

# Title VI/Environmental Justice Program

South East Texas Regional Planning Commission -  
Metropolitan Planning Organization



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South East Texas Regional Planning Commission -  
Metropolitan Planning Organization

Resolution Adopting the Title VI/Environmental Justice Program

WHEREAS, the South East Texas Regional Planning Commission -Metropolitan Planning Organization (SETRPC-MPO) has been designated by the Governor of the State of Texas as the entity responsible for the metropolitan transportation planning process in Hardin, Jefferson, and Orange Counties in southeast Texas; and

WHEREAS, Title VI of the 1964 Civil Rights Act provides 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 receiving federal financial assistance; and

WHEREAS, the Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [2.5 57] March 22, 1988); and

WHEREAS, Executive Order 12898, titled *Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations*, orders that disproportionately high and adverse human health and environmental effects of federally funded programs and activities shall be identified and addressed; and

WHEREAS, this Title VI/Environmental Justice Program has been developed in accordance with requirements of the Federal Highway Administration and Federal Transit Administration.

NOW, THEREFORE, BE IT RESOLVED that the Transportation Planning Committee of the SETRPC-MPO hereby approves and adopts this Title VI/Environmental Justice Program.

Adopted this \_\_\_ day of \_\_\_\_\_, 2017

\_\_\_\_\_, Secretary  
JOHRTS Transportation Planning Committee

\_\_\_\_\_, Chair  
JOHRTS Transportation Planning Committee

## Introduction

This *Title VI/Environmental Justice Program* has been prepared to address the responsibilities of the South East Texas Regional Planning Commission-Metropolitan Planning Organization (SETRPC-MPO) as a recipient of federal financial assistance as they relate to requirements of Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, the Civil Rights Restoration Act of 1987, and Executive Order 12898. These federal laws and orders seek to prevent any form of discrimination and to ensure certain populations are not disproportionately adversely affected by plans, programs, and projects implemented by public agencies.

## Title VI

Title VI of the Civil Rights Act of 1964 first prohibited discrimination on the basis of race, color, or national origin in programs or activities receiving federal financial assistance. Furthermore, the Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients and contractors, whether those programs and activities are federally funded or not. The Age Discrimination Act of 1975 clarified that age is a protected group under Title VI.

## Environmental Justice

Presidential Executive Order 12898, entitled Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, promulgated on February 11, 1994, expanded the scope of previous guidance to include identifying and avoiding “disproportionately high and adverse” effects on minority and low-income populations. The United States Department of Transportation (U.S. DOT) Order 6640.23 requires the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) to implement the principles of Environmental Justice in all programs, policies, and activities.

The three principles of Environmental Justice are:

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

Environmental Justice must be considered in all phases of planning and focuses on enhanced public involvement and an analysis of the distribution of benefits and impacts. Environmental Justice issues arise most frequently when certain communities:

- receive the benefits of improved accessibility, faster trips, and congestion relief, while others experience fewer benefits
- suffer disproportionately from transportation programs' negative impacts, like air pollution
- have to pay higher transportation taxes or higher fares than others in relation to the services that they receive
- are less represented than others when policymaking bodies debate and decide what should be done with transportation resources

While Environmental Justice concerns are more frequently raised during project development, Title VI applies equally to the plans, programs, and activities of planning activities in which the SETRPC-MPO is actively involved.

### **Program Summary**

To address these federal requirements, the SETRPC-MPO has developed this Title VI/Environmental Justice Program. Specifically, this Title VI/Environmental Justice Program:

- contains the SETRPC-MPO's formal Policy Statement regarding Title VI/Environmental Justice
- describes the SETRPC-MPO's Title VI/Environmental Justice general program elements
- includes a Title VI Complaint Form

### **The SETRPC-MPO Title VI/Environmental Justice Program**

It is the goal of the SETRPC-MPO, acting as the transportation planning agency for the Jefferson-Orange-Hardin Regional Transportation Study (JOHRTS) area and designated recipient of federal transportation funds, to not discriminate against any person with respect to an MPO program, activity, or service, nor to disproportionately adversely impact Environmental Justice populations. Therefore, the SETRPC-MPO has developed the following policy statement:

