

TITLE VI COMPLIANCE PLAN

CIVIL RIGHTS ACT OF 1964

Greater East End Management District

Title VI Policy Statement

The **Greater East End Management District (GEEMD)** assures that no person shall on the grounds of race, color and national origin, as provided by Title VI of the Civil Rights Act of 1964 excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which federal aid funds are used (Federally Funded Program). The **GEEMD** further assures every effort will be made to ensure nondiscrimination in all of its Federally Funded Programs. The policy will apply to all GEEMD Federally Funded Programs.

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color and national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.9 and 49 CFR 21).

GEEMD does not have any subrecipients but, in the event the GEEMD distributes federal aid funds to another governmental entity, the GEEMD will include Title VI language in all written agreements and will monitor for compliance.

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Introduction

The Greater East End Management District (GEEMD) was created in 1999 by the 76th Texas legislature and is one of the more than 20 districts in the Houston area. A bill to create the district was introduced in the House of Representatives and Senate. HB 3692 was signed into law on May 10, 1999.

GEEMD was formed to promote economic development, improve infrastructure and amenities, provide services to commercial property owners and create opportunities for workforce training and development. GEEMD has been working diligently to improve conditions in the East End by sponsoring urban development, public art and design, mobility improvements and a variety of successful efforts to improve the quality of life and opportunities for new development

Greater East End Management District Responsibilities

The President of the GEEMD is responsible for ensuring the implementation of the GEEMD's Title VI program. The Title VI Coordinator is responsible for the overall management of the Title VI program.

1. Data Collection

Statistical data on race, color, or national origin of participants in and beneficiaries of, federally funded programs is to be gathered and maintained. GEEMD will prepare and update a demographic profile of the region using the most current and appropriate statistical information available on race, income and other pertinent data annually. This information will be made available to the public on the District's website and in hard copy format, if requested.

2. Report and Update

Reports and updates will be submitted to the Federal Transit Administration (FTA) every three years or as required by FTA. The Title VI Coordinator is responsible for gathering information from appropriate staff members and consolidating this information into the final document. This documentation is to include:

- A report on the previous year's Title VI-related activities and efforts, including accomplishments and program changes.
- An update on Title VI-related goals and objectives for the upcoming year.
- A report on the training GEEMD staff provided or received on Title VI, Environmental Justice (EJ) or Limited English Proficiency (LEP).
- A list of Title VI complaints received and how they were addressed.
- An inventory of public meetings held, community outreach efforts, and data collected at each.

3. Annual Review of Title VI Program

In preparing for the Reports and Updates, the Title VI Coordinator will review the District's Title VI program to assure compliance. In addition, the Title VI Coordinator will review the District's operational guidelines and publications, including those for contractors, to ensure that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of Information Related to the Title VI Program

Information on GEEMD's Title VI program is to be disseminated to District employees, contractors, consultants as well as to the public.

5. Resolution of Complaints

Any individual may exercise his or her right to file a complaint with GEEMD, if that person believes that he or she or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits/services or on the grounds of race, color or, national origin,. GEEMD will make a concerted effort to resolve complaints as set forth in its Title VI Complaint Procedure, found in Appendix A.

6. Procedure Manual

This document serves as the Title VI Procedure Manual for the Greater East End Management District's Title VI program, incorporating the day-to-day procedures necessary to maintain the program. This manual will be updated regularly to incorporate changes and additional responsibilities.

Program Administration and Title VI Coordinator's Responsibilities

The President of GEEMD will:

1. Ensure that all aspects of the transportation planning process comply with Title VI.
2. Ensure participation of a cross section of various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic organizations and participating in roundtable meetings in minority communities, when applicable.
3. Assist the Title VI Coordinator in gathering and organizing information for internal annual Title VI Update Reports.
4. Review the Program Development work program and other directives to ensure compliance with Title VI program requirements.
5. Gather statistical data on program participation regarding race, color or national origin,

6. In the event the GEEMD passes federal funds to subrecipients, the subrecipient shall submit Title VI programs to the GEEMD for review and approval.

