assure coordination between the elected officials, policy boards and the transportation planning process. The BGMPO TAC has 14 members, and meets the third Tuesday, 5:30 p.m., during the months of January, March, May, August and October. The BGMPO TCC has 24 members and meets the third Tuesday, 9:00 a.m., during the meeting months of the TAC. The TCC and TAC has the option to alter their respective meeting schedules in accordance with the BGMPO Public Involvement Plan. Please refer to **Appendix B** for lists of current TAC and TCC members with race, gender, and affiliation included.

Title VI Coordinator

Key responsibilities of the coordinator include:

- Maintaining knowledge of Title VI and related requirements.
- Attending civil rights training when offered by NCDOT, FHWA or other federal agencies.
- Administering the Title VI Nondiscrimination Program and coordinating implementation of this Plan.
- Making sure internal staff and officials are familiar and complying with their Title VI obligations.
- Disseminating Title VI information internally and to the public, including in languages other than English.
- Presenting Title VI-related information to decision-making bodies for input and approval.
- Ensuring Title VI-related posters are prominently and publicly displayed.
- Developing a process to collect data related to race, national origin, sex, age, and disability to ensure minority, low-income, and other underserved groups are included and not discriminated against.
- Ensuring that non-elected boards and committees reflect the service area and minorities are represented.
- Promptly processing (receiving, logging, investigating and/or forwarding) discrimination complaints.
- Providing information to NCDOT and cooperating during compliance reviews and investigations.
- Promptly resolving deficiencies to ensure compliance with Title VI nondiscrimination requirements.

If the MPO Administrator or Title VI Coordinator changes, the Title VI Policy Statement and USDOT Title VI Assurances, will immediately be updated, and an updated policy statement and nondiscrimination agreement will be signed by the new MPO Administrator.

Staffing

The MPO has two full-time staff positions that consists of the following job categories:

- MPO Administrator
- Transportation Planner

The former Administrator is currently serving as temporary part-time support staff. An organizational chart showing the Title VI Coordinator's place within the organization is in **Appendix C**.

ENVIRONMENTAL JUSTICE (EJ)

In 1994, President William Jefferson Clinton issued Executive Order (EO) 12898, Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations. To comply with the EO, federal agencies developed EJ guidelines for their funding recipients, including Federal Highway Administration (FHWA) Order 6640.23A. Accordingly, the BGMPO will make achieving EJ part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations.

EJ is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation and enforcement of environmental laws, regulations and policies. The three fundamental EJ principles that guide USDOT (affiliated) actions are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including interrelated social and economic effects, on minority and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

[Executive Order 14008: Tackling Climate Change at Home and Abroad](#), created the government-wide [Justice40 Initiative](#) which establishes the goal that at least 40% of the benefits of certain federal investments flow to disadvantaged communities. Justice40 aims to address decades of underinvestment in disadvantaged communities. In January of 2021, President Biden issued Executive Order 14008. The order directed the Council on Environmental Quality (CEQ) to develop a new tool. This tool is called the Climate and Economic Justice Screening Tool (CEJST). The tool has an interactive map and uses datasets that are indicators of burdens in eight categories: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. The tool uses this information to identify communities that are experiencing these burdens. These are the communities that are disadvantaged because they are overburdened and underserved. Census tracts that are overburdened and underserved are highlighted as being disadvantaged.

The BGMPO Title VI EJ *Degree of Impact* analysis utilized various EJ tools that disaggregated demographic data by race and ethnicity to identify disproportionate impacts and utilized state and federal tools to determine disadvantaged community status. The metric tools used to identify disadvantaged populations were the NCDOT Transportation Disadvantaged Index, the US DOT Transportation Disadvantaged Census Tracts (US DOT DCT), US DOT Equitable Transportation Community (ETC) Explorer, and the Council on Environmental Quality's Climate and Economic Justice Screening Tool (CEJST).

NC TDI Analysis - The TDI is a metric developed by NCDOT to identify the propensity of concentrated transportation disadvantaged individuals. The TDI used for the BGMPO EJ analysis incorporated ACS block group level population data from the 2018–2022, 5-year survey. The TDI composite score was based on six indicators of potential transportation disadvantage: carless households; individuals with low incomes; mobility-

impaired individuals aged 18 years and older (physical, mental, or self-care disability); youth aged 15 and under (non-drivers); seniors; and Black, Indigenous, and Persons of Color (BIPOC) population. Each of the indicators is scored based on the relative concentration using the Jenks Natural Breaks method for the entire state of North Carolina. This method creates natural groupings of data values using the Jenks Natural Breaks algorithm, which groups similar values and maximizes differences between classes. This method is used to classify the block group data value for each indicator into one of three groups based on the relative population concentration, where block groups with the lowest concentrations of a given population received a score of 1 and those with the highest concentrations received a score of 3. The resulting map from the TDI analysis can be seen in Figure 2. Seventeen percent of BGMPO residents live in areas with a high TDI score.

The USDOT TDCT is a new equity analysis tool brought forth as part of the Justice40 Initiative. The DCTs are comprised of 22 indicators collected at the U.S. Census tract level, which are then grouped into six categories of transportation disadvantage. The BGMPO TDCT disadvantaged census tracts, defined by the USDOT TDCTs tool, exceeded the 50th percentile (75th for resilience) across at least four of the six transportation disadvantaged indicators. Each of the six disadvantage indicators are assembled at the Census tract level using data from the CDC Social Vulnerability Index, Census America Community Survey, EPA Smart Location Map, HUD Location Affordability Index, EPA EJ Screen, FEMA Resilience Analysis and Planning Tool, and FEMA National Risk Index.

Within the BGMPO region, 13 Census tracts meet the DCT threshold. As shown in Figure 3, 12 of the 13 census tracts fall within the urban area of the BGMPO region. The City of Burlington, City of Graham, City of Mebane, Town of Elon, Town of Green Level, and Town of Haw River have portions of their municipality that fall within a DCT. Unincorporated Alamance County along the NC-54 corridor and unincorporated Orange County east of Mebane are also classified as disadvantage communities. Understanding the location of these census tracts help with prioritizing project types identified in BGMPO transportation plans for these locations.

USDOT's ETC Explorer calculates the cumulative impacts of transportation disadvantage across census tracts. Census tracts that are overburdened and underserved are highlighted as being disadvantaged. The five components — Transportation Insecurity, Health Vulnerability, Environmental Burden, Social Vulnerability, and Climate and Disaster Risk Burden — are calculated by obtaining a composite score for each component. USDOT then uses percentile ranking to determine each census tracts component score against all other census tracts. USDOT considers a census tract to be experiencing disadvantage if the overall index score places it in the 65th percentile (or higher) of census tracts. The overall score is percentile ranked to generate a final percentile score rank. By examining cumulative impacts, the BGMPO can identify the communities experiencing the highest combined burdens and begin to identify the types of projects that would best benefit the targeted community (Figure 4).

To achieve EJ, our programs will be administered to identify and avoid disproportionately high and adverse effects on minority populations and low-income populations by using the degree of impact tools described above and by:

- (1) Identifying and evaluating environmental, public health, and interrelated social and economic effects of our programs, policies and activities.
- (2) Proposing measures to avoid, minimize and/or mitigate disproportionately high and adverse environmental and public health effects, and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by our programs, policies and activities, where permitted by law.
- (3) Considering alternatives to proposed programs, policies, and activities, where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts to minority and/or low-income populations; and
- (4) Eliciting public involvement opportunities and considering the results thereof, including soliciting input from affected minority and low-income populations in considering alternatives.

- (5) Adding an EJ section to plans and studies, such as the Metropolitan Transportation Plan, Public Involvement Plans, and Corridor Studies.

EJ analyses will be updated annually to determine if our programs, policies, or activities will result in disproportionately high and adverse human health and environmental effects on minority populations and low-income populations. EJ applies to our policies, such as where public meetings will be held, and our projects, such as when we plan to construct or expand a transportation facility. Thus, we will look at various alternatives and seek input from potentially affected communities before making a final decision. EJ analyses will remain on file indefinitely, and copies will be provided to NCDOT, upon request, during compliance reviews or complaint investigations.

DATA COLLECTION/ANALYSIS/REPORTING

Data collection, analysis and reporting are key elements of a successful Title VI enforcement strategy. To ensure that Title VI reporting requirements are met, the demographic and trend data will be collected and tracked to document public involvement in the decision-making process and actual beneficiaries of our programs and services. This section contains relevant population data for our overall service area. The data provides context for the Title VI Nondiscrimination Program and will be used to ensure nondiscrimination in public outreach and delivery of our programs. Please refer to **Appendix - D** for demographic tables on Race & Ethnicity, Age & Sex, Disability, Poverty, and Household Income.

Population Locations

Recipients of FHWA funds are required to identify the characteristics and locations of populations they serve, particularly by race/ethnicity, poverty and limited English proficiency. We will document this narratively or through maps that overlay boundaries and demographic features on specific communities, and provide this information to NCDOT, upon request. (See **Appendix E – Demographic Maps**)

LIMITED ENGLISH PROFICIENCY (LEP)

Limited English Proficient (LEP) persons are individuals for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. These individuals reported to the U.S. Census Bureau that they speak English less than very well.

To comply with USDOT's LEP Policy Guidance and Executive Order 13166, this section of our Title VI Plan outlines the steps BGMPO will take to ensure meaningful access by LEP persons to all benefits, services and information provided under our programs and activities. A four-factor analysis was conducted to determine the LEP language groups present in our planning area and the specific language services that are needed.

The intent of this Limited English Proficiency (LEP) Plan is to ensure that residents in the BGMPO study area that do not speak or read English proficiently have access to the planning process and information published by the BGMPO. The BGMPO shall provide multilingual publications and comments and/or interpretation at meetings or events to the degree that funding permits based on current laws and regulations.

The purpose of the Plan is to identify the responsibilities of the BGMPO in fulfilling the needs of persons with Limited English Proficiency (LEP) pursuant to Title VI of the Civil Rights Act of 1964 and the Executive Order 13166. The Civil Rights Act states that "no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. Different treatment based on a person's inability to speak, write, or understand English may be a type of national origin discrimination.

The BGMPO has identified reasonable steps to provide language assistance for LEP persons seeking access to MPO programs. A Limited English Proficient person is one who does not speak English as their primary language and who has a limited ability to read, speak write, or understand English. The LEP identifies procedures for a person to gain access and information to BGMPO information if English is not their primary language. Four factors were evaluated for development of this plan.

Four Factor Analysis

This Four Factor Analysis is an individualized assessment that balances the following four factors:

- (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;
- (2) The frequency with which LEP individuals come in contact with the program;
- (3) The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
- (4) The resources available to the recipient and costs.

Factor #1: *The number or proportion of LEP persons eligible to be served or likely to be encountered by the program, activity, or service of the recipient.*

In an effort to determine the profile of LEP persons, the BGMPO reviews census data to measure the number of individuals within the study area that may be impacted by the transportation planning process and/or beneficiaries of programs, activities, or services. Table 1, Language Spoken at Home by Ability to Speak English for the Population 5 years and over derived from the US Census Bureau, 2018 - 2022 ACS 5-year estimates collected between: January 1, 2018 and December 31, 2022. Table 1 displays the primary language spoken and number of individuals that are LEP. For our planning purposes, every language group that has at least 5% or 1,000 people who speak English less than very well, within the margin of error (MOE). Data for Alamance County is not available. However, in previous years, Spanish speakers comprise the largest concentration of LEP individuals in the BGMPO's study area, followed by other Indo-European, and Asian and Pacific.

