

TITLE VI 2020

Greenville-Pickens Area Transportation Study

*Environmental
Justice State
of South Carolina*

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Policy Statement

The Greenville-Pickens Area Transportation Study (GPATS) is committed to ensuring the fundamental principles of equal opportunity are upheld in all decisions involving our employees and contractors/consultants and to ensuring that the public-at-large is afforded access to our programs and services.

To that end, no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to mistreatment under any GPATS program or activity on the grounds of race, color, or national origin. GPATS assures all its programs and activities will be free from mistreatment, whether those programs and activities are federally funded or not.

GPATS conducts its Title VI/Environmental Justice Program in a team approach involving all GPATS personnel. The Director of GPATS is responsible to ensure GPATS' compliance with the Title VI/EJ implementing regulations.

Inquiries concerning GPATS' policies, investigations, reports and compliance with applicable laws, regulations, and concerns regarding compliance with Title VI/Environmental Justice may be directed to the Director at Greenville-Pickens Area Transportation Study, 301 University Ridge, Ste 3800, Greenville, South Carolina 29601, telephone 864-467-7143.

This policy statement must be circulated throughout GPATS and be included by reference in all contracts, agreements, programs, and services administered by GPATS.

March 16,
2020

Keith Brockington, GPATS Executive Director

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March 16,
2020



Keith Brockington, GPATS Executive Director

GPATS Title VI Assurance

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

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to the Federal Aid highway program:

1. That the Recipient agrees that each “program” and each “facility” as defined in subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and, in adapted form, in all proposals for negotiated agreements:

The (Recipient), in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-mistreatment in Federally-assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, Non-White business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be mistreated on the grounds of race, color, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix A of this assurance in every contract subject to the Act and the Regulations.
4. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

5. That where the Recipient receives federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
6. That this assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, except where the federal financial assistance is to provide, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Recipients or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; of (b) the period during which the Recipient retains ownership or possession of the property.
7. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this assurance.

Appendix A

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:

Compliance with Regulations: The contractor (Hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-mistreatment in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration (FHWA), and Federal Transit Administration (FTA), as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.

- (1) Non-mistreatment:** The Contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the mistreatment prohibited by Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR part 21. This includes FHWA or FTA specific program requirement.
- (2) 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 will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-mistreatment on the grounds of race, color, or national origin. This includes FHWA or FTA specific program requirements.
- (3) Information and Reports:** The contractor will provide all information and report required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)*, **the FEDERAL HIGHWAY ADMINISTRATION (FHWA)**, or **the FEDERAL TRANSIT ADMINISTRATION (FTA)** to be pertinent to ascertain compliance with such Acts, Regulations, instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)*, FHWA or the FTA, as appropriate, and will set forth what efforts it has made to obtain the information.
- (4) Sanctions for Noncompliance:** In the event of the contractor's noncompliance with the Non-mistreatment provisions of this contract, the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* will impose such contract sanctions as it or **the FEDERAL HIGHWAY ADMINISTRATION (FHWA)**, or **the FEDERAL TRANSIT ADMINISTRATION (FTA)** 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.

(5) Incorporation of Provisions: The contractor will include the provisions of paragraphs one (1) through six (6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontractor procurement as the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* the *FEDERAL HIGHWAY ADMINISTRATION (FHWA)*, or the *FEDERAL TRANSIT ADMINISTRATION (FTA)* may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with, litigation with a subcontractor, or supplier because of such direction, the contractor may request the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* to enter into any litigation to protect the interests of the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)*. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Appendix B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* will accept Title to the lands and maintain the project constructed thereon, in accordance with the appropriate legislative authority, the Regulations for the Administration of its programs and activities, and the policies and procedures prescribed by *the FEDERAL HIGHWAY ADMINISTRATION or the FEDERAL TRANSIT ADMINISTRATION* of the U.S. Department of Transportation in accordance with and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-mistreatment in federally assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. §2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the SCDOT all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

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

The *Greenville-Pickens Area Transportation Study (GPATS) (MPO)*, in consideration or the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person will on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to mistreatment with regard to any facility located wholly or in part on over or under such lands hereby conveyed [,] [and)* (2) that the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* will use the lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, SubTitle A, Office of the Secretary, Part 21, Non-mistreatment in federally assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned non-mistreatment conditions, the Department will have a right to enter or re-enter said lands and facilities on said land, and the above described land and facilities will thereon revert to and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

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

Appendix C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in all deeds, licenses, leases, permits, or similar instruments entered into by the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* pursuant to the provisions of Assurance 7(a):

- A. The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree [in the case of deeds and leases add "as a covenant running with the land"] that:
 1. In the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all other requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to mistreatment in the use of said facilities.
- B. With respect to licenses, leases, permits, etc., in the event of a breach of any of the above Non-mistreatment covenants, *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said land and the facilities thereon, and hold the same as if said [licenses, lease, permit, etc.] had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-mistreatment covenants, *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* will have the right to enter or reenter said lands and facilities thereon, and the above described lands and facilities will thereupon revert to and vest in and become the absolute property of *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* and its assigns.*

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

Appendix D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in all deeds, licenses, leases, permits, or similar instruments entered into by the *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, lessee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases add "as a covenant running with the land") that:
 - (1) no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to mistreatment in the use of said facilities,
 - (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to mistreatment, and
 - (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-mistreatment covenants, *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* will have the right to terminate the (license, permit, etc., as appropriate) and enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-mistreatment covenants, *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* will have the right to enter or reenter said lands and facilities thereon, and the above described lands and facilities will thereupon revert to and vest in and become the absolute property of *Greenville-Pickens Area Transportation Study (GPATS) (MPO)* and its assigns.*

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

Appendix E

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the “contractor”) agrees to comply with the following non-mistreatment statutes and authorities, including but not limited to:

Pertinent Non-Mistreatment Authorities:

- Title VI of the 1964 Civil Rights Act (42 U.S.C. 2§000 *et seq.*, 78 stat. 252), (prohibits mistreatment on the basis of race, color, national origin); and 49 CFR Part 21;
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. §4601) Prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects;
- The Federal-aid Highway Act of 1973, (23 U.S.C. §324 *et seq.*), (prohibits mistreatment on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. 794 *et seq.*), as amended, (prohibits mistreatment on the basis of disability); and 49 CFR Part 27;
- The Age Mistreatment Act of 1975, as amended (42 U.S.C. §6101 *et seq.*), (prohibits mistreatment on the basis of age);
- Airport and Airway Improvement Act of 1982, (42 U.S.C. §47123), as amended, (prohibits mistreatment on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (P.L. 100-209), (Broadened, the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Mistreatment Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms “programs or activities” to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit mistreatment on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§12131-12189) as implemented by Department of Transportation regulations at 49 CFR Parts 37 and 38;
- The Federal Aviation Administration’s Non-mistreatment statute (49 U.S.C. §47123) (prohibits mistreatment on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Non-White Populations and Low-Income Populations, which ensures Non-mistreatment by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on Non-White and low-income populations;

- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin mistreatment includes mistreatment because of [Limited English proficiency \(LEP\)](#). To ensure compliance, recipients must take reasonable steps to ensure that LEP persons have meaningful access to programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendment of 1972, as amended, which prohibits mistreatment on the basis of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Recipient under the Federal Aid highway program and is binding on it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal Aid highway program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Recipient.

March 16,
2020

Greenville-Pickens Area Transportation Study

Recipient

Keith Brockington, GPATS Executive Director

- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin mistreatment includes mistreatment because of Limited English proficiency (LEP). To ensure compliance, recipients must take reasonable steps to ensure that LEP persons have meaningful access to programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendment of 1972, as amended, which prohibits mistreatment on the basis of sex in education programs or activities (20 U.S.C. 1681 *et seq.*).

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March 16,
2020

Greenville-Pickens Area Transportation Study

Recipient



Keith Brockington, GPATS Executive Director

Authorities

Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000-4;

42 USC 4601 to 4655; 23 USC 109(h);

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 denied the benefits of, or be otherwise subjected to mistreatment under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.9 and 49 CFR 21).

The Civil Rights Restoration Act of 1987 also 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 contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).

Federal Aid Highway Act of 1973, 23 USC 324: No person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to mistreatment under any program or activity receiving federal assistance under this title or carried on under this title.

Age Mistreatment Act of 1975, 42 USC 6101: No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to mistreatment under, any program or activity receiving federal financial assistance.

Americans With Disabilities Act of 1990 PL 101-336: No qualified individual with a disability shall, by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to mistreatment by a department, agency, special purpose district, or other instrumentality of a state or a local government.

Section 504 of the Rehabilitation Act of 1973: No qualified handicapped person shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subjected to mistreatment under any program or activity that receives or benefits from federal financial assistance.

Circulator 4702.1B: The purpose of this circular is to provide recipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation (“DOT” or “the Department”) Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to [Limited English Proficient \(LEP\)](#) Persons (70 FR 74087, December 14, 2005).

USDOT Order 1050.2: Standard Title VI Assurances

EO 12250: Department of Justice Leadership and coordination of Non-mistreatment Laws.

EO 12898: Federal Actions to Address Environmental Justice in Non-White Populations and Low-Income Populations; and

28 CFR 50.3: Guidelines for the enforcement of Title VI, Civil Rights Act of 1964.

EO 13166: Improving Access to Services for Persons with Limited English Proficiency

Administration - General

The GPATS Director shall have lead responsibility for coordinating the administration of the Title VI/Environmental Justice (Title VI/EJ) and related statutes, program, plan, and assurances. Special emphasis program areas for GPATS are Public Transit, Planning Assistance and Program Management. GPATS has developed a Public Involvement Process, which will be used in conjunction with the Title VI/Environmental justice program and is include by reference.

- Reports

If any individual believes that they or any other program beneficiaries have been the object of an unequal treatment or mistreatment as to the receipt of benefits and/or services, or on the grounds of race, color, national origin, they may exercise their right to file a report with GPATS. Reports may be filed with the GPATS Director. Every effort will be made to resolve Reports informally at the lowest level.

Reports may also be filed directly with the Federal Highway Administration.

- Data Collection

Statistical data on race, color, and national origin, of participants in, and beneficiaries of the GPATS programs, e.g., relocates, impacted citizens, and affected communities, will be gathered and maintained by GPATS. The gathering procedures will be reviewed annually to ensure sufficiency of the data in meeting the requirements of the Title VI/EJ program.

- GPATS Reviews

Special emphasis program reviews will be conducted based on the annual summary of Title VI activities, accomplishments and problems. The reviews will be conducted by GPATS to assure effectiveness in their compliance of Title VI/EJ provisions. The GPATS Director will coordinate efforts to ensure the equal participation in all their programs and activities at all levels.

- Title VI/EJ Reviews on Sub-recipients

Title VI/EJ compliance reviews will be conducted annually by the GPATS Director. Priority for conducting reviews will be given to those recipients of federal (US Department of Transportation) funds with the greatest potential of impact to those groups covered by the act. The reviews will entail examination of the recipients' adherence to all Title VI/EJ requirements. The status of each review will be reported in the annual update and report to relevant US Department of Transportation (US DOT) modes (e.g. FHWA, Federal Transit Administration).

- Annual Reports

An annual report will be required by August 1 of each year. The GPATS Director will be responsible for coordination and compilation of these reports. Said reports are to be submitted by September 1 to the South Carolina Department of Transportation (SCDOT) and Federal Highway Administration. These reports will review Title VI/EJ accomplishments achieved during the year and goals for the next year.

- Title VI/EJ Plan Updates

An annual update of the Title VI implementing plan will be submitted by October 1 to the Federal Highway Division Administrator for approval or disapproval.

- FTA Title VI Compliance Reviews

Triennial Reviews by FTA as required by Circular 4702.1, Title VI Program Guidelines for Federal Transit Administration recipients. The report may be submitted more often should conditions warrant. Currently the City of Greenville has taken over the FTA funds and transit operations of GTA.

- Public Dissemination

GPATS will disseminate Title VI/EJ program information to GPATS employees and to the general public. Title VI/EJ program information will be submitted to sub-recipients, contractors, and beneficiaries. Public dissemination will include inclusion of Title VI/EJ language in contracts and publishing the Title VI/EJ Policy Statement on GPATS's Web site.

- Remedial Action

GPATS will actively pursue the prevention of Title VI/EJ deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When deficiencies are found, procedures will be promptly implemented to correct the deficiencies and to put in writing the corrective action(s). The period to determine corrective action(s) and put it (them) in writing to effect compliance may not exceed 90 days from the date deficiencies are found.

