Appendix C – Environmental Justice Analysis

(Including Title VI Reporting)

Adopted September 2016
Regional Transportation Commission of Southern Nevada

TITLE VI REPORT UPDATE
FOR
METROPOLITAN TRANSPORTATION PLANNING
IN SOUTHERN NEVADA

Submitted to the
Nevada Department of Transportation
In accordance with
Title VI of the Civil Rights Act of 1964
September, 2016
# TABLE OF CONTENTS

1. INTRODUCTION ..........................................................................................................................3

2. TITLE VI ASSURANCES .............................................................................................................4

3. TITLE VI PROGRAM GENERAL REQUIREMENTS .................................................................6
   3.1. Copy of the RTC’s Title VI Notice ..................................................................................6
   3.2. Procedure and Form for filing complaints ........................................................................6
   3.3. Public Transportation related Title VI Investigations, Complaints, or Lawsuits ..........6
   3.4. Public Participation Plan ...............................................................................................7
   3.5. Language Assistance Plan ...........................................................................................10
   3.6. Boards and Committees ...............................................................................................22
   3.7. Summary of compliance with Title VI by RTC and its Subrecipient(s) .......................25
   3.8. Title VI Equity Analysis for Construction of Facilities ................................................29

4. TITLE VI REQUIREMENTS FOR METROPOLITAN PLANNING ORGANIZATIONS ..............34
   4.1. Demographic Profile with Minority population in the aggregate ..................................35
   4.2. Assessing Mobility Needs of the Minority Population For Planning Purposes ..............41
   4.3. Distribution of Funds in the Aggregate ..........................................................................44
   4.4. Self Certification ..........................................................................................................52
   4.5. Conclusion .....................................................................................................................52

APPENDICES

A. Certification
B. Title VI Notice to the Public
C. Title VI Complaints Procedure
D. Environmental Justice Analysis for Construction of Facilities
1. INTRODUCTION

The Regional Transportation Commission (RTC) of Southern Nevada plays a unique role in the Las Vegas area. It is not only the area Metropolitan Planning Organization (MPO); it is also the transit authority responsible for providing public transportation in the region. As the MPO, RTC plays a very important role in transportation planning by partnering with Nevada Department of Transportation (NDOT) and all the local governments and transportation agencies to monitor growth and develop plans to address the immediate and long range transportation needs of the region.

The RTC receives Federal funds both as a transit provider and as the MPO. Title VI of the Civil Rights Act of 1964, requires that government, state and local government agencies that are in receipt of Federal funds carry out their responsibilities and provide services in a manner that does not discriminate on the basis of race, color, and national origin. Federal government funding agencies have the responsibility for ensuring that the requirements of Title VI are enforced.

The Federal Transit Administration (FTA) is the leading federal agency overseeing the RTC’s compliance with the requirements of Title VI. These requirements are amplified through the detailed guidance set out in FTA Circular C4702.1B of October, 2012. This report has been developed by the RTC in accordance with the provisions of Circular C4702.1B as they relate to the functions of the RTC as the Metropolitan Planning Organization for Southern Nevada.

Since Federal funding for transportation planning is administered by the Nevada Department of Transportation (NDOT), that agency has the prime responsibility for ensuring that both State agencies and the MPOs in Nevada comply with Title VI. This report is therefore submitted to NDOT for incorporation into their Title VI report to FTA.

This report has been developed in parallel with a Program Update Report developed in accordance with the provisions of Circular C4702.1B as they relate to the functions of the RTC as the transit agency for the region.

In addition to the provisions of Title VI, Federal funding agencies also monitor how the recipients of Federal funds consider issues of Environmental Justice with regard to project planning, the siting and construction of facilities, and the conduct of thorough public involvement processes. Environmental Justice is primarily, the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.
2. TITLE VI ASSURANCES

The annual Title VI Certification and Assurances were provided to the FTA via an update in the FTA’s web-based Grants Management System (TEAM). The RTC certifications and assurances, signed by RTC Board Chairman, were last updated on April 14, 2016. A signed copy of the certifications and assurances are attached in Appendix A.

The Grantee hereby gives the following specific assurances:

- That the grantee complies with all applicable Federal statutes and regulations to carry out any FTA funded project.
- That the grantee, under a continuing obligation, complies with the terms and conditions of the FTA Grant Agreement or Cooperative Agreement for its Project, including the FTA Master Agreement incorporated by reference and made part of the latest amendment to the Grant Agreement or Cooperative Agreement.
- That the grantee recognizes that Federal laws and regulations may be modified from time to time and those modifications may affect Project implementation.
- That the grantee understands that Presidential executive orders and Federal guidance, including Federal policies and program guidance, may be issued concerning matters affecting Applicant or its Project.
- That the applicant agrees that the most recent Federal laws, regulations, and guidance will apply to its Project, unless FTA determines otherwise in writing.
- That the applicant, in light of recent FTA legislation applicable to FTA and except as FTA determines otherwise in writing, agrees that requirements for FTA programs may vary depending on the fiscal year for which the funding for those programs was appropriated.

In some instances, FTA has determined that Federal statutory or regulatory program and eligibility requirements for a fiscal year will apply to:

(1) New grants and cooperative agreements, and
(2) New amendments to grants and cooperative agreements that:
   (a) Have been awarded Federal funds made available or appropriated for FY 2016 or the previous fiscal year, or
   (b) May be awarded Federal funds appropriated for FY 2016 or the previous fiscal year, but in other instances, FTA has determined that FAST will apply to the Federal funds made available or appropriated for FY 2016 or a previous fiscal year, and

RTC requires that all Section 5310 subrecipients submit all appropriate FTA certifications and assurances to RTC prior to funding agreement execution and annually thereafter when FTA publishes the annual list of certifications and assurances. RTC will not execute any funding agreements prior to having received these items from the selected subrecipients. RTC, within its administration, planning, and technical assistance capacity, also will comply with all appropriate certifications and assurances for FTA assistance programs and will submit this information to the FTA as required.
The certifications and assurances pertaining to civil rights include:

1. **Nondiscrimination Assurances in Accordance with the Civil Rights Act**
2. **Documentation Pertaining to Civil Rights Lawsuits and Complaints**

Nondiscrimination assurances included above involve the prohibition of discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibit discrimination in employment or business opportunity, as specified by 49 U.S.C. 5332 (otherwise known as Title VI of the Civil Rights Act of 1964), as amended (42 U.S.C. 2000d et seq.) and U.S. DOT regulations, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation- Effectuation of Title VI of the Civil Rights Act, 49 C.F.R. Part 21. By complying with the Civil Rights Act, no person, on the basis of race, color, national origin, creed, sex, or age, will be excluded from participation in, be denied the benefits of any program for which the subrecipient receives federal funding via RTC.

As a condition of receiving Federal Transit Administration Section 5310 funds, subrecipients must comply with the requirements of the US Department of Transportation’s Title VI regulations. The purpose of Title VI is to ensure that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Recipients are also responsible for ensuring compliance of each of their subrecipients (if any), including collecting Title VI Programs, and for ensuring that their third-party contractors are complying with Title VI and the recipient’s Title VI Program.
3. TITLE VI PROGRAM GENERAL REQUIREMENTS

3.1. Copy of the RTC’s Title VI Notice

All vehicles owned and/or operated by the RTC are required to have Title VI information posted on the vehicle referencing the RTC contact information. These postings are also required by any contracted entity of the RTC including the fixed route and paratransit operating contractors, grant recipients, non-profit and for-profit organizations.

- RTC Title VI Notice is posted as follows:
- All RTC Transit Vehicles
- RTC Administration Building
- Bonneville Transit Center
- Westcliff Transit Center and Park & Ride
- Centennial Hills Transit Center and Park & Ride
- South Strip Transfer Terminal
- Integrated Bus Maintenance Facility
- Sunset Maintenance Facility

Appendix B contains a copy of Title VI Notice to the public that indicates that the RTC complies with Title VI and informs the public of the protection against discrimination by the RTC.

3.2. Procedure and Form for filing complaints

Consistent with the FTA Circular, the RTC has developed a procedure for addressing Title VI complaints. Appendix C contains a copy of the procedure and form that a member of the public may use to file a Title VI discrimination complaint against the RTC. The complaint form is also available in English and Spanish at the RTC website at [http://www.rtcsnv.com/about-the-rtc/legal-notices-title-vi/](http://www.rtcsnv.com/about-the-rtc/legal-notices-title-vi/).

3.3. Public Transportation related Title VI Investigations, Complaints, or Lawsuits

RTC has not received any Transit-Related Title VI Investigations and Lawsuits since the submission of the previous Title VI Program Update Report in 2013. There have been some complaints that were made by the transit users and responded to by RTC staff. Below we have listed the Title VI complaints received at the RTC in 2015 and the actions taken to investigate and resolve them.
There have not been any Title VI Investigations, Complaints or Lawsuits related to RTC’s MPO activities and programs.

### 3.4. Public Participation Plan

The RTC Public Participation Plan is very comprehensive and uses a variety of approaches to engage the public in the agency’s transportation planning processes for the region. The primary citizen participation outreach activities used by the RTC include:

- Public hearings and meetings conducted as required and appropriate,
- Surveys offered on the web and at transportation fairs,
- Project-specific advisory groups,
- Public comment periods, and
• Ongoing activities, such as the RTC website, transportation fairs, participation in the other agency outreach activities, media relations, and special events.

It is important to note that in all outreach efforts undertaken by the RTC are based on the following:

• MPO: All analyses for provisions for the minority and Limited English Proficiency (LEP) population are based on Clark County as a whole.
• Transit: All analyses for provisions for the minority and LEP population are based on service area.

Public Participation Strategies
Outreach opportunities during plan development and formal public comment periods can include public meetings, advisory committee reviews, surveys, direct mail pieces and door-to-door canvassing in areas affected by the project, public notices, media briefings and interviews, and timely events such as formal ceremonies and informal information fairs. This variety of approaches ensures that public involvement is continuing, cooperative, and comprehensive. In all of the outreach efforts described below special attention is placed on inclusiveness and emphasis on reaching out to the minority and LEP population. Assistance such as providing for language translations, ADA accessibility meeting locations, sign language service, foreign language service and resources, when requested and multiple locations and document translation services are provided for all public meetings.