Table 1 Language Spoken at Home

	Alamance County				Guilford County				Orange County			
LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent of Population	Margin of Error	Estimate	Margin of Error	Percent of Population	Margin of Error	Estimate	Margin of Error	Percent of Population	Margin of Error
Total (population 5 years and over):	N	N	(x)	(x)	519,804	+/-164	(x)	(x)	145,717	+/- 671	(x)	(x)
Speak only English or speak English "very well"	N	N	N	N	483,481	+/- 4,211	93.0%	+/- 0.8	138,770	+/-1,443	95.2%	+/- 0.9
Spanish	N	N	N	N	41,353	+/- 2,611	8.0%	+/- 0.5	11,009	+/- 1,735	7.6%	+/- 1.2
Speak English "very well"	N	N	N	N	25,550	3,097	61.8%	+/- 5.4	6,825	+/- 1,248	62.0%	+/- 9.0

Speak English less than "very well"	N	N	N	N	15,803	+/-2,136	38.2%	+/- 5.4	4,184	+/-1,327	38.0%	+/- 9.0
Other Indo-European Languages	N	N	N	N	19,969	+/- 4866	3.8%	+/- 0.9	3,323	+/-1,045	92.4%	+/- 4.6
Speak English "very well"	N	N	N	N	12,930	+/- 2996	64.8%	+/- 10.3	273	+/- 164	7.6%	+/- 4.6

Factor #2: The frequency with which LEP individuals come in contact with the program.

The BGMPO routinely assesses the frequency at which staff has or may possibly have contact with LEP persons. This includes documenting phone calls, public meetings' attendees, office visits, etc. requests for interpreters or translated publications. On average, the BGMPO has encounters with LEP individuals on a quarterly basis during public pop-up events and monthly stakeholder meetings.

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

The impact of proposed transportation investments on underserved and underrepresented populations groups may be evident in use of federal funds in five (5) major areas for the BGMPO:

- Unified Planning Work Program (UPWP)
- Transportation Improvement Program (TIP)
- Metropolitan Transportation Plan (MTP)
- Transportation Safety Plan
- Multimodal study updates

Public involvement is a priority consideration in BGMPO, studies and programs. The impacts of transportation improvements resulting from these planning activities have an impact on all residents. Understanding and continued involvement are encouraged throughout the transportation planning process. The BGMPO is concerned with input from all stakeholders, and every effort is taken to make the planning process inclusive as possible as prescribed in the BGMPO Public Involvement Plan (PIP).

As a result of the long-range transportation planning process, selected projects receive approval for federal funding and progress towards project planning and construction under the responsibility of local jurisdictions or state transportation agencies. These state and local organizations have their own policies to ensure LEP individuals can participate in the process. The BGMPO will investigate the translation of documents, meeting agendas and possible website conversion applications to better serve the Hispanic/Latino populations. There may also be community service/social programs and agencies that can be included in the MPO public participation process. BGMPO staff will seek these partnering organizations to provide BGMPO materials. The BGMPO will provide alternative language (Spanish, most likely) to share with LEP individuals and/or local community service organization involved with Hispanics community.

Factor #4: The resources available to the recipient and costs.

The BGMPO receives federal and local funding on an annual basis. Presently, two staff members administer all programs and activities. The MPO Administrator is bilingual and able to communicate and translate public documents from English to Spanish. For languages other than Spanish, the BGMPO would partner with

Community Based Organizations (CBOs) or City of Burlington staffers as the city maintains a listing of employees approved as interpreters. These staffers are also available for in-person or virtual meetings.

LANGUAGE ASSISTANCE PLAN

As a result of the above four factor analysis, a Language Assistance Plan (Plan) was not required. However, reasonable attempts will be made to accommodate any persons encountered who require written translation or oral interpretation services in accordance with the BGMPO Public Participation Plan.

Language Assistance Measures

The following general language assistance measures are reasonable and achievable for our organization at this time:

- Translating public notices posted in the local paper and at stations, stops, and in vehicles into **any languages that meet the safe harbor threshold in Factor 1**.
- Vital documents—such as brochures with service times and routes—are translated into Spanish across the entire service area, and available in our facilities, health department and hospitals and shopping centers.
- Making a concerted effort to inform LEP persons of available language assistance via staff, broadcast media, relationship-building with organizations, and our website (that has a translate option).
- Posting vital bulletin board information and disseminating community surveys in various languages.
- Providing translation and interpretive services when appropriate (upon request or predetermined) at meetings.
- Determining how best to take public involvement to LEP groups directly, including through small group meetings.
- Language line translation services at our call center.
- Where possible, utilizing or hiring staff who speak a language other than English and can provide competent language assistance.
 - Note: We will not ask community-based organizations (CBO) to provide, or serve as, interpreters at our meetings. Relying upon CBOs in that capacity could raise ethical concerns. If a CBO decides (on its own) to translate any materials for its constituents, or bring interpreters it trusts to our meetings, we will not object. That is their right.
- Using language identification flashcards (iSpeak) to determine appropriate services.
- Establishing a process to obtain feedback on our language assistance measures.

Specific Measures by Language Group – Spanish and other Indo-European Languages

Written Translation and Oral Interpretation

Vital documents will be translated for each eligible LEP language group in our service area that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be encountered. Translated materials will be placed online and in appropriate public (or private) places accessible to LEP persons. The safe harbor provisions apply to the translation of written documents only, and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. When appropriate, translation of any document will be communicated orally in the appropriate language.

If the 5% trigger is reached for a LEP language group that is fewer than 50 persons, written notice will be provided in the primary language of that group of the right to receive competent oral interpretation of vital written materials, free of cost. The most effective method of notice, which could be an ad in the local newspaper or other publication, a radio commercial, or door hangers, will be determined in consideration of the circumstances on the ground and in coordination with LEP community contacts.

Staff Support for Language Assistance

- Our staff (including receptionists) will be provided a list of referral resources that can assist LEP persons with written translation and oral interpretation, including the Title VI Coordinator and consultants contracted to provide LEP services. This list will be updated as needed to remain current
- All main offices will have available language assistance flashcards and materials translated into the languages that meet the safe harbor threshold. When encountering an LEP person, staff should present the individual with an iSpeak flashcard and let them choose the language. Do not assume their preferred language. Assistance may be sought from bilingual staff fluent in the identified language before contacting a referral resource. Document the encounter and report it to the Title VI Coordinator.

Training: All employees will be instructed on our procedures for providing timely and reasonable assistance to LEP persons. New employee orientation will also explain these procedures to new hires. Staff routinely encountering LEP persons by telephone or in person will receive annual refresher training. All other employees will be reminded of LEP through annual Title VI program acknowledgements and basic Title VI trainings.

Project-Specific LEP Outreach

A project-specific four factor analysis will be conducted for any project or outreach event limited to a specific geographical area (i.e., the project study area or outreach area, respectively). Language assistance will be provided in accordance with the measures already outlined, including translating written materials for each LEP language group that is 5% or 1,000, whichever is less, of the project or outreach area population.

Monitoring and Updating the Language Assistance Plan

Monitoring of daily interactions with LEP persons will be continuous, thus language assistance techniques may be refined at any time. This Plan will be periodically reviewed—at least annually—to determine if our assistance measures and staff training are working. Resource availability and feedback from agency staff and the general public will be factors in the evaluation and any proposed updates. Among other practices, this process will include working with LEP community contacts to determine if our employees are responding appropriately to requests made with limited English or in languages other than English, and observing how agency staff responds to requests. To the best of our ability, we will attempt to never eliminate a successful existing LEP service. Significant LEP program revisions will be approved or adopted by our board or designated official and dated accordingly. LEP data and procedures will be reviewed and updated at least once every three years.

DISSEMINATION OF TITLE VI INFORMATION

In accordance with 23 CFR 200.9(b)(12) and 49 CFR 21.9(d), BGMPO will utilize community outreach and public education to disseminate Title VI information to our employees, contractors, sub-recipients and the public. Reasonable steps will be taken to make the public aware of their rights and our obligations under Title VI through, including, but not limited to:

- Visibly posting our Title VI Policy Statement in public areas at our facilities, on our website, at our meetings, and prominently in any documents and reports we distribute.
- Placing notices in newspapers and publications with a large circulation among minority groups in the general vicinity of projects and activities. Ads in newspapers and other publications shall include the following:

“Burlington – Graham Metropolitan Planning Organization operates without regard to **race, color, national origin, limited English proficiency, sex, age or disability**. For more information on our Title VI program, or how to file a discrimination complaint, please contact Eliud De Jesus, EDeJesus@burlingtonnc.gov.
- Translating information into languages other than English that meet the LEP safe harbor threshold;

- Incorporating Title VI language into our contracts and agreements (See Appendix C for Title VI Contract Language); and
- Ensuring any contractors and sub-recipients we have also disseminate Title VI information.

Please refer to our Public Involvement Plan (PIP) for additional outreach methods we employ to comply Title VI. Our PIP can be found here: www.bgmipo.com.

External Discrimination Complaints

These discrimination complaint procedures outline the process used by the BGMPO to process complaints of alleged discrimination filed under Title VI of the Civil Rights Act of 1964 and related nondiscrimination laws that are applicable to BGMPO programs, services, and activities. Complaints will be investigated by the appropriate authority. Upon completion of an investigation, the complainant will be informed of all avenues of appeal. Every effort will be made to obtain early resolution of complaints at the lowest level possible by informal means.

FILING OF COMPLAINTS

1. **Applicability** – These procedures apply to the beneficiaries of our programs, activities, and services, such as the members of the public and any consultants/contractors we hire.
2. **Eligibility** – Any person or class of persons who believes that he/she has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities based upon race, color, national origin, sex, age, or disability, may file a written complaint. The law prohibits intimidation or retaliation of any sort. The complaint may be filed by the affected individual or a representative and must be in writing.
3. **Time Limits and Filing Options** – A complaint must be filed no later than 180 calendar days after the following:
 - The date of the alleged act of discrimination; or
 - The date when the person(s) became aware of the alleged discrimination; or
 - Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

Complaints may be submitted to the following entities:

- **Burlington – Graham MPO**, MPO Administrator, PO Box 1358, 425 S. Lexington Avenue, Burlington, NC 27215; 336.222.7365; comments@burlingtonnc.gov.
 - **North Carolina Department of Transportation**, Office of Civil Rights, External Civil Rights Section, 1511 Mail Service Center, Raleigh, NC 27699-1511; 919-508-1830 or toll free 800-522-0453
 - **Federal Highway Administration**, North Carolina Division Office, 310 New Bern Avenue, Suite 410, Raleigh, NC 27601, 919-747-7010
 - **US Department of Transportation**, Departmental Office of Civil Rights, External Civil Rights Programs Division, 1200 New Jersey Avenue, SE, Washington, DC 20590; 202-366-4070
 - **US Department of Justice**, Special Litigation Section, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, DC 20530, 202-514-6255 or toll free 877-218-5228
4. **Format for Complaints** – Complaints shall be in **writing** and **signed** by the complainant(s) or a representative and include the complainant's name, address, and telephone number. Complaints received by fax or e-mail will be acknowledged and processed. Allegations received by telephone or in person will be reduced to writing, may be recorded and will be provided to the complainant for confirmation or revision before processing. Complaints will be accepted in other languages, including Braille.

5. **Complaint Basis** – Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term “basis” refers to the complainant’s membership in a protected group category.

Table 2 - Protected Group Categories

Protected Categories	Definition	Examples	Applicable Statutes and Regulations
Race	An individual belonging to one of the accepted racial groups; or the perception, based usually on physical characteristics that a person is a member of a racial group	Black/African American, Hispanic/Latino, Asian, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, White	Title VI of the Civil Rights Act of 1964; 49 CFR Part 21; 23 CFR 200. (Executive Order 13166)
Color	Color of skin, including shade of skin within a racial group	Black, White, brown, yellow, etc.	
National Origin (LEP)	Place of birth. Citizenship is not a factor. Discrimination based on language or a person’s accent is also covered.	Mexican, Cuban, Japanese, Vietnamese, Chinese	
Sex	Gender	Women and Men	1973 Federal-Aid Highway Act; Title IX of the Education Amendments of 1972.
Age	Persons of any age	21 year old person	Age Discrimination Act of 1975
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, alcoholic, para-amputee, epileptic, diabetic, arthritic	Section 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990

Complaint Processing

1. When a complaint is received, an Acknowledgment Letter and a Complainant Consent/Release Form will be mailed to the complainant within ten (10) business days by registered mail.
2. We will consult with the NCDOT Title VI Program to determine the acceptability and jurisdiction of all complaints received. (Note: If NCDOT will investigate, the Title VI Program will be responsible for the remainder of this process. We will record the transfer of responsibility in our complaints log).
3. Additional information will be requested if the complaint is incomplete. The complainant will be provided 15 business days to submit any requested information and the signed Consent Release form. Failure to do so may be considered good cause for a determination of no investigative merit.
4. Upon receipt of the requested information and determination of jurisdiction, we will notify the complainant and respondent of whether the complaint has sufficient merit to warrant investigation.
5. If the complaint is investigated, the notification shall state the grounds of our jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. If the complaint does not warrant investigation, the notification to the complainant shall specifically state the reason for the decision.