The Title VI Coordinator, as authorized by the President of the GEEMD, is responsible for initiating, monitoring, and ensuring GEEMD's compliance with Title VI requirements set forth in Federal guidance. In support of this, the Title VI Coordinator will:

1. Establish, maintain and update a Title VI procedures manual containing general information pertaining to the administration of GEEMD's program, as well as related documents.
2. Assess communications and public involvements strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed.
3. Ensure inclusion of Title VI language in contracts and Requests for Proposals (RFP), and contract solicitations.
4. Review consultants and contractors for Title VI compliance as described below:
 - Ensure that all consultants and contractors verify their compliance with Title VI procedures and requirements.
 - If a recipient or sub-recipient is found to not be in compliance with Title VI, the Title VI Coordinator and relevant staff will work with the recipient or sub-recipient to resolve the deficiency status and will write a remedial action if necessary.
5. Identify, investigate and work to eliminate discrimination when found to exist.
6. Process Title VI complaints received.
7. Maintain log of complaints received that include complaint number, complainant information, basis of complaint, summary and outcome of investigation.
8. Review important Title VI-related issues with GEEMD President, as needed.

Complaint Procedures for Federally Funded Programs and Activities

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, Equal Employment Opportunity (EEO) and On-the-Job Training (OJT) Program components, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any Federally Funded Program or activity administered by the GEEMD, as well as to sub-recipients, consultants, and contractors. These procedures apply to complaints filed against a program and/or activity funded by either the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA) or the Federal Aviation Administration (FAA) and other Federal offices.

Intimidation or retaliation of any kind is prohibited per Title 49, Code of Federal Regulations, Part 21.11(e).

The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination.

These procedures are part of an administrative process, which do not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the investigator may be utilized for resolution, at any stage of the process. The investigator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with the GEEMD (*see attached form*). A formal complaint must be filed within 180 calendar days of the alleged occurrence, or when the alleged discrimination became known to the complainant. The complainant must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Present the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
 - c. Present a detailed description of the issues including names and job.
 - d. **Allegations received by fax or email will be acknowledged and processed, once the identity(ies) of the complainant(s) and the nature of the complaint are determined. The complainant is required to mail a signed, original copy of the fax or email transmittal to the GEEMD in order for GEEMD to be able to process it.**
 - e. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return to the GEEMD for processing.

- f. If required, case file will be submitted to the appropriate authority.
2. Acceptance of a complaint will be determined by:
- a. Whether the complaint is timely filed;
 - b. Whether the allegations involve a covered basis such as race, or, national origin;
 - c. Whether the allegations involve a program or activity of a Federal-aid recipient, sub-recipient, or contractor; or, in the case of ADA allegations, an entity open to the public;
 - d. The complainant(s) acceptance of a reasonable resolution based on the GEEMD's administrative authority (reasonability to be determined by the GEEMD).
3. A complaint may be dismissed for the following reasons:
- a. Complainant requests the withdrawal of the complaint;
 - b. Complainant fails to respond to repeated requests for additional information needed to process complaint; or
 - c. Complainant cannot be located after reasonable attempts.
4. The GEEMD has sole authority for accepting complaints for investigation. Once the GEEMD decides to proceed with the investigation, the complainant and the respondent will be notified in writing of the determination within ten (10) calendar days. The complaint will receive a case number and then be logged into GEEMD's records identifying its basis, alleged harm, the race, color and, national origin of the complainant(s).
5. In cases where the GEEMD assumes investigation of the complaint, the District will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of GEEMD's written notification of acceptance of the complaint to furnish his/her response to the allegations.
6. Within 40 calendar days of the acceptance of the complaint, the GEEMD investigator will prepare an investigative report for the President of the GEEMD. The report shall include a narrative description of the incident, identification of persons interviewed, and findings and recommendations for disposition. The President will have 10 calendar days to review and provide comments to the investigator.
7. The President of the GEEMD will address any comments to the preliminary investigative report, and the report and its findings will be forwarded to GEEMD's legal consultant for review. The legal consultant will review the report and associated documentation and will provide input within 10 calendar days. There will be a period of 10 calendar days for the legal consultant to discuss the report and any recommendations with the President of the GEEMD for any needed modifications.
8. GEEMD's final investigative report and a copy of the complaint will be forwarded to either the FTA within 60 calendar days of the acceptance of the complaint.
9. GEEMD will notify the parties of its preliminary findings.