Public Outreach
Public Information Meetings are intended to provide an opportunity for the general public to submit comments and learn more about the RTC’s program of projects, plans, and services. Members of the public are able to provide input and feedback at the public information meetings through the public comment process. Public meetings and presentations will be used to present draft materials, educate the public and solicit information from the public. Contact information including e-mail addresses is collected at all public meetings. Public meeting attendees are encouraged to use comment cards to submit comments, suggestions, and unresolved questions. Comment cards are given out at all outreach activities and public meetings. The following are strategies that could be used to engage the public:

• Meeting venue is determined and times are slotted that capture different audiences at different times to ensure as many people as possible attend
• Advertisements appear 15 days prior to the date of the scheduled public meeting
  ▪ Las Vegas Review Journal
  ▪ The Sentinel Voice
  ▪ El Mundo (Spanish translated)
  ▪ Chinese Daily (Chinese translated)
• Court Reporter is scheduled
• Display boards are created with simplified messaging that is pertinent to the subject of the meeting
• Sign-In Sheets
• News Releases to local television, radio and print media
• Public meeting is posted in all local jurisdictions and e-mailed
• Information is posted to the RTCSNV Web site
• Direct Mail
• Homeowners Associations are notified via e-mail
• Neighborhood Services is contacted and they send an e-mail to their perspective databases
• Information is posted in libraries and community centers
• Collateral is created and placed in transit vehicles that reach all of our customers across the Las Vegas Valley
• Collateral is created and placed in transit shelters that have the details of any service changes, fare increases
• All transit facilities will have information posted in regard to transit changes, such as routes, fares and time changes
• Collateral is given to all the Transit drivers and disseminated to the passengers across the Las Vegas Valley
• RTC conducts an “ALL HANDS” training session alerting all personnel of changes, planning, programs and projects
• Send out an email blast to the subscribed group letting them know of changes

Public Outreach Online
The RTC utilizes social networking Web sites such as Facebook, Twitter, and YouTube which are popular enhancements to outreach efforts. Such sites have great potential to expand the number of participants in the process and attract new participants, especially those typically not involved in the planning. Social networking sites also have the potential to generally improve the quality of the participation experience.
• Tool to reach additional participants (interested people join as a “friend” or a “fan” to group)
• Links to reports and summaries
• Notification of upcoming meetings and events
• Discussion boards
• Addition of photos and videos

Hearings/Meetings
The RTC plans and conducts public meetings and hearings to provide citizens with the opportunity to give input and receive information on transportation projects and policy changes. These hearings are usually held during a public comment period and are advertised in a variety of local print publications. Outreach to minority publications is an element of the public advertisement procedure. Non-discrimination notification and the procedure for individuals requiring special assistance to attend are posted as part of the public notice.

Notices are published in local newspapers of general circulation including those directed at minority communities. Special exhibits are prepared to convey various aspects of the subject of the meeting. Staff members are available to answer questions. Citizens may comment during the public meeting either in writing or verbally for recording. A court reporter is normally present to take oral comments. Comments are compiled into the meeting minutes. As appropriate, other public meetings are held at various convenient locations throughout the Valley to encourage participation.

Native American Tribal Consultation
RTC staff accompanies NDOT staff to tribal consultation meetings. The Las Vegas and Moapa Paiutes have reservations within Clark County: the Las Vegas Paiutes in the urbanized area and northwest and the Moapa Paiutes in the northeast. Both communities are planning residential, industrial,
and/or tourism development on their lands and are interested in cooperating with NDOT and RTC to assure adequate transportation facilities are available.

Web Site
The RTC web site, www.rtcsnv.com, is another outlet for citizens to receive information on the RTP/TIP and make comment. Documents are posted on the web site during the public comment period and can be downloaded for review. Comments can be provided directly on the website’s plan comment page. Visitors can also ask to be contacted on specific issues as change occurs.

3.5. Language Assistance Plan

3.5.1. Background and Legal basis for language assistance requirements
The U.S. Department of Transportation (DOT) requires that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and to develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in Lau v. Nichols, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Federal agencies have published guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. This order applies to all state and local agencies that receive federal dollars. The LAP outlined below is based on the federal guidance provided by U.S. DOT.

3.5.2. Language Assistance Needs Assessment – Four Factor Analysis
The RTC is both the transit authority and the transportation planning agency for Southern Nevada. As the designated MPO (Metropolitan Planning Organization), the RTC oversees the transportation planning process for the region. The RTC as the transit authority provides public transportation services to the general public and paratransit services to the disabled.

This plan outlines how to identify a person who may require language assistance, the ways in which the RTC provides such assistance, any staff training that may be required to provide such services and the resources available to reach out to the people who may need language assistance service.
In order to prepare the Language Assistance Plan (LAP), a needs assessment is conducted utilizing the four factor analysis, as recommended by USDOT.

The four factors are:

**Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by RTC services and programs.

**Factor 2:** The frequency with which LEP persons come into contact with RTC services and programs.

**Factor 3:** The nature and importance of the RTC’s services and programs in people’s lives.

**Factor 4:** The resources available to the RTC for LEP outreach, as well as, the costs associated with the outreach.

In the following analyses each factor is considered first in relation to the services provided by RTC Transit and then in relation to the programs of the RTC acting as the MPO.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by RTC services and programs**

Public transit is a key means of achieving mobility for many LEP persons. Providing language assistance to persons with limited English proficiency is an effective way to ensure community outreach that helps identify the mobility needs of this population and any concerns or hardships they may be experiencing due to service or fare changes. An effective Language Assistance Plan demonstrates that the RTC values its customers who use the RTC’s fixed route bus services and ADA (American Disabilities Act) Paratransit Demand Response Services and is committed to seeking their opinions in order to retain and improve the service the RTC offers to the community.

Although the MPO has less immediate impact on people’s lives, the planning and programming decisions made by the MPO will affect the future economic health of the region and the transportation options available to residents. An effective LAP program is the only way of determining the extent to which the transportation needs of the LEP population mirror those of the community at large and the extent to which LEP persons have different needs that should be addressed through the planning and project development process.

As indicated in the table below, the latest Census data shows a steady growth of the increasingly diverse population in Southern Nevada. Clark County has experienced a substantial increase in non-English speaking population or people who speak a language “other than English”. Also, noteworthy is the substantial increase amongst the Spanish speaking and the Asian population who are LEP or in other words, do not speak English “very well” (Table A).
### Table A: English Proficiency

<table>
<thead>
<tr>
<th>LANGUAGE SPOKEN AT HOME</th>
<th>2000</th>
<th>2005</th>
<th>2011</th>
<th>2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population 5 years and over</td>
<td>1,272,872</td>
<td>1,563,237</td>
<td>1,831,695</td>
<td>1,840,196</td>
</tr>
<tr>
<td>English only</td>
<td>942,435</td>
<td>1,097,583</td>
<td>1,217,070</td>
<td>1,225,571</td>
</tr>
<tr>
<td>Language other than English</td>
<td>330,437</td>
<td>465,654</td>
<td>614,625</td>
<td>614,625</td>
</tr>
<tr>
<td>Speak English less than 'very well&quot;</td>
<td>163,355</td>
<td>215,829</td>
<td>264,867</td>
<td>264,904</td>
</tr>
<tr>
<td>Spanish</td>
<td>230,951</td>
<td>333,028</td>
<td>423,841</td>
<td>417,724</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>127,342</td>
<td>169,560</td>
<td>189,597</td>
<td>187,976</td>
</tr>
<tr>
<td>Other Indo-European languages</td>
<td>35,134</td>
<td>47,424</td>
<td>52,000</td>
<td>49,685</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>9,367</td>
<td>13,145</td>
<td>15,049</td>
<td>14,508</td>
</tr>
<tr>
<td>Asian and Pacific Islander languages</td>
<td>55,663</td>
<td>76,022</td>
<td>120,260</td>
<td>125,133</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>23,723</td>
<td>29,897</td>
<td>52,954</td>
<td>53,682</td>
</tr>
<tr>
<td>Other languages</td>
<td>Not Avail.</td>
<td>9,180</td>
<td>18,524</td>
<td>20,242</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>Not Avail.</td>
<td>3,227</td>
<td>7,267</td>
<td>7,733</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau – ACS 2009-2013 5 Year Estimates, Table S1601 – “Language Spoken At Home”

When the race and ethnicity of the population is further broken down, it also indicates that the Asian population is growing rapidly in this region, and the fastest growing group within the Asian population, is Filipinos. So while 8.8 percent of total population in Clark County is Asian, 52 percent of the Asian population is Filipino (Table B). This is important to note because the RTC will have to closely monitor the Census data and ensure that the Language Assistance Plan (LAP) is updated in a timely manner when the threshold population is reached in the Filipino community. At that point, the RTC would be required to conduct additional surveys to determine the primary language of the Filipino community in order to provide language assistance to this ethnic minority group and maintain an inclusive public involvement process. (A survey may be necessary because there are two main languages spoken by the Filipino population and a survey is the best way to assess language translation needs).
Table B: Detailed Breakdown of Race and Ethnicity for Language Assistance Plan

<table>
<thead>
<tr>
<th>Race or Ethnicity</th>
<th>2013 Population</th>
<th>Percentage of Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total (All Ages)</td>
<td>1,976,925</td>
<td>100</td>
</tr>
<tr>
<td>White Alone</td>
<td>933,371</td>
<td>47.2%</td>
</tr>
<tr>
<td>Black or African American Alone</td>
<td>201,993</td>
<td>10.2%</td>
</tr>
<tr>
<td>American Indian and Alaska Native Alone</td>
<td>8,499</td>
<td>0.4%</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>174,795</td>
<td>8.8%</td>
</tr>
<tr>
<td>Asian Indian</td>
<td>6,507</td>
<td>0.3%</td>
</tr>
<tr>
<td>Chinese</td>
<td>27,517</td>
<td>1.4%</td>
</tr>
<tr>
<td>Filipino</td>
<td>91,417</td>
<td>4.6%</td>
</tr>
<tr>
<td>Japanese</td>
<td>8,732</td>
<td>0.4%</td>
</tr>
<tr>
<td>Korean</td>
<td>12,020</td>
<td>0.6%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>9,614</td>
<td>0.5%</td>
</tr>
<tr>
<td>Other Asian</td>
<td>18,988</td>
<td>1.0%</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>13,562</td>
<td>0.7%</td>
</tr>
<tr>
<td>Native Hawaiian</td>
<td>5,077</td>
<td>0.3%</td>
</tr>
<tr>
<td>Guamanian or Chamorro</td>
<td>2,856</td>
<td>0.1%</td>
</tr>
<tr>
<td>Samoan</td>
<td>3,408</td>
<td>0.2%</td>
</tr>
<tr>
<td>Other Pacific Islander</td>
<td>2,276</td>
<td>0.1%</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>166,971</td>
<td>8.4%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not Hispanic or Latino</td>
<td>1,394,841</td>
<td>70.6%</td>
</tr>
<tr>
<td>Hispanic or Latino**</td>
<td>582,084</td>
<td>29.4%</td>
</tr>
</tbody>
</table>

MPO programs
The RTC conducts special analyses to assess the impacts of a regionally significant project on minority, low income, underserved and Limited English Proficiency (LEP) populations. Regionally significant projects are those projects which serve regional transportation needs (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers; or transportation terminals) and would normally be included in the modeling of the metropolitan area's transportation network. At a minimum, this includes all principal arterial highways and all fixed guideway transit facilities that offer a significant alternative to regional highway travel. Mapping software is typically used by the RTC to find the aggregate amount of projects crossing census tracts with greater than average concentration of minority, low income, underserved and LEP populations. This exercise enables the RTC to ensure that a fair amount of investment is made to provide services to this socioeconomic group and that the projects are distributed in an equitable manner throughout the Southern Nevada region. In terms of the LEP population, it was determined that the Clark County average is 7.7 percent. Meanwhile, about 24 percent of regionally significant
projects crossed census tracts with a greater than average LEP population concentration (see Figure A).

**Figure A: Regionally Significant Projects and the Clark County LEP Population by Census Tract**

Transit Services
The RTC Transit Planning Department conducts special analyses to assess those routes that operate in minority, low income, underserved and LEP populations. The majority of RTC transit routes
operate in areas where there is a significant LEP population. In addition, all transit routes operate at least partially in LEP populations due to the length of the route and the expanse of the service area.

All RTC Transit vehicles contain material that allows persons of multiple languages to interpret information about the system. In addition, automatic annunciator systems provide multi-lingual announcements.

**Figure B: RTC Transit Services and facilities and the Clark County LEP Population by Census Tract**

**Factor 2: The frequency with which LEP persons come into contact with the RTC services and programs.**

**Transit Services**

Typically, the front line staff such as the bus drivers, dispatchers and call center staff are primarily in direct contact with LEP individuals on a daily basis. They are the ones answering to inquiries made
regarding transit and paratransit services or activities. Currently, the most common request for translation is Spanish and translation services for other languages are extremely rare.