*The SETRPC-MPO assures that no person shall, on the grounds of race, color, national origin, sex, age, disability or income status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (P.L. 100.259), and other related federal orders, directives, and guidelines, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity. Additionally, per Executive Order 12898 (Environmental Justice) and subsequent United States Department of Transportation, Federal Highway Administration, and Federal Transit Administration directives, the SETRPC-MPO shall make every effort to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of the SETRPC-MPO's programs, policies, and activities on Title VI/Environmental Justice protected populations. Furthermore, the SETRPC-MPO assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs or activities are federally funded or not. In the event that the SETRPC-MPO distributes federal*

*aid funds to another entity, the MPO will include Title VI language in all written agreements. The Title VI Coordinator is responsible for carrying out the activities documented in the SETRPC-MPO's Title VI/Environmental Justice Program.*

### **SETRPC-MPO Title VI/Environmental Justice Program Elements**

The following seven elements comprise the SETRPC-MPO's formal Title VI/Environmental Justice Program. The implementation of these activities will be the responsibility of the SETRPC-MPO's Title VI Coordinator, with assistance from other MPO support staff.

#### **1. Data Collection and Analysis**

In order to adequately address Title VI and Environmental Justice requirements, the SETRPC-MPO will regularly gather and analyze demographic data related to race, color, national origin, age, income level, language spoken, disability, and gender for the three-county SETRPC-MPO planning area (Jefferson, Orange, and Hardin Counties). This demographic data will be used to better target public outreach efforts and to consider Environmental Justice issues, as needed. Data from the United States Census Bureau's decennial Census and its annual American Community Survey will be regularly updated and reviewed to ensure that the most current data is available to sufficiently meet the requirements of the SETRPC-MPO's Title VI/Environmental Justice Program. This data analysis will be updated to include new data as it becomes available.

#### **2. Public Participation**

The SETRPC-MPO seeks to provide equal access to all citizens through an inclusive and robust public participation process. This process is documented in the MPO's Public Participation Plan (PPP), which describes in detail the broad range of public outreach and participation techniques that the MPO utilizes to reach the community at large. The PPP explicitly states that the SETRPC-MPO will ensure that groups that have historically been underserved, including minority, elderly, disabled, low-income, and limited English proficiency populations, will be encouraged to participate in the transportation planning process. Key strategies that the SETRPC-MPO will employ to engage these populations groups include:

- Conduct meetings at locations that are accessible by public transit and are compliant with the Americans with Disabilities Act.
- Seek assistance from community leaders and organizations to facilitate involvement of traditionally underserved populations.
- Provide interpretation services or other special accommodations that are requested.
- Provide language assistance to persons that do not speak English as their primary language and have limited ability to read, speak, or understand English.
- Routinely evaluate the effectiveness of all communications and public participation efforts to reach underserved populations and make appropriate adjustments as necessary.

### 3. Transportation Planning Process

The SETRPC-MPO is responsible for conducting a continuing, comprehensive, and cooperative (3-C) transportation planning process that results in plans and programs that are for the benefit of all residents of the three-county area. This transportation planning process results in four planning-related documents:

- **Unified Planning Work Program (UPWP)** – an annual statement of work that identifies the planning priorities and activities to be carried out within the SETRPC-MPO metropolitan planning area for a given fiscal year (October 1 to September 30).
- **Public Participation Plan (PPP)** – a set of guidelines that outlines the procedures, tools, techniques, and expectations for public outreach and education during the transportation planning and development processes.
- **Metropolitan Transportation Plan (MTP)** – a long-range multimodal transportation plan that includes the set of projects, programs, and policies that are anticipated to be implemented over a 20-year planning horizon.
- **Transportation Improvement Program (TIP)** – a prioritized listing of transportation projects and programs covering a period of four years, representing the short-range implementation program of the MTP.

The SETRPC-MPO is committed to ensuring that its programs, plans, and projects meet the needs of all persons, regardless of socioeconomic background, and avoid disproportionately high and adverse human health or environmental effects, including social and economic effects, on Title VI/Environmental Justice protected populations. To support this commitment, The SETRPC-MPO has developed a process to consider all submitted projects early in the transportation process rather than after a project has progressed to the alternatives analysis and design stages. Considering project costs, benefits, and impacts together with Environmental Justice criteria early in the planning process is intended to promote developing more feasible and prudent projects that can contribute to equity in the transportation planning process. The SETRPC-MPO will implement this goal through three distinct steps:

- Maintain a robust public outreach process to provide meaningful opportunities for involvement.
- Identify and map target populations through an analytical process.
- Explicitly consider impacts of transportation and target populations.