Special Emphasis Program Areas

Planning

Develop the Metropolitan Planning Organization's (MPO's) input into the State Transportation Improvement Program (STIP) and the 6-Year Plan. The MPO is also responsible for developing a 20-Year Plan and the Transportation Improvement Program (TIP) to meet present and future needs for safe, adequate, and efficient transportation. Planning also encompasses clean air issues, safety, pavement management, transportation analysis, transportation reporting, inventory, research, mapping, major project studies and training and technical assistance for communities.

- GPATS Director will:
 - Ensure that all aspects of the planning process operation, including environmental impact reviews, comply with Title VI/EJ.
 - Serve as a resource person helping to ensure participation of a cross section of people representative of the affected population, including various and diverse social, economic, and ethnic interest groups are represented in the planning process.
 - Provide the annual report on Title VI/EJ accomplishments for the previous year and goals for the next year.
 - Ensure equal opportunity for participation on Advisory Committees.
 - Ensure Title VI/EJ language is included or incorporated by reference in every sub-recipient contract.

Transit

Coordinate local planning efforts with respect to transit.

- GPATS Director will:
 - Encourage land-use development and density that supports transit and multi modal opportunities.
 - Collaborate with City Planners and Greenville Transit Authority and Clemson Area Transit in the development of transit or multimodal studies and plans,
 - Develop transportation projects that are designed to provide safe transit stops and bike lanes or other amenities that encourage other modes of travel.

Notice to the Public under Title VI for GPATS

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to mistreatment under any program or activity receiving Federal financial assistance.

- Greenville-Pickens Area Transportation Study (GPATS) operates its programs and services without regard to race, color, and national origin in accordance with the Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a report with GPATS.
- For more information contact the GPATS Executive Director Keith Brockington at kbrockington@greenvillecounty.org or (864) 467-7143 or the Title VI Coordinator Asangwua Ikein at aikein@greenvillecounty.org or (864) 467-7287.
- If information is needed in another language, contact (864) 467-7270.
- A reportee may file a report directly with the Federal Transit Administration by filing a report with the Office of Civil Rights,
 - Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave, SE
Washington, DC 20590

~Si se necesita información en otro idioma llame al (864) 467-7270.

As outlined in the [Public Participation Plan \(PPP\)](#), GPATS' public notices in public areas of the agency's offices, posted to <http://gpats.org/AboutGPATS/Calendar.aspx>, meeting notices and calendar events are listed by Greenville County, at <https://www.greenvillecounty.org/apps/CalendarGC/CountyCouncil.aspx>, as meeting rooms are reserved, and any public notices of official changes to plans (e.g., TIP Amendments) are published with the Greenville News.

Report Procedures

Investigation

Investigation Plan

The investigator (only an individual who is trained in civil rights) shall prepare a written plan which includes, but is not limited to, the following:

- Names of the reportee(s) and respondent(s);
- Basis for the report;
- Issues, events, or circumstances that caused the person to believe that they has been mistreated;
- Information needed to address the issue;
- Criteria, sources necessary to obtain the information;
- Identification of key people;
- Estimated investigation time line; and
- Remedy sought by the reportee(s).

Conducting the Investigation

- The investigation will address only those issues relevant to the allegations in the report.
- Confidentiality will be maintained as much as possible.
- Interviews will be conducted to obtain facts and evidence regarding the allegations in the report. The investigator will ask questions to elicit information about aspects of the case.
- A chronological contact sheet is maintained in the case file throughout the investigation.
- Only individuals trained in civil rights should conduct mistreatment investigations.

Investigation Reporting Process

- Within 40 days of receiving the report, the investigator prepares an investigative report and submits the report and supporting documentation to the Human Resources Director or their designee for review.
- The Director or designee reviews the file and investigative report. Subsequent to the review, the Director makes a final determination of “probable cause” or “no probable cause” and prepares the final decision letter.

Reporting Requirements to an External Agency

A copy of the report, together with a copy of the investigation report and the Director’s final decision letter, is forwarded to the Federal Highway Administration South Carolina Division Office within 60 days of the date the report was received.

Records

All records and investigative working files are maintained in a confidential area. Records are kept for three years.

Filing a Report

Introduction

The Title VI/Environmental Justice and Related Statutes report procedures are intended to provide aggrieved persons an avenue to raise reports of mistreatment regarding GPATS' programs, activities and services as required by statute.

Purpose

The purpose of the mistreatment report procedures is to describe the process used by the Office of Human Resources (OHR) for processing reports of mistreatment under Title VI of the Civil Rights Act of 1964 and related statutes.

Roles and Responsibilities

The GPATS Executive Director has overall responsibility for the mistreatment report process and procedures. The Director may, at their discretion, assign a capable person within GPATS to investigate the report.

The designated investigator will conduct an impartial and objective investigation, collect factual information and prepare a fact-finding report based upon the information obtained from the investigation.

In cases where the reportee is unable or incapable of providing a written statement, the reportee will be assisted in converting the verbal report into a written report. All reports, however, must be signed by the reportee and/or by the reportee's representative.

The reportee shall make themselves reasonably available to the designated investigator, to ensure completion of the investigation within the timeframes set forth.

Filing Reports

Applicability: The report procedures apply to the beneficiaries of the GPATS programs, activities and services including, but not limited to, the public, contractors, subcontractors, consultants and other sub-recipients of federal and state funds.

Eligibility: Any person who believes that they or any specific class of persons has been subjected to mistreatment or retaliation prohibited by Civil Rights authorities may file a report. The report:

- Must be based upon race, color, and national origin;
- Must be reduced to writing; and
- Must be filed within 180 calendar days of the alleged occurrence or when the alleged mistreatment became known to the reportee.

This plan requires that SCDOT be immediately notified of any report or allegation of mistreatment. Every effort will be made to obtain early resolution of reports at the lowest possible level. The option of informal mediation meeting(s) between the affected parties and the investigator may be utilized for resolution, at any stage of the process.

Time Limitation and Filing Options Title VI/EJ reports of mistreatment may be filed with:

- GPATS
- South Carolina Department of Transportation
- Federal Highway Administration
- U.S. Department of Transportation

In all situations, the GPATS and County employees must contact the GPATS Executive Director immediately upon receipt of a Title VI/EJ report.

Keith R. Brockington, AICP
County Transportation Planning Manager/GPATS Executive Director
Greenville County Department of Planning and Code Compliance
GPATS | Greenville-Pickens Area Transportation Study
(864)-467-7143
kbrockington@greenvillecounty.org

Reports must be filed no later than 180 calendar days after:

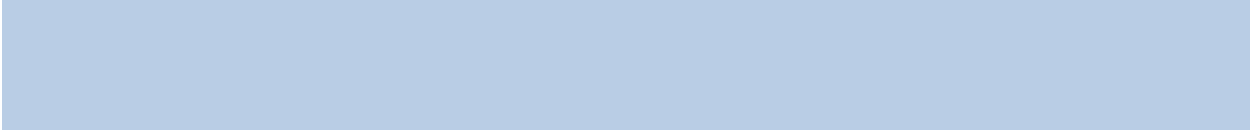
- The date of the alleged act of mistreatment; or
- The date the person became aware of the alleged mistreatment; or
- Where there has been a continuing course of discriminatory conduct, the date on which the conduct was discontinued.

Receipt and Acceptance When any element of the Greenville-Pickens Area Transit Study (GPATS) receives an inquiry, comment or report which alleges or implies mistreatment as addressed by Title VI of the Civil Rights Act of 1964 and its progeny, it will be logged in and immediately forwarded to the SCDOT's Office of Business Development and Special Programs.

The GPATS Executive Director will respond within ten (10) calendar days from date of receipt, advising receipt of the report and that the matter was forwarded to SCDOT for further processing. The Director's letter will also contain the appropriate SCDOT contact information.

GPATS will fully cooperate with the appropriate agency throughout the entire investigative process.

Reports must be in writing and must be signed by the reportee and/or the reportee's representative. The report must set forth as fully as possible the facts and circumstances surrounding the claimed mistreatment. In the event a person makes a verbal report of mistreatment to a GPATS employee, or other person authorized to receive reports on behalf of GPATS, shall interview the person. If



necessary, the authorized person will assist the person in writing the report for the person or the person's representative to sign.

Designated GPATS special emphasis area operating elements will require the sub-recipients they serve to forward to the Director any report of mistreatment made to them about their own actions or actions of sub-grantees or contractors.

Internal Report Processing

Initial Contact

Special emphasis program area representatives serve as GPATS's resources for members of the public who wish to file a mistreatment report under Title VI/EJ and related statutes. As resources, they will provide reportees with:

1. An explanation of their filing options;
2. The mistreatment report process; and
3. A Title VI/EJ and Related Statutes Mistreatment report Form.

Use of the Report Form is not necessary for the reportee. Rather, it is intended to help the reportee provide enough information to begin processing the report.

The Report Review Process

1. The Director or their designee, reviews the report upon receipt to ensure that relevant information is provided, the report is timely, and meets jurisdiction.
2. The report shall be investigated, unless:
 - The report is withdrawn.
 - The reportee fails to provide required information.
 - The report is filed beyond the 180 calendar day timeframe.
 - The reportee is not part of a protected group.
 - The report is determined to be more appropriately under a jurisdiction other than GPATS. If this is the case, the reportee will be directed to the appropriate agency.
3. Upon determination that the report warrants a GPATS investigation, the reportee is sent a letter, acknowledging receipt of the report, and giving the name of the investigator.
4. The respondent – the person alleged to have committed the mistreatment -- is notified by mail that they have been named in a report. The letter also includes the investigator's name and informs the respondent that they will be contacted for an interview.

Title VI Liaison

The Title VI Liaison for the GPATS region is Asangwua Ikein. The Title VI Liaison duties include;

- Having a working knowledge of Title VI and the report process.
- Attending training on the Title VI and other Non-mistreatment authorities when offered.
- Disseminating Title VI information to the public and in languages other than English, when necessary.
- Coordinating and execute Title VI educational and outreach activities.
- Implementing procedures for the prompt processing of Title VI mistreatment reports.
- Developing a process to collect data on race, color, or national origin so these groups are included and not disproportionately impacted.
 - GPATS collects any and all Title VI Reports via GPATS' [Title VI Report Form](#). Any reports are then investigated in conjunction with SCDOT Public Involvement & Title VI Office of Planning & Asset Management.
 - Also, GPATS collects its demographic data for vulnerable group locations in the GPATS region from the US census.
- Committing 10% of administrative work time on Title VI.

The Title VI Liaison for the GPATS can be reached at;
Asangwua Ikein
Transit Planner/Grants Manager
Greenville-Pickens Area Transportation Study ([GPATS](#))
Greenville County Square
301 University Ridge, Suite 3800, Greenville, SC 29601
(864) 467-7287 (work)
(864) 467-7161 (fax)
AIkein@greenvillecounty.org

GPATS is committed to ongoing training for the Title VI Liaison.

March 16,
2020

Keith Brockington, GPATS Executive Director

Title VI Liaison


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March 16,
2020



Keith Brockington, GPATS Executive Director

Title VI Report Form



Greenville-Pickens Area Transportation Study

Section I:

Name: _____

Address: _____

Telephone
Home: _____ Work: _____ Cell: _____

Email: _____

Accessible Format Requirements?

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> Large Print | <input type="checkbox"/> Audio Tape |
| <input type="checkbox"/> Telecommunication Device for the Deaf (TTY's) | <input type="checkbox"/> Other: _____ |

Section II:

Are you filing this report on your own behalf?

- Yes* No

*If you answered "yes" to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are reporting:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

- Yes No

Section III:

I believe the mistreatment I experienced was based on (check all that apply):

- Race Color National Origin

Date of Alleged Incident (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were mistreated. Describe all persons who were involved. Include the name and contact information of the person(s) who mistreated you (if known) as well as names and contact information:

Signature of Reportee

Date



Or mail/fax to: Keith Brockington/Asangwua Ikein
Greenville County Square
301 University Ridge, Suite 3800
Greenville, SC 29601
Fax: (864)-467-7161

Title VI Report Log

Year: _____

Name of Reportee	Date Report Received	Mistreatment Based On?	Address	Telephone	Remarks/Final Disposition

Investigations, Reports, & Lawsuits

GPATS has no past or current reports.

Public Participation Plan (PPP)

GPATS has created a [PPP](#) that can be found on the GPATS website.