In 2012, the RTC retained Strategic Solutions to conduct a Local Transit Riders Survey to help guide the decision making process for the agency in regards to marketing and outreach to its local customers. Out of the total of 400 random surveys completed, data shows that 46.5 percent of the riders preferred using the RTC Transit Guide to receive information about the RTC transit. Approximately 26.0 percent are using the RTC website and approximately 23 percent are asking the bus drives when they need information. This information is important because it means the RTC should continue to publish the Transit Guidebook as the majority of the riders are still dependent on that as opposed to using electronic versions such as the RTC website. It also emphasizes the need for well-trained bilingual staff for bus drivers who are knowledgeable about the services provided by the agency.

In 2016, RTC staff included at least 60 people who speak a total of 20 different languages. There is one in-house Spanish speaker certified through Clark County who spends 25 percent of staff time translating agency documents and an additional outside contractor that is certified through the State of Nevada. The RTC Call Center has staff that is capable of conversational Spanish and currently updating staff requirements to include a minimum of one certified Spanish speaker per work shift. In addition, per the most recent survey conducted by RTC’s Human Resources Department, there are sixty Spanish speakers, thirteen Tagalog speakers, four Mandarin speakers, six French speakers, three Hindi speakers, six German speakers, three Japanese speakers, two Asante speakers, two Ga speakers, two sign language interpreters, and one speaker each of Akon, Arabic, Bulgarian, Chinese, Danish, Italian, Korean, Lithuanian, Polish, Portuguese, Punjabi, Russian, Shona, Ukrainian, Urdu, Visayan. The aforementioned staff is conversational in the language(s) they speak and provide services as needed. When additional language services are requested, outside contractors, such as American Sign Language Communication and Preston Bass, provide these services with training from RTC staff.

**MPO Programs**

The staff resources that are discussed above are also available to the MPO as needed. Notices of public meetings held during the development and review of planning documents are always placed in Spanish language media. Staffing at these meetings normally includes at least one staff person able to converse in conversational Spanish, and more bilingual resources are committed to meetings in areas known to have a high proportion of Spanish speakers. Most MPO plans and programs are region-wide and cater to the demographics discussed under Factor 1. However more localized planning studies may affect communities with different demographics. Typically this will take the form of a higher than average Hispanic population. On at least one occasion when a study covered an area with a significant non-Hispanic minority, the RTC has translated the meeting notices into that language.

The RTC website is regularly updated to display the latest activities and the website allows for instant translation of the information posted in the following languages:

1. Chinese
2. Dutch
3. French
4. German
RTC is steadily increasing its use of social media and along with this will be looking for evidence of need to improve the effectiveness of our outreach to LEP persons.

Factor 3: The nature and importance of RTC services and programs in people’s lives.

Transit Services
The RTC provides public transportation services to the general population through its fixed route bus service as well as some specialized transportation services that are based on demand response, such as the paratransit services for the elderly and the disabled. The RTC is always striving to provide the exceptional customer service to its riders. Therefore, it is important to the agency that language is not a barrier for the LEP customers while accessing any such transit or transportation services.

In 2014, the RTC contracted with ETC Institute to conduct an on-board transit survey. The purpose of the study was to gather updated travel behavior data from transit users across all RTC fixed bus services. The data will be used to compile statistically accurate information about transit customers and how they use the transit system for transit agency planning purposes. Approximately 14,100 on board surveys were conducted and completed and 30,000 trips had their points of embarking and disembarking noted.

The results of the survey provided a breakdown of the residential bus routes ridership by race/ethnicity, income and age. On the residential routes, the survey found that approximately 37.4 percent of the respondents described themselves as White/Caucasian, 35.7 percent as African American, 23.5 percent as Hispanic/Latino, 7.5 percent as Asian, 2.3 percent as Native Hawaiian/Pacific Islander, 1.6 percent as American Indian/Alaska Native, 1 percent as Other. A majority of the residential bus route users (55.3 percent) have a household income below $30,000 and the greatest number of transit users ranged from ages 18-34. The substantial percentage of Hispanic riders suggests that the greatest need for translation services would be in Spanish language. This also indicates the importance of the Title VI regulations and the use of Federal funds to benefit minorities, low income, and LEP population who are typically the underserved population but the predominant users of public transit.

In order to keep the transit riders informed of any fare or service changes made by the RTC, notices are prepared, translated in Spanish language and posted in various ways to get the word out. Specific information related to all the various Transit services provided by the RTC is also available on the RTC website at [http://www.rtcsnv.com/transit/](http://www.rtcsnv.com/transit/). Collateral is created for all public outreach to educate the public in regards to RTC services, programs, policies, and fare and service changes. The material is disseminated in various formats both in English and Spanish.
The various outreach mediums that are used by the RTC to reach out to the community as a whole are:

- Social Media: Facebook and Twitter.
- Newspaper Ads: Las Vegas Review Journal (most popular local paper), The Sentinel Voice (African-American publication), El Mundo (Spanish translated), and Chinese Daily (Chinese translated)
- Radio Ads: Broadcast all participating English and Spanish stations.
- Collateral is placed in the interior of all the transit vehicles that reach all customers across the Las Vegas Valley including the electronic multi-media on board (MMOB) system.
- Collateral is placed at transit shelters throughout the Las Vegas Valley.
- Ads are placed on the exterior of transit vehicles traveling throughout the Las Vegas Valley.
- Information is posted at all transit facilities and all RTC offices.
- RTC transit pass sales team disseminates information to customers.
- Transportation contractor holds staff meetings to let employees and drivers know of changes.
- Fliers are produced and disseminated to all transit vehicle drivers.
- Transit vehicle drivers disseminate fliers to customers.
- RTC conducts an “ALL HANDS” training session alerting all personnel of changes including appropriate contracted personnel, such as Fare Enforcement Officers.
- Fare Enforcement Officers disseminate fliers to customers.
- Customer Service on hold phone messaging informs customers of upcoming changes.
- RTC staff (street teams) is placed at affected areas promoting changes.
- Signs/decals are posted at transit stops and on ticket vending machines.
- E-mail blast is disseminated to appropriate rtcsnv.com subscribers.
- Information is highlighted in all agency Pocket Guides distributed for free to customers.
- Information is highlighted in all agency Transit Guides sold to customers.
- News releases are disseminated to local television, radio and print media.
- Information is distributed to major community employers.
- Information is posted on the RTC website at rtcsnv.com.
- Homeowners Associations are notified via e-mail.
- Each local jurisdiction’s Neighborhood Services Department sends an e-blast to their perspective databases, as well as posting it within their respective facilities.
- Each local jurisdiction’s Business Development Office sends an e-blast to their perspective databases, as well as posting it within their respective facilities.
- Information is posted in libraries, community centers, and other community-gathering locales
- Information workshops/transportation fairs are held at local libraries, community centers, malls, major employers, community events, neighborhood meetings, and other community-gather locales throughout the Las Vegas Valley.
- Club Ride (the agency’s transportation demand management program) disseminates newsletters and e-blasts to its customers, as well as conducts weekly information workshops at their clients’ offices.

ADDITIONAL PARATRANSIT-SERVICE SPECIFIC OUTREACH MEDIUMS

Paratransit specific program information is available on the web at [http://www.rtcsnv.com/transit/paratransit/](http://www.rtcsnv.com/transit/paratransit/)

- Direct mail highlighting the proposed changes is sent to all Paratransit customers and their guardians/personal care attendants.
Newsletter article regarding the proposed changes is included in “Paratransitions” (newsletter disseminated to Paratransit customers).

Customer Service on hold phone messaging informs Paratransit customers of upcoming changes.

Collateral is created and placed in the interior of all the Paratransit vehicles.

Paratransit Certification office disseminates fliers to potential and current Paratransit customers and their guardians/personal care attendants.

Major Paratransit customer employers disseminate fliers to current Paratransit customers and their guardians/personal care attendants.

RTC Paratransit pass sales team disseminates information to customers.

Information is highlighted in the agency Paratransit Riders’ Guides and Paratransit Eligibility brochure given to customers.

**MPO programs**

The primary function of the MPO is to set out the long term needs for transportation investment in the region through the development and update of the 20-year Regional Transportation Plan (RTP). This plan provides a framework for discussion of the importance of transportation to the regional economy, accessibility, mobility and safety. Given the downturn in economy that had drastic effects in the lives of the Clark County residents, the RTC has turned its attention to the alternative modes of transportation as for those who, whether from necessity or choice, do not have access to an automobile for some or all of their travel needs. Current planning efforts seek to redress the balance and more resources are now being committed to the improvement of pedestrian and bicycle facilities and to addressing serious safety concerns.

Given the importance of the RTP, a Spanish-language edition of the Executive Summary to the current RTP has been prepared and made available over the agency website.

The RTP serves as a base for selecting projects to be implemented in the near-term using funding under federal transportation programs. These projects are identified in the Transportation Improvement Program (TIP). The RTC also conducts planning studies that are funded under the Unified Planning Work Program (UPWP). These studies often provide the basis for including projects in the RTP and TIP. When appropriate, the RTC will conduct outreach and provide information to the community on these studies. Outreach and informational material is typically produced in Spanish and may be translated into other languages if it is warranted.

**Factor 4: The resources available to the RTC Transit for LEP outreach, as well as the costs associated with the outreach.**

This analysis covers the resources available to support LEP outreach for both transit and MPO services and programs.

Each year, the RTC commits a considerable amount of funds and resources to provide for and improve access to its services and programs for traditionally underserved populations including LEP persons. The costs associated with customer services to the LEP population are part of RTC’s annual budget.

Currently, the Spanish population has a significant presence in the service area; therefore, a number of materials are created and translated in a format that is easily understood by this Spanish speaking
population. The RTC website is designed such that it can automatically translate the information into 12 languages including Spanish, French, simplified Chinese, German, Portuguese, Italian, Dutch, Greek, Japanese, Korean, Russian, and Swedish. The RTC also offers language translation services for public meetings at no cost to the public, if the request is made 48 hours prior to the time of the scheduled meetings. In addition to receiving comments from the public at various public meetings, the RTC makes a court reporter available to ensure that all comments are officially documented and responded to by the agency.

Due to the fact that there are a number of RTC staff who speak some specialized foreign languages and that Human Resources maintains a list of all such staff, the agency takes advantage of these important resources in order to provide language assistance to customers by making staff available to translate customer requests, when needed, and is able to do so at a very short notice.

Collateral are created and translated for outreach and marketing purposes to include:
- Direct mailings in English and Spanish
- Signs/decals are posted at transit stops and on ticket vending machines
- E-mail blast is disseminated to appropriate rtcsnv.com subscribers
- Information is highlighted in all agency Pocket Guides distributed for free to customers
- Information is highlighted in all agency Transit Guides sold to customers
- News releases are disseminated to local television, radio and print media
- Newsletters and e-blasts by Club Ride
- Spanish outreach materials (public notices, service explanations)
- English/Spanish on-board signage (how to use services, fares)
- English/Spanish brochures (i.e. fare box use, know your rights)
- Spanish route and time guides
- Spanish representation at public meetings

3.5.3 Implementation of the Language Assistance Plan (LAP)
One of the main tasks for the RTC is to monitor the prioritization of transportation projects in the Regional Transportation Plan (RTP) and the changes to RTC Transit routes, fares and services. In particular, the RTC must analyze any major decision made to the overall transportation system, particularly if it negatively affects areas of high concentration of LEP population. Some of the ongoing LAP implementation strategies include:
- Identifying the LEP Individuals who need Language Assistance
- Language Assistance Measures
- Staff Training
- Public Involvement
- Monitoring and Updating the LAP

Identifying the LEP Individuals who need Language Assistance:
The RTC will continue to monitor the language needs of the LEP individuals within its services area and will continue to do the following:
- Continue to monitor the languages and the customers’ needs encountered by the front-line staff.
- Continue to monitor the language preferences of the paratransit applicants.
- Continue to monitor the American Community Survey 1-Year Estimate published each year by the US Census Bureau for changes in the LEP population.
• Closely monitor the Census data and ensure that the Language Assistance Plan (LAP) is updated in a timely manner when the threshold population is reached in the Filipino community that is the fastest growing population in Southern Nevada besides the Hispanic population.