Robust public involvement will be guided by the SETRPC-MPO Public Participation Plan and Limited English Proficiency Plan. Public participation will solicit and consider input from all groups and citizens affected by the SETRPC-MPO's transportation plans or programs. The needs of those that have traditionally be underserved by the transportation system will be particularly considered.

The analytic process has two distinct steps: identifying target populations, and mapping the results.

The first part of the analytic process, identifying target populations, builds a demographic profile of the region using Census statistical data. The data is used to identify Census Tracts within the region that have a higher percentage of any targeted population than the regional percentage. This profile is included as **Appendix 1** of this document. Data from this profile is used to define an Environmental Justice Area of Concern (EJCOC) for each specific targeted population. The Environmental Justice EJCOCs are supplemented by additional data to identify populations with Limited English Proficiency (LEP), which are included in the analytical process.

The second part of the analytic process enters the EJCOCs and demographic data into a Geographic Information System (GIS). The GIS displays layers of information such as transportation projects, transit routes, significant employment destinations, and locations of government services, so that the potential for disproportionate impacts to areas within the EJCOCs can be evaluated for every project.

The analysis of the results of the analytic process identifies transportation projects that lie within an EJCOC or have an impact to a targeted population. The impacts of transportation projects in EJCOCs are explicitly scored in the Project Selection Process. The Project Selection Process has two components: a Road Evaluation Track and a Transportation Choices & Livability Evaluation Track. Each evaluation track evaluates a project on multiple criteria, so that the impacts of a project on EJCOCs are considered explicitly, but also are considered within the context of additional concerns such as access to transit and other multimodal facilities, Context Sensitive Solutions, compliance with the Americans with Disabilities Act, and alternatives analysis of routes for new construction.

This comprehensive project selection process and scoring criteria define a process with an analytic basis that considers the impact of transportation decisions and projects on EJCOCs both explicitly and within the overall transportation planning context. However, the process is similar to the NEPA process for evaluating the impacts of transportation projects on the environment, since it is intended only to identify high-level impacts. Like the NEPA process, if the evaluation of a specific project reveals that it does have a potential impact, it may require more in-depth study to determine the full scope and scale of the impacts and weigh them against project benefits.

#### **4. Measures of Effectiveness (MOEs)**

Measures of Effectiveness (MOEs) for the Title VI program were developed to ensure that targeted communities are included in the public involvement process and that they have meaningful opportunities for involvement. The MOEs for this program are shared with the MOEs for the overall public participation process. Specific MOEs for the Title VI program are:

- 100% of all formal public meetings, project meetings, and committee meetings are

- accessible to persons with disabilities and are located on a fixed-route public transit line.
- 100% of requests for translations of planning materials that are requested by LEP populations meeting the four-factor criteria receive responses within three working days. The translation of the documents may take longer, depending on their length and complexity, and the four-factor criteria in some cases allows a translation request to be denied for non-vital or costly requests.
  - 100% of special interest groups, organizations, or governments listed in the public participation contacts database are contacted once per year to verify their information and maintain their interest in the process.
  - 50% of individuals listed in the public participation contacts database are contacted once per year to verify their information and maintain their interest in the process.

## **5. Contractors**

From time to time, the SETRPC-MPO executes contracts with consultants to assist in carrying out the 3-C transportation planning process. All SETRPC-MPO consultant contracts include language stating that the contractor agrees that persons shall not be excluded from participation in, be denied the benefit of, or otherwise be subject to discrimination during the work and activities related to the contract.

## **6. Training Program**

As changes to federal and state regulations and guidance related to Title VI and Environmental Justice change, SETRPC-MPO staff will seek the necessary training to ensure continued compliance with these issues.

## **7. Complaint Procedures**

Any person who believes he or she, or any specific class of persons, has been subjected to discrimination or retaliation prohibited by the Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a formal written complaint using the form found in **Appendix 2** of this document. All formal written complaints received will be addressed, investigated, and responded to by the SETRPC-MPO, in cooperation with its state and federal planning partners.