Complaint Log

1. When a complaint is received, the complaint will be entered into the Discrimination Complaints Log with other pertinent information and assigned a **Case Number**. (Note: All complaints must be logged).
2. The complaints log will be submitted to the NCDOT’s Civil Rights office during Title VI compliance reviews. (Note: NCDOT may also request the complaints log during pre-grant approval processes).
3. When reporting **no complaints**, check the **No Complaints or Lawsuits** box and sign the log.

Please refer to **Appendix F** for a copy of our Discrimination Complaint Form, Complaints Log, and Sample Investigation Template.

REVIEW OF ORGANIZATIONAL DIRECTIVES

It is the responsibility of every official who develops policies, procedures, manuals, guidelines, and other directives to ensure they have been reviewed for Title VI compliance. All staff members will assist in carrying out this requirement by making sure drafts of these documents are submitted to the Title VI Coordinator to ensure Title VI requirements are included.

TITLE VI TRAINING

All BGMPO employees will receive basic Title VI training at least once every three years. New hires will receive this training within 90 days of their start date. Basic training will cover all sections of this Plan and our overall Title VI obligations. Staff may receive specialized training on how Title VI applies to their specific work areas. Those who routinely encounter the public, such as office personnel, call center staff, and vehicle drivers, will receive annual refresher training. Trainings will be provided or organized by the Title VI Coordinator and will often coincide with updates to our nondiscrimination policies and procedures. Records of staff trainings, such as agendas, sign-in sheets, copies of calendars, and certificates, will remain on file for at least three years (and in personnel files).

COMPLIANCE AND ENFORCEMENT PROCEDURES

FHWA recipients must have mechanisms in place to enforce compliance with Title VI. BGMPO utilizes internal training, meetings, monitoring contractors, technical assistance, and findings from periodic NCDOT reviews to identify deficiencies and potential discrimination. If NCDOT identifies deficiencies, BGMPO will correct all deficiencies within 90 days based on a Corrective Action Plan (CAP). If attempts by NCDOT to resolve a compliance issue are unsuccessful, NCDOT may take any or all of the following steps with FHWA's concurrence:

- a. Canceling, terminating, or suspending the contract or agreement in whole or in part;
- b. Refraining from extending any further assistance to the recipient under the program with respect to which the failure or refusal occurred until satisfactory assurance of future compliance has been received from the recipient.
- c. Taking such other action that may be deemed appropriate under the circumstances, until compliance or remedial action has been accomplished by the recipient.
- d. Referring the case to the FHWA for appropriate administrative or legal proceedings.
- e. Other means authorized by law.

To ensure compliance with Title VI, BGMPO will take proactive steps to prevent discrimination in our programs and activities, including the following:

- | | |
|---|---|
| <input type="checkbox"/> Conduct periodic Title VI training; | review of contracts for nondiscrimination language; |
| <input type="checkbox"/> Address Title VI issues at staff meetings; | <input type="checkbox"/> Customize public outreach according to the situation or community at hand; |
| <input type="checkbox"/> Participate or cooperate during compliance reviews conducted by NCDOT; | <input type="checkbox"/> Build a system of mutual trust and two-way communication with the public; |
| <input type="checkbox"/> Inform and monitor any consultants/contractors regarding their Title VI obligations, including | |

- ☐ Maintain pertinent demographic data (statistical);
- ☐ Document processes & activities related Title VI.
- ☐ Ensure policies and procedures support and comply with Title VI;

If BGMPO identifies compliance issues with our consultants/contractors, we will also take corrective action. If attempts at corrective action are unsuccessful, any or all of the following steps may be taken with NCDOT's concurrence:

- a. Canceling, terminating, or suspending the contract or agreement with the consultant/contractor in whole or in part.
- b. Taking such other action that may be deemed appropriate under the circumstances.
- c. Referring the case to the NCDOT for appropriate administrative or legal proceedings.

APPENDIX A

Title VI / Nondiscrimination Assurances

UNITED STATES DEPARTMENT OF TRANSPORTATION STANDARD TITLE VI / NONDISCRIMINATION ASSURANCES

DOT ORDER NO. 1050.2A

THE *BURLINGTON-GRAHAM MPO (BGMP)* (HEREIN REFERRED TO AS THE "RECIPIENT"), **HEREBY AGREES THAT**, AS A CONDITION TO RECEIVING ANY FEDERAL FINANCIAL ASSISTANCE FROM THE U.S. DEPARTMENT OF TRANSPORTATION (DOT), THROUGH **FEDERAL HIGHWAY ADMINISTRATION (FHWA)**, IS SUBJECT TO AND WILL COMPLY WITH THE FOLLOWING:

STATUTORY/REGULATORY AUTHORITIES

- TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 (42 U.S.C. § 2000D ET SEQ., 78 STAT. 252), (PROHIBITS DISCRIMINATION ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN);
- 49 C.F.R. PART 21 (ENTITLED NONDISCRIMINATION IN FEDERALLY-ASSISTED PROGRAMS OF THE DEPARTMENT OF TRANSPORTATION-EFFECTUATION OF TITLE VI OF THE CIVIL RIGHTS ACT OF 1964);
- 28 C.F.R. SECTION 50.3 (U.S. DEPARTMENT OF JUSTICE GUIDELINES FOR ENFORCEMENT OF TITLE VI OF THE CIVIL RIGHTS ACT OF 1964).

THE PRECEDING STATUTORY AND REGULATORY CITES HEREINAFTER ARE REFERRED TO AS THE "ACTS" AND "REGULATIONS," RESPECTIVELY.

GENERAL ASSURANCES

IN ACCORDANCE WITH THE ACTS, THE REGULATIONS, AND OTHER PERTINENT DIRECTIVES, CIRCULARS, POLICY, MEMORANDA, AND/OR GUIDANCE, THE RECIPIENT HEREBY GIVES ASSURANCE THAT IT WILL PROMPTLY TAKE ANY MEASURES NECESSARY TO ENSURE THAT:

"NO PERSON IN THE UNITED STATES SHALL, ON THE GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN, BE EXCLUDED FROM PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE OTHERWISE SUBJECTED TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY, FOR WHICH THE RECIPIENT RECEIVES FEDERAL FINANCIAL ASSISTANCE FROM DOT, INCLUDING THE FEDERAL HIGHWAY ADMINISTRATION."

THE CIVIL RIGHTS RESTORATION ACT OF 1987 CLARIFIED THE ORIGINAL INTENT OF CONGRESS, WITH RESPECT TO TITLE VI AND OTHER NONDISCRIMINATION REQUIREMENTS (THE AGE DISCRIMINATION ACT OF 1975, AND SECTION 504 OF THE REHABILITATION ACT OF 1973), BY RESTORING THE BROAD, INSTITUTIONAL-WIDE SCOPE AND COVERAGE OF THESE NONDISCRIMINATION STATUTES AND REQUIREMENTS TO INCLUDE ALL PROGRAMS AND ACTIVITIES OF THE RECIPIENT, SO LONG AS ANY PORTION OF THE PROGRAM IS FEDERALLY ASSISTED.

SPECIFIC ASSURANCES

MORE SPECIFICALLY, AND WITHOUT LIMITING THE ABOVE GENERAL ASSURANCE, THE RECIPIENT AGREES WITH AND GIVES THE FOLLOWING ASSURANCES WITH RESPECT TO ITS FEDERALLY ASSISTED **FEDERAL-AID HIGHWAY PROGRAM**:

1. THE RECIPIENT AGREES THAT EACH "ACTIVITY," "FACILITY," OR "PROGRAM," AS DEFINED IN §§ 21.23(B) AND 21.23(E) OF 49 C.F.R. § 21 WILL BE (WITH REGARD TO AN "ACTIVITY") FACILITATED, OR WILL BE (WITH REGARD TO A "FACILITY") OPERATED, OR WILL BE (WITH REGARD TO A "PROGRAM") CONDUCTED IN COMPLIANCE WITH ALL REQUIREMENTS IMPOSED BY, OR PURSUANT TO THE ACTS AND THE REGULATIONS.
2. THE RECIPIENT WILL INSERT THE FOLLOWING NOTIFICATION IN ALL SOLICITATIONS FOR BIDS, REQUESTS FOR PROPOSALS FOR WORK, OR MATERIAL SUBJECT TO THE ACTS AND THE REGULATIONS MADE IN CONNECTION WITH ALL FEDERAL-AID HIGHWAY PROGRAM AND, IN ADAPTED FORM, IN ALL PROPOSALS FOR NEGOTIATED AGREEMENTS REGARDLESS OF FUNDING SOURCE:
3. THE RECIPIENT WILL INSERT THE CLAUSES OF APPENDIX A AND E OF THIS ASSURANCE IN EVERY CONTRACT OR AGREEMENT SUBJECT TO THE ACTS AND THE REGULATIONS.

"THE *BURLINGTON-GRAHAM MPO*, IN ACCORDANCE WITH THE PROVISIONS OF TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 (78 STAT. 252, 42 U.S.C. §§ 2000D TO 2000D-4) AND THE REGULATIONS, HEREBY NOTIFIES ALL BIDDERS THAT IT WILL AFFIRMATIVELY ENSURE THAT ANY CONTRACT ENTERED INTO PURSUANT TO THIS ADVERTISEMENT, DISADVANTAGED BUSINESS ENTERPRISES WILL BE AFFORDED FULL AND FAIR OPPORTUNITY TO SUBMIT BIDS IN RESPONSE TO THIS INVITATION AND WILL NOT BE DISCRIMINATED AGAINST ON THE GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN IN CONSIDERATION FOR AN AWARD."

BY SIGNING THIS ASSURANCE, THE *BURLINGTON-GRAHAM MPO* ALSO AGREES TO COMPLY (AND REQUIRE ANY SUB-RECIPIENTS, SUB-GRANTEES, CONTRACTORS, SUCCESSORS, TRANSFEREES, AND/OR ASSIGNEES TO COMPLY) WITH ALL APPLICABLE PROVISIONS GOVERNING THE **FHWA AND NCDOT** ACCESS TO RECORDS, ACCOUNTS, DOCUMENTS, INFORMATION, FACILITIES, AND STAFF AND ALSO COMPLY WITH ANY PROGRAM OR COMPLIANCE REVIEWS, AND/OR COMPLAINT INVESTIGATIONS CONDUCTED BY THE **FHWA AND NCDOT**. THE *BURLINGTON-GRAHAM MPO* WILL KEEP RECORDS, REPORTS, AND SUBMIT THE MATERIAL FOR REVIEW UPON REQUEST TO **FHWA AND NCDOT**, OR ITS DESIGNEE IN A TIMELY, COMPLETE, AND ACCURATE WAY. ADDITIONALLY, AND COMPLY WITH ALL OTHER REPORTING, DATA COLLECTION, AND EVALUATION REQUIREMENTS, AS PRESCRIBED BY LAW OR DETAILED IN PROGRAM GUIDANCE.

THE *BURLINGTON-GRAHAM MPO* GIVES THIS ASSURANCE IN CONSIDERATION OF AND FOR OBTAINING ANY FEDERAL GRANTS, LOANS, CONTRACTS, AGREEMENTS, PROPERTY, AND/OR DISCOUNTS, OR OTHER FEDERAL-AID AND FEDERAL FINANCIAL ASSISTANCE EXTENDED AFTER THE DATE HEREOF TO THE RECIPIENTS BY THE U.S. DEPARTMENT OF TRANSPORTATION UNDER THE **FEDERAL-AID HIGHWAY PROGRAM**. THIS ASSURANCE IS BINDING ON THE *BURLINGTON-GRAHAM MPO*, OTHER RECIPIENTS, SUB-RECIPIENTS, SUB-GRANTEES, CONTRACTORS, SUBCONTRACTORS AND THEIR SUBCONTRACTORS', TRANSFEREES, SUCCESSORS IN INTEREST, AND ANY OTHER PARTICIPANTS IN THE **FEDERAL-AID HIGHWAY PROGRAM**. THE PERSON(S) SIGNING BELOW IS AUTHORIZED TO SIGN THIS ASSURANCE ON BEHALF OF THE RECIPIENT.