Language Assistance Measures:
The RTC will continue to implement the current measures to assist the LEP population and will continue to enhance its services to strengthen the LAP to include:
• Continue to provide for interpreters as needed, in Spanish and any other language requested.
• Maintain regular communication with the drivers, dispatchers and other front line staff regarding their experience with the LEP clients in order to assess the assistance provided.
• Continue to translate important notices regarding fares, service changes, and major transportation planning studies or changes in policies that may directly or indirectly impact the LEP population.
• Continue to work with local social services agencies to disseminate information to the LEP population and to collect information regarding the unmet needs.

Staff Training:
The RTC is going to ensure that staff is provided appropriate training in order to provide high level of customer service to the general population as well as the LEP population.
• All staff to be regularly trained for handling potential Title VI and LEP complaints.
• Staff with bilingual capabilities would be encouraged to work for the agency and will be given special training related to language assistance and how to handle potential Title VI and LEP complaints.
• Continue to survey staff for their language skills in order to provide conversation language assistance to RTC customers, as needed.

Public Involvement:
The RTC will continue to implement its very extensive and inclusive public outreach process as has been detailed previously.
• Continue to monitor the effectiveness of the current process via feedback received from the public as well as certain targeted surveys.
• Update the Public Participation Plan as needed.
• Explore new and innovative techniques and strategies to engage the public in transportation planning.

Monitoring and Updating the LAP:
The RTC will continue to update the LAP as required by the USDOT and as the characteristics of the population changes. Updates will be made as necessary and may include, but not limited to:
• Changes in LEP population by number or area as new information are made available.
• Updated analysis of the current LEP service area.
• Requirements for addition language translation services.
• Updates to policies and procedures, if such guidance is directed by the RTC Board.
Notice to LEP Persons:
Any person requesting language assistance should contact:
Kenneth Rodriguez
RTC Customer Service Manager
600 S. Grand Central Parkway, Suite 350
Las Vegas, NV 89106
(702) 676-1523 (phone)
(702) 676-1518 (fax)
rodriguezk@rtcsnv.com

3.6. Boards and Committees

Membership of the Board of the RTC is defined in the Nevada Revised Statutes and is comprised of eight members designated by each of the local governments in the region, as well as the Director of the Nevada Department of Transportation serving in an ex-officio capacity. The composition of the Board is thus determined by the cumulative decisions of each of the member entities.

The Board is supported and advised by a number of Committees and Subcommittees. In most cases, the adopted RTC Policies and Procedures define the entities or agencies to be represented, leaving the membership to be designated by the specified entities and agencies.

There are two committees whose membership is at the discretion of the RTC. These are the Transportation Access Advisory Committee (TAAC) and the Bus Shelter and Bench Advisory Committee (BSBAC). The following is an analysis of the membership of these two Committees.

3.6.1. Minority Participation in the Transportation Access Advisory Committee

The RTC currently has a transit-related advisory committee that is made of non-elected citizens. It is the Transportation Access Advisory Committee (TAAC). The TAAC provides public input on the special transportation concerns and needs of the elderly and disabled members of the community pursuant to the requirements of the Americans with Disabilities Act of 1990 (ADA). TAAC meetings are held the Wednesday before the last Thursday every other month at 1:30 p.m. in Room 108 of the RTC Administrative Building, unless otherwise posted. TAAC meeting schedule and agenda could be found at the RTC website at http://www.rtcsnv.com/about-the-rtc/meetings/taac/

The Policies and Procedures governing the membership of the TAAC state that: “The TAAC shall number no fewer than eight, nor more than 16 persons, each appointed by the RTC.” The committee membership is currently set at 13 members. As of June 2016, the demographic breakdown of the TAAC is as follows:

<table>
<thead>
<tr>
<th>Race and/or Ethnicity</th>
<th>Number on TAAC</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>10</td>
</tr>
<tr>
<td>Black or African American</td>
<td>2</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>1</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>0</td>
</tr>
</tbody>
</table>
Besides the demographic breakdown by race and ethnicity, amongst the current 13 members there are 6 persons aged 60 years or older and 5 persons with disabilities as members of the Committee out of which some committee members are either senior or disabled or both.

**Special Outreach for TAAC membership**

Per RTC Committee By-laws, all incumbents are provided a first priority of selection. In April 2013 RTC Staff included in the agenda an item to request interested Committee members submit their interest forms, Thirteen (13) incumbents submitted their forms and were approved by the RTC Governing Body in June 2015. There were no new members added for this term.

The following information was distributed by the RTC Governmental Affairs staff to an Email group that consisted of Hispanic and Asian Pacific community leaders. In addition to Title VI requirements, the RTC is required to seek committee representation from all entities that make up the RTC Governing Body (Boulder City, Henderson, Las Vegas, Mesquite and North Las Vegas). Personal calls were made by RTC Governmental Affairs staff to staff members of those under-represented communities seeking names of recommended committee applicants.

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**The Regional Transportation Commission of Southern Nevada (RTC) would like to reach out to the Hispanic and Asian communities to see who may be interested in serving as a representative on our Transportation Access Advisory Committee (TAAC). Below and attached is more information about TAAC. Please know that I am available to meet with you in person to further discuss or we can schedule a conference call.**

**What is the Transportation Access Advisory Committee?**

The Transportation Access Advisory Committee (TAAC) provides public input on the transportation-related concerns and needs of seniors and disabled members of the community as it relates to the business matters of the RTC’s various responsibilities including federal planning requirements, streets and highways funding, the freeway arterial system, and public transportation. Items are presented to TAAC for their review, discussion and recommendation prior to presentation to the RTC Board of Commissioners. TAAC also serves to meet the requirements for public participation in Section 5310 (Transportation for Elderly Persons and Persons with Disabilities).

**When Does the Committee Meet?**

This committee meets in alternating months on a Wednesday from 1:30 p.m. to 3:00 p.m. The committee is limited by its by-laws to the 1.5 hours meeting timeframe, unless a majority of the committee sees a need to vote an extension of the time.

**Term of the Committee:**

In July 2015 and continues through June 2017.

**Do I Get paid to be on this Committee?**

Members volunteer their time and service. The RTC does not pay members to participate in their committees.

Thank you for your time and I look forward to hearing from you.
In response, the RTC received community interest as well and accepted applications from individuals, referrals from retiring members of the 2013-2015 TAAC, and from community organizations that represent either disability or elderly interests.
3.6.2. Minority Participation in the Bus Shelter and Bench Advisory Committee

The 2005 session of the Nevada Legislature passed Assembly Bill 239, which transferred authority for bus stops from local governments to the RTC. AB 239 further required the establishment of an advisory committee to provide information and advice to the RTC concerning the construction and maintenance of those benches and shelters, thereby heightening Commission sensitivity to community needs and desires.

The Policies and Procedures governing the membership of the Bus Shelter and Bench Advisory (BSBAC) reflect the requirements of AB 239 as follows:
“Assembly Bill 239 mandates two members of the general public from each city within the county appointed by the governing body of that city and six members of the general public appointed by the Commission.”

As of June 2016, the demographic breakdown of the BSBAC is as follows:

<table>
<thead>
<tr>
<th></th>
<th>Total membership of BSBAC</th>
<th>Members appointed by RTC</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>9</td>
<td>6</td>
</tr>
<tr>
<td>Black or African American</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Asian</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

The RTC is mindful that this Committee has a low representation of minorities overall. Over the coming months, RTC will make efforts to increase minority representation similar to those being made for the Transportation Access Advisory Committee and described in 3.6.1 above.

3.7. Summary of compliance with Title VI by RTC and its Subrecipient(s)

The RTC Transit Department is responsible for the administration of the Section 5310 (Transportation for Elderly Persons and Persons with Disabilities) program. The subrecipient monitoring and compliance for this program are described in detail below:

In an effort to monitor and ensure compliance, periodic audits are performed by RTC staff. These audits are performed at both the on-site locations as well as in the form of randomized client calls and physical transportation performance monitoring. Further, the Grantees agree by contract that “the RTC, the Comptroller General of the United States, and the Secretary of Transportation, or any of their duly authorized representatives, shall, for the purpose of audit and examination, be permitted to inspect all work, materials, payrolls, and other data and records, and to audit the books, records, and accounts relating to the performance of the agreement. Further, the Subrecipient agrees to maintain all required records for at least three (3) years after the RTC has made final payment and all other pending matters are closed.”
The RTC will begin an investigation within fifteen (15) working days of receipt of a complaint and will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if an investigation is needed. If the complainant fails to provide the requested information in a timely basis, the RTC may administratively close the complaint. Accordingly the RTC will complete the investigation within ninety (90) days of receipt of the complaint. A written investigation report will be prepared by the investigator. The report shall include a summary description of the incident, findings and recommendations for disposition. Failure by the Grantee or subcontractor to carry out these requirements under Title VI shall constitute a material breach of the agreement, which may result in the termination of the agreement or such other remedy as the RTC deems appropriate.

3.7.1. Grant Recipients
The RTC’s contract with the grantees stipulates that “The Subrecipient selected as a result of this solicitation shall comply, and assure the compliance by its subcontractors under this project, with all requirements of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000d et seq., and U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act,” 49 C.F.R. Part 21, and any implementing requirements FTA may issue.

3.7.2. Recipients/subrecipients
Section 5310 recipients/subrecipients’ responsibilities include:

a. For direct recipients (transit operators who are FTA grantees), submitting a grant application to FTA and carrying out the terms of that grant;

b. Meeting program requirements and grant/funding agreement requirements including, but not limited to, Title VI reporting requirements;

c. Making best efforts to execute selected projects; and complying with other applicable local, state, and federal requirements.

Grantees further agree as a recipient of FAST Act funding to comply with all applicable requirements of the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. §§ 12101 et seq; Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. Section 794; 49 U.S.C. Section 5301(d); and the following regulations and any amendments there to:

a. U.S. DOT regulations, “Transportation Services for Individuals with Disabilities (ADA),” 49 C.F.R. Part 37;


e. DOJ regulations, “Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities,” 28 C.F.R. Part 36;

3.7.3. Roles and Responsibilities

In the role of a direct recipient (for non-FTA grantee transit operators or public entities, and for non-profits only), RTC's responsibilities also include:

a. Forwarding a grant application to FTA;
b. Entering into funding agreements with subrecipients; and
c. Monitoring subrecipient compliance with Federal requirements, through inclusion of such requirements in subrecipient agreements and through ongoing monitoring activities. (See Section XVI on Designated Recipient Program Management.)

3.7.4. Monitoring Compliance by Subrecipients

RTC makes appropriate certifications of compliance with Federal requirements. RTC includes language regarding these federal requirements in its contracts with subrecipients and requires each subrecipient to execute a certification of compliance with the relevant federal requirements. Subrecipient certifications are required of the subrecipient prior to the execution of a contract by RTC and annually thereafter when FTA publishes the annual list of certifications and assurances. RTC may also conduct onsite visits as described in the previous section.