Limited English Proficient (LEP) Plan

GPATS has created a [LEP Plan](#) that can be found on the GPATS website.

Note: GPATS is assuming that LEP populations that don't speak English "very well" might also be immigrant populations.

Facility Site Equity Analysis

GPATS doesn't operate any transit services.

Fixed Route Transit Provider Requirements

GPATS doesn't operate any transit services.

GPATS Advisory Team

GPATS Advisory Team is its Study Team. GPATS encourages participation of Non-White members. Nevertheless, GPATS' Study Team is voluntary and comprised of engineers, planners, and public works officials that serve the counties and local municipalities within GPATS' boundaries. GPATS has no so control or say over who counties and local municipalities assign to GPATS' Study Steam.

Table 1: GPATS Study Team

Study Team Members		Sex		Race				Hispanic or Latino(a)
		Male	Female	White	Asian	American Indian or Alaska Native	Black or African American	
	Total	43	26	59	0	0	10	0
	Percentage	62.32%	37.68%	85.51%	0.00%	0.00%	14.49%	0.00%
1	Keith Brockington, AICP, GPATS Executice Director	✓		✓				
2	Brennan Groel, AICP, GPATS Transportation Planner		✓	✓				
3	Asangwua Ikein, AICP, GPATS Transit Planner/Grants Manager	✓					✓	
4	Hesha Gamble, PE, Greenville County County Engineer		✓				✓	
5	Kurt Walters, Greenville County Traffic Engineer	✓		✓				
6	Judy Wortkoetter, PE, Greenville County Land Development		✓	✓				
7	Paula Gucker, Greenville County Assistant County Administration		✓	✓				
8	Sarah Holt, Greenville County Director of Planning & Zoning		✓	✓				
9	Rashida Jeffers-Campbell, Greenville		✓				✓	

	County Sub-Division Administrator							
10	Ty Houck, Geenville County Rec	✓		✓				
11	Dwayne Cooper, PE, City of Greenville City Engineering	✓		✓				
12	Valerie Holmes, PE, City of Greenville Traffic Engineer		✓	✓				
13	Clint Link, PE, City of Greenville Engineering	✓		✓				
14	Mike Murphy, PE, City of Greenville Engineering	✓		✓				
15	Jonathan Graham, City of Greenville Planning Director	✓		✓				
16	Edward Kinney, City of Greenville Landscape Architecture	✓		✓				
17	Skip Limbaker, Greenville County Schools Planning	✓		✓				
18	James Keel, Greenlink Director	✓		✓				
19	Kayleigh Sullivan, Greenlink Transit Planning Manager		✓	✓				
20	Nicole McAden, Greenlink Marketing & Program Manager		✓	✓				
21	Shawn Bell, City of Fountain Inn City Administrator	✓		✓				
22	Gregory Gordos, City of Fountain Inn City Planner	✓		✓				
23	Steve Grant, PE, City of Greer Engineer	✓		✓				
24	Brandon McMahan, City of Greer Planning Director		✓	✓				

25	Brandon Madden, City of Mauldin City Administrator	✓					✓	
26	David Dyrhaug, City of Mauldin Planning Director	✓		✓				
27	Jason Knudsen, City of Simpsonville Planning Director	✓		✓				
28	Dianna Gracely, City of Simpsonville City Administrator		✓	✓				
29	Tony Cirelli, City of Perndleton Planning Director	✓		✓				
30	David Poulson, City of Pickens City Administrator	✓		✓				
31	Todd Steadman, City of Clemson Planning Director	✓		✓				
32	Kent Guthrie, City of Clemson, City Engineer	✓		✓				
33	Chris Brink, Pickens County Planning Director	✓		✓				
34	Rodney Robinson, Pickens County County Engineer	✓		✓				
35	Patrea St. John, City of Travelers Rest Planning Director		✓	✓				
36	Jon Caime, Laurens County, County Administrator	✓		✓				
37	Dale Satterfield, Laurens County Director of Public Works	✓		✓				
38	Stephen Steese, City of Easley City Administrator	✓		✓				
39	Bruce Evilsizor, City of Liberty City Administrator	✓		✓				

40	Brian Petersen, Mayor of Liberty	✓		✓				
41	Blake Sanders, City of Easley Planning & Projects Manager	✓		✓				
42	Heather Lollis, CATbus Budget & Grants Manager		✓	✓				
43	Peter Knudsen, Clemson University Campus Planning	✓		✓				
44	Katerina Moreland, Clemson University Campus Transportation Planning Director		✓	✓				
45	Jeff Parkey, Anderson County Planning Manager	✓		✓				
46	Lisa Mann, Anderson County Planning		✓	✓				
47	Rhonda Sloan, Anderson County Transportation Planner		✓				✓	
48	Dyke Spencer, Executive Director, Powdersville Water District	✓		✓				
49	Chip Bentley, AICP, ACOG Planning Director	✓		✓				
50	Steve Pelissier, ACOG Executive Director	✓		✓				
51	Lance Estep, ACOG Transportation Planner	✓		✓				
52	Christie Hall, PE, SCDOT Secretary of Transportation	✓		✓				
53	Doug Frate, SCDOT Statewide Planning	✓		✓				
54	Brian Fulmer, SCDOT Planning	✓		✓				
55	Erica Hailey, SCDOT Preconstruction		✓				✓	
56	Stephanie Jackson-Amell, SCDOT		✓	✓				

	District Engineering Administrator							
57	Christina Lewis, SCDOT, Statewide Planning		✓	✓				
58	Casey Lucas, SCDOT Preconstruction		✓	✓				
59	Kenny Larimore, SCDOT Statewide Planning	✓		✓				
60	Renee Miller-Cotton, SCDOT Regional Program Manager		✓				✓	
61	Johnny Mmanu-ike, SCDOT Multi-Modal Planning	✓					✓	
62	Craig Nelson, SCDOT Engineering	✓		✓				
63	Machael Perterson, SCDOT Statewide Planning Chief		✓				✓	
64	Penny Phillips, SCDOT Engineering		✓	✓				
65	Brandon Wilson, SCDOT Engineering	✓		✓				
66	Diane Lackey, SCDOT Intermodal & Freight Programs		✓	✓				
67	Jessica Hekter, FWHA Planning		✓	✓				
68	Mark Pleasant, FHWA Planning	✓		✓				
69	Yolanda Morris, FHWA Planning		✓				✓	

System-wide Standards and Polices

GPATS doesn't operate any transit services.

Monitoring of Sub-recipients

Title 49 CFR Section 21.9(b) states the following:

Each recipient shall keep such records and submit to the Secretary timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this part. In the case in which a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part. In general recipients should have available for the Secretary racial and ethnic data showing the extent to which members of Non-White groups are beneficiaries of programs receiving Federal financial assistance.

Currently, GPATS has only two sub-recipients:

1. Senior Solution
2. Turning Point of SC

If an application is granted, sub-recipients will be required to sign a Title VI affirmation of compliance before any funding can be allocated. Upon award of funding, sub-recipients will be required to sign and operate within the FTA certifications and assurances. Sub-recipient will be required to provide demographic information on the race and English proficiency of residents they served. This information will assist the sub-recipient in assessing the level and quality of service it provides to communities within its service area and in assessing the need for language assistance.

Assistance Provided to Sub-recipients

The following sample notice to the public informing beneficiaries of their rights under Title VI and procedures on how to file a Title VI complaint will be provided to all subrecipients:

Public Information Concerning Title VI of the Civil Rights Act of 1964, as amended;

“The transportation provider is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you believe you have been subjected to mistreatment under Title VI, you may file a written report with the transportation provider, _____(mailing address), or call the transit information center at _____(phone number, Toll Free phone number, TTY number), or by e-mail on this website under “Contact Us.”

All sub-recipients will be required to place notices of Title VI rights in a prominent location where members of the public access the subrecipients’ services, e.g. customer service desks, foyers, and/or office bulletin boards.

All sub-recipients will be held to the same standards as GPATS. As such, all sub-recipients will be provided the Title VI sections of [Report Procedures](#), [Filing a Report](#), and [Internal Reporting Process](#) as outlined in GPATS Title VI Plan 2020 as a sample to employ in there organization.

MPO Requirements

To provide guidance for MPO’s for adhering to FTA regulations, FTA provided a circular, 47021.A, which specifies procedures for Title VI compliance, however, FTA updated the circulator, 4702.1B, which supersedes and cancels the first. GPATS’ urbanized area is composed of many ethnicities. [Table 2](#) illustrates the 2017 ACS 5-Year Estimates within GPATS’ boundaries, from ESRI Business Analyst.

Table 2: Demographics

	Total	White	Black/African-American	American Indian & Alaska Native	Asian	Native Hawaiian	Some Other Races	Two or More Races	Hispanic Origin (Any Race)
Estimates	689,191	520,082	107,298	1,926	16,059	453	27,758	15,615	43,687
Percentage	100.00%	75.46%	15.57%	0.28%	2.33%	0.07%	4.03%	2.27%	6.34%

GPATS’ Non-White populations are spread throughout the urbanized area, but tend to locate within or closer to cities within GPATS’ Urbanized Area. Some of the data included Margin of Error (MOR) data that was used to determine the Coefficient of Variation (CV)¹.

Those of [Hispanic Origin](#) can be of Any Race, of which the US Census defines [five races](#). Within the GPATS region, a large portion of the Hispanic population identifies as White and some census block data has medium reliability – between 12% - 40%, but most have low reliability. The US Census block data projects that there are sizable amounts of Hispanics that identify as “[Some Other Race](#)” – a sixth category of people who don’t identify as one of the five race defined by the US Census – or “Two or More Races,” but this data has low reliability – over 40%.

¹ Decisions about the quality of an estimate based on the MOE are difficult to make. ESRI has simplified this process by adding symbols to flag reliability of data based on sample size. Symbols are based on thresholds of reliability ESRI established using an estimate's Coefficient of Variation (CV).



High Reliability: Small CVs, less than or equal to 12 percent, are flagged green to indicate that the sampling error is small relative to the estimate and the estimate is reasonably reliable.



Medium Reliability: Estimates with CVs between 12 and 40 are flagged yellow—use with caution.



Low Reliability: Large CVs, over 40 percent, are flagged red to indicate that the sampling error is large relative to the estimate. The estimate is considered very unreliable.

The CV is a measure of relative error in the estimate, calculated as the ratio of the standard error to the estimate itself.

Read an [in-depth explanation of Margin of Error](#) from ESRI's Data Team.