## Appendix 1 - Title VI Demographic Profile

A demographic profile of Title VI populations by Census Tract is a useful tool to identify geographic areas of interest. Knowledge of these areas will help the SETRPC-MPO customize its public outreach, monitor areas of impact for its plans and programs, and track the effectiveness of its Title VI compliance efforts.

**Table 1** presents data on Title VI populations by Census Tract, based on American Community Survey 5-Year 2011-2015 Estimates. Cells shaded in red identify the Census Tracts that most significantly contribute to the total population aged 65 and over or to identified minority populations in the SETRPC-MPO planning area. The definition of significance for age and minority populations are discussed on the following page.

*Table 1: Title VI Populations by Census Tract*

County	Tract	Total Population	65 and older	Percent 65 and Older	White	Percent White	Hispanic	Percent Hispanic	Black	Percent Black	Asian	Percent Asian
Hardin	301	3604	498	14	3245	90	297	8	3	0	10	0
Hardin	302	5498	853	16	4994	91	216	4	137	2	30	1
Hardin	303	9951	1219	12	8932	90	449	5	478	5	0	0
Hardin	304	2362	363	15	1778	75	232	10	261	11	62	3
Hardin	305.01	4503	508	11	4116	91	83	2	118	3	123	3
Hardin	305.02	8523	1403	16	8047	94	369	4	10	0	0	0
Hardin	306	3715	549	15	3470	93	222	6	0	0	0	0
Hardin	307	4183	745	18	2601	62	546	13	958	23	0	0
Hardin	308	4472	874	20	2793	62	238	5	1241	28	110	2
Hardin	309	4471	647	14	4336	97	97	2	0	0	16	0
Hardin	310	4093	531	13	3960	97	123	3	10	0	0	0
Orange	202	3648	599	16	1093	30	43	1	2317	64	0	0
Orange	203	2550	477	19	1862	73	174	7	419	16	53	2
Orange	205	3281	603	18	2212	67	691	21	332	10	0	0
Orange	207	4691	807	17	3210	68	303	6	828	18	166	4
Orange	208	1758	390	22	1174	67	128	7	391	22	11	1
Orange	209	3636	558	15	1772	49	394	11	1420	39	9	0
Orange	210	2197	363	17	2008	91	85	4	37	2	15	1
Orange	211	1891	288	15	1788	95	67	4	0	0	0	0
Orange	212	4671	561	12	4326	93	234	5	32	1	27	1
Orange	213	6013	1202	20	4602	77	210	3	826	14	261	4
Orange	214	4012	544	14	3723	93	217	5	9	0	0	0
Orange	215	2245	181	8	1911	85	130	6	0	0	16	1
Orange	215	7223	1094	15	6587	91	470	7	19	0	0	0
Orange	216	3858	677	18	3400	88	440	11	8	0	0	0
Orange	217	2314	369	16	2067	89	225	10	0	0	14	1
Orange	218	2639	454	17	2405	91	191	7	26	1	9	0
Orange	219	6359	840	13	5875	92	171	3	19	0	68	1
Orange	220	4080	530	13	3914	96	144	4	0	0	0	0
Orange	222	3982	340	9	3669	92	144	4	0	0	113	3
Orange	223	7143	859	12	6288	88	499	7	68	1	69	1
Orange	224	5026	542	11	4167	83	604	12	94	2	41	1