Ensuring Compliance of Title VI Requirements

The GEEMD operates its programs without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the GEEMD.

For more information on the GEEMD's civil rights program, and the obligations and procedures to file a complaint, contact 713-928-9916; email info@greatereastend.com or visit our office at 3211 Harrisburg Blvd., Houston, Texas 77003. For additional information, visit www.greatereastend.com.

If information is needed in another language, contact 713-928-9916.
Si necesita mas informacion en otro idioma, llame al 713-928-9916.

Public Participation

It is the goal of GEEMD to establish a public participation process that is effective and meaningful for citizens in order to engage them in planning activities. GEEMD will ensure that all members of the public are informed and involved early; that their issues and concerns are heard; and that their concerns are considered prior to any final decisions. The Public Participation Plan ensures that all communications and public involvement efforts comply with Title VI. GEEMD is committed to:

- Educate and effectively disseminate information to the public.
- Encourage effective communication among a diverse group of stakeholders
- Provide ample opportunity and promote continued participation
- Incorporate public comments and recommendations into the decision making process
- Evaluate the effectiveness of the public participation strategies.

Special Emphasis Program Areas

The President and Director of Economic Development and Infrastructure annually update and coordinate GEEMD's future plans for transportation improvement programs and projects. Projects included in the update are the result of evaluation and prioritization of needs in various transportation areas. The evaluation process includes input from GEEMD staff, cities, local jurisdictions and organizations, citizen groups, and private individuals.

Limited English Proficiency (LEP) Strategies

Strategies to provide meaningful access to LEP persons to ensure that they can communicate effectively will be achieved by some or all of the following measures including, but not limited to:

- Applying the "four factor analysis" process provided as a guideline from the U.S. Department of Justice to determine LEP needs. This process includes determining the number and proportion of LEP individuals within the population, the frequency with which LEP individuals will come

in contact with the program, the nature and importance of the program to people's lives, and the resources available to provide translation services. The results of this analysis will be used to outreach and engage LEP persons in the infrastructure planning process. Transportation planning is the responsibility of Houston Metropolitan Transit.

- Developing a demographic assessment for the impacted area to determine if there is 5% or 1,000 persons, whichever is less, of the total District population eligible to be served, affected or encountered and provide special language assistance and address the needs of the minority population.
- Providing for a range of language assistance options, including notices to LEP persons in a language they can understand regarding their right to free language assistance.
- Training to ensure that staff are knowledgeable and aware of LEP policies and procedures, the GEEMD Title VI Compliance Plan and are trained to work effectively in the facilitation of the process.
- Providing translation services for public documents and competent interpreters at public hearings as requested.
- Increasing opportunities for public involvement, particularly by historically underserved populations including LEP individuals by publishing notices of public meetings advertising in local and local minority newspapers.
- Monitoring the program to ensure that LEP persons have meaningful access to the transportation planning and implementation process.

Specific Activities for Limited English Proficiency Individuals

GEEMD has adopted the following policy regarding language assistance for Federally Funded Programs:

1. There will be at least one Spanish speaking employee at every public contact event when such a request is made in advance of meeting.
2. GEEMD will maintain a call list of employees that are available to provide language assistance and will contract with outside agencies that may assist with translation for languages other than Spanish upon sufficient advanced request.
3. Employment opportunities on Federally Funded Programs will be advertised in multiple languages, including English, Spanish and Vietnamese.
4. Published informational brochures, etc., regarding GEEMD Federally Funded Programs are written in English and can be translated to Spanish or Vietnamese upon request.
5. GEEMD does not operate transit services, contract for transit services, or oversee emergency responders. GEEMD's federal program is limited to implementing transit capital improvements.
6. American Sign Language interpreters will be available for face to face meetings with GEEMD staff regarding Federally Funded Programs upon sufficient advanced request.

7. The GEEMD will document interactions with LEP individuals in field activities and community meetings, including follow-up responses. Sign-in sheets for community meetings will request language preference.

Appendix 1

Greater East End Management District, Title VI Notice to Public

The **Greater East End Management District (GEEMD)** hereby gives public notice that it is the **GEEMD**'s policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all its federally funded programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which **GEEMD** receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the **GEEMD**. Any such complaint must be in writing and filed with the **GEEMD** Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from this office at no cost to the complainant by calling (713) 928-9916.