3.7.5. Project Monitoring and Reporting

All grantees are required to report any Title VI complaints to the RTC in the monthly invoice and report. RTC maintains spreadsheets to track any Title VI incidents. The RTC also tracks project expenditures, amounts charged to funding sources, local matching sources, and project budgets and schedules. RTC will be responsible for reporting to FTA the total expenditures for each federal grant and reconciling the grant expenditures and revisions to the project budgets. Further, subrecipients are required to submit to RTC status reports on a quarterly basis.
3.7.6. On-Site Reviews
RTC and/or its representatives may perform on-site project monitoring visits with subrecipients. Site visits may be conducted using checklists that outline accounting and record-keeping requirements in compliance with OMB Circulars A-122 and A-87 if the subrecipient received operating assistance; OMB 49 CFR Part 18 and Part 19 administrative requirements; the regulatory requirements for receipt of federal funds; and vehicle inventory and maintenance records if the subrecipient received capital assistance.

3.7.7. Coordination
From the programming process perspective, the level of coordination in Southern Nevada is enhanced by virtue of RTC being the designated recipient for all urban and non-urban areas of Clark County (the largest populated county in Nevada).

RTC also makes every effort to coordinate the programming efforts. For small urbanized area programming the RTC works with the rural city councils and the township boards. RTC has also dedicated staff to manage the programming of the Section 5310 program in the region. This staff serves several functions that enhance coordination: day-to-day points of contact for other stakeholders in the region; reporting to RTC’s advisory groups; and also providing feedback to other staff on related aspects of RTC’s legislative program.

From the programming priorities perspective, RTC, through the Coordinated Transportation Plan, strongly encourages the following strategies that enhance service delivery for the transportation-disadvantaged population: enhancing land use and transportation coordination; promoting enhanced pedestrian access to public transit and other modes of travel; promoting coordinated advocacy and improving efforts to coordinate funding with human service agencies; improving inter-jurisdictional and intermodal travel; and developing and implementing mobility management approaches.

3.7.8. Other/Advisory Groups
The following groups also advise RTC’s administration of the programs:
Transportation Access Advisory Committee – provides public input on the special transportation concerns and needs of the elderly and disabled members of the community pursuant to the requirements of the Americans with Disabilities Act of 1990 (ADA). This committee is represented with a divergent group with various levels of expertise and ethnic origin.

3.7.9. Project Selection Criteria and Method of Distributing Funds
In connection with RTC’s Title VI monitoring obligations, as outlined in FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, (“Title VI Circular”), issued on October 1, 2012 applicants will be required to provide the following information:
1. The organization’s policy regarding Civil Rights (based on Title VI of the Civil Rights Act) and for ensuring that benefits of the project are distributed equitably among minority population groups in the project’s service area.
2. Information on whether the project will provide assistance to predominantly minority populations. (Projects are classified as providing service to predominantly minority populations if the proportion of minority persons residing in the project’s geographic service area exceeds the average proportion of minority persons in the region.)
3.7.10. Section 504 and ADA Reporting

RTC agrees to comply with the requirements of 49 U.S.C. 5301 (d), which states the federal policy that elderly individuals and individuals with disabilities have the same right as other individuals to use public transportation services and facilities, and that special efforts will be made in planning and designing those services and facilities to implement transportation accessibility rights for elderly individuals and individuals with disabilities. RTC also agrees to comply with all applicable provisions of Section 504 of the Rehabilitation Act of 1973, as amended, with 29 U.S.C. 794 which prohibits discrimination on the basis of disability and with the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. 12101 et seq., which requires that accessible facilities and services be made available to individuals with disabilities, and any subsequent amendments to these laws. Finally, RTC agrees to comply with applicable implementing federal regulations and directives and any subsequent amendments thereto.

RTC specifically requires in all third party contracts and funding agreements that the subrecipient/contractor at any tier complies with the applicable provisions of the Americans with Disabilities Act (ADA) of 1990, which prohibits discrimination on the basis of disability, as well as applicable regulations and guidelines issued pursuant to the ADA (42 U.S.C. 12101 et seq.), Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794; Section 16 of the Federal Transit Act, as amended, 49 U.S.C. § 5310(f); and their implementing regulations.

3.7.11. Metropolitan Transportation Planning

The MPO Department of the RTC does not pass through any Federal planning funds to subrecipients; therefore, this section is not applicable.

3.8. Title VI Equity Analysis for Construction of Facilities

Title 29 CFR Section 21.9 (b)(3) states that “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

The following facilities were constructed during this reporting period and consisted of thorough analysis of Environmental Justice (EJ) impacts within the surrounding area of the proposed locations of the respective projects and their residents. A brief narrative of each of the project is provided below and the respective EJ analysis is attached in the Appendix D.
3.8.1. Bonneville Transit Center

The construction of the Bonneville Transit Center (BTC) was completed and the facility opened in October 2010. It comprises of a 20,000 square foot terminal building to house RTC’s transit administration staff. The terminal building provides for customer service, ticketing, security, and a limited waiting area for patrons. The facility also includes a bike center with capacity to store nearly 100 commuter bikes along with other amenities such as restrooms with showers and a bicycle repair area. The site is located adjacent to one of the Strip and Downtown Express route stations and will have 16 on-site bus berths and 6 on-street positions, all with shaded waiting areas. The BTC is a landmark transit facility that showcases sustainability while improving access to/from downtown Las Vegas. The project was awarded the highest honor by the Green Building Certification Institute (GBCI) with Platinum LEED (Leadership in Energy and Environmental Design) designation.

The Bonneville Transit Center was constructed in order to replace and expand the operations of the former Downtown Transportation Center (DTC). A new transit center was needed primarily for two reasons. First, the DTC was located on City of Las Vegas property and needed to be relocated as the City wanted to implement its redevelopment plans in that area. Second, a larger and more efficient transit facility was needed to manage the projected increase in riders and transit departures. The larger facility was also needed to accommodate the expanded Bus Rapid Transit (BRT) system and recently added double-deck buses (the Deuce).

There was a very detailed and thorough environmental assessment conducted on two possible sites in order to evaluate the impacts of such a project in the area, based on NEPA guidance. A detailed analysis including the socioeconomic impacts and environmental justice, were conducted and a Finding of no Significant Impact (FONSI) was determined and it was deemed that the two site alternatives considered for the transit center were suited for the project area.

The project area was identified as an EJ community based upon race and income. Specifically, the census block groups within the project area had a minority population percentage that was higher than the Clark County percentage. Also, the median-household incomes for census block groups within the project area were aggregately lower than the poverty threshold used during the development of the environmental assessment.

The first site alternative discussed in the environmental assessment would require the acquisition and relocation of one retail business, approximately seven professional businesses (including two bail bonds and one professional office building), at least eight occupied residences (including two apartment buildings and a 160-unit apartment complex), and two parking lots used by businesses. Displaced businesses would be justly compensated and given relocation assistance; therefore impacts would be the temporary inconvenience of relocation. Residents and pedestrians in the vicinity of the project area would have greater access to other areas of the Las Vegas Valley and therefore benefit from an increase in employment opportunities. The increased access to minority and non-minority owned businesses in the vicinity of the project area would have a beneficial impact to the economy. In addition, the increased business development in the area would also create more job opportunities for low-income populations. Therefore, long-term impacts to EJ populations in the vicinity of the project area would be beneficial.
The second site alternative would not require the acquisition of land and relocation of residences or businesses from the 6.5-acre property. However, the RTC may acquire three parcels for this alternative. This would require the acquisition and relocation of two small businesses. This alternative would result in the same temporary impacts and beneficial impacts to the EJ population in the project area as the first site alternative.

The No Action alternative requires the staging of buses along roadways throughout the Las Vegas Valley including the downtown area. The staging of buses along streets would impede access to businesses and residences. Although the obstructed access would be a nuisance to patrons and business owners, it is unlikely that the impact to EJ populations would be significant. The staging of the buses on roadways would occur in many areas of Las Vegas and some of those areas may have EJ populations. However, the staging areas would not be limited to only areas containing EJ populations. There would not be a central transit terminal in the downtown area to accommodate existing and future transit operations under the No Action alternative. The EJ population in the project area would not benefit from the long-term transit, employment, and business opportunities of the proposed project. Ultimately, a portion of the first site alternative was chosen for the BTC.

3.8.2. UNLV (University of Nevada Las Vegas) Multi-Modal Transit Center
The proposed project involves the construction of a multi-modal transit center on approximately 1.2 acres of land located on the University of Nevada, Las Vegas (UNLV) campus. The site is located approximately 220 feet west of Maryland Parkway and 1,050 feet north of Tropicana Avenue, in unincorporated Clark County. Specific project land uses at the site are expected to include approximately six bus bays for future local and rapid transit routes, outdoor shelter waiting area, closed-circuit television cameras for security, ticket vending machines, and intelligent transportation systems to provide route and schedule information.

An environmental justice analysis for the facility was conducted as part of the Categorical Exclusion document submitted to FTA. The project area was identified as an EJ community based upon race and income, according to the following data from the 2000 U.S. Census Bureau:
- The aggregate minority percentage for the project area (53 percent) was higher than the Clark County percentage (50 percent).
- The percentage of persons below poverty level (14.7 percent) was higher than the Clark County percentage (10.6 percent).

It was concluded that the development of a transit hub would not be burdensome to disadvantaged passengers, and that the Disabled, Elderly, Minority, and Low-Income would not be disproportionately affected. Finally, the transit center provided a mode-choice for the area residents to get to and from UNLV and help reduce the use of automobiles on the roadway system and the resulting congestion (subsequently reducing pollution).

3.8.3. Centennial Hills Park-and-Ride Facility
This is a Park-and-Ride and a supporting Transit Terminal building on an approximately 14 acre site located west of US Highway 95, east of Durango Drive, immediately south of the Oso Blanca Frontage Road, in the City of Las Vegas.
An environmental justice analysis was conducted during the NEPA process. The project area was not considered an EJ community based upon race and income, according to the following data from the 2000 U.S. Census Bureau:

- The aggregate minority percentage for the project area (18 percent) was higher than the City of Las Vegas percentage (54 percent).
- The percentage of persons below poverty level (5.3 percent) was higher than the City of Las Vegas percentage (11.7 percent).

Despite the project area not being an EJ community, the percentage changes for the various EJ population characteristics between 1990 and 2000 were massive, ranging from 31 percent to 300 percent. Those percentage changes, as well as the overall population increase in the Las Vegas Valley, supported the need for the Park-and-Ride facility. It was concluded that the development of this Park-and-Ride would not be burdensome to the disadvantaged passengers, and that the Disabled, Elderly, Minority, and Low-Income would not be disproportionately affected. Finally, the proposed Park-and-Ride will help provide a mode-choice for the area residents to get to and from their workplace, primarily in the resort corridor, help reduce the use of automobiles on the roadway system and the resulting congestion (subsequently reducing pollution).

3.8.4. Park and Ride Facility at Durango Drive and Westcliff Drive

The proposed project involves the construction of a Park and Ride and a supporting transit terminal building on approximately 3.1 acres of land located west of Durango Drive, east of Angel Park Golf Course, and approximately one-quarter mile south of the Summerlin Parkway, in the City of Las Vegas. A shared-use trail and park is also planned immediately north of the proposed Park and Ride.