Table 1: (Continued) Title VI Populations by Census Tract

County	Tract	Total Population	65 and older	Percent 65 and Older	White	Percent White	Hispanic	Percent Hispanic	Black	Percent Black	Asian	Percent Asian
Jefferson	1.01	5935	607	10	2862	48	618	10	2304	39	74	1
Jefferson	1.02	2313	146	6	846	37	156	7	1241	54	64	3
Jefferson	1.03	3171	285	9	250	8	207	7	2696	85	18	1
Jefferson	2	4934	666	13	963	20	535	11	3367	68	38	1
Jefferson	3.02	7071	1367	19	4621	65	454	6	1298	18	617	9
Jefferson	3.04	7113	836	12	3315	47	1403	20	2170	31	160	2
Jefferson	3.06	3797	561	15	2846	75	273	7	425	11	212	6
Jefferson	3.07	3543	395	11	1498	42	346	10	1030	29	120	3
Jefferson	3.08	6115	748	12	2797	46	335	5	2357	39	471	8
Jefferson	3.09	2963	533	18	1559	53	408	14	897	30	20	1
Jefferson	3.10	5329	1353	25	3404	64	547	10	1217	23	161	3
Jefferson	4	4267	559	13	2538	59	195	5	1446	34	50	1
Jefferson	5	2361	339	14	684	29	489	21	1163	49	10	0
Jefferson	6	5671	567	10	611	11	1101	19	3959	70	0	0
Jefferson	7	3126	394	13	98	3	187	6	2821	90	0	0
Jefferson	9	2030	268	13	97	5	292	14	1641	81	0	0
Jefferson	11	2304	176	8	1003	44	291	13	862	37	40	2
Jefferson	12	2416	201	8	733	30	758	31	873	36	19	1
Jefferson	13.01	5040	1054	21	2080	41	766	15	2120	42	50	1
Jefferson	13.02	3204	463	14	1025	32	485	15	1361	42	289	9
Jefferson	13.03	3413	438	13	1596	47	360	11	1094	32	319	9
Jefferson	17	1809	292	16	199	11	31	2	1550	86	0	0
Jefferson	19	3018	187	6	536	18	1122	37	1100	36	247	8
Jefferson	20	2190	260	12	397	18	657	30	890	41	205	9
Jefferson	21	3087	577	19	229	7	390	13	2468	80	0	0
Jefferson	22	2964	452	15	181	6	169	6	2574	87	0	0
Jefferson	23	3045	810	27	32	1	189	6	2824	93	0	0
Jefferson	24	2808	349	12	426	15	677	24	1620	58	74	3
Jefferson	25	3905	247	6	668	17	926	24	2258	58	0	0
Jefferson	26	6009	230	4	1337	22	450	7	3755	62	248	4
Jefferson	51	936	194	21	63	7	8	1	865	92	0	0
Jefferson	54	1350	156	12	211	16	138	10	984	73	0	0
Jefferson	55	2986	410	14	312	10	933	31	1230	41	476	16
Jefferson	56	3974	192	5	565	14	2459	62	665	17	239	6
Jefferson	59	1561	161	10	62	4	5	0	1490	95	0	0
Jefferson	61	1176	232	20	81	7	49	4	1025	87	0	0
Jefferson	63	1365	253	19	163	12	47	3	1120	82	4	0
Jefferson	64	1592	189	12	122	8	518	33	917	58	0	0
Jefferson	65	3457	307	9	514	15	1799	52	846	24	234	7
Jefferson	66	3974	286	7	976	25	1290	32	1220	31	393	10
Jefferson	67	2910	218	7	257	9	1892	65	594	20	89	3
Jefferson	68	2255	217	10	594	26	889	39	461	20	311	14
Jefferson	69	3208	513	16	957	30	131	4	1841	57	244	8
Jefferson	70.01	6181	935	15	1778	29	966	16	2689	44	477	8
Jefferson	70.02	4346	567	13	1505	35	845	19	806	19	837	19
Jefferson	71	3545	494	14	1854	52	1348	38	196	6	91	3
Jefferson	101	3184	194	6	391	12	2219	70	454	14	109	3
Jefferson	102	2083	200	10	557	27	867	42	640	31	19	1
Jefferson	103	2664	269	10	687	26	1410	53	507	19	3	0
Jefferson	104	2982	512	17	2372	80	319	11	114	4	126	4
Jefferson	105	4241	701	17	1929	45	1570	37	479	11	219	5
Jefferson	106	5352	778	15	3859	72	1191	22	57	1	14	0
Jefferson	107	3219	593	18	2737	85	320	10	67	2	36	1
Jefferson	108	4856	564	12	4091	84	362	7	205	4	46	1