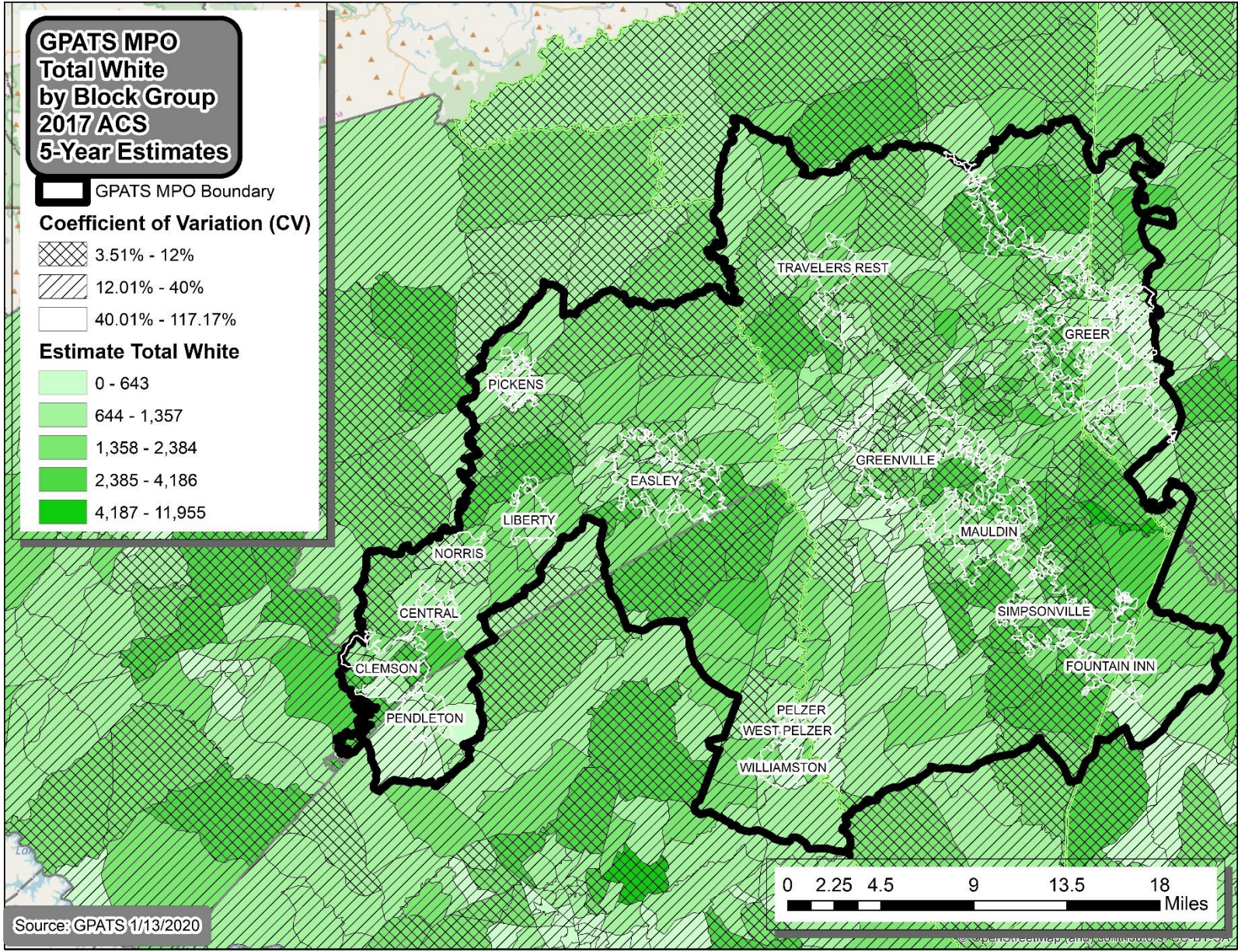
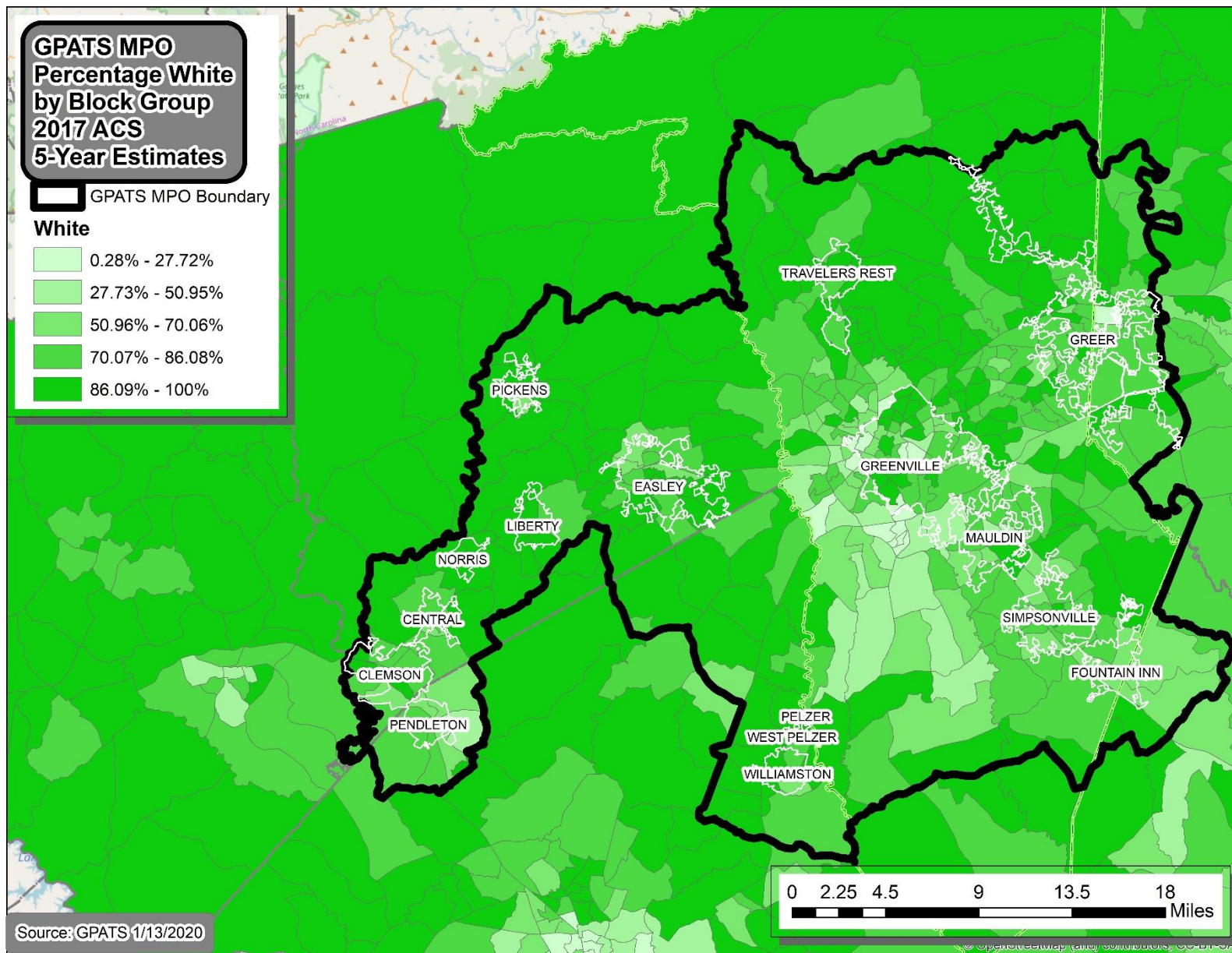


Figure 1: Total White Population

Figure 2: Percentage White Population



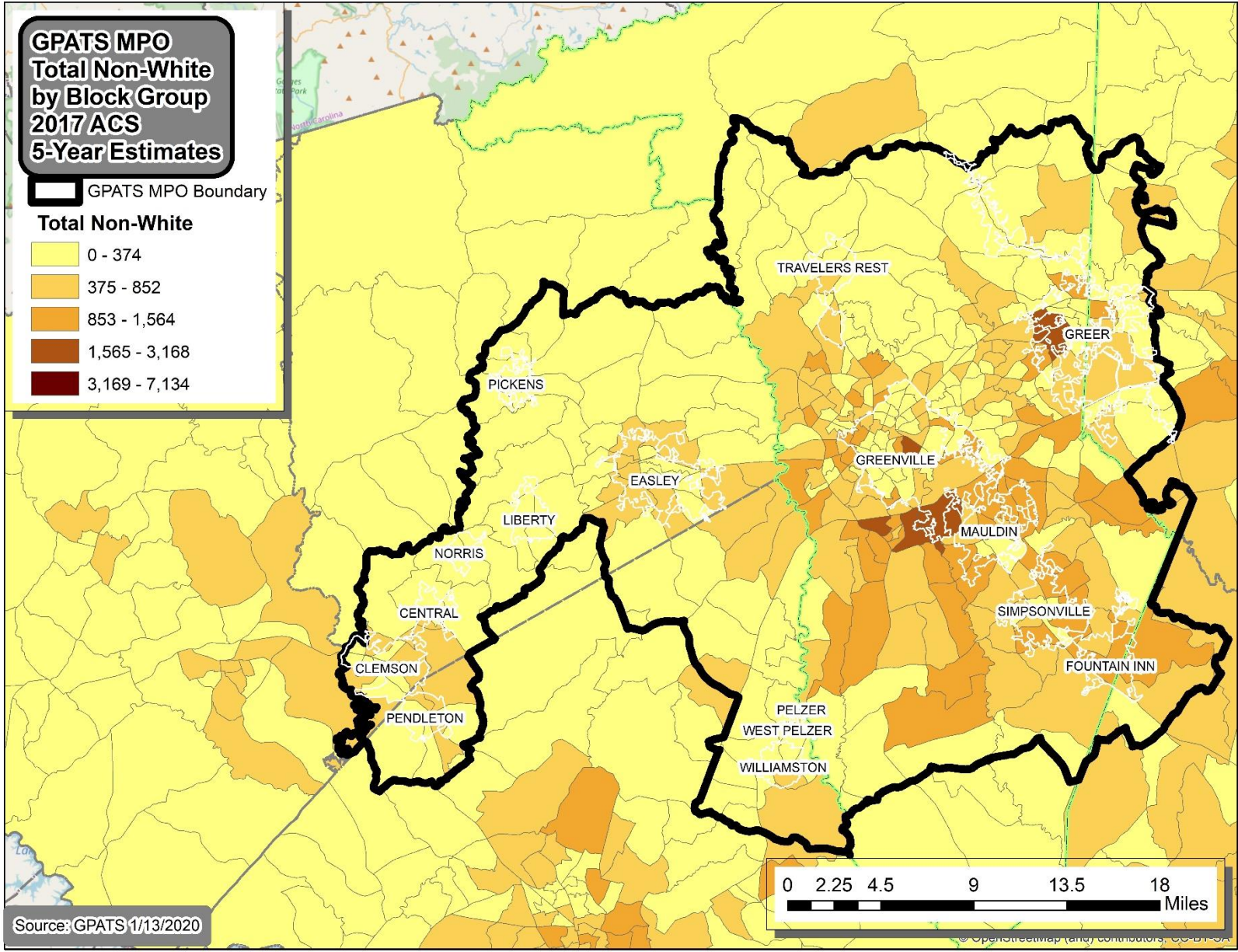
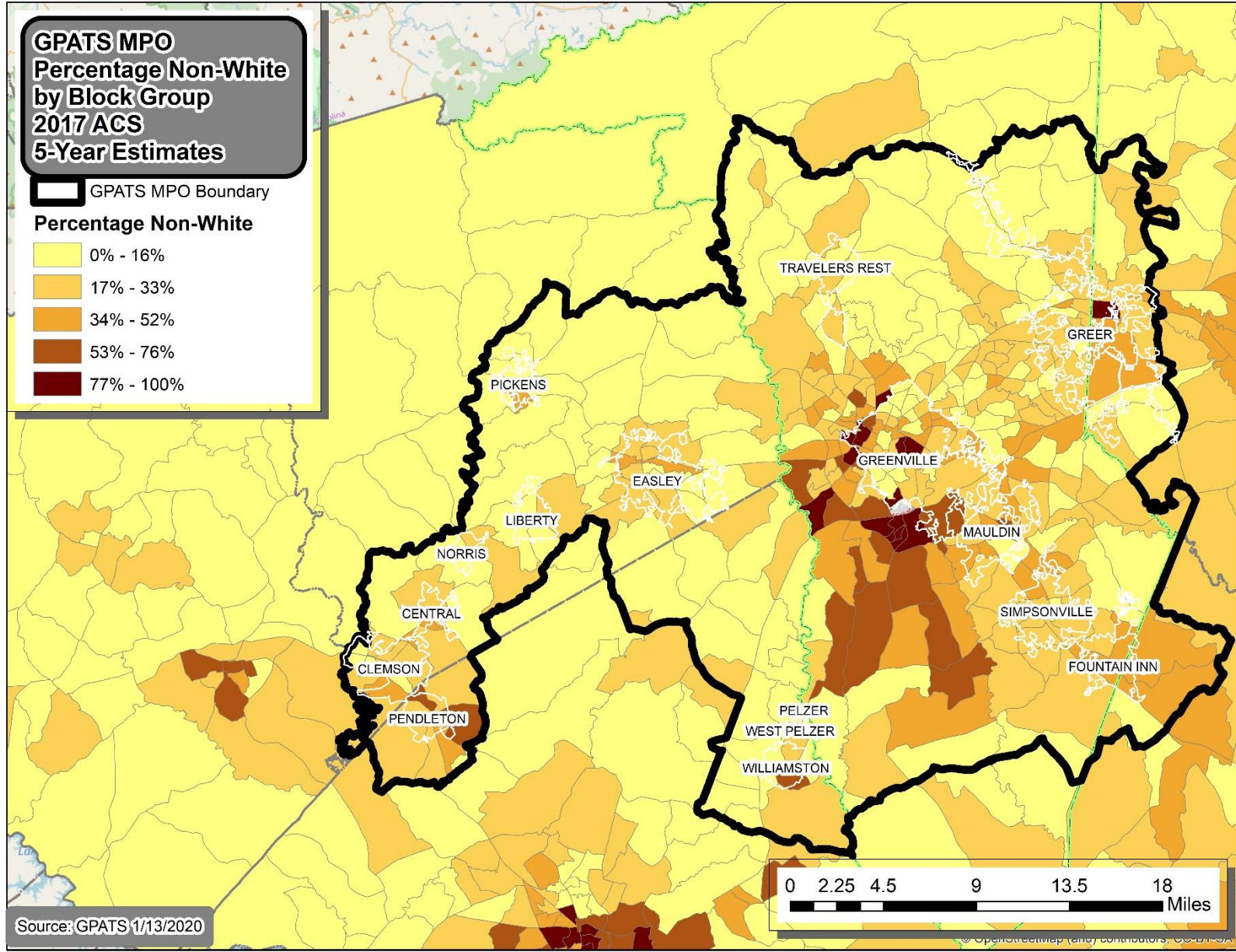