BURLINGTON-GRAHAM MPO (BGMPO)

BY _____
BGMPO TAC CHAIR

DATED _____

BGMPO ADMINISTRATOR

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 BURLINGTON GRAHAM MPO AND/OR 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, AGE, SEX, COLOR, DISABILITY, OR NATIONAL ORIGIN IN THE SELECTION AND RETENTION OF SUBCONTRACTORS, INCLUDING PROCUREMENTS OF MATERIALS AND LEASES OF EQUIPMENT. THE CONTRACTOR SHALL NOT PARTICIPATE EITHER DIRECTLY OR INDIRECTLY IN THE DISCRIMINATION PROHIBITED BY SECTION 21.5 OF THE REGULATIONS, INCLUDING EMPLOYMENT PRACTICES WHEN THE CONTRACT COVERS A PROGRAM SET FORTH IN APPENDIX B OF THE REGULATIONS.

(3) **SOLICITATIONS FOR SUBCONTRACTORS, INCLUDING PROCUREMENTS OF MATERIALS AND EQUIPMENT:** IN ALL SOLICITATIONS EITHER BY COMPETITIVE BIDDING OR NEGOTIATION MADE BY THE CONTRACTOR FOR WORK TO BE PERFORMED UNDER A SUBCONTRACT, INCLUDING PROCUREMENTS OF MATERIALS OR LEASES OF EQUIPMENT, EACH POTENTIAL SUBCONTRACTOR OR SUPPLIER SHALL BE NOTIFIED BY THE CONTRACTOR OF THE CONTRACTOR'S OBLIGATIONS UNDER THIS CONTRACT AND THE REGULATIONS RELATIVE NONDISCRIMINATION ON GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN.

(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 BURLINGTON GRAHAM MPO, THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION OR THE FEDERAL HIGHWAY ADMINISTRATION 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 BURLINGTON GRAHAM MPO, THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION, OR THE FEDERAL HIGHWAY ADMINISTRATION 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 BURLINGTON GRAHAM MPO AND/OR THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION SHALL IMPOSE SUCH CONTRACT SANCTIONS AS IT OR THE FEDERAL HIGHWAY ADMINISTRATION 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 PARAGRAPH (1) THROUGH (6) IN EVERY SUBCONTRACT, INCLUDING PROCUREMENTS 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 BURLINGTON GRAHAM MPO, NORTH CAROLINA DEPARTMENT OF TRANSPORTATION OR THE FEDERAL HIGHWAY ADMINISTRATION MAY DIRECT AS A MEANS OF ENFORCING SUCH PROVISIONS INCLUDING SANCTIONS FOR NON-COMPLIANCE: 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 BURLINGTON GRAHAM MPO TO ENTER INTO SUCH LITIGATION TO PROTECT THE INTERESTS OF THE BURLINGTON GRAHAM MPO, AND, IN ADDITION, THE CONTRACTOR MAY REQUEST THE UNITED STATES TO ENTER INTO SUCH LITIGATION TO PROTECT THE INTERESTS OF THE UNITED STATES.

APPENDIX B

TAC and TCC Members and Responsibilities

Table 3 - BGMPO 2024 TAC Membership

Burlington-Graham MPO TAC 2024 Roster

Kelly Allen – **WF**
Mayor
Town of Haw River
P. O. Box 582
Haw River, NC 27258
kallen@townofhawriver.com

Donald Tichy – **WM**
Mayor
Village of Alamance
P. O. Box 96
Alamance, NC 27201
don@tichytraingroup.com

Leonard Williams - **BM**
Mayor
TAC Chairman
Town of Gibsonville
129 West Main Street
Gibsonville, NC 27249
lenwms125@aol.com

Anna Richards – **BF**
Orange County Commissioner
300 West Tryon Street
PO Box 8181
Hillsborough, NC 27278
arichards@orangecountync.gov

Barrett Brown – **BM**
Town Council Member
Town of Green Level
1262 Deer Run Trail
Burlington, NC 27217
bbrown@greenlevelnc.com

Jim Butler – **WM**
Mayor
City of Burlington
PO Box 1358
425 S. Lexington Avenue
Burlington, NC 27215
jbutler@burlingtonnc.gov

Montrena Hadley – **BF**
Mebane City Council
City of Mebane
106 East Washington Street
Mebane, NC 27302
mhadley@cityofmebane.com

Monti Allison – **WM**
Town Council Member
Town of Elon
1308 Princeton Drive
Elon, NC 27244
mallison@elon.gov

Michael S. Fox – **WM**
NCDOT - BOT
100 N. Greene Street
Suite 600
Greensboro, NC 27401
msfox@ncdot.gov

Steve Carter - **WM**
Alamance Co. Commissioner
2412 Elon Ossipee Rd
Elon 27244
steve.carter@alamance-nc.com

Mr. Bob Ward - **WM**
TAC Vice Chair
Burlington City Council
City of Burlington
PO Box 1358
425 S. Lexington Avenue
Burlington, NC 27215
bward@burlingtonnc.gov

Craig York – **WM**
Town Manager
Town of Whitsett
558 NC Hwy 100
Whitsett NC 27377
townhall@whitsettnc.com

Ricky Hall – WM
Mayor Pro Tem
City of Graham
PO Drawer 357
Graham, NC 27253
Rhall@cityofgraham.com

Frankie T. Jones, Jr. - BM
Guilford County Commissioner
3731 Old Julian Road
Julian, NC 27283
frankietjones@guilfordcountync.gov

Bobby Chin - AM
TAC Alternate
City Council Member
City of Graham
PO Drawer 357
Graham, NC 27253
bchin@cityofgraham.com

Suzette Morales, PE – BF
ExOfficio
Planning & Environment Specialist
Federal Highway Administration
310 New Bern Avenue, Suite 410
Raleigh, NC 27601
Omojojadavwe.Morales@dot.gov

Wright Archer, III PE – WM
ExOfficio
Division Engineer
NCDOT Division 7
1584 Yanceyville Street
Greensboro, NC 27405
warcher@ncdot.gov

Table 4 - 2024 BGMPO TCC Membership

Nishith Trivedi, Chair - **AM**
Orange County
ntrivedi@orangecountync.gov

Mike Nunn, AICP Vice Chair – **WM**
City of Burlington
munn@burlingtonnc.gov

Eliud De Jesus – **HM**
BGMPO Administrator
EDeJesus@burlingtonnc.gov

Ben Baxley - **WM**
Town of Gibsonville
bbaxley@gibsonville.net

Peter Murphy - **WM**
Alamance County Transportation Authority
exec@acta-nc.com

Preston Mitchell - **WM**
City of Mebane
pmitchell@cityofmebane.com

Steven Robinson, PE - **WM**
NCDOT Division 7
srobinson@ncdot.gov

Cameron West - **WM**
City of Graham
cwest@cityofgraham.com

Pam Cook, PE – **WF**
Burlington-Graham MPO Coordinator
NCDOT TPD
pcook@ncdot.gov

Oliver Bass **BM**
Guilford Co. Planning Dept.
obass@guilfordcountync.gov

Chad Reimakoski - **WM**
NCDOT
jcreimakoski@ncdot.gov

Mark Kirstner, AICP - **WM**
Piedmont Authority for Regional Transportation
markk@partnc.org

Dan Danieleley - **WM**
Burlington-Alamance
dan@flyburlingtonnc.gov

Nick Farmerie – **WM**
Village of Alamance
villagealamance@bellsouth.net

John A. (Andy) Bailey, CPM - **WM**
Western Piedmont Planning Group Supervisor NCDOT
jbailey@ncdot.gov

Suzette Morales, PE - **BF**
Federal Highway Administration
Omojojadavwe.Morales@dot.gov

Ashley Ownbey - **WF**
City of Mebane
aownbey@cityofmebane.com

Matthew Hoagland - **WM**
Alamance County
MHoagland@alamancecountync.gov

Sean Tencer - **WM**
Town of Haw River
stencer@townofhawriver.com

John Andoh – **BM**
Link Transit
jandoh@burlingtonnc.gov

Brandon Parker - **BM**
Town of Gibsonville
planning@gibsonville.net

Brian Tennent, PE – **WM**
City of Burlington
btennent@burlingtonnc.gov

Jaimee Cousin – **BF**
Town of Green Level
jcousin@greenlevelnc.com

Aaron Holland - **BM**
City of Graham
aholland@cityofgraham.com

Alex Rotenberry, AICP – WM
NCDOT – IMD
arotenberry@ncdot.gov

Lori Oakley, AICP – WF
City of Elon
loakley@elon.gov

Jay Heikes – WM
GoTriangle
jheikes@gotriangle.org

Ruiqi Guo - WF
GoTriangle
rquo@gotriangle.org

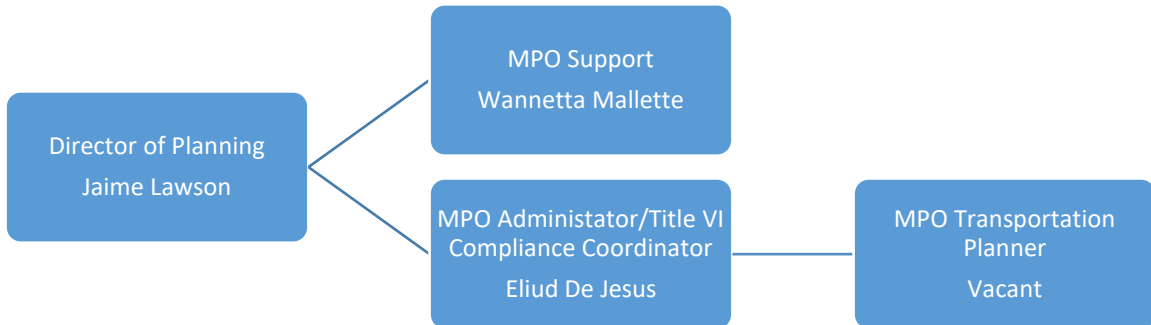
Nishant Shah – AM
NCDOT Division 7
nshah@ncdot.gov

Megen Hoenk -WF
NCRR
mhoenk@ncrr.com

Margaret Scully – WF
GoTriangle
mscully@gotriangle.org

APPENDIX C

Figure 5 BGMPO Organizational Chart



APPENDIX D

BGMPO Demographic Tables

Race and Ethnicity

The following table was completed using data from Census Table QT-P3, Race and Hispanic or Latino Origin: 2010:

Table 5 - Race and Ethnicity for BGMPO Metro Area

Race and Ethnicity	Alamance Count		Guilford County		Orange County	
	Number	Percent	Number	Percent	Number	Percent
Total Population	171,779	100%	539,557	100%	145,919	100%
White	105,172	61.2%	259,445	48.1%	99,949	68.5%
Black or African American	33,408	19.4%	182,645	33.9%	15,521	10.6%
Indian or Alaska Native	183	0.1%	1,292	0.2%	456	0.3%
Asian	2,748	1.6%	29,944	5.2%	11,368	7.8%
Native Hawaiian and Other Pacific Islander	57	0.0%	57	0.0%	34	0.0%
Some other Race	1,053	0.6%	2,893	0.5%	691	0.5%
Two or More Races	5,958	3.5%	18,852	3.5%	5,160	3.55
Hispanic or Latino (of any race)	23,200	13.5%	46,429	8.6%	12,740	8.7%
Mexican	14,777	8.6%	24,986	4.6%	6,472	4.4%
Puerto Rican	1,349	0.8%	6,273	1.2%	1,115	0.8%
Cuban	309	0.2%	1,363	0.3%	307	0.2%
Other Hispanic or Latino	6,765	3.9%	13,807	2.6%	4,846	3.3%

Age and Sex

The following table was completed using data from Census Table QT-P1, Age Groups and Sex: 2010:

Table 6 - Age and Sex for BGMPO Metro Area

Age	Alamance County					
	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	171,779	82,328	89,451	100%	100%	100%
Under 5 years	9,741	4,973	4,768	5.7	6.0%	5.3%
Under 18 years	37,805	19,326	18,479	22	23.5%	20.7%
18 and over	133,974	63,002	70,972	78	76.5%	79.3%
65 years and over	29,084	12,427	16,657	16.9	15.1%	18.6%
Median Age	39.1	37.7	40.1			

Age	Guilford County					
	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	539,557	256,731	282,826	100%	100%	100%
Under 5 years	30,350	15,520	14,830	5.6%	6.0%	5.2%
Under 18 years	118,288	60,211	58,077	21.9%	23.5%	20.5%
18 years and over	421,269	196,520	224,749	78.1%	76.5%	79.5%
65 years and over	83,813	35,999	47,814	15.5%	14.0%	16.9%
Median Age	37.2	36.1	38.3			

Age	Orange County					
	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	145,949	69,888	76,031	100%	100%	100%
Under 5 years	6,146	3,076	3,070	4.2%	4.4%	4.0%
Under 18 years	28,026	14,339	13,687	19.2%	20.5%	18.0%
18 years and over	117,893	55,549	62,344	80.8%	79.5%	82.0%
65 years and over	22,449	10,033	12,416	15.4%	14.4%	16.3%
Median Age	36.2	36.1	36.3			

The following table was completed using data from Census Table S1810, Disability Characteristics:

Table 7 – Disability Characteristics for BGMPO Metro Area

Alamance County						
Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	178088	123	19891	2282	11.2	1.3
Population under 5 years	9904	263	0	222	0.0	2.0
Population 5 to 17 years	29396	275	7	12	0.0	0.1
Population 18 to 64 years	108304	582	2349	1050	2.2	1.0
Population 65 years and over	30484	508	5094	973	16.7	3.2
SEX						
Male	86529	1307	9444	1594	10.9	1.9
Female	91559	1276	10447	1466	11.4	1.6
RACE AND HISPANIC OR LATINO ORIGIN						
White	104195	1428	12958	1543	14.4	1.5
Black or African American	36621	2019	4273	1174	11.7	3.3
American Indian and Alaska Native	N	N	N	N	N	N
Asian	N	N	N	N	N	N
Native American and Other Pacific Islander	N	N	N	N	N	N
Some other Race	18,167	3,024	644	439	3.5	2.3
Two or more races	14,745	3,202	1,632	868	11.1	6.4
Hispanic or Latino (of any race)	22,485	13	964	540	3.5	2.0

Guilford County						
Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	545,507	+/- 613	68,074	+/- 4,772	12.5	+/- 0.9
Population under 5 years	30,062	+/- 164	0	+/- 222	0	+/- 0.7
Population 5 to 17 years	89,633	1+/- 64	4,396	+/- 1,425	4.9	+/- 1.6
Population 18 to 34 years	137,353	+/- 572	11,186	+/- 2,245	8.1	+/- 1.6
Population 35 to 64 years	201,170	+/- 1021	25,050	+/- 3,358	12.5	+/- 1.7
Population 65 to 74 years	52,416	+/- 986	12,691	+/- 1,798	24.2	+/- 3.4
Population 75 years and over	34,873	+/- 879	14,751	+/- 1,799	42.3	+/- 5.0
SEX						
Male	258,587	+/- 1,044	31,208	+/- 2,900	12.1	+/- 1.1
Female	28,8920	+/- 811	36,866	+/- 3,489	12.8	+/- 1.2
RACE AND HISPANIC OR LATINO ORIGIN						
White	254,739	+/- 2,889	36,660	+/- 3,331	14.4	+/- 1.3
Black or African American	181,928	+/- 5,127	21,967	+/- 2,666	12.1	+/- 1.4
American Indian and Alaska Native	N	N	N	N	N	N
Asian	30,323	+/- 1,234	3,300	+/- 992	10.9	+/- 3.2
Native American and Other Pacific Islander	N	N	N	N	N	N
Some other Race	26,188	+/- 4,431	1,988	+/- 942	7.6	+/- 3.6
Two or more races	49,390	+/- 6,522	3,579	+/- 1,055	7.2	+/- 2.1
Hispanic or Latino (of any race)	55,964	+/- 106	3,600	+/- 999	6.4	+/- 1.8

Orange County						
Subject	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	149,531	+/-171	15,710	+/- 1717	10.5	+/- 1.1
Population under 5 years	4,909	+/-671	18	+/- 33	0.4	+/- 0.7
Population 5 to 17 years	22,094	+791	1,283	+/- 773	5.8	+/- 3.5
Population 18 to 34 years	45,066	+/-777	3,313	+/- 1030	7.4	+/- 2.3
Population 35 to 64 years	53,286	+/-958	3,756	+/- 1066	7.0	+/- 2.0
Population 65 to 74 years	14,744	+/-554	3,326	+/- 723	22.6	+/- 4.7
Population 75 years and over	9,432	+/-647	4,014	+/- 724	42.6	+/- 7.0
SEX						
Male	70,062	+/-1295	7,995	+/- 1373	11.4	+/- 2.0
Female	79,469	+/-1266	7,715	+/- 1213	9.7	+/- 1.5
RACE AND HISPANIC OR LATINO ORIGIN						
White	103,129	+/-2594	10,637	+/- 1452	10.3	+/- 1.4
Black or African American	16,052	+/-1940	3,195	+/- 1129	19.9	+/- 7.0
American Indian and Alaska Native	N	N	N	N	N	N
Asian	12,189	+/-520	599	+/- 318	4.9	+/-2.6
Native American and Other Pacific Islander	N	N	N	N	N	N
Some other Race	N	N	N	N	N	N
Two or more races	10,826	+/-10,826	819	+/-524	524	+/-4.6
Hispanic or Latino (of any race)	15,738	+/-15,738	1,093	+/- 714	714	+/- 4.5

Poverty

The following table was completed using data from Census Table S1701, Poverty Status in the Past 12 Months:

Table 8 - Poverty Status for BGMPO Metro Area

Alamance County						
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	173,042	+/-488	20,956	+/-4,624	12.1%	+/-2.7
AGE						
Under 18	39,039	+/-293	5,403	+/-2,465	13.8%	+/-6.3
18 to 64	103,519	+/-713	11,559	+/-2,412	11.2%	+/-2.3
65 years and over	30,484	+/-508	3,994	+/-971	13.1%	+/-3.2
SEX						
Male	85,518	+/-1,338	9,901	+/-2,499	11.6%	+/-3.0
Female	87,524	+/-1,499	11,055	+/-2,523	12.6%	+/-2.9
RACE AND HISPANIC OR LATINO						

ORIGIN						
White	100,367	+/-1,586	10,089	+/-2,324	10.1%	+/-2.3
Black or African American	36,264	+/-1,999	4,950	+/-2,115	13.6%	+/-5.8
American Indian and Alaska Native	N	N	N	N	N	N
Asian	N	N	N	N	N	N
Native Hawaiian and Other Pacific Islander	N	N	N	N	N	N
Some other Race	18,167	+/-3,024	4,038	+/-2,386	22.2%	+/-12.7
Two or more races	14,054	+/-3,230	1,159	+/-747	8.2%	+/-5.7
Hispanic or Latino	27,107	+/-292	5,424	+/-2,874	20.0%	+/-10.6
RACE AND HISPANIC OR LATINO ORIGIN						
All individuals below:						
50 percent of poverty level	6,652	+/-1,719	(X)	(X)	(X)	(X)
125 percent of poverty level	26,449	+/-5,297	(X)	(X)	(X)	(X)
150 percent of poverty level	31,890	+/-5,228	(X)	(X)	(X)	(X)
185 percent of poverty level	47,343	+/-6,497	(X)	(X)	(X)	(X)
200 percent of poverty level	53,017	+/-6,195	(X)	(X)	(X)	(X)
Guilford County						
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	552,473	+/-2637	78,418	+/-9,756	15.0%	+/-1.9
AGE						
Under 18	116,639	+/-1989	25,356	+/-5,209	21.7%	+/-4.4
18 to 64	318,545	+/-1548	43,354	+/-5,215	13.6%	+/-1.5
65 years and over	87,289	+/-621	9,708	+/-1,709	11.1%	+/-1.9
SEX						
Male	250,380	+/-1821	35,128	+/-4,901	14.0%	+/-1.9
Female	272,093	+/-1838	43,290	+/-6,065	15.9%	+/-2.2
RACE AND HISPANIC OR LATINO ORIGIN						
White	241,464	+/-3555	21,865	+/-3,270	9.1%	+/-1.3
Black or African American	171,011	+/-5254	41,208	+/-7,924	23.3%	+/-4.5
American Indian and Alaska Native	N	N	N	N	N	N
Asian	29,119	+/-1387	4,190	+/-2,135	14.4%	+/-7.3
Native Hawaiian and Other Pacific Islander	N	N	N	N	N	N
Some other Race	25,633	+/-4384	3,855	+/-2,192	15.0%	+/-8.5
Two or more races	4,6361	+/-6386	6,677	+/-2,661	14.4%	+/-6.0
Hispanic or Latino	53,851	+/-912	8,957	+/-2,713	16.5%	+/-5.0
RACE AND HISPANIC OR LATINO ORIGIN						
All individuals below:						
50 percent of poverty level	37659	6325	(X)	(X)	(X)	(X)
125 percent of poverty level	98007	9412	(X)	(X)	(X)	(X)
150 percent of poverty level	121992	10420	(X)	(X)	(X)	(X)

185 percent of poverty level	157427	11775	(X)	(X)	(X)	(X)
200 percent of poverty level	173081	11700	(X)	(X)	(X)	(X)
Orange County						
Subject	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	139,320	+/-709	16,200	+/-2,851	11.6%	+/-2.0
AGE						
Under 18	26,824	+/-496	1,016	+/-541	3.8%	+/-2.0
18 to 64	88,320	+/-1,063	13,549	+/-2,549	15.3%	+/-2.9
65 years and over	24,176	+/-629	1,635	+/-599	6.8%	+/-2.5
SEX						
Male	65,923	+/-1,196	6,686	+/-1,686	10.1%	+/-2.5
Female	73,397	+/-1,117	9,514	+/-2,074	13.0%	+/-2.8
RACE AND HISPANIC OR LATINO ORIGIN						
White	97,656	+/-2,710	11,297	+/-2,559	11.6%	+/-2.5
Black or African American	14,868	+/-1,922	2,112	+/-1,315	14.2%	+/-8.6
American Indian and Alaska Native	N	N	N	N	N	N
Asian	9,229	+/-800	1,905	+/-785	20.5%	+/-8.1
Native Hawaiian and Other Pacific Islander	N	N	N	N	N	N
Some other Race	N	N	N	N	N	N
Two or more races	10,439	+/-2,593	630	+/-440	6.0%	+/-3.9
Hispanic or Latino	N	N	N	N	N	N
RACE AND HISPANIC OR LATINO ORIGIN						
All individuals below:						
50 percent of poverty level	9,247	+/-2,222	(X)	(X)	(X)	(X)
125 percent of poverty level	19,474	+/-2,946	(X)	(X)	(X)	(X)
150 percent of poverty level	24,437	+/-3,125	(X)	(X)	(X)	(X)
185 percent of poverty level	31,278	+/-3,923	(X)	(X)	(X)	(X)
200 percent of poverty level	33,474	+/-3,923	(X)	(X)	(X)	(X)

Household Income

The following table was completed using data from Census Table S1901, Income in the Past 12 Months (In 2013 Inflation-Adjusted Dollars):