Table 1: (Continued) Title VI Populations by Census Tract

County	Tract	Total Population	65 and older	Percent 65 and Older	White	Percent White	Hispanic	Percent Hispanic	Black	Percent Black	Asian	Percent Asian
Jefferson	109.01	3286	598	18	2782	85	86	3	175	5	148	5
Jefferson	109.02	4735	919	19	3531	75	510	11	154	3	491	10
Jefferson	110.01	4991	689	14	3994	80	653	13	50	1	32	1
Jefferson	110.02	3523	571	16	3036	86	355	10	71	2	0	0
Jefferson	111.01	4613	849	18	3849	83	609	13	55	1	27	1
Jefferson	111.02	2773	430	16	2115	76	541	20	38	1	43	2
Jefferson	112.01	8601	1170	14	6339	74	1201	14	756	9	305	4
Jefferson	112.02	3552	15	0	1183	33	1129	32	1230	35	5	0
Jefferson	112.03	2202	36	2	669	30	657	30	859	39	1	0
Jefferson	113.02	5270	155	3	1123	21	1911	36	2025	38	73	1
Jefferson	113.03	2308	466	20	2111	91	182	8	0	0	15	1
Jefferson	113.04	3325	404	12	2672	80	151	5	386	12	86	3
Jefferson	114	7710	1269	16	4943	64	1187	15	1512	20	0	0
Jefferson	115	2459	363	15	2110	86	239	10	85	3	0	0
Jefferson	116	1832	258	14	1483	81	322	18	23	1	0	0
Jefferson	117	1574	282	18	210	13	706	45	658	42	0	0
Jefferson	118	1603	263	16	134	8	130	8	1339	84	0	0
Jefferson	9800	167	32	19	34	20	23	14	0	0	97	58

Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

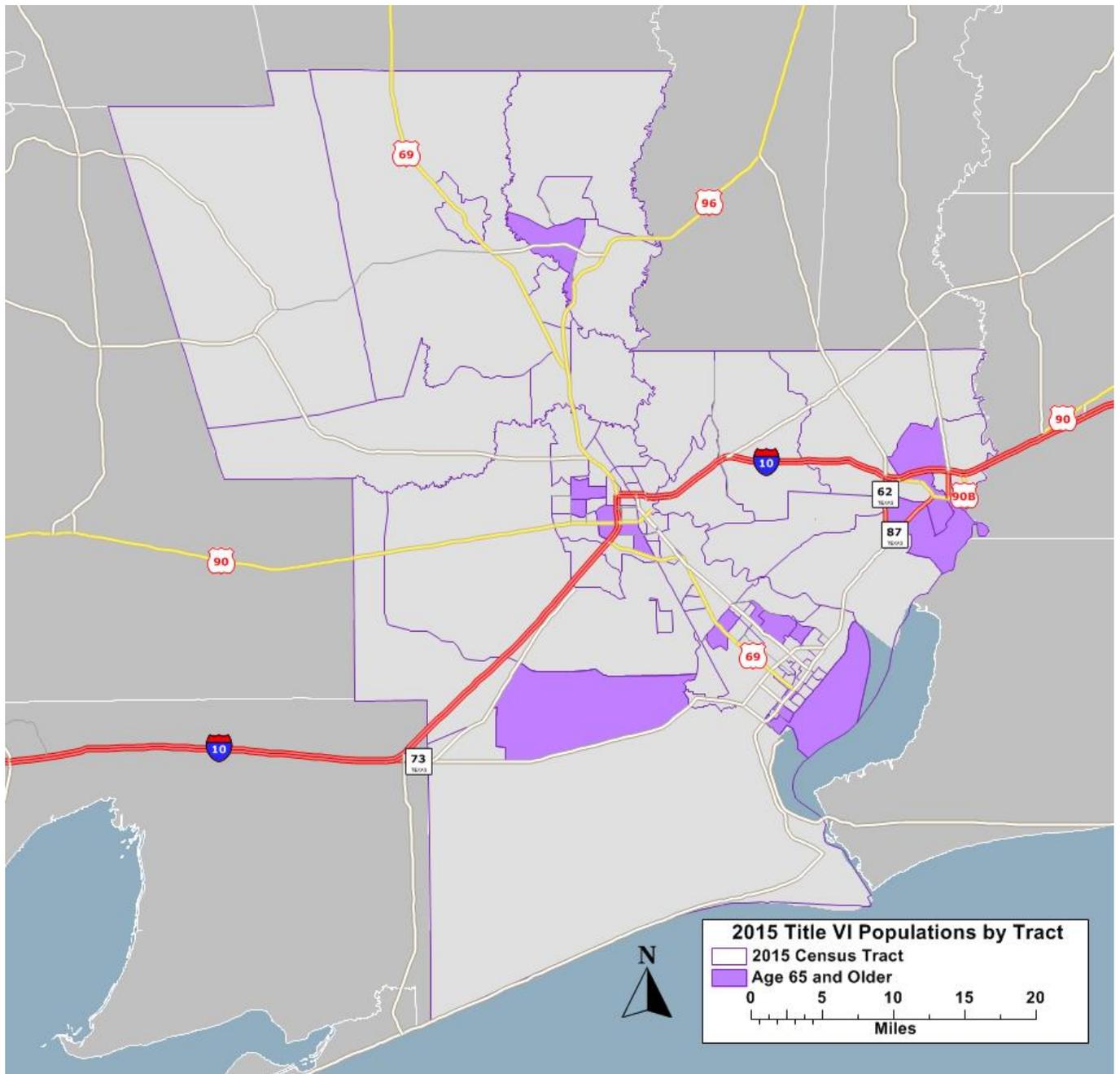
For the age category, there are 53,732 persons aged 65 or over out of a total population of 391,464. This is 13.7% of the total population. In order to identify the most significant areas of interest, the threshold was set as Tracts that have 18% of more of their population aged 65 and over, based on a natural breaking point in the data.