Figure 3: Total Non-White Population

Figure 4: Percentage Non-White Population



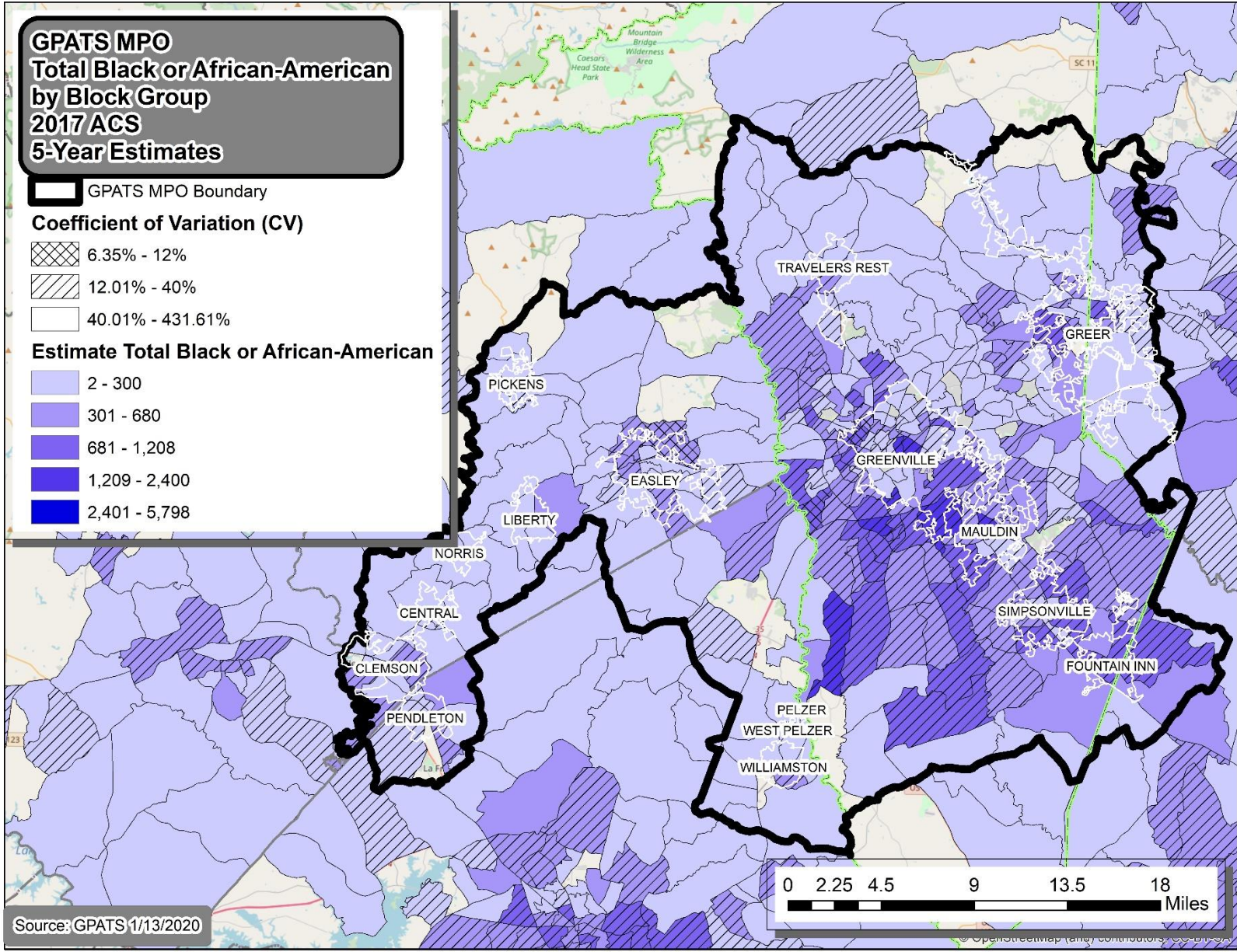
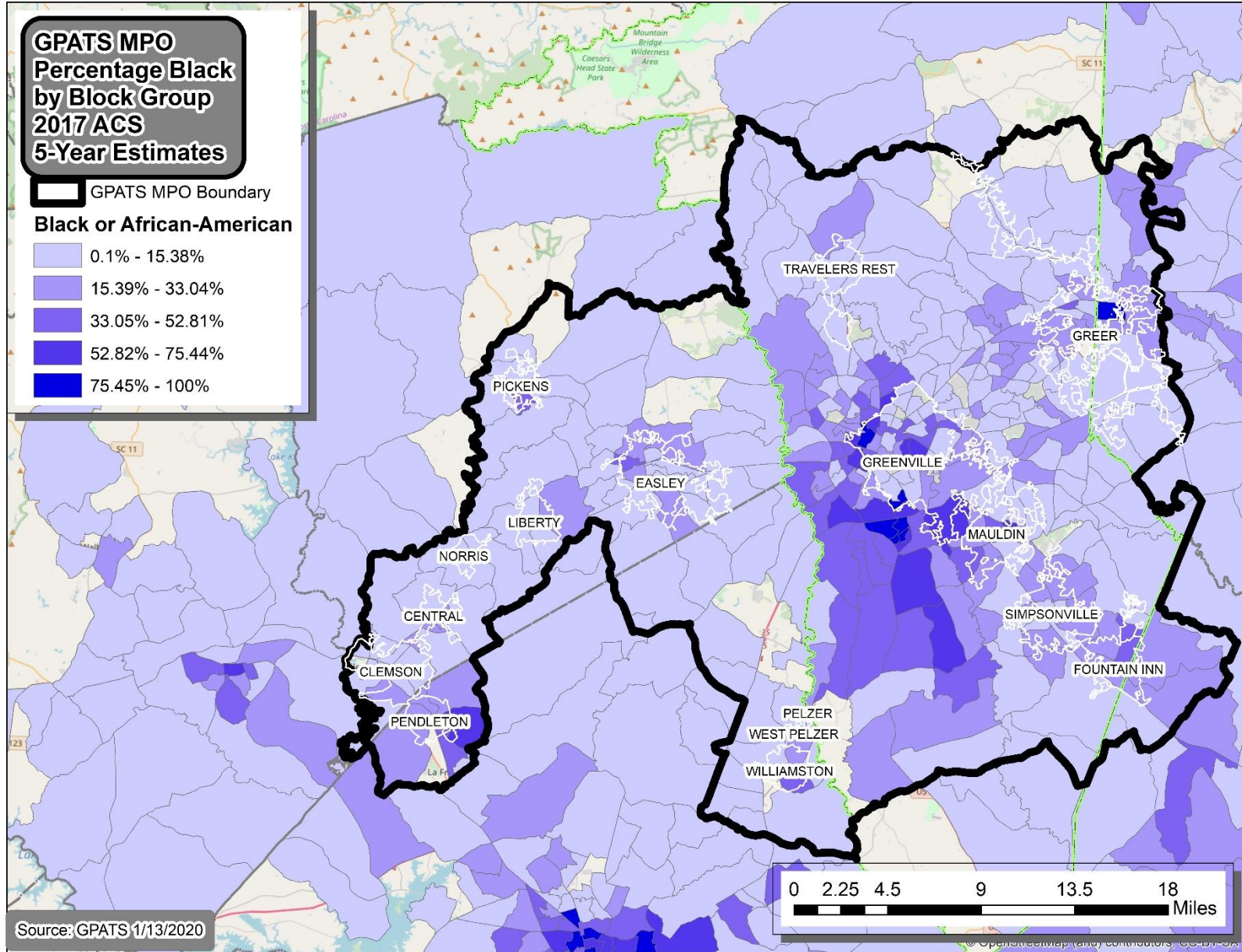


Figure 5: Total Black Population

Figure 6: Percentage Black Population



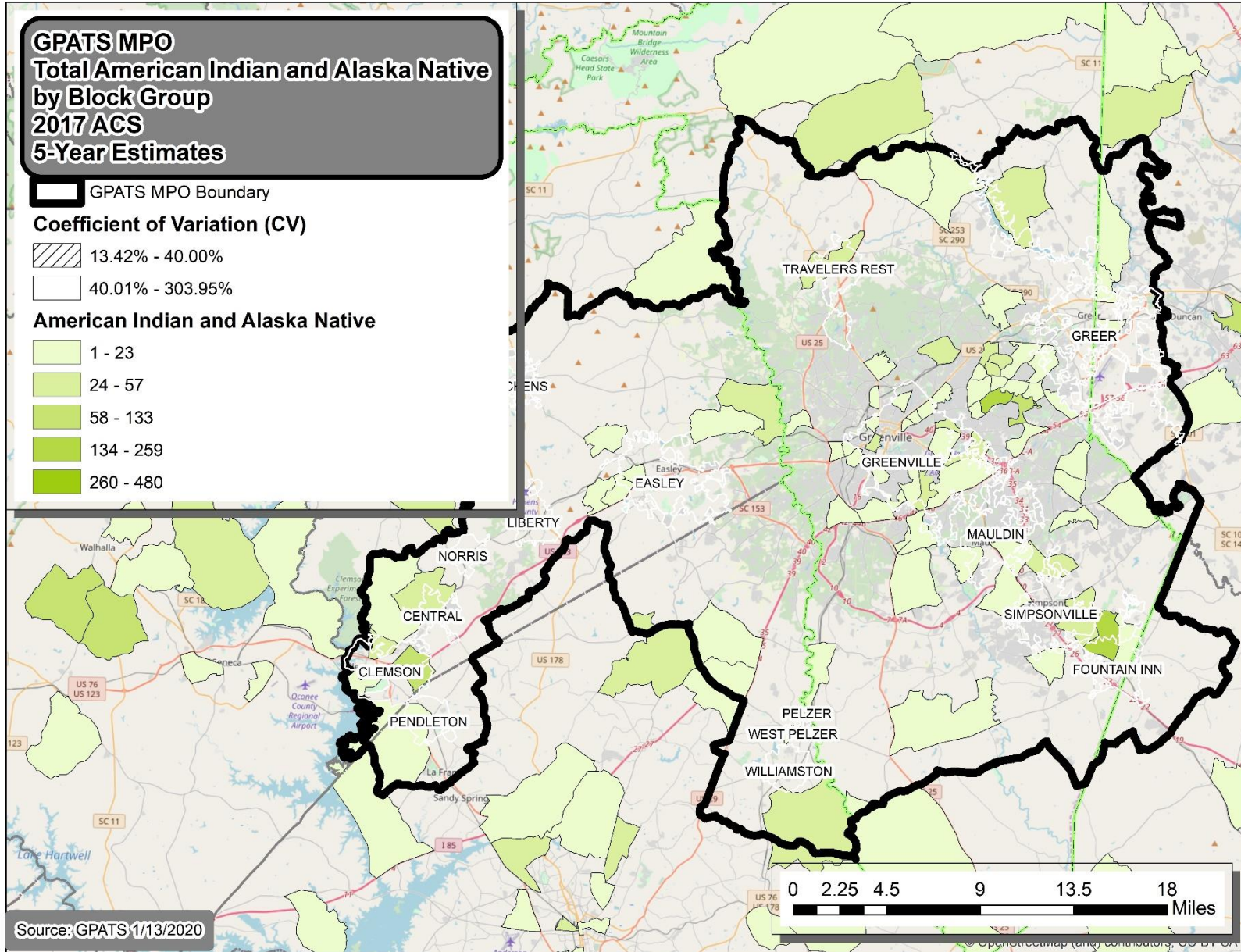
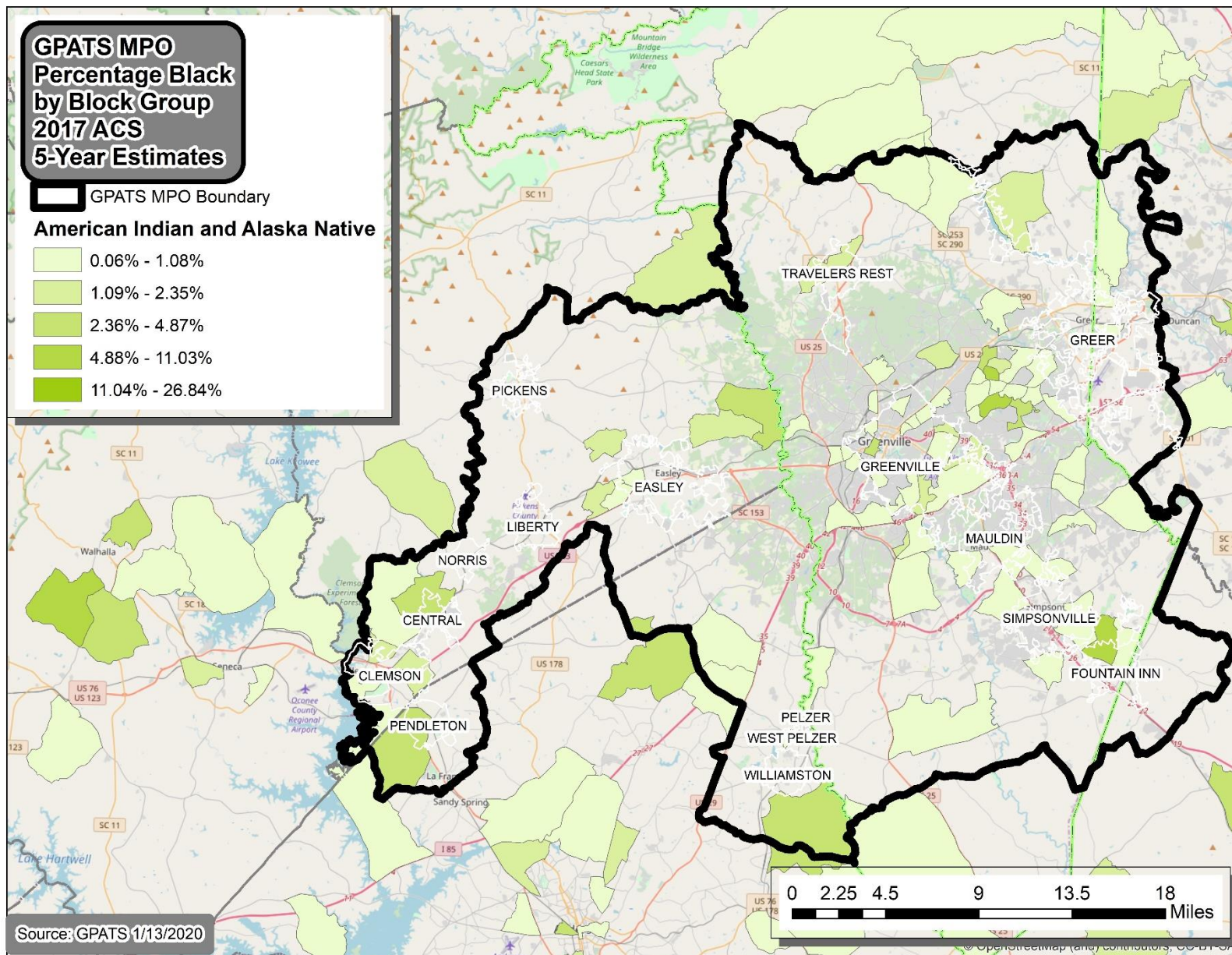