Table 9 - Household Income for BGMPO Metro Area

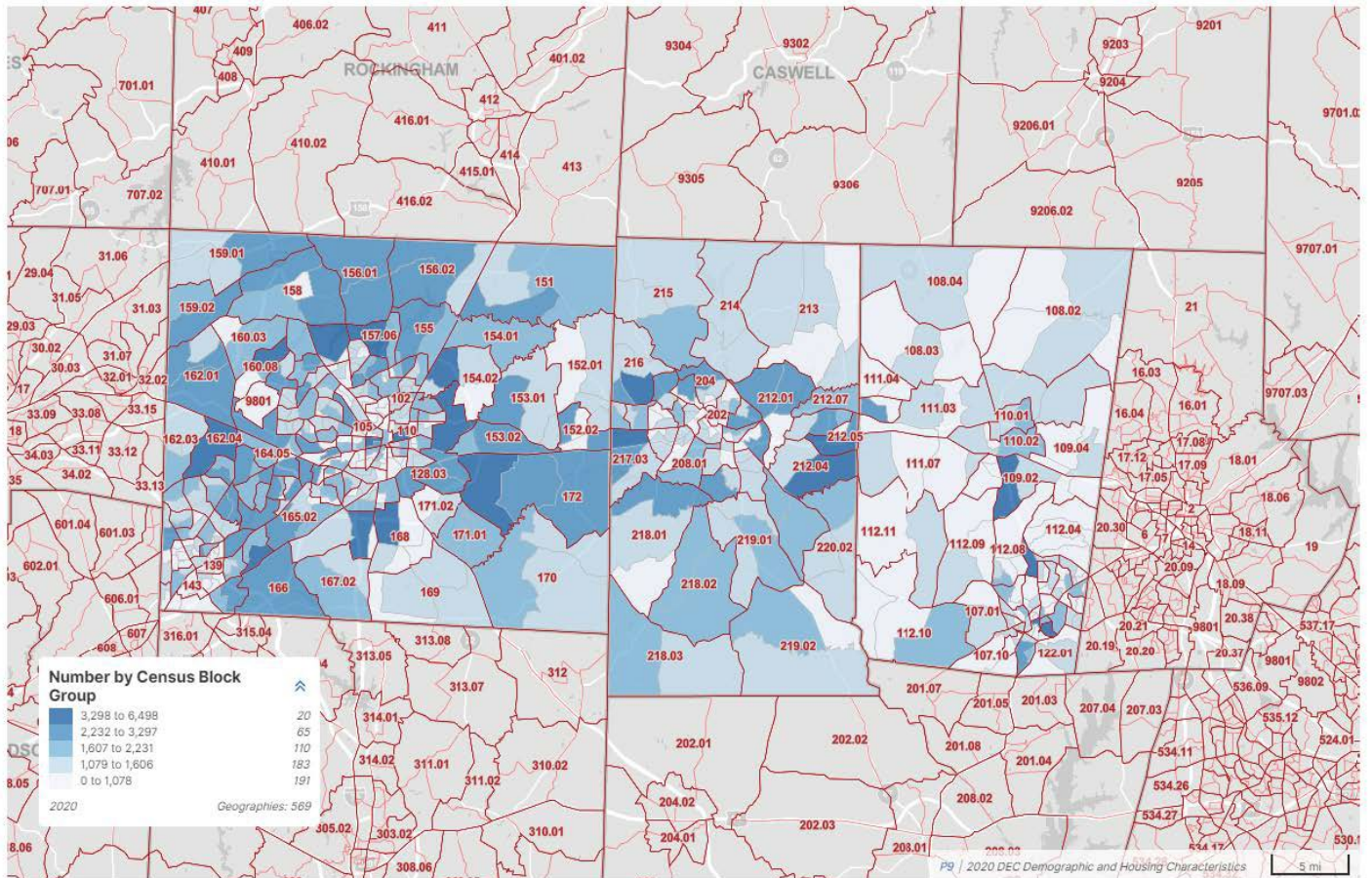
Subject	Alamance County		Guilford County		Orange County	
	Households		Households		Households	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total	70,911	+/-2,022	222,927	+/-2,765	59,771	+/-1,399
Less than \$10,000	5.4	+/-1.4	6.3	+/-1.1	4.7	+/-1.6
\$10,000 to \$14,999	4.2	+/-1.2	3.8	+/-0.8	3.0	+/-1.2
\$15,000 to \$24,999	7.7	+/-1.9	3.8	+/-1.1	8.3	+/-1.7
\$25,000 to \$34,999	6.9	+/-1.5	8.0	+/-1.3	5.3	+/-1.4

\$35,000 to \$49,999	12.1	+/-2.2	13.7	+/-1.5	7.8	+/-1.6
\$50,000 to \$74,999	21.1	+/-2.8	17.6	+/-1.7	15.2	+/-2.7
\$75,000 to \$99,999	14.5	+/-2.4	12.8	+/-1.4	10.5	+/-2.0
\$100,000 to \$149,999	17.6	+/-2.6	15.4	+/-1.5	15.9	+/-2.3
\$150,000 to \$199,999	5.8	+/-1.4	7.5	+/-1.1	9.2	+/-1.9
\$200,000 or more	4.7	+/-1.5	8.3	+/-1.1	20.0	+/-2.3
Median income (dollars)	65,633	+/-5,901	65,413	+/-3,004	86,381	+/-7,105
Mean income (dollars)	62,394	+/-4,771	91,350	+/-3,668	138,044	+/-10,526

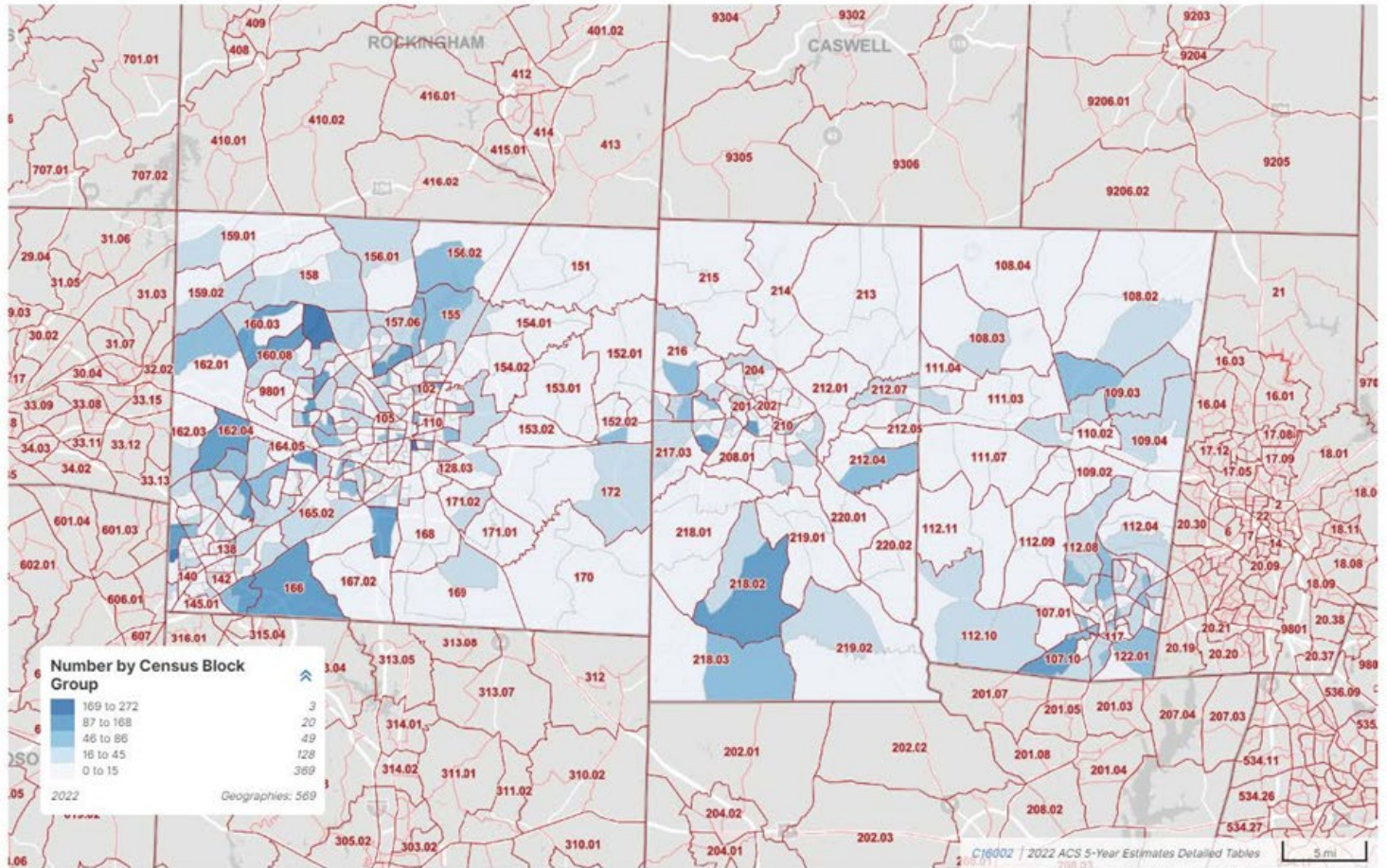
APPENDIX E

Figure 1 - Demographic Maps (EJ)

Hispanic and Latino Population Total:



Other Indo-European languages: - Total:



The TD Index identifies, describes, and calculates relative barriers that may limit access to transportation. The TD Index describes concentrations of zero-vehicle ownership, poverty level, youth aged 15 and under,

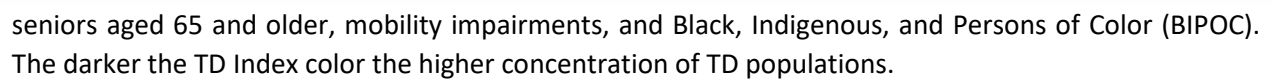
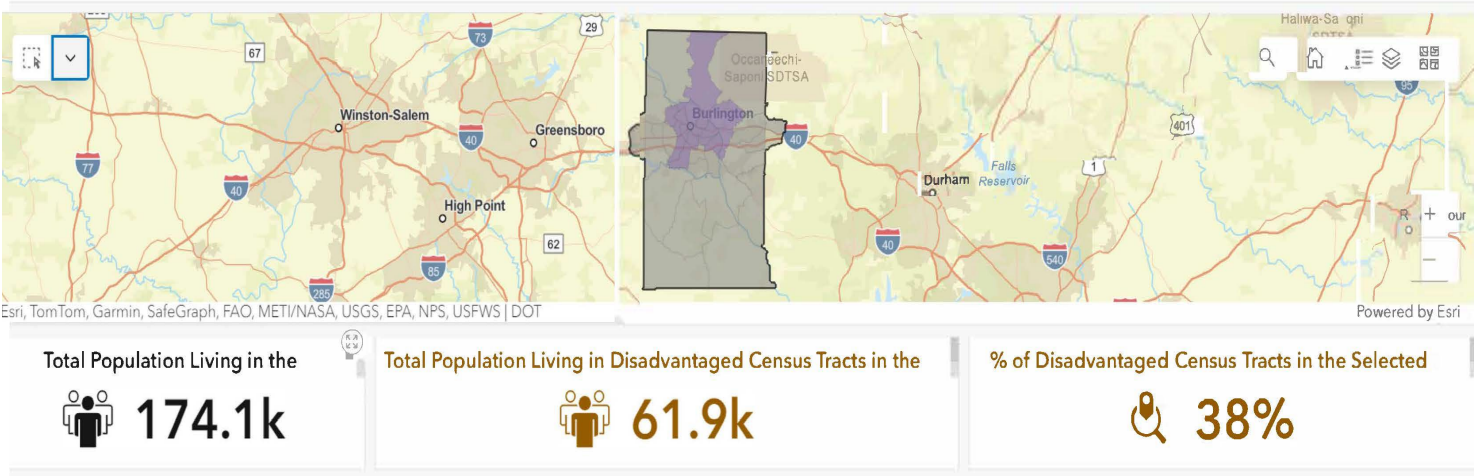