This notice is to be posted in the office of the **GEEMD**, on **GEEMD** website (www.greatereastend.com) and at other strategic locations throughout the District.

A shortened version of the above paragraph, such as the example below, may be used in publications where space or cost is an issue:

The Greater East End Management District fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information or to obtain a Title VI Discrimination Complaint Form, see our website or call 713-928-9916.

Spanish

Notificación de Título VI al Público

Es la póliza del Greater East End Management District de asegurar que ninguna persona sea excluida de participación o sea negada los beneficios, o sea discriminada bajo cualquiera de sus programas y actividades financiadas con fondos federales sobre la base de raza, color, origen nacional, como proveído por el Título VI del Acto de Derechos Civiles de 1964. Cualquier persona que cree que sus protecciones de Título VI han sido violadas, puede hacer una queja con el District. Para información adicional con respecto a los procedimientos de quejas de Título VI y/o información con respecto a nuestras obligaciones sin discriminación, por favor de comunicarse con los Coordinadores de Título VI del District, 713-928-9916.

Part A
For Contractors, Subcontractors, Suppliers, and Manufacturers

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

1. Compliance With Regulations

The contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter DOT), Title 49, Code of Federal Regulations, part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination

The contractor, with regard to the work performed during the contract, shall not discriminate on the grounds of race, color, and national origin in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment

In all solicitations either by competitive bidding or negotiations made by the contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the ground of race, color, and national origin.

4. Information and Reports

The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto and shall permit access to its books, records, accounts, other sources of information and its facilities as may be determined by the **Greater East End Management District** or the Texas Department of Transportation to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the contractor shall so certify to the **Greater East End Management District** or the Texas Department of Transportation as appropriate, and shall set forth what efforts it has made to obtain the information.

5. Sanctions for Noncompliance

In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, **Greater East End Management District** shall impose such contract sanctions as it or the Federal Highway Administration or Federal Transit Administration may determine to be appropriate, including, but not limited to:

1. Withholding of payments to the contractor under the contract until the contractor complies, and/or.
2. Cancellation, termination or suspension of the contract in whole or in part.

Appendix 2

Contract Complaint Procedures

The following pertains only to complaints regarding the infrastructure programs of the Greater East End Management District. For Title VI transit complaints, or if you believe you have suffered housing or employment discrimination, please contact the appropriate agency.

Title VI, 42 U.S.C. § et. seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement 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.

The GEEMD has in place a Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Complaint Form

Name: _____
Address: _____
City: _____ State: _____ Zip Code _____
Home/Cell Phone No: _____ Work Phone No: _____
Were you discriminated against because of:
☐ Race ☐ Color ☐ National Origin
☐ Other _____
Date of Alleged Incident: _____

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. If more space is needed please use the back of the form or attach additional sheet.

Have you filed this complaint with any Federal, state or local agency or with any Federal or state court? ☐
Yes ☐ No

If yes, check all that apply:

☐ Federal agency ☐ Federal court ☐ State agency ☐ State Court
☐ Local agency

Please provide information about a contact person at the agency/court where the complaint was filed.

Name _____
Address _____
City, State and Zip Code _____
Telephone Number _____

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

Signature

Date

Please mail this form to:

Title VI Coordinator
Greater East End Management District
3211 Harrisburg Blvd.
Houston, TX 77003
713-928-9916

Forma de Queja

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código Postal _____

No. de Hogar/Celular: _____ No. de Trabajo: _____

Ha sido usted discriminado a causa de:

☐ Raza ☐ Color ☐ Origen Nacional

☐ Otra Razon: _____

Fecha de Incidente Alegado: _____

Explique detalladamente lo que sucedió y como usted fue discriminado. Indique las personas involucradas.

Asegurese de incluir los nombres e información de contacto de los testigos. Si requiere mas espacio, por favor use la parte de atras de este forma o incluya una pagina adicional.

A presentado esta queja con alguna agencia federal, estatal, o local or o alguna corte federal, estatal, o local?

☐ Si ☐ No

En caso afirmativo, indique lo que corresponda.