Figure 7: Total American Indian and Alaska Native

Figure 8: Percentage American Indian and Alaska Native



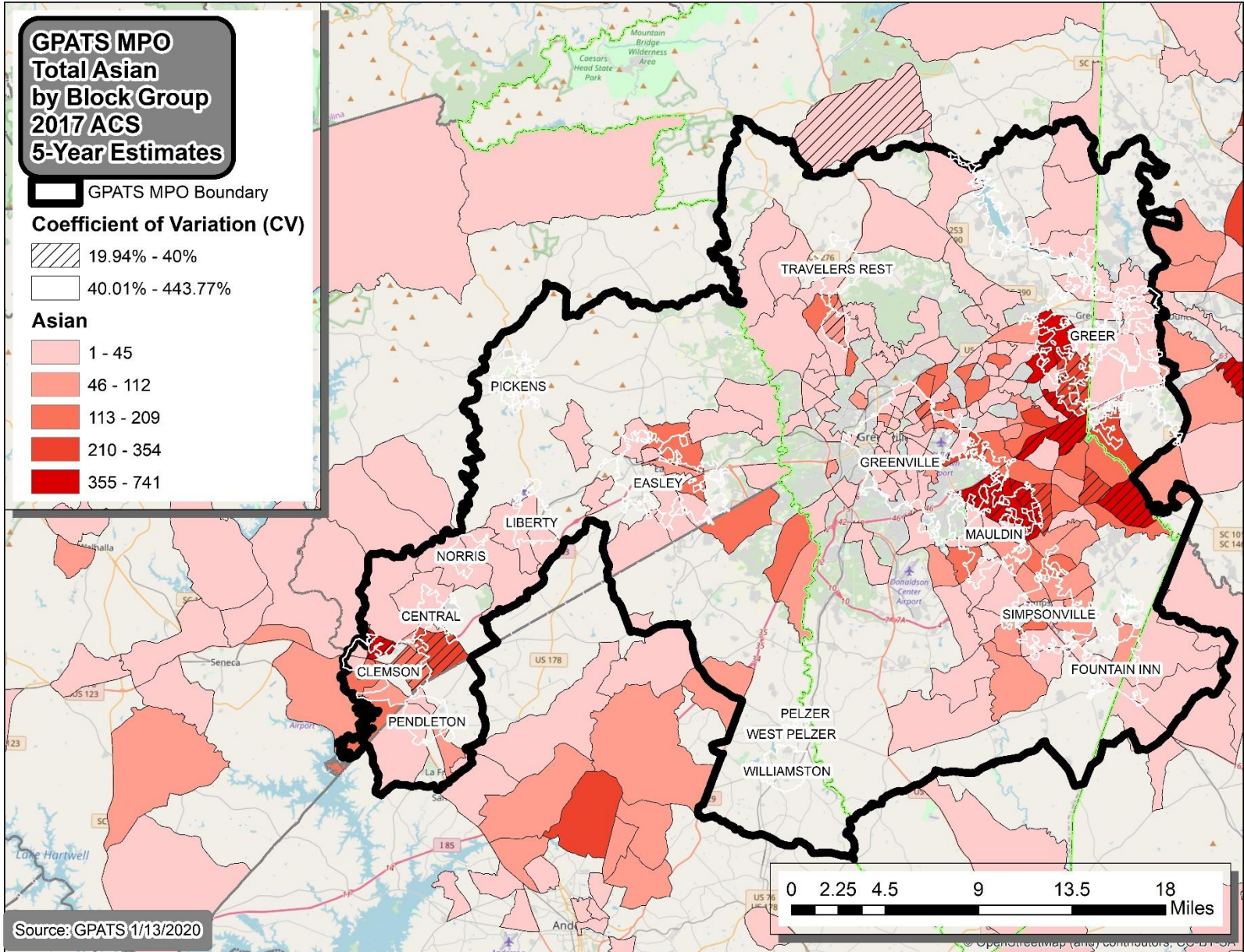
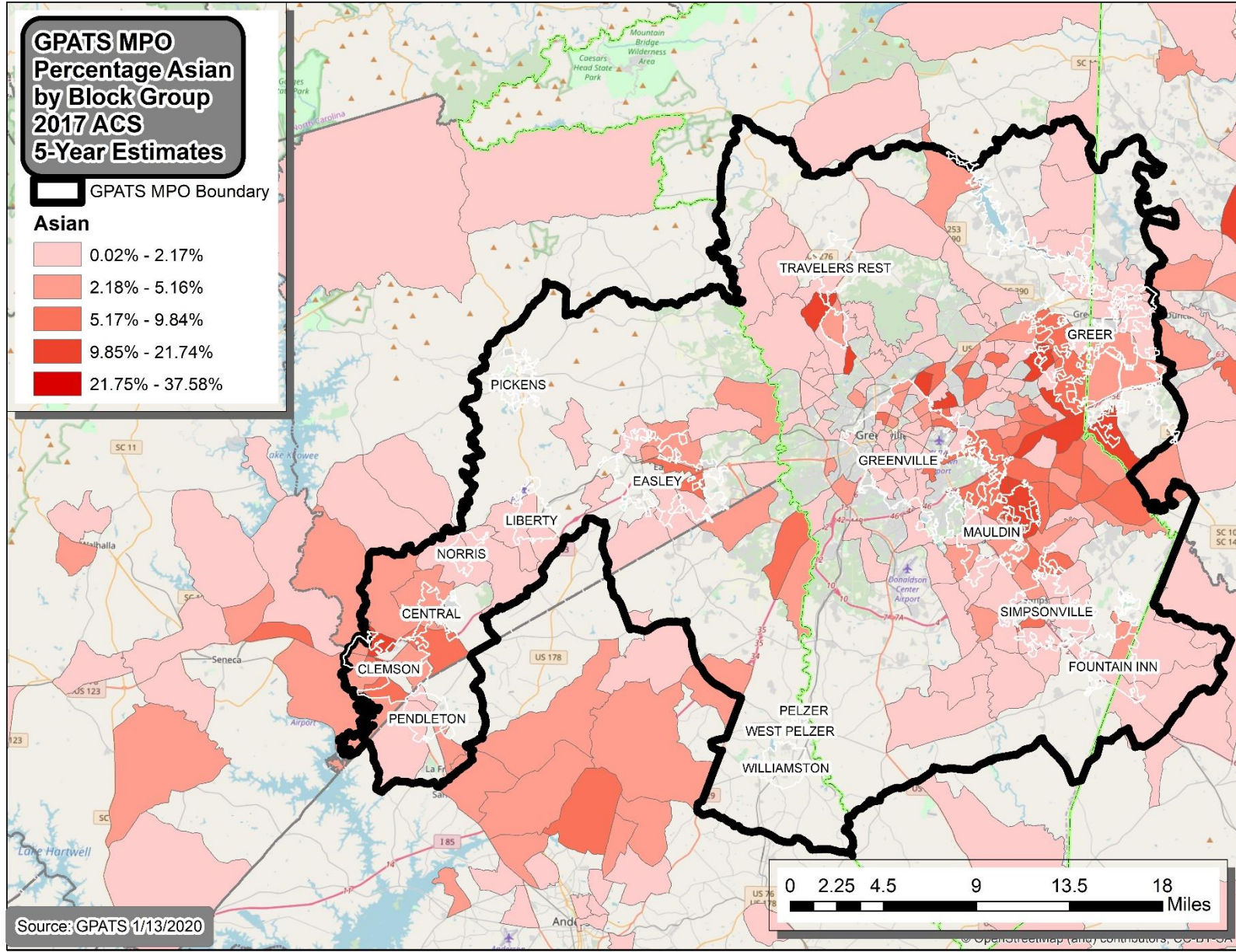