Minority populations total 166,753, comprising 42.6% of the regional population. The threshold value for minority populations was set to this value to identify Tracts that have a greater proportion of minority population than the region as a whole.

Only the Hispanic, Black, and Asian populations had Tracts that met the threshold values. There is a total of 1,087 American Indians in the region, but their maximum value of the percentage of Tract population is only 2.7%. For Hawaiians and Other Pacific Islanders, there are only 132 total persons in the region, with a maximum percentage of a Tract's population at less than 1%. In contrast, the maximum value for the percentage of population in a Tract for Hispanics of any race is 69.7%; for Blacks the maximum value is 95.5%; and for Asians it is 58.1%.

**Figure 1** identifies the locations of the Census Tracts that contribute most significantly to the population aged 65 or over. Areas of interest include Tracts in Silsbee, Beaumont, Nederland, Port Arthur, and Orange.

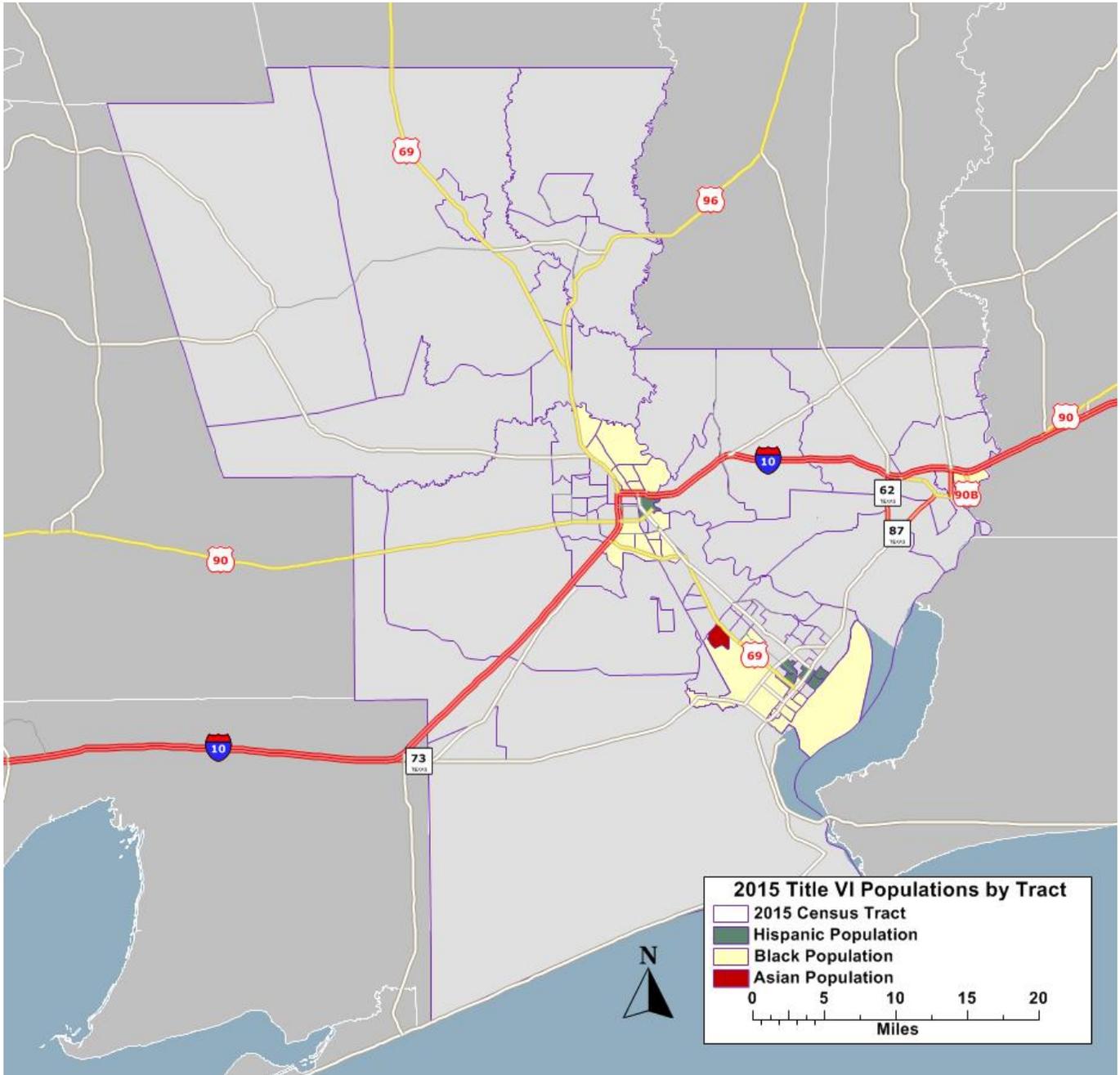
*Figure 1: Census Tracts That Contribute Most Significantly to the Total Population Aged 65 and Over*



Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

Tracts that contribute significantly to the Hispanic, Black, or Asian populations are shown in **Figure 2**. Tracts that contribute most significantly to these areas of interest for Title VI populations lie in Beaumont, Nederland, Port Arthur, and Orange.

Figure 2: Census Tracts That Contribute Most Significantly to Minority Populations



Source: 2011-2015 American Community Survey 5-Year Estimates, Table B16001

## Appendix 2 - Title VI Complaint Form

<b>Section I:</b>					
Name:					
Address:					
Telephone (Home):			Telephone (Work):		