Figure 3 USDOT Equitable Transportation Community (ETC) Explorer

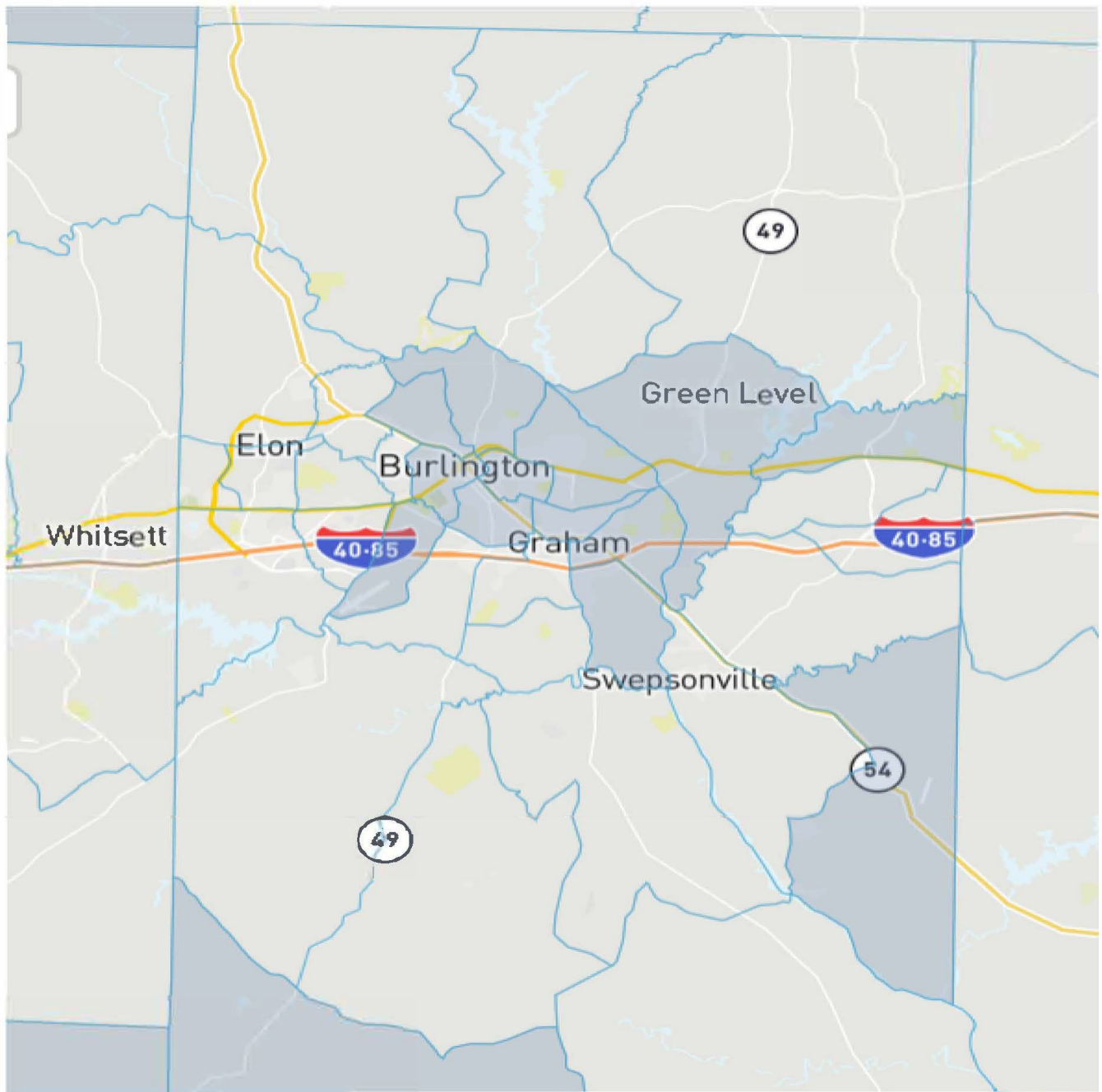
BGMPO EJ Disadvantaged Census Tracts



BGMPO EJ Disadvantaged Census Tracts

Figure 4 Climate and Economic Justice Screening

Census tracts that are overburdened and underserved are highlighted as being disadvantaged



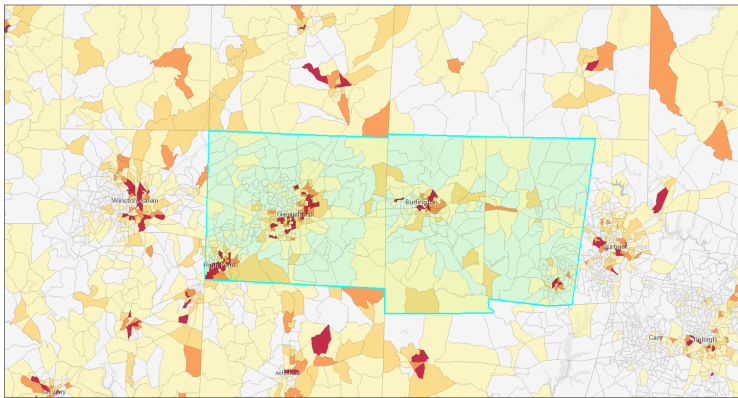


EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

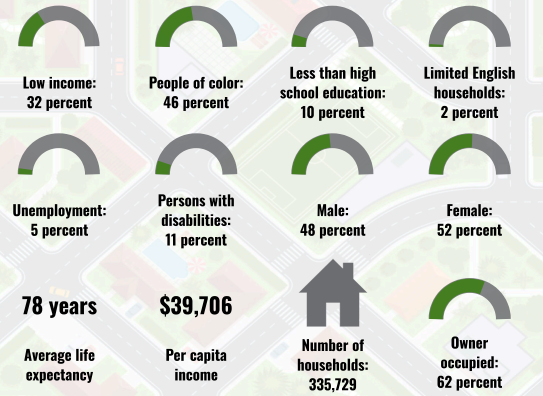
BGMPO Planning Area

County: Alamance, Guilford, Orange
Population: 857,255
Area in square miles: 1492.87

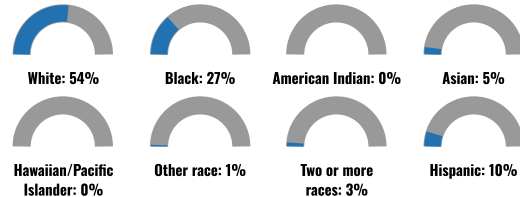


September 26, 2024
Low Income: (National Percentiles)
50 - 80 percentile
80 - 90 percentile
90 - 100 percentile
Less than 50 percentile
50 - 80 percentile
80 - 90 percentile
90 - 100 percentile
BGMPO Planning Area
0 5 10 15 20 mi
0 5 10 15 20 km
ESRI, HERE, NPS, Esri, HERE, Garmin, USGS, EPA, NOAA

COMMUNITY INFORMATION



BREAKDOWN BY RACE



BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2018-2022. Life expectancy data comes from the Centers for Disease Control.

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	85%
Spanish	7%
French, Haitian, or Cajun	1%
Other Indo-European	2%
Chinese (including Mandarin, Cantonese)	1%
Other Asian and Pacific Island	1%
Arabic	1%
Other and Unspecified	1%
Total Non-English	15%

Report for County: Alamance, Guilford, Orange

Report produced September 26, 2024 using EJScreen Version 2.3

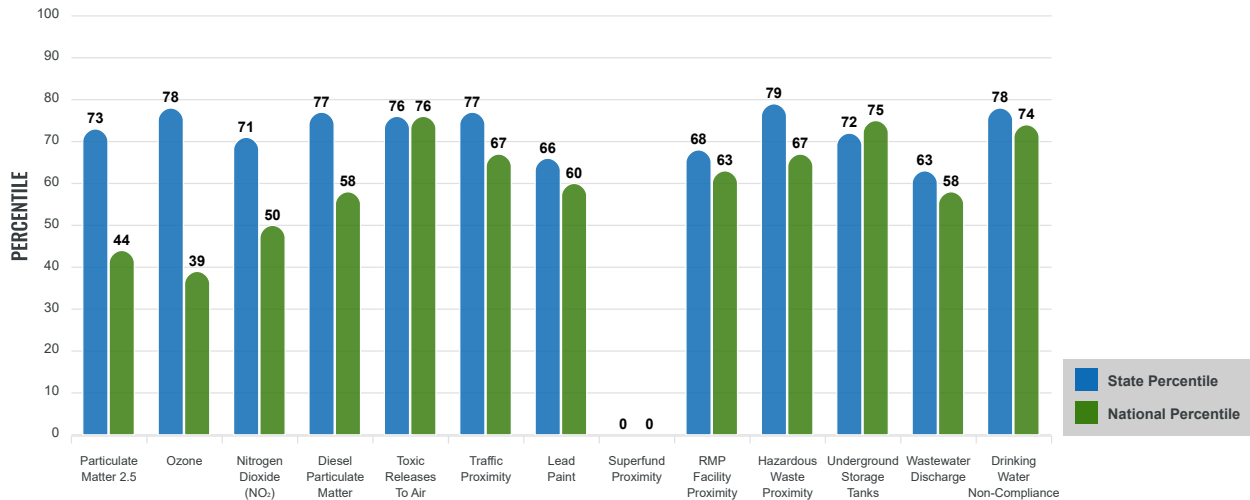
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

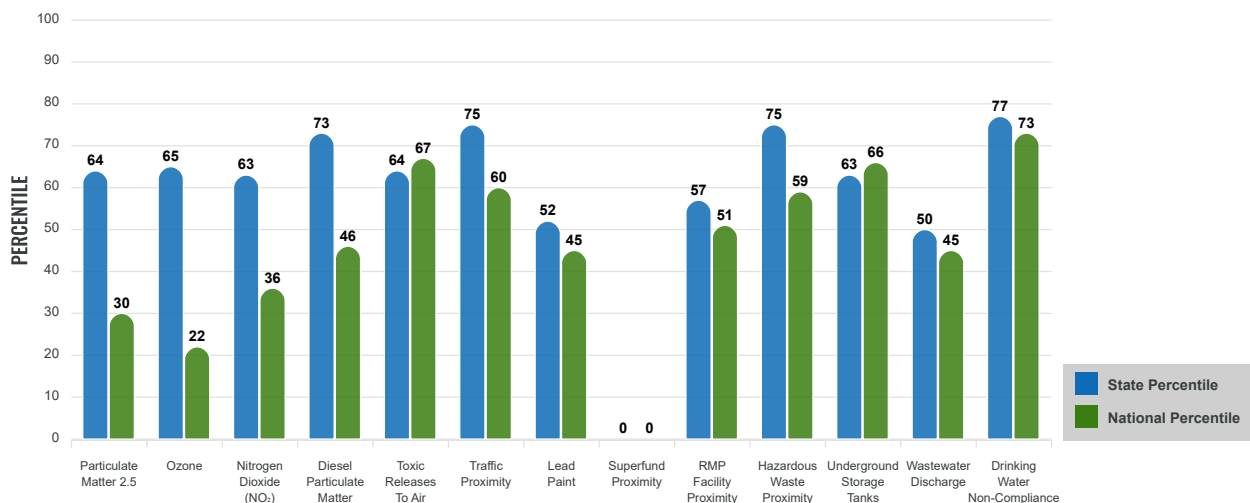
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low income, percent persons with disabilities, percent less than high school education, percent limited English speaking, and percent low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



Report for County: Alamance, Guilford, Orange

Report produced September 26, 2024 using EJScreen Version 2.3

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
ENVIRONMENTAL BURDEN INDICATORS					
Particulate Matter 2.5 (µg/m³)	7.34	6.99	61	8.45	26
Ozone (ppb)	54.7	54	69	61.8	20
Nitrogen Dioxide (NO ₂) (ppbv)	5.3	5	61	7.8	26
Diesel Particulate Matter (µg/m³)	0.125	0.102	69	0.191	38
Toxic Releases to Air (toxicity-weighted concentration)	3,300	3,100	80	4,600	80
Traffic Proximity (daily traffic count/distance to road)	1,100,000	690,000	76	1,700,000	56
Lead Paint (% Pre-1960 Housing)	0.18	0.17	64	0.3	46
Superfund Proximity (site count/km distance)	0	0.11	0	0.39	0
RMP Facility Proximity (facility count/km distance)	0.42	0.29	77	0.57	59
Hazardous Waste Proximity (facility count/km distance)	2.2	0.94	86	3.5	61
Underground Storage Tanks (count/km²)	5.4	3.8	79	3.6	80
Wastewater Discharge (toxicity-weighted concentration/m distance)	1200	1300	90	700000	75
Drinking Water Non-Compliance (points)	0.64	0.58	82	2.2	76
SOCIOECONOMIC INDICATORS					
Demographic Index USA	1.51	N/A	N/A	1.34	64
Supplemental Demographic Index USA	1.53	N/A	N/A	1.64	49
Demographic Index State	1.64	1.49	62	N/A	N/A
Supplemental Demographic Index State	1.76	1.91	43	N/A	N/A
People of Color	46%	37%	65	40%	62
Low Income	32%	34%	51	30%	59
Unemployment Rate	5%	5%	62	6%	60
Limited English Speaking Households	2%	2%	77	5%	66
Less Than High School Education	10%	11%	54	11%	58
Under Age 5	5%	5%	57	5%	57
Over Age 64	16%	18%	46	18%	49