An environmental justice analysis was conducted during the NEPA process. The project area was not considered an EJ community based upon race and income, according to the following data from the 2000 U.S. Census Bureau:

- The aggregate minority percentage for the project area (32.4 percent) was higher than the City of Las Vegas percentage (54 percent).
- The percentage of persons below poverty level (4.1 percent) was higher than the City of Las Vegas percentage (11.7 percent).

Despite the project area not being an EJ community, the percentage changes for the various EJ population characteristics between 1990 and 2000, as well as the overall population increase in the Las Vegas Valley, supported the need for the Park-and-Ride facility. It was concluded that the development of this Park-and-Ride would not affect, separate, or isolate any neighborhoods, ethnic groups or minority and/or low-income populations. There is no disproportionate burden or benefit to any specific groups associated with the project.

3.8.5 RTC Mobility Training Center

The Regional Transportation Commission of Southern Nevada’s (RTC) Mobility Training Center (MTC) is a 14,700 square foot facility located at the existing RTC Sunset Maintenance Facility at 5165 West Sunset Road in the southern part of the valley.
It was designed to help Southern Nevadans, especially senior residents and persons with disabilities, move more independently throughout the community. At the MTC, citizens learn how to best utilize RTC fixed route transit services, as well as obtain Americans with Disabilities Act (ADA) Paratransit certification, providing them with independence and the freedom to travel to various destinations throughout Southern Nevada.

About Mobility Training
RTC Mobility Training is a free one-on-one or group training program to help persons with disabilities and senior citizens learn to use RTC fixed route transit service safely by developing skills and confidence needed to travel independently. The MTC features modern classrooms and an assessment center to provide firsthand transit boarding and fare box experience. The rich learning environment of the MTC will arm individuals with the necessary tools to access public transportation that will take them to jobs, appointments and social activities.

About ADA Paratransit Certification
RTC ADA Paratransit services are available to people who experience physical, cognitive, or visual impairments and are functionally unable to use the RTC’s fixed route transit services independently. All who request eligibility for Paratransit services must be certified and participate in a functional ability assessment.
4. TITLE VI REQUIREMENTS FOR METROPOLITAN PLANNING ORGANIZATIONS

This Chapter covers the requirements that must be followed by Metropolitan Planning Organizations (MPOs) that are subrecipients of Federal Transit Administration (FTA) funds.

As with the general requirements discussed in Chapter 3, these MPO requirements are set out in detail in FTA Circular C4702.1B of October, 2012.
4.1. Demographic Profile with Minority population in the Aggregate

4.1.1. Population Profile by Race and Ethnicity
The RTC, in its capacity as a regional transportation agency, compiles demographic data within Clark County for various planning purposes. This data is utilized to address the mobility needs of the population as a whole as well as to conduct equity analyses for transit and/or transportation related projects and their impacts on the traditionally underserved population. The traditionally underserved population is typically low income people, minorities, seniors, persons with disabilities, and people with Limited English Proficiency (LEP). RTC serves as the lead agency to all member agencies for conducting demographic data analyses that form the basis for transportation related needs assessment. This data is further analyzed to ensure that planning and implementation occurs in an equitable manner, and that there is no undue burden or negative impacts of any such activity on one socio-economic group over others.

The Southern Nevada region has been one of the fastest growing urbanized areas in the country, experiencing about 42 percent increase in population from 2000 Census to 2010 Census. Figure A illustrates the rapid growth in both population that occurred in the Las Vegas Valley between 1990 and 2013.

![Figure A: Population Trends for Clark County 1990 - 2013](source: Clark County Department of Comprehensive Planning, SNRPC Consensus Population Estimate.)

According to the 2013 American Community Survey (ACS), the total population of Clark County increased by 601,160 between 2000 and 2013 (see Table A).
Table A: Population Comparison by Race and Ethnicity

<table>
<thead>
<tr>
<th>CLARK COUNTY, NEVADA</th>
<th>2000</th>
<th>Percentage of total population</th>
<th>2013</th>
<th>Percentage of total population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total population</td>
<td>1,375,765</td>
<td>100.0</td>
<td>1,976,925</td>
<td>100.0</td>
</tr>
<tr>
<td>Caucasian (White)</td>
<td>984,796</td>
<td>71.6%</td>
<td>1,316,033</td>
<td>66.6%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>124,885</td>
<td>9.1%</td>
<td>209,072</td>
<td>10.6%</td>
</tr>
<tr>
<td>American Indian and Alaska Native not Hispanic</td>
<td>10,895</td>
<td>0.8%</td>
<td>11,481</td>
<td>0.6%</td>
</tr>
<tr>
<td>Asian not Hispanic Not Hispanic</td>
<td>72,547</td>
<td>5.3%</td>
<td>174,795</td>
<td>8.8%</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander Not Hispanic</td>
<td>6,412</td>
<td>0.5%</td>
<td>13,562</td>
<td>0.7%</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>166,971</td>
<td>8.4%</td>
<td>85,011</td>
<td>4.3%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>85,011</td>
<td>4.3%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hispanic or Latino¹</td>
<td>302,143</td>
<td>22.0%</td>
<td>582,084</td>
<td>29.1%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2013 American Community Survey, Five Year Estimates, Table B03002

Between 2000 and 2013, noticeable population increases occurred among various races and ethnicities. The Asian population has increased by 248 percent, the Native Hawaiian/Pacific Islander population has increased by 217 percent and those identifying as Hispanic or Latino ethnicity increased by 93 percent.

Figure B: 2013 Population Distribution by Race in Clark County

¹ Hispanic or Latino is considered Ethnicity, not Race per U.S. Census Bureau
Geographically, the heaviest concentration of non-white (or minority) population groups occurs in the central and northeast portions of the Las Vegas Valley (see Figure A). A relatively fair share of regionally significant transportation projects does cross minority census tracts, according to analysis summarized later in this chapter.

Figure A: Minority Census Tracts in the Las Vegas Valley

4.1.2. Population Profile of the Disabled Population by Age
The RTC as the transit provider serves a very important role in providing public transportation to the disabled population, seniors and seniors with disabilities. As evidenced in Table B, the number of seniors and seniors with disability has been fairly stable in the last decade. Also, it is important to note that in Nevada a person over the age of 62 years is considered a senior. However, it is difficult to extract the number of people over the age of 62 years from Census data. This increase reflects overall growth in the region; the proportion of seniors and seniors with disability has increased only slightly.
The population trend also indicates that the growth of the senior citizen population in Clark County is slightly below the national trend. Nationally, the senior population over the age of 60+ years has increased by 13.6 percent from 2000 to 2010. According to the U.S. Administration on Aging, the older population is becoming more racially and ethnically diverse as the overall minority population grows and experiences great longevity. Additionally, the percentage of older persons, which was 16 percent of the older population in 2000, is expected to grow to 24 percent by 2020.

### Table B: Total Number of Senior Citizens and Senior Citizens with a Disability

<table>
<thead>
<tr>
<th>Clark County, NV</th>
<th>2000</th>
<th>%</th>
<th>2005</th>
<th>%</th>
<th>2013</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Civilian Non-Institutionalized Population</td>
<td>1,375,765</td>
<td>100%</td>
<td>1,677,684</td>
<td>100%</td>
<td>1,952,917</td>
<td>100%</td>
</tr>
<tr>
<td>Civilian 65 years and Older</td>
<td>143,706</td>
<td>10.4%</td>
<td>179,150</td>
<td>10.7%</td>
<td>232,239</td>
<td>11.9%</td>
</tr>
<tr>
<td>With a disability</td>
<td>58,417</td>
<td>4.2%</td>
<td>62,076</td>
<td>3.7%</td>
<td>80,311</td>
<td>4.1%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, American Community Survey (2009-2013 Five Year Estimates), Table S1810 – Disability Characteristics.

The 2013 ACS also shows that this region has a significant number of residents of all ages with disabilities and it is very important that the RTC addresses the mobility needs of this particular group also (see Table C). While 11.5 percent of the total population is disabled, persons aged 65 and older compromise the largest percentage (37.2 percent) of the disabled population in the county.

### Table C: Disability Status of the Civilian Non-Institutionalized Population

<table>
<thead>
<tr>
<th>Clark County, NV</th>
<th>2013</th>
<th>Percentage of Age Group Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Civilian Non-institutionalized Population</td>
<td>1,952,917</td>
<td></td>
</tr>
<tr>
<td>With a disability</td>
<td>213,532</td>
<td></td>
</tr>
<tr>
<td>Under 18 years</td>
<td>350,605</td>
<td></td>
</tr>
<tr>
<td>With a disability</td>
<td>15,824</td>
<td>4.5%</td>
</tr>
<tr>
<td>18 to 64 years</td>
<td>1,233,344</td>
<td></td>
</tr>
<tr>
<td>With a disability</td>
<td>116,191</td>
<td>9.4%</td>
</tr>
<tr>
<td>65 years and over</td>
<td>232,239</td>
<td></td>
</tr>
<tr>
<td>With a disability</td>
<td>86,555</td>
<td>37.2%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, American Community Survey (2009-2013 Five Year Estimates), Table S1810 – Disability Characteristics

### 4.1.3. Population Profile by English Language Proficiency

In the Language Assistance Plan (LAP) provided in Chapter 3, there is a detailed analysis of the language assistance needs of the Clark County population. This section identifies the current and future needs for translation services in the planning processes. The latest Census data shows a steady growth of the increasingly diverse population in Southern Nevada. Clark County has experienced a substantial increase in non-English speaking population or people who speak a language “other than English”. The fastest growing group within the Asian population is Filipino. Asians constitute 8.5 percent of total population in Clark County.

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2 Source: U.S. Administration on Aging, Department of Health and Human Services.
4.1.4. Population Profile by Income and Poverty Level

As reported in the Regional Transportation Plan (RTP) 2013-2035, the Las Vegas region is one of the fastest growing urbanized areas in the country. However, the area was negatively impacted in growth and employment when the economic downturn started in mid-2008. In January 2008, the unemployment rate for the State of Nevada was at 5.4 percent and for Clark County the unemployment rate was 5.5 percent for the same period. By mid-2010, Clark County experienced one of the highest unemployment rates in the nation at 14.6 percent in July 2010. Although this region continues to grow, economic recovery has been slow for Clark County as well as the State of Nevada. The current unemployment for the state of Nevada is 5.8 percent as a whole and the Las Vegas region is at 6.2 percent. As of the 2013 American Communities Survey, 15.1 percent of the residents of lived below poverty level with majority of them being either African-American or Native American residents (see Table D).

Table D: Poverty Status in Clark County

<table>
<thead>
<tr>
<th></th>
<th>Total Population</th>
<th>Population below poverty level</th>
<th>% of population below poverty level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population for whom poverty status is</td>
<td>1,952,209</td>
<td>295,724</td>
<td>15.1%</td>
</tr>
<tr>
<td>White</td>
<td>1,302,483</td>
<td>172,478</td>
<td>13.2%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>203,112</td>
<td>50,001</td>
<td>24.6%</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>11,189</td>
<td>2,391</td>
<td>21.4%</td>
</tr>
<tr>
<td>Asian</td>
<td>173,942</td>
<td>17,266</td>
<td>9.9%</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>13,312</td>
<td>3,439</td>
<td>25.8%</td>
</tr>
<tr>
<td>Hispanic or Latino origin (of any race)</td>
<td>575,210</td>
<td>127,288</td>
<td>22.1%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2009-2013 American Community Survey Five Year Estimates– Table S1701
As the local economy worsened, the earning power of the residents decreased. As demonstrated in Table E, the Median Family Income as well as the Median Household Income decreased from 2005 to 2011. Both rebounded between 2011 and 2013 as the economy improved. Approximately 40 percent of the population in Clark County has annual income that is below the Median Family Income (MFI) in 2013 (MFI is $60,666) and approximately 47 percent of the population is below Median Household Income (MHI) (see Table E).