Electronic Mail Address:					
Accessible Format Requirements?		Large Print	TDD	Audio Tape	Other:
<b>Section II:</b>					
Are you filing this complaint on your own behalf?			Yes (If "yes" go to Section III)		No
If not, please supply the name of the person for whom you are complaining:					
Please explain why you have filed for a third party:					
Have you obtained permission of the aggrieved third party to file this complaint?			Yes		No
<b>Section III:</b>					
I believe the discrimination I experienced was based on (check all that apply):					
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin					
Date of Alleged Discrimination (Month, Day, Year): _____					
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved, including witnesses. If more space is needed, please use the back of this form. You may also attach any written materials or other information that you think is relevant to your complaint.					
_____					
_____					
<b>Section IV:</b>					
Have you previously filed a Title VI complaint with this agency?			Yes		No
<b>Section V:</b>					
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court?					
<input type="checkbox"/> Yes <input type="checkbox"/> No					
If yes, check all that apply:					
<input type="checkbox"/> Federal Agency: _____			<input type="checkbox"/> State Agency: _____		
<input type="checkbox"/> Federal Court: _____			<input type="checkbox"/> Local Agency: _____		
<input type="checkbox"/> State Court: _____					
<b>Section VI:</b>					
Name of agency complaint is against:					
Contact Person:			Title:		

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person at the address below, or mail this form to: South East Texas Regional Planning Commission-MPO, Title VI Coordinator, 2210 Eastex Freeway, Beaumont, Texas 77703