Figure 9: Total Asian Population

Figure 10: Percentage Asian Population



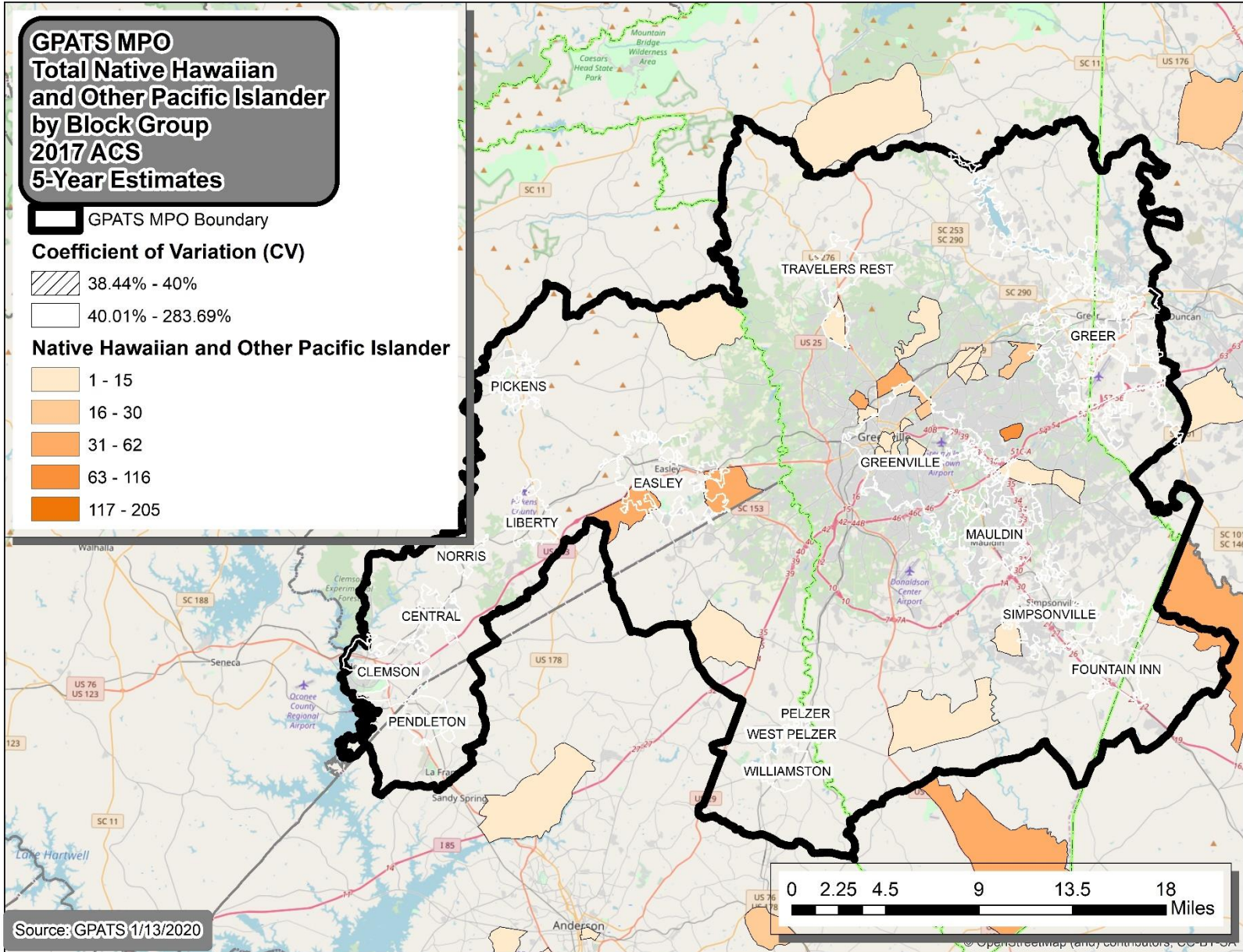
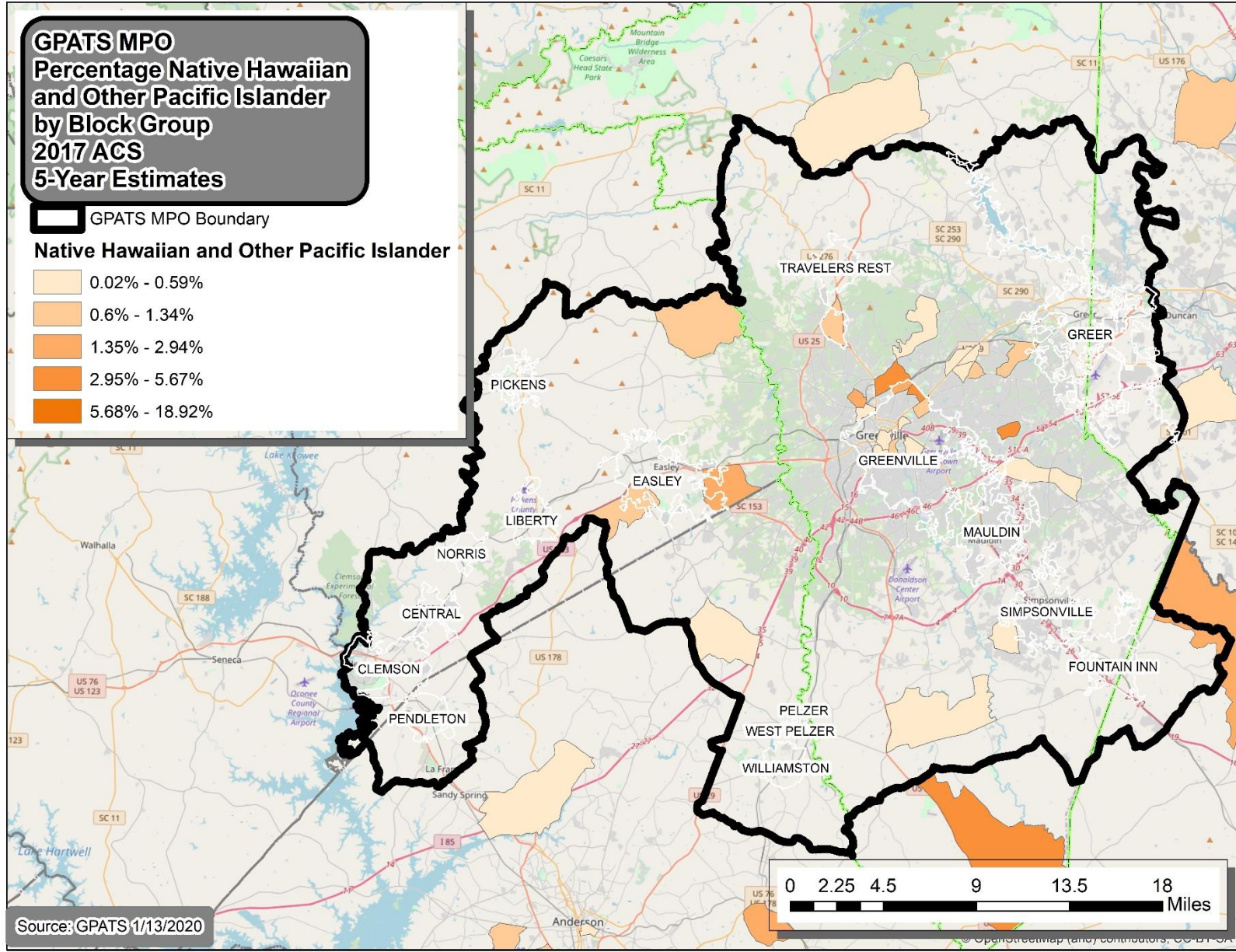


Figure 11: Total Native Hawaiian and Other Pacific Islander

Figure 12: Percentage Native Hawaiian and Other Pacific Islander



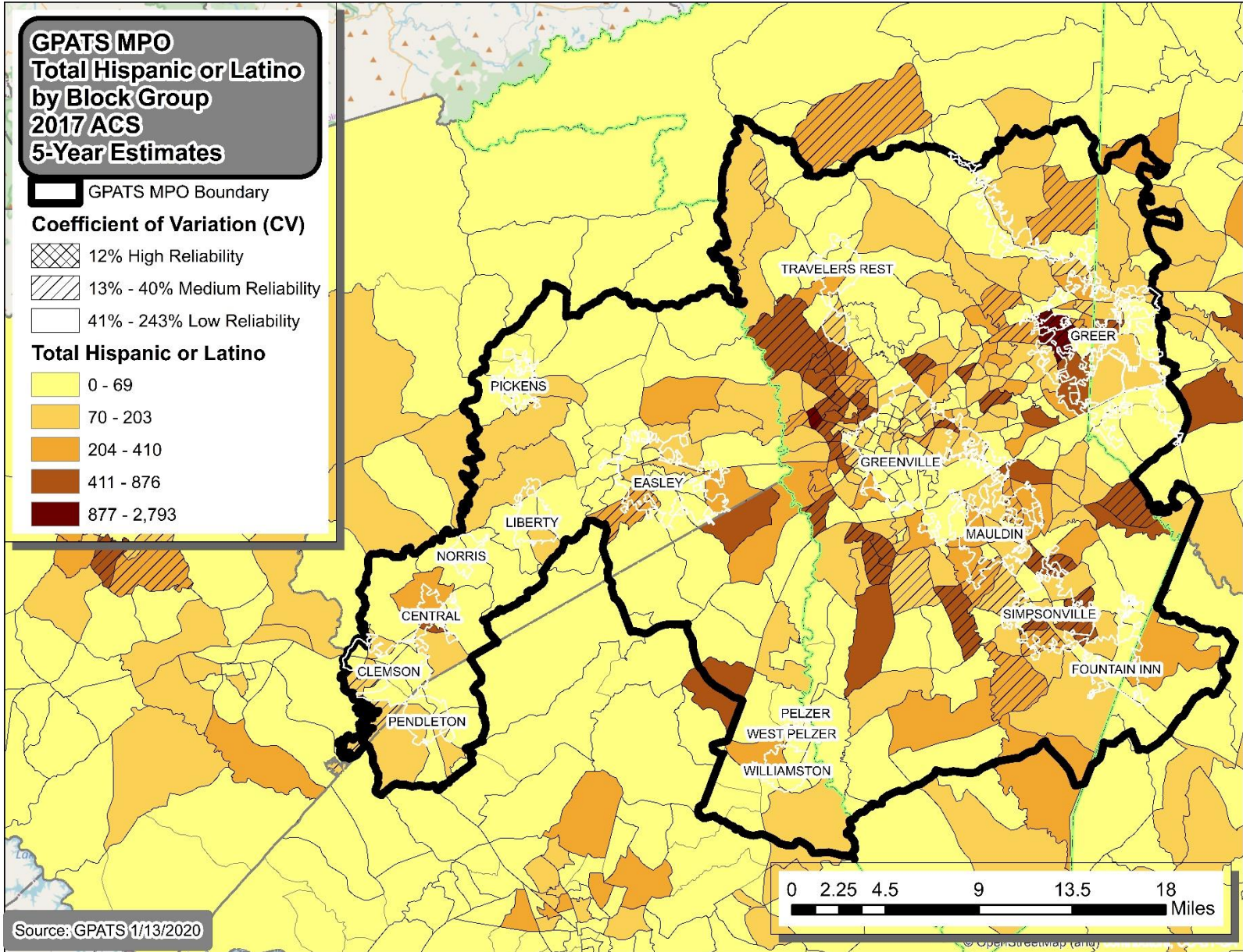
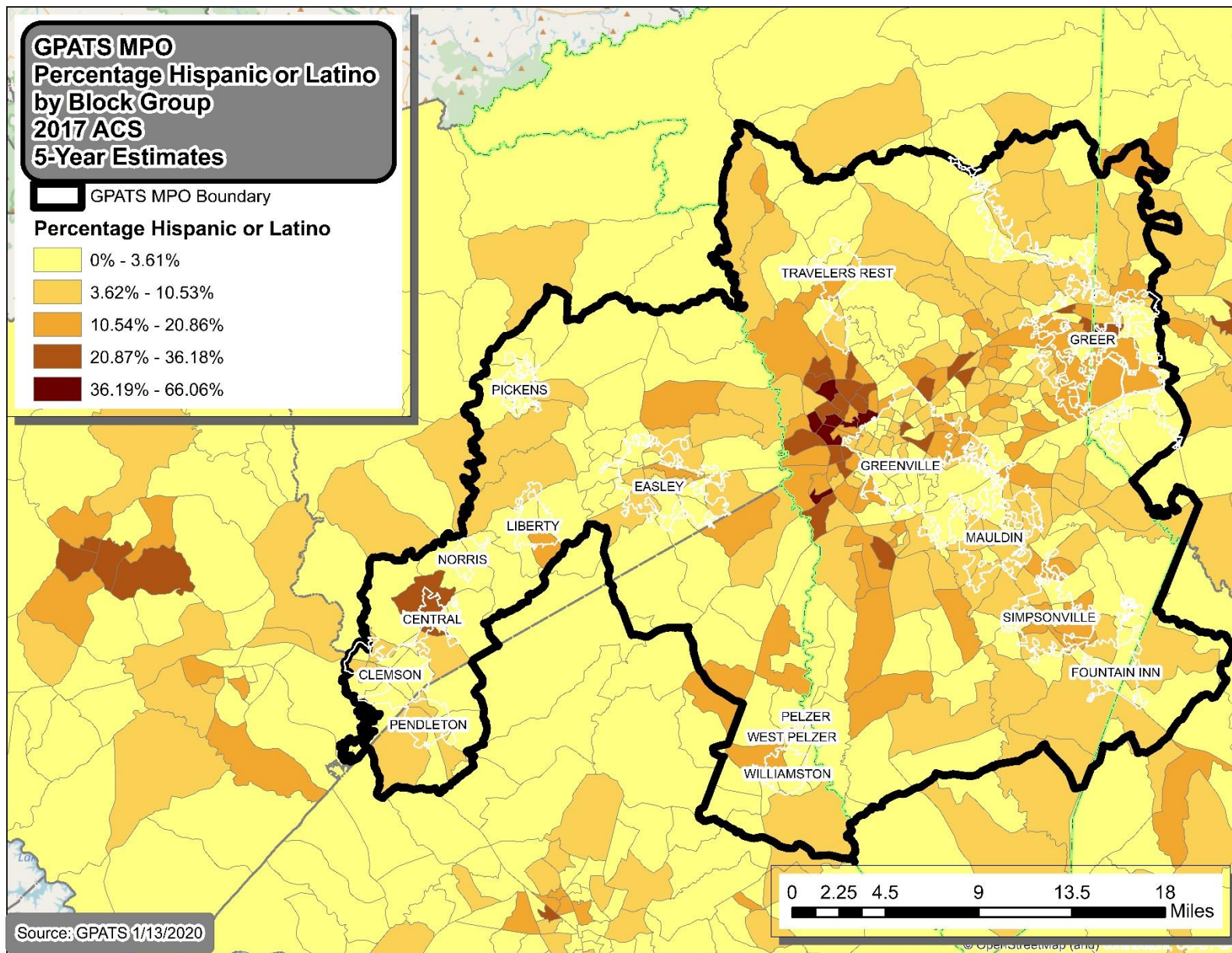