In spite of such rapid growth decline during the economic downturn, per the RTP 2013-2035, a much more sustainable growth trend is projected for Southern Nevada through 2035. It is also projected that an average annual population increase of about 1.8 percent is projected for this region over the next 25 years.

**Table E – Income Comparison for Clark County**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>414,377</td>
<td>637,740</td>
<td>450,617</td>
<td>696,834</td>
<td>461,236</td>
<td>710,058</td>
</tr>
<tr>
<td>Median income ($'s)</td>
<td>$56,886</td>
<td>$49,571</td>
<td>$55,766</td>
<td>$48,215</td>
<td>$60,666</td>
<td>$52,873</td>
</tr>
<tr>
<td>Less than $10,000</td>
<td>18,649</td>
<td>42,600</td>
<td>23,866</td>
<td>52,423</td>
<td>21,678</td>
<td>46,154</td>
</tr>
<tr>
<td>$10,000 to $14,999</td>
<td>11,010</td>
<td>30,353</td>
<td>14,335</td>
<td>35,011</td>
<td>13,837</td>
<td>31,243</td>
</tr>
<tr>
<td>$15,000 to $24,999</td>
<td>36,762</td>
<td>68,211</td>
<td>40,146</td>
<td>78,856</td>
<td>36,899</td>
<td>71,716</td>
</tr>
<tr>
<td>$25,000 to $34,999</td>
<td>46,900</td>
<td>77,270</td>
<td>45,908</td>
<td>81,179</td>
<td>46,124</td>
<td>80,237</td>
</tr>
<tr>
<td>$35,000 to $49,999</td>
<td>64,623</td>
<td>102,706</td>
<td>74,905</td>
<td>110,227</td>
<td>68,263</td>
<td>106,509</td>
</tr>
<tr>
<td>$50,000 to $74,999</td>
<td>95,246</td>
<td>132,808</td>
<td>90,987</td>
<td>132,674</td>
<td>95,476</td>
<td>141,302</td>
</tr>
<tr>
<td>$75,000 to $99,999</td>
<td>59,085</td>
<td>80,565</td>
<td>64,218</td>
<td>82,334</td>
<td>68,263</td>
<td>92,308</td>
</tr>
<tr>
<td>$100,000 to $149,999</td>
<td>57,294</td>
<td>71,292</td>
<td>58,151</td>
<td>77,345</td>
<td>68,263</td>
<td>87,337</td>
</tr>
<tr>
<td>$150,000 to $199,999</td>
<td>12,994</td>
<td>17,099</td>
<td>20,792</td>
<td>24,315</td>
<td>23,523</td>
<td>29,822</td>
</tr>
<tr>
<td>$200,000 or more</td>
<td>11,814</td>
<td>14,836</td>
<td>17,309</td>
<td>22,470</td>
<td>18,911</td>
<td>24,142</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, American Community Survey, Table S1901 “Income in the Past Twelve Months (2009-2013 ACS Five Year Estimates)
4.2. Assessing Mobility Needs of the Minority Population For Planning Purposes

The RTC’s long-range transportation plan includes a goal of enhancing public awareness of, and support for, the regional transportation system. With this goal in mind, many of the RTC’s MPO activities include the opportunity for Title VI population groups to provide input. This holds true of planning studies and construction of capital projects.

4.2.1. MPO Public Participation Plan

Under Section 2.3, Public Comment Opportunities, the Public Participation Plan touches on how the RTC incorporates minority and limited English proficiency communities into the process. This includes:

- Public meeting notices to minority publications, including the Spanish and Chinese language newspapers when necessary.
- Availability of an interpreter at public hearings and meetings, upon prior request.
- Availability of comment cards in both English and Spanish.

In general, RTC staff analyzes the census data regarding low-income, minority, and limited English proficiency population groups frequently. This analysis determines if additional public meetings are needed or if public outreach documents are translated for plan document updates, planning studies, and capital projects.

4.2.2. Planning Studies

With the Public Participation Plan providing the general strategy, the RTC has provided opportunities for public input on several planning studies with study areas heavily populated by several Title VI protected groups. The following is a list of those studies and a brief description of how the RTC provided public input opportunities:

- **2014 Household Travel Survey:** The RTC in contract with Westat sought the collection of demographic and travel data for 7,000 households in the Las Vegas Valley. Westat recruited over 11,000 households via address based sampling to participate. A total of 7,072 households provided travel details via website, computer assisted telephone interviews or mail back options. A subset of 10 percent of this group utilized global positioning system (GPS) technology to help record their daily trips. The outreach for the survey included Spanish language postcards to improve participation from Hispanic communities. The demographics of the retrieved households (completing the survey and reporting their data) compared to the percentages for the regional population as stated in the American Community Survey were as follows:

<table>
<thead>
<tr>
<th>Identifying as Hispanic Among Household Travel Survey Respondents</th>
<th>Retrieved Households</th>
<th>American Community Survey</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>14.4%</td>
<td>29.4%</td>
</tr>
<tr>
<td>No</td>
<td>83.5%</td>
<td>70.6%</td>
</tr>
<tr>
<td>Don’t Know</td>
<td>2.1%</td>
<td></td>
</tr>
</tbody>
</table>
Racial Demographics Among Household Travel Survey Respondents

<table>
<thead>
<tr>
<th></th>
<th>Retrieved Households</th>
<th>American Community Survey</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>67.0%</td>
<td>66.6%</td>
</tr>
<tr>
<td>African-American</td>
<td>9.4%</td>
<td>10.6%</td>
</tr>
<tr>
<td>Other</td>
<td>18.6%</td>
<td>22.8%</td>
</tr>
<tr>
<td>Don’t Know/Refused</td>
<td>4.9%</td>
<td>-</td>
</tr>
</tbody>
</table>

**Regional Bicycle Pedestrian Plan:** With a focus on minority communities and hard to reach populations, the RTC Regional Bicycle Pedestrian Plan project team arranged and attended 12 community events and spoke to hundreds of residents about how to improve walking and biking in Southern Nevada. Pop-up meeting locations were held in all section of the region, and were specifically chosen to focus outreach towards underserved and underrepresented communities in Southern Nevada. An equity map was created to select locations based on these community demographics.

At each event, participants were given information about the project and asked to take the online community survey on iPads. Approximately 300 community members took the online survey at one of the 12 pop-up events held around the region between October 2015 and February 2016.

**Metroquest Visioning Survey:** The RTC sought the community’s input to prioritize the region’s transportation and mobility needs and future projects. This has been performed to ensure that Southern Nevada has the proper transportation infrastructure in place to enhance connectivity and ensure mobility for our residents, now and in the future. Survey questions covered identifying top transportation priorities, preferences for safety, road priorities, spending, daily travel and transit, future investment. While many responses to the Visioning survey were received via the dedicated study web site, efforts were made by the RTC to get participation from low income, minority dominant areas. This was achieved by having staff distribute paper copies of the survey to waiting passengers in these areas.

Earlier studies which were conducted by the RTC in study areas heavily populated by Title VI groups included:

**The Community Mobility Study for Central Las Vegas:** Two initial public meetings were held to solicit comments on mobility in the study area. Visual representations of the project data generated during the data development/preliminary analysis were displayed and a series of questions were developed and asked to those participating in the meeting. Comments from the public meeting were incorporated, as appropriate, into the final analysis. During this timeframe a comprehensive mobility survey was distributed to solicit additional information that was also used as part of the final analysis.
Washington Avenue Complete Streets Study - The RTC sought initial community input on the Washington Avenue and Owens Avenue/Vegas Drive Complete Streets. This is a feasibility study to evaluate opportunities along Washington Avenue between Durango Drive and Nellis Boulevard and Owens Avenue/Vegas Drive between Rampart Boulevard and Nellis Boulevard for “Complete Streets” treatments. Short- and long-term improvements will be identified to make the study area more inviting for transit, bicycle, and pedestrian user.

Public workshops were held at Gibson Middle School and Rancho High School on November 19 and 20, 2013, respectively. Additionally, a survey was posted online in English and Spanish from November 4 to December 11, 2013. The input received about how people use the corridors, their preferences, and their observations about safety will help influence what improvements will be proposed in the study.

The City of Henderson ADA Planning Study will provide background research on demographics and provide a planning level ADA analysis of typical developments in their community. As directed by Title II of the Americans with Disabilities Act (ADA) both state and local governments must make their programs and services accessible to persons with disabilities. This relates not only to access to government facilities, programs, and events but also to pedestrian facilities within public rights-of-way. The information gathered during this study will form a starting point for the City of Henderson to update and/or create a new ADA Transition Plan to include the necessary assessment of public rights-of-way. Once the Public Rights-of-Way Accessibility Guidelines (PROWAG) are adopted by the Department of Justice, they will become enforceable standards under Title II of the ADA

4.2.3. Capital Projects
Most of the capital projects managed by the RTC’s MPO Department go through an environmental analysis and documentation in accordance with the National Environmental Policy Act (NEPA). As part of this process, an Environmental Justice analysis is conducted. Demographic data for minority and low-income groups, for both the project area and the entire county, is normally gathered and compared as part of the Environmental Justice analysis. Section 3.8 of the General Requirements chapter documents analysis done for the majority of capital projects managed by RTC during the current Title VI reporting period. In addition, the RTC monitors comments received during construction to ensure that construction activities are not disproportionately affecting minorities or minority-owned businesses.
4.3. Distribution of Funds in the Aggregate
This section describes the distribution of State and Federal funds in the aggregate that are managed by the Regional Transportation Commission of Southern Nevada and its impacts on minority and non-minority population. The analysis was conducted by overlaying the regionally significant projects on demographic maps.

4.3.1. Demographic Maps – Data Source and Methodology
This section provides the methodology to create maps for minority, low-income, elderly, disabled, and limited English proficiency populations in Clark County, Nevada. The maps (and data contained within them) are used by the RTC to determine if transit or MPO activities/projects impact the populations referenced above and if so, determine the extent. The data is periodically maintained in order to stay current with any major transit service change or long-range plan update.

4.3.2. Data Source
Population data comes from the U.S. Census Bureau. In particular, the two primary sources are the American Community Survey (ACS) five year estimates for the years between 2009 and 2013. We also utilized Remix transportation planning software, which was built on the same data range from the American Community Survey. For the purposes of determining activity/project impact, the RTC uses census tract-level data. The following list describes the particular data source within the U.S. Census Bureau for each population:

- Disabled: 2013 American Community Survey, 5 year Estimates, Table B23024, “Poverty Status by Disability Status”
- Elderly: 2013 American Community Survey, 5 year Estimates, Table B01001, “Sex by Age”.
- Limited English Proficiency: 2013 American Community Survey, 5 year Estimates, Table B16004, 5 year Estimates, “Age by Language Spoken At Home By Ability to Speak English”.
- Minority: 2013 American Community Survey, 5 year Estimates, Table B02001- “Race”

4.3.3. Methodology for Creating the Demographic Maps
The methodology to determine the location and concentration of identified population groups involves three steps, which are:

Step 1: Define the population groups. Non-white means a person who is Black, Hispanic, Asian American, or American Indian and Alaskan Native. White refers to a non-Hispanic Caucasian. Low-income means a person whose median household income is at or below the Department of Health and Human Service (HHS) poverty guidelines for 2013. Limited English proficiency means a person who speaks English "less than very well." Elderly means a person who is at 65 years of age or older. Disabled refers to a person who has a physical or mental condition that limits movements, senses or activities.
Step 2: Determine the average percentage for each population group within Clark County, Nevada.