☐ Agencia Federal ☐ Corte Federal ☐ Agencia Estatal ☐ Corte Estatal

☐ Agencia Local

Por favor incluya información sobre una persona de contacto de la agencia o corte a la cual se present la queja.

Nombre _____

Dirección _____

Ciudad, Estado, Código Postal _____

No. de Telefono _____

Por favor firme abajo. Puede anadir cualquier material escrito o información que usted piense que sea relevante a su queja.

Firma

Fecha

Por favor mandar este forma a:

Title VI Coordinator
Greater East End Management District
3211 Harrisburg Blvd.
Houston, TX 77003
713-928-9916

Appendix 3-
Title VI Compliance History

Greater East End Management District first adopted a Title VI Compliance Plan in 2009 and began implementation of the FTA grant in the third calendar quarter of 2011. As of Plan adoption, Greater East End Management District has no history of Title VI complaints, investigations or lawsuits.

The District does not provide transit services. Non-provision of transit service eliminates the necessity of analyzing the impact on minority and low-income populations of service and fare changes that occur, monitoring of service quality or system-wide service standards and policies.

Appendix 4

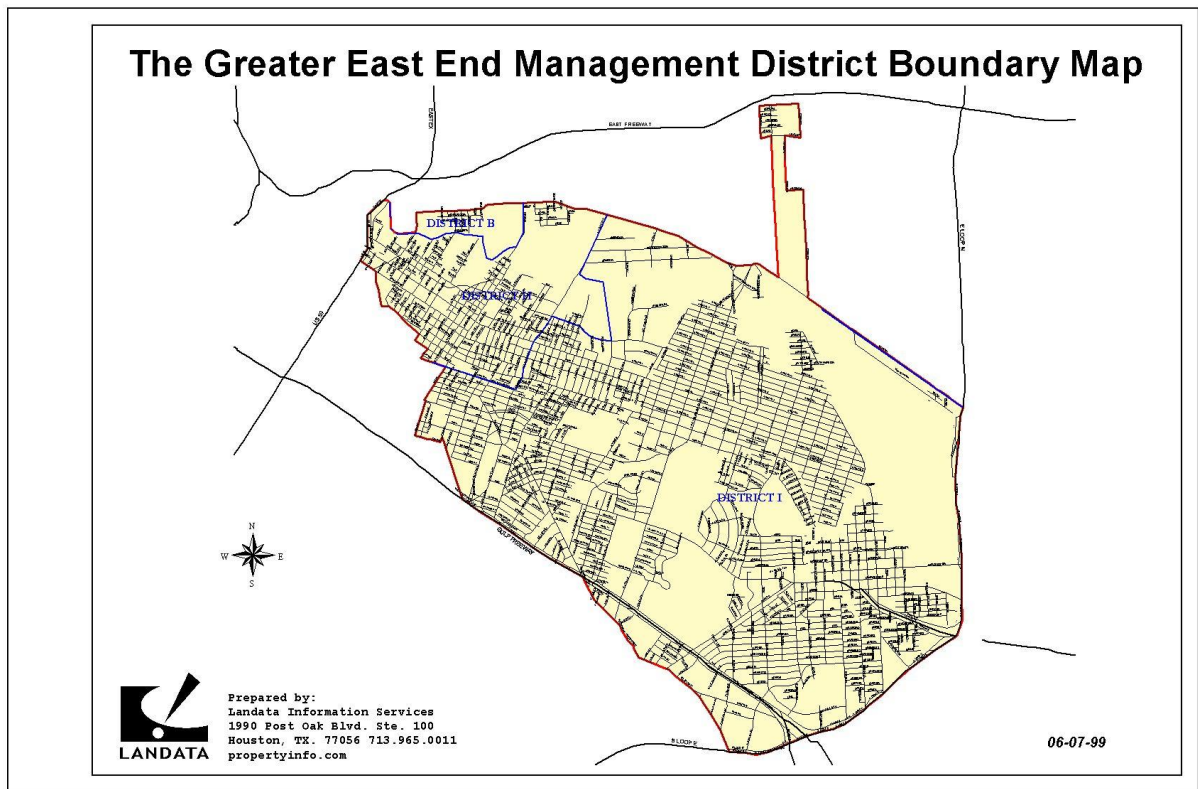
Four Factor Analysis

Limited English Proficiency Analysis and Plan

Greater East End Management District has conducted the Four Factor Analysis and developed its plan to provide meaningful access to transit-related improvements within the District's boundaries. The results are stated below:

Factor 1 - The Number and Proportion of LEP Persons Served or Encountered

Language Spoken at Home				
76693 Total Population	Total	Percent	English less than "very well"	Percent
English (only)	16431	21.4		
Spanish or Spanish Creole	59075	77	35875	60.7
French (Incl. Patois, Cajun)	167	.2	89	53
Italian	27	.03	15	55
Portuguese or Portuguese Creole	18	.02	0	0
Scandinavian	25	.03	0	0
Persian	15	.01	0	0
Gujarati	20	.02	0	0
Urdu	17	.02	0	0
Other Indic Languages	35	.04	35	100
Other Indo-European Languages	19	.02	19	100
Chinese	40	.05	29	72
Japanese	26	.03	0	0
Mon-Khmer, Cambodian	36	.04	26	72
Vietnamese	567	.7	336	59



Factor 2 - Frequency of Contact

The Greater East End Management District does not provide transit services, rather utilizes FTA funds to develop pedestrian infrastructure that enhances people's ability to easily access the transit services provided by Houston METRO. The most likely instances that LEP persons would come into contact with the projects conducted by the District is during procurement or construction. GEEMD informs the public during all procurement endeavors, advertising efforts, public meetings and other instances that documents, instructions and other vital materials can be translated into Spanish or other language at no cost to the user. Staff members were bilingual upon hire; therefore no extra training is necessary for translation of project information. During the planning of infrastructure, notices are provided in Spanish and Spanish-speaking staff is available at meetings. None of the construction projects require any detours or significant changes to accessing public transportation.

Factor 3 - Importance of Programs

Greater East End Management District utilizes FTA funds for the construction of pedestrian infrastructure. Primarily, within District boundaries, 34% of the population is transit-dependent, riding the bus, walking or biking to work. The construction of sidewalks, ADA ramps, pedestrian lighting and signalization provides benefit to all users of transit services and increases safe commute of all persons. Income analysis of the Districts population is as follows:

HOUSEHOLD INCOME		Percent of Total
Total (Estimate)	26148	
Less than \$10,000 (Estimate)	2993	11.40
\$10,000 to \$14,999 (Estimate)	2426	9.30
\$15,000 to \$19,999 (Estimate)	3080	11.78
\$20,000 to \$24,999 (Estimate)	2419	9.25
\$25,000 to \$29,999 (Estimate)	1920	7.34
\$30,000 to \$34,999 (Estimate)	1869	7.14
\$35,000 to \$39,999 (Estimate)	1518	5.80
\$40,000 to \$44,999 (Estimate)	1365	5.22
\$45,000 to \$49,999 (Estimate)	1321	5.05
\$50,000 to \$59,999 (Estimate)	1959	7.49
\$60,000 to \$74,999 (Estimate)	1814	6.93
\$75,000 to \$99,999 (Estimate)	1654	6.32
\$100,000 to \$124,999 (Estimate)	748	2.86
\$125,000 to \$149,999 (Estimate)	506	1.93
\$150,000 to \$199,999 (Estimate)	347	1.32
\$200,000 or more (Estimate)	209	0.79

Factor 4 - Resources Available and Associated Cost

Greater East End Management District offers LEP persons the opportunity for full access to information regarding infrastructure improvements projects. Bilingual staff members with the ability to proficiently translate oral information as well as translate written documentation are available. The District estimates that the cost of providing vital documents in two languages and the provision of other LEP-related efforts range from \$6,000 to \$12,000 annually. These costs are absorbed into the District annual budget.

Appendix 5

Public Participation Process

Greater East End Management District, while not involved in transit planning, maintains an ongoing public participation process for all construction projects. The Board of Directors meetings are posted and open to ensure a greater chance for involvement from concerned stakeholders. The projects are discussed in detail at the public meetings which occur before construction initiates. Separate stakeholder meetings are scheduled to discuss various aspects of the construction. Outreach by door-to-door bilingual contact is also undertaken with private property owners to make them aware in advance of construction activities. During construction, public meetings can be held as needed and monthly flyers are available in area businesses.