*Diesel particulate matter index is from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haqs/air-toxics-data-update>.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	54
Water Dischargers	570
Air Pollution	347
Brownfields	45
Toxic Release Inventory	240

Other community features within defined area:

Schools	218
Hospitals	21
Places of Worship	251

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for County: Alamance, Guilford, Orange

Report produced September 26, 2024 using EJScreen Version 2.3

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	18%	21%	22	20%	36
Heart Disease	5.4	6.1	34	5.8	46
Asthma	10	10.1	52	10.3	45
Cancer	6.1	6.5	38	6.4	42
Persons with Disabilities	11.4%	14.2%	34	13.7%	40

CLIMATE INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	5%	10%	37	12%	42
Wildfire Risk	0%	9%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	12%	14%	52	13%	58
Lack of Health Insurance	9%	11%	41	9%	62
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access Burden	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Report for County: Alamance, Guilford, Orange

Report produced September 26, 2024 using EJScreen Version 2.3

APPENDIX F

Investigation Guidance, Discrimination Complaint Form and Log

INVESTIGATIVE GUIDANCE

- A. Scope of Investigation** – An investigation should be confined to the issues and facts relevant to the allegations in the complaint, unless evidence shows the need to extend the issues.
- B. Developing an Investigative Plan** – It is recommended that the investigator (i.e., Title VI Coordinator or other official trained to conduct Title VI investigations) prepares an Investigative Plan (IP) to define the issues and lay out the blueprint to complete the investigation. The IP should follow the outline below:
1. Complainant(s) Name and Address (Attorney name and address if applicable)
 2. Respondent(s) Name and Address (Attorney for the Respondent(s) name and address, if applicable)
 3. Applicable Law(s)
 4. Basis/(es)
 5. Allegation(s)/Issue(s)
 6. Background
 7. Name of Persons to be interviewed
 - a. Questions for the complainant(s)
 - b. Questions for the respondent(s)
 - c. Questions for witness(es)
 8. Evidence to be obtained during the investigation
 - a. Issue – e.g., Complainant alleges his predominantly African American community was excluded from a meeting concerning a future project which could affect the community.
 - i. Documents needed – e.g., mailing list which shows all physical addresses, P.O. Box numbers, property owner names, and dates when the meeting notification was mailed; other methods used to advertise the meeting.
- C. Request for Information** – The investigator should gather data and information pertinent to the issues raised in the complaint.
- D. Interviews** – Interviews should be conducted with the complainant, respondent, and appropriate witnesses during the investigative process. Interviews are conducted to gain a better understanding of the situation outlined in the complaint of discrimination. The main objective during the interview is to obtain information that will either support or refute the allegations.
- E. Preparing an Investigative Report** – The investigator should prepare an investigative report setting forth all relevant facts obtained during the investigation. The report should include a finding for each allegation. A sample outline for an investigative report is provided below.

Sample Investigative Report Template

- I. **COMPLAINANT(S) NAME** (or attorney for the complainant(s) – name and address if applicable)
- II. **RESPONDENT(S)** (or attorney for the respondent(s) – name and address if applicable)
- III. **APPLICABLE LAW/REGULATION**
- IV. **COMPLAINT BASIS/(ES)**
- V. **ALLEGATIONS**
- VI. **BACKGROUND**
- VII. **INVESTIGATIVE PROCEDURE**
- VIII. **FINDINGS OF FACT**
- IX. **CONCLUSION**
- X. **RECOMMENDED ACTIONS**

DISCRIMINATION COMPLAINT FORM

Figure 5 - Discrimination Complaint Form

<p>Any person who believes that he/she has been subjected to discrimination based upon race, color, national origin, sex, age, or disability may file a written complaint with BGMPPO, within 180 days after the discrimination occurred.</p>				
Last Name:		First Name:		<input type="checkbox"/> Male <input type="checkbox"/> Female
Mailing Address:		City	State	Zip
Home Telephone:	Work Telephone:	E-mail Address		
<p>Identify the Category of Discrimination:</p> <p> <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> AGE <input type="checkbox"/> SEX <input type="checkbox"/> DISABILITY <input type="checkbox"/> LIMITED ENGLISH PROFICIENCY </p>				
<p>Identify the Race of the Complainant</p> <p> <input type="checkbox"/> Black <input type="checkbox"/> White <input type="checkbox"/> Hispanic <input type="checkbox"/> Asian American <input type="checkbox"/> American Indian <input type="checkbox"/> Alaskan Native <input type="checkbox"/> Pacific Islander <input type="checkbox"/> Other _____ </p>				
<p>Date and place of alleged discriminatory action(s). Please include earliest date of discrimination and most recent date of discrimination.</p>				
<p>Names of individuals responsible for the discriminatory action(s):</p>				
<p>How were you discriminated against? Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status (basis) was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s), if necessary).</p>				
<p>The law prohibits intimidation or retaliation against anyone because he/she has either taken action, or participated in action, to secure rights protected by these laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Explain what action you took which you believe was the cause for the alleged retaliation.</p>				

Names of persons (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complaint: (Attached additional page(s), if necessary).

<u>Name</u>	<u>Address</u>	<u>Telephone</u>
1. _____	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____

DISCRIMINATION COMPLAINT FORM

Have you filed, or intend to file, a complaint regarding the matter raised with any of the following? If yes, please provide the filing dates. Check all that apply.

- ☐ NC Department of Transportation _____
☐ Federal Highway Administration _____
☐ US Department of Transportation _____
☐ Federal or State Court _____
☐ Other _____

Have you discussed the complaint with any BGMPO representative? If yes, provide the name, position, and date of discussion.

Please provide any additional information that you believe would assist with an investigation.

Briefly explain what remedy, or action, are you seeking for the alleged discrimination.

****WE CANNOT ACCEPT AN UNSIGNED COMPLAINT. PLEASE SIGN AND DATE THE COMPLAINT FORM BELOW.**

COMPLAINANT'S SIGNATURE

DATE

MAIL COMPLAINT FORM TO:

Burlington – Graham MPO
 PO Box 1358
 425 S. Lexington Avenue
 Burlington, NC 27215

FOR OFFICE USE ONLY

Date Complaint Received: _____

Processed by: _____

Case #: _____

Referred to: ☐ NCDOT ☐ FHWA Date Referred: _____

Discrimination Complaint Log

Figure 6 - Discrimination Complaint Log

Log Year(s):

CASE NO.	COMPLAINANT NAME	RACE/ GENDER	RESPONDENT NAME	BASIS	DATE FILED	DATE RECEIVED	ACTION TAKEN	DATE INVESTIG. COMPLETED	DISPOSITION

No Complaints or Lawsuits ☐

I certify that to the best of my knowledge, the above described complaints or lawsuits alleging discrimination, or **no complaints or lawsuits** alleging discrimination, have been filed with or against **Burlington – Graham Metropolitan Planning Organization** since the previous Title VI Program submission to NCDOT.

Signature of Title VI Coordinator or Other Authorized Official

Date

Print Name and Title of Authorized Official

APPENDIX G

Compliance Review Checklist for FHWA Subrecipients

Figure 7 - Compliance Review Checklist

General Requirements	Completed
1. A copy of the recipient's signed USDOT Title VI Assurances	<input type="checkbox"/>
2. Title VI Policy Statement (signed)	<input type="checkbox"/>
3. Title VI Notice to Public, including a list of locations where the notice is posted	<input type="checkbox"/>
4. Name and official title of Title VI Coordinator and a list of their Title VI duties	<input type="checkbox"/>
5. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)	<input type="checkbox"/>
6. Title VI Complaint Form	<input type="checkbox"/>
7. List of Title VI complaints, investigations, or lawsuits (i.e., Title VI Complaint Log)	<input type="checkbox"/>
8. Public Participation Plan, including information about outreach methods to engage traditionally underserved constituencies (e.g., minorities, low-income, disabled), as well as a summary of outreach efforts	<input type="checkbox"/>
9. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance, which requires conducting four-factor analyses	<input type="checkbox"/>
10. A table depicting the membership of any non-elected committees and councils, broken down by race and gender, and a description of the process the MPO uses to encourage minorities and women to participate on such committees	<input type="checkbox"/>
11. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program	<input type="checkbox"/>
12. Compliance and enforcement procedures to ensure nondiscriminatory administration of programs and services	<input type="checkbox"/>
13. A demographic profile of your planning area that includes identification of the locations of minority, low-income, LEP, and/or other underserved populations	<input type="checkbox"/>
14. Information regarding how consultants and/or subrecipients are monitored for compliance with Title VI	<input type="checkbox"/>
15. Any environmental justice analysis conducted in the past three years and, if necessary, a description of the measures used to address any disproportionately high and adverse impacts to minority or low-income communities	<input type="checkbox"/>
16. Documentation from any Title VI compliance reviews or investigations conducted by any agency other than NCDOT-OCR in the last three years.	<input type="checkbox"/>

APPENDIX H

Title VI Resolution

Resolution

ADOPTING THE BURLINGTON GRAHAM URBAN AREA METROPOLITAN PLANNING ORGANIZATION TITLE VI PLAN

WHEREAS, the Burlington – Graham Metropolitan Planning Organization (BGMPO) has been designated by the Governor of the State of North Carolina as the Metropolitan Planning Organization (MPO) responsible, together with the State, for the comprehensive, continuing, and cooperative transportation planning process for the Burlington-Graham metropolitan planning area; and,

WHEREAS, the Transportation Advisory Committee has found that the BGMPO is conducting transportation planning in a continuous, cooperative, and comprehensive manner in accordance with 23 U.S.C. 134 and 49 U.S.C. 1607; and,

WHEREAS, the purpose of Title VI of the United States Civil Rights Act of 1964 and subsequent legislation, regulations, statutes and orders is to prohibit programs that receive Federal funds from discriminating against participants on the basis of race, color, national origin, disability, age, gender, or income status; and,

WHEREAS, the Transportation Advisory Committee has considered how the Transportation Planning Process will affect the involvement of Disadvantaged Business Enterprises in the FHWA and the FTA funded planning projects; and,

WHEREAS, the Transportation Advisory Committee has considered how the Transportation Planning Process will affect the elderly and the disabled per the provision of the Americans with Disabilities Act of 1990 as amended and the U.S.D.O.T. implementing regulations; and,

WHEREAS, the Title VI Plan includes the following documents: Title VI policy statement, Title VI notice to the public, Title VI complaint procedures and complaint forms, records of Title VI complaints and lawsuits, Limited English Proficiency Plan, and other reports, Environment Justice maps, and documents; and,

WHEREAS, the Transportation Advisory Committee has found the Transportation Planning Process to be in full compliance with Title VI of the Civil Rights Act of 1964 and the Title VI Assurance executed by each State under 23 U.S.C. 324 and 29 U.S.C. 794, (42 U.S.C. § 2000D ET SEQ., 78 STAT. 252), 49 C.F.R. PART 21 and 28 C.F.R. SECTION 50.3 and additional assurances as required;

NOW THEREFORE, BE IT RESOLVED that the Transportation Advisory Committee for the Burlington – Graham Metropolitan Planning Organization hereby certifies compliance with policies, procedures and plans with regard to Title VI of the Civil Rights Act of 1964 and hereby adopt the BGMPO's Title VI plan on this the _____ day of _____, 2025.

CERTIFICATE: The undersigned certifies that the foregoing is a true and correct copy of a resolution adopted by the voting members of the TAC on _____.

Date: _____

By: _____

TAC Chair

STATE of: North Carolina

COUNTY of _____

I, _____, Notary Public of _____ County, North Carolina do hereby certify that _____, BGMPO TAC Chair, personally appeared before me on the _____ to affix his signature to the foregoing document.

Notary Public

My Commission expires: _____