- For each census tract, tally the total number of each population group using the definitions in step 1.
- To obtain the census tract percentage for a given population group, divide the total population group number by the total population number of the census tract.
- To obtain the average County percentage for a given population group, divide the total of all census tract percentages by the number of census tracts in Clark County, Nevada.

Step 3: Develop the demographic maps by census tract. For census tracts at or above the average Clark County percentage for a given population group, that tract was assigned a color on the map. Census tracts below the average percentage were not assigned a color. Thresholds two and three for the low-income demographic map were assigned colors.

4.3.4. Distribution of State and Federal Funds in the Aggregate for Public Transportation Purposes

During the development of the Fiscal Year 2013-2035 RTP, the RTC conducted a very thorough Environmental Justice (EJ) analysis of the distribution of State and Federal funds in the aggregate for public transportation purposes. This section summarizes the analysis done within the RTP, with slight updates to some of the data assumptions made and data sources used.

Table F shows the total portion in miles of regionally significant projects that cross each EJ population group by census tract. The table also shows the percentage of each EJ population group in Clark County. Finally, the table shows the total portion of regionally significant project costs that cross each EJ population group.
Table F: Regionally Significant Projects in relation to EJ Population Groups

<table>
<thead>
<tr>
<th>Category</th>
<th>Miles</th>
<th>% (Percentage)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Regionally Significant (RS) Miles</td>
<td>403.76</td>
<td>100.0%</td>
</tr>
<tr>
<td>Crossing Low-Income Census Tracts</td>
<td>177.65</td>
<td>44%</td>
</tr>
<tr>
<td>% of Low-Income in Clark County</td>
<td></td>
<td>19.3%</td>
</tr>
<tr>
<td>Crossing Minority Census Tracts</td>
<td>209.96</td>
<td>52%</td>
</tr>
<tr>
<td>% of Minority in Clark County</td>
<td></td>
<td>50.7%</td>
</tr>
<tr>
<td>Crossing LEP Census Tracts</td>
<td>96.90</td>
<td>24%</td>
</tr>
<tr>
<td>% of LEP in Clark County</td>
<td></td>
<td>14.7%</td>
</tr>
<tr>
<td>Crossing Elderly Census Tracts</td>
<td>161.50</td>
<td>40%</td>
</tr>
<tr>
<td>% of Elderly in Clark County</td>
<td></td>
<td>12.4%</td>
</tr>
<tr>
<td>Crossing Disabled Census Tracts</td>
<td>189.77</td>
<td>47%</td>
</tr>
<tr>
<td>% of Disabled in Clark County</td>
<td></td>
<td>21.1%</td>
</tr>
</tbody>
</table>

Source: US Census Bureau; Regional Transportation Commission of Southern Nevada

The following maps (Figures D through H) identify EJ populations in relationship to planned street and highway improvements in the RTP.

Census EJ Analysis
RTP 2013 - 2035 AB413 All Regionally Significant Projects
06-13-2016

<table>
<thead>
<tr>
<th>Category</th>
<th>LENGTH</th>
<th>FT</th>
<th>MI</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 RTP 2013-2035 AB413 Regionally Significant Projects in ACS 2013 5-Year Title VI Categories</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Low Income Block Groups</td>
<td>795,127</td>
<td>150.59</td>
<td>37%</td>
<td></td>
</tr>
<tr>
<td>2 Minority Block Groups</td>
<td>609,191</td>
<td>115.38</td>
<td>29%</td>
<td></td>
</tr>
<tr>
<td>3 Elderly Block Groups</td>
<td>683,096</td>
<td>129.37</td>
<td>24%</td>
<td></td>
</tr>
<tr>
<td>4 Limited English Proficiency Block Groups</td>
<td>844,888</td>
<td>160.02</td>
<td>40%</td>
<td></td>
</tr>
<tr>
<td>5 Disability Block Groups</td>
<td>496,996</td>
<td>94.13</td>
<td>23%</td>
<td></td>
</tr>
</tbody>
</table>
Figure E: Regionally Significant Projects Overlaid with the Minority Population by Census Tract
Figure F: Regionally Significant Projects Overlaid with the LEP Population by Census Tract

Source: ACS 2013 5-Year

Legend

- Regionally Significant Projects
- Regionally Significant Projects
- Census Block Group w/ Limited English Proficiency
- Population Greater Than Clark County Average

Clark County Average for the Limited English Proficiency Population is 7.07%
Figure G: Regionally Significant Projects Overlaid with the Elderly Population by Census Tract

Source: ACS 2013 5-Year

Legend
- Regionally Significant Projects
- Regionally Significant Projects
- Census Block Group w/ Elderly Population Greater than Clark County Average

Clark County Average for the Elderly Population is 11.87%
4.4. Self-Certification

FHWA and FTA jointly completed a certification review of the RTC in its capacity as the MPO in 2013. A specific recommendation that was made in this certification report regarding Title VI was “The RTC should continue to implement and expand its Title VI Program by continually reviewing its internal program areas, as well as its subrecipients”. The RTC’s response to this recommendation was to affirm its commitment comply with the requirements of the Title VI circular and ensure that RTC is committed to ensuring that no person is excluded from participation, denied the benefits of, or discriminated against under the projects, programs and activities on the basis of race, color, creed, national origin, sex or age, as provided in Title VI of the Civil Rights Act. RTC intends to periodically review any demographic changes via the annual population and employment forecasting and Census updates in order to strengthen its analytical process. These periodic reviews and analyses would help update the existing data and highlight changes to the socio-economic make-up of this region. The RTC will ensure that all such updates are then communicated to the local project agencies in order to facilitate full participation of the all the various socio-economic groups and in all stages of project development.

4.4.1. Analysis of Regional Demographic Data to identify Minority Populations

The RTC has developed an approach to collecting regional demographic data, including minority population data, per census tract. This data is overlaid with regionally significant projects or transit service routes to determine the positive and negative impacts. The methodology of this approach can be found in the sub-section, “Demographic Maps – Data Source and Methodology,” of this chapter.

When the 2013-2035 RTP was created, the regional demographic data was analyzed by census tract to identify the region’s population by minority, low income, LEP, elderly, and disabled. During the preparation of this report, some of the data was updated based on the most recent American Community Survey 5-Year Estimates and mapped for inclusion. Figures B thru F display the mapped demographic analysis for the region.

During the development of the 2013-2035 RTP, the RTC partnered with UNLV (University of Nevada, Las Vegas) and the member agencies to develop new regional forecasts of economic and population growth based on the updated projections of land uses in the Valley. RTC used the forecasts to revise the predictions of travel demand, traffic growth, and the analysis of air quality impacts. Input was sought from the various committees and the citizens during the development of major transportation related activities, such as, the RTP, TIP (Transportation Improvement Program) via meetings, surveys, and other public involvement activities, consistent with the agency’s Public Participation Plan. Consultations are also regularly conducted with the FHWA (Federal Highway Administration), FTA (Federal Transit Authority), EPA (Environmental Protection Agency) and NDOT (Nevada Department of Transportation).

4.4.2. Providing Member Agencies with Data

All data referenced above is available upon request. The RTC also provides comments and/or assistance with other member agencies on other planning efforts that have demographic data analysis. Specifically, RTC staff makes sure that the assumptions made by the member agency during the analysis do not heavily deviate with the RTC’s assumptions. For example, the RTC was asked to provide comments on demographic data maps created by the Southern Nevada Regional Planning Coalition for its planning effort (nicknamed “Southern Nevada Strong”) to develop a
Regional Plan for Sustainable Development. Overall, the cooperation between member agencies on demographic data analysis allows for less replication and better products.

4.4.3. Participation of Minority Community in the Planning Process

Incorporated within the RTC’s agency-wide public participation plan are strategies specifically designed to engage the LEP residents of Clark County. Depending on the area affected by a study or a plan these strategies have been used successfully to reach out to the public in general as well as the minority and LEP residents. More information can be found in the public participation plan and Section B (“Assessing Mobility Needs of the Minority Population for Planning Purposes”) of this chapter.

It is important to include the participation of minority community in the transportation planning process because often this group lacks the ability to drive an automobile or the financial resources to own one. Thus, they are in greater need of transportation options, including various transit services. Also, minority groups tend to be clustered by neighborhoods. Whenever this occurs, transportation providers can target a neighborhood to provide the specific service needs of that particular group. For example, certain Las Vegas transit routes for the elderly tend to have pick-up points in areas where there are senior homes.

One of the main tasks for the RTC is to monitor the prioritization of transportation projects in the RTP and the changes to RTC Transit routes. In particular, the RTC must analyze any major decision made to the overall transportation system, particularly if it negatively affects areas with a high concentration of any EJ group. The 2013-3035 RTP states potential actions that the RTC will take in order to ensure compliance with Title VI requirements. They are:

1) Planning for each project includes documentation of impacts on Minority and Low-Income populations.
2) Development of plan documents includes outreach to Minority and Low-Income populations through media serving these communities and public meetings held throughout the region.
3) RTC transit activities are continually reviewed and results summarized once every three years.
4) The RTC purchasing division maintains a list of qualified Disadvantaged Business Enterprises (DBE) and, in addition to the direct award of project, service, and acquisition contracts by the agency, contractors are required to make a good faith effort to involve DBEs as subcontractors.
5) The collective impacts of TIP projects are reviewed prior to TIP adoption.

During the development of the last RTP, the agency conducted various types of surveys to seek public input. In one of the surveys, the public were asked to provide the zip code of the area where they lived. There were a total of 466 surveys received by the agency. When the zip code of the survey respondents was overlaid on minority census tracts in Clark County, it showed that 108 of the survey respondents were from the minority area of the county or approximately 23 percent participation from the minority community. Although, this exercise is more anecdotal than scientific, it does provide a visual demonstration that is helpful in understanding which communities are currently being more proactive and the communities or areas that the RTC should make efforts for further outreach.
4.5. Conclusion: Disparate Impacts Analysis

The RTC is very aware of the mobility needs of the population that are minority, low-income, senior, disabled and LEP in order to ensure that the EJ component is thoroughly applied to:

- Develop fully integrated modal options.
- Improve access to mass transportation facilities and services.

While some of the transportation projects reach the new growth areas of Clark County, the vast majority of transportation investment in existing and new facilities is planned for centrally located areas. These areas are where higher concentrations of the various EJ populations live. Minority communities were of particular concern, because this group represents almost 51 percent of the Clark County population. In terms of lane miles, 52 percent of the regionally significant projects reach minority communities. Overall, the maps above show that street and highway spending is more than equitable. These projects provide positive impacts for all segments of the population in terms of travel-time savings, emissions reductions, congestion relief, and accessibility enhancements.

Meanwhile, a detailed mapping analysis with transit routes overlaid on demographic data by Census Tracts illustrates that the majority of the transit and transportation planning projects currently serve the center of the region which contains several predominantly minority areas (see Figure E).

In terms of negative impacts, construction activities to existing transportation corridors can often disrupt traffic flow and increase air/noise pollution in communities, including the targeted EJ communities in this analysis. These impacts occur, however, throughout the entire length of the various improvement projects. When these types of disruptions are anticipated during the construction period, traffic engineers must analyze and provide the needed alternate routes for people living in the targeted EJ communities to get to and from work, shopping, and other trips. Additionally, the negative temporary impacts of improvement projects are eventually compensated by better mobility within these corridors after completion of the construction project. A certification review of the MPO occurred in 2016, but the report from this was not available at the time of the preparation of the Title VI document.