Figure 13: Total Hispanic or Latino

Figure 14: Percentage Hispanic or Latino



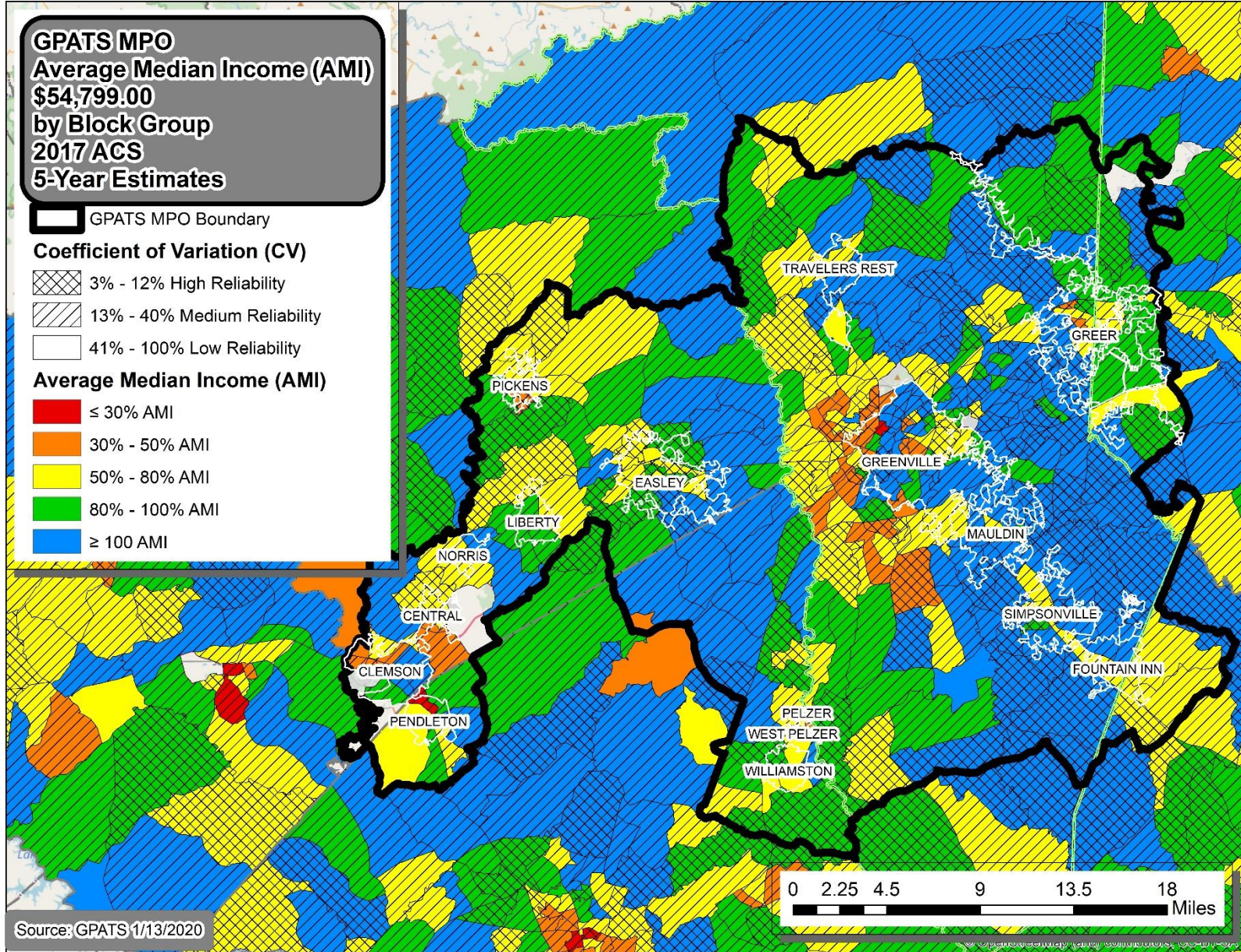
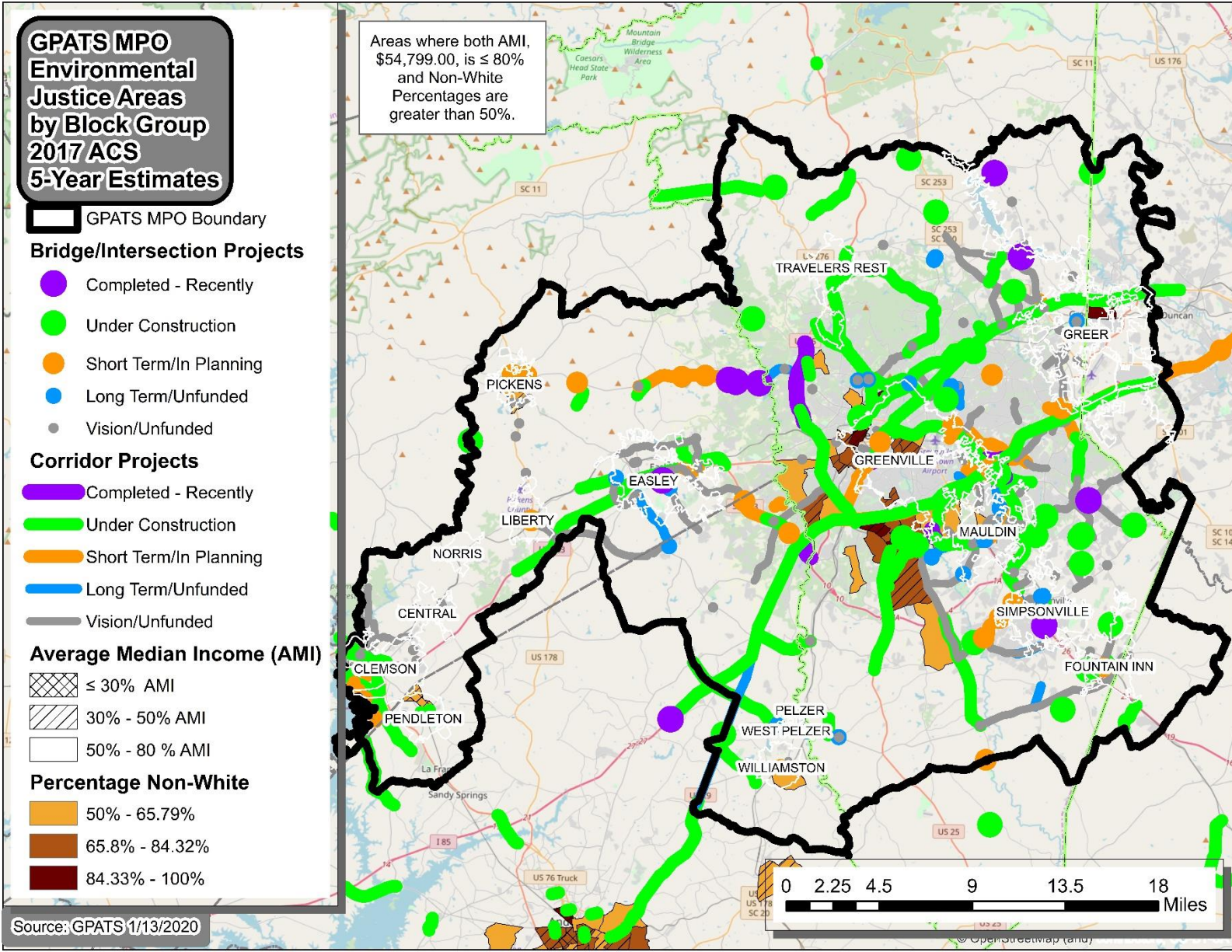


Figure 15: Average Median Income (AMI)

Figure 16: Environmental Justice Areas (EJA)



Definitions

Adverse Effects -- The totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to; (See Appendix B for additional discussion of “significant”).

- bodily impairment, infirmity, illness or death
- air, noise, water pollution, and soil contamination
- destruction or disruption of man-made or natural resources
- destruction or diminution of aesthetic values
- destruction or disruption of community cohesion or a community's economic vitality
- destruction or disruption of the availability of public and private facilities and services
- adverse employment effects
- displacement of persons, businesses, farms, or nonprofit organizations
- increased traffic congestion, isolation, exclusion, or separation of Non-White or low-income individuals within a given community or from the broader community
- denial of, reduction in, or significant delay in the receipt of benefits of GPATS programs, policies, or activities

Significant Adverse Effects on Non-White and Low-Income Populations -- An adverse effect that;

- a. is predominately borne by a Non-White population and/or a low-income population, or
- b. will be suffered by the Non-White population and/or low-income population and is shown to be appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-Non-White population and/or non-low-income population

Limited English Proficiency -- Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be Limited English proficient (LEP). These individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter.

Federal Assistance -- Includes grants and loans of federal funds; the grant or donation of federal property and interests in property; the detail of federal personnel, Federal property of any interest in such property without consideration or at a nominal consideration or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and any federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

Low-Income -- A person whose median household income is at or below the Department of Health and Human Services poverty guidelines (<https://aspe.hhs.gov/poverty-guidelines>).

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

Non-White -- A person who is:

- a. Black -- a person having origins in any of the Black racial groups of Africa;
- b. Hispanic -- a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
- c. Asian American-- a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands; or
- d. American Indian and Alaskan Native -- a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.

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

Noncompliance -- A recipient has failed to meet prescribed requirements and has shown an apparent lack of good faith effort in implementing all the requirements of Title VI/ Environmental Justice and related statutes.

Persons -- Where designation of persons by race, color, or national origin is required, the following designations ordinarily may be uses: “White not of Hispanic origin,” “Black not of Hispanic origin,” “Hispanic,” “Asian or Pacific Islander,” “American Indian or Alaskan Native.” Additional subcategories based on national origin or primary language spoken may be used, where appropriate, on either a national or a regional basis.

Program -- Includes any multi-modal or bridge project including project planning or any activity for the provision of services, financial aid, or other benefits to individuals. This includes education or training, work opportunities, health, welfare, rehabilitation, housing, or other services, whether provided directly by the recipient of federal financial assistance or provided by others through contracts or other arrangements with the recipient.

Recipient -- Any state, territory, possession, the District of Columbia, Puerto Rico, or any political subdivision, or instrumentality thereof, or any public or private agency, institution, or organization, or other entity, or any individual, in any state, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal assistance is extended, either directly or through another recipient, for any program. Recipient includes any successor, assignee, or transferee thereof, but does not include any ultimate beneficiary under any such program.

Sub-recipient -- An agency such as a council of governments, regional planning agency, educational institution, for example, that receives Federal Highway Administration (FHWA) funds through the State DOTs and not directly from the FHWA. Other agencies, local governments, contractors, consultants that receive these funds are all considered sub-recipients.