Title VI Plan
April 2018

Title VI/Non-Discrimination Policy

It is Eastgate’s Policy that all recipients of federal funds that pass through this agency ensure that they are in full compliance with Title VI and all related regulations and directives in all programs and activities.

No person shall, on the grounds of race, color, national origin, sex, age, disability, low-income status, or limited English proficiency be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of Eastgate's programs, policies, or activities.

This report was financed by the Federal Highway Administration, Ohio Department of Transportation, Federal Transit Administration, and Eastgate Regional Council of Governments. The contents of this report reflect the views of Eastgate, which is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect the official views or policy of the Department of Transportation. This report does not constitute a standard, specification, or regulation.
The Eastgate Regional Council of Governments is a multipurpose Regional Council of Governments for Ashtabula, Mahoning and Trumbull Counties, as established by Section 167.01 of the Ohio Revised Code. Eastgate is the agency designated or recognized to perform the following functions:

- Serve as the Metropolitan Planning Organization (MPO) in Mahoning and Trumbull counties, with responsibility for the comprehensive, coordinated, and continuous planning for highways, public transit, and other transportation modes, as defined in Fixing America’s Surface Transportation Act (FAST Act) legislation.
- Perform continuous water quality planning functions in cooperation with Ohio and U.S. EPA.
- Provide planning to meet air quality requirements under FAST Act and the Clean Air Act Amendments of 1990.
- Administration of the Economic Development District Program of the Economic Development Administration.
- Administration of the Local Development District of the Appalachian Regional Commission.
- Administration of the State Capital Improvement Program for the District 6 Public Works Integrating Committee.
- Administer the area clearinghouse function, which includes providing local government with the opportunity to review a wide variety of local or state applications for federal funds.
- Administration of the Clean Ohio Conservation Funds.
- Administration of the regional Rideshare Program for Ashtabula, Mahoning, and Trumbull Counties.
- With General Policy Board direction, provide planning assistance to local governments that comprise the Eastgate planning area.

**GENERAL POLICY BOARD (2018)**

Chair – Pat Ginnetti, Mahoning County
Vice Chair – Julie Green, Trumbull County

Mayor Eric Augustein, Village of Beloit
Mayor Ruth Bennett, Village of Orangeville
Mayor Jamael Tito Brown, City of Youngstown
Mauro Cantalamessa, Trumbull County Commissioner
Mayor John Darko, City of Hubbard
David Ditzler, Mahoning County Commissioner
J.P. Ducro, IV, Ashtabula County Commissioner
James Ferraro, Director, Western Reserve Transit Authority
Mayor Herman Frank II, Village of Washingtonville
Mayor Douglas Franklin, City of Warren
Mayor Richard Duffett, City of Canfield
Frank Fuda, Trumbull County Commissioner
Fred Hanley, Hubbard Township Trustee
Mark Hess, Trumbull County Transit
Mayor Arno Hill, Village of Lordstown
Mayor James Iudiciani, Village of Lowellville
Mayor Harry Kale, Village of New Middletown
Casey Kozlowski, Ashtabula County Commissioner
Paul Makosky, City of Warren
Mayor Shirley McIntosh, Village of West Farmington
Mayor James Melfi, City of Girard
John Moliterno, Western Reserve Port Authority

**TECHNICAL ADVISORY COMMITTEE (2018)**

Chair - Gary Shaffer
Vice Chair - Kristen Olmi

**CITIZENS ADVISORY BOARD (2018)**

Chair - Randy Samulka
Vice Chair - James J. Pirko
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Introduction

The Eastgate Regional Council of Governments serves as the federally-designated Metropolitan Planning Organization for Mahoning and Trumbull Counties, Ohio. As such, Eastgate is responsible for ensuring that existing and future expenditures of governmental funds for transportation projects and programs in the two-county region are based on a continuing, cooperative, and comprehensive planning process. In recent years, a renewed emphasis on Title VI issues and environmental justice has become a major focus of the transportation planning process. With that in mind, this document details Eastgate’s efforts to ensure compliance with Title VI and related non-discrimination and environmental justice regulations.

Policy Statement & Authorities

Title VI Policy Statement

The Eastgate Regional Council of Governments assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any agency-sponsored program or activity. Nor shall sex, age or disability stand in the way of fair treatment of all individuals.

Eastgate further assures that every effort will be made to ensure nondiscrimination in all its programs and activities, whether those programs and activities are federally funded or not. If Eastgate distributes federal aid funds to another entity, Eastgate will include Title VI language in all written agreements and will monitor for compliance. Title VI compliance is a condition of the receipt of federal funds. Eastgate’s Executive Director and Title VI Coordinator are authorized to ensure compliance with provisions of this policy and with the law, including the requirements of Title 23 Code of Federal Regulations (CFR) Part 200 and Title 49 CFR Part 21.

Eastgate acknowledges its responsibility for initiating and monitoring Title VI activities and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

James G. Kinnick, P.E., Executive Director
Eastgate Regional Council of Governments

Authorities

Title VI of the 1964 Civil Rights Act and its related statutes provide that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability, 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 (refer to 23 CFR 200.9 and 49 CFR 21).

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid Recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [S. 557] March 22, 1988).
Additional Authorities and Citations Include, but are not limited to: Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; 23 United States Code 324; Title II of the Americans with Disabilities Act of 1990; Department of Transportation Order 1000.12; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; Executive Order 13166; 23 CFR Parts 450 and 500; 28 CFR 35; 28 CFR 36; 28 CFR 41; 28 CFR 42, Subpart C; 28 CFR 50.3.

Organization & General Responsibilities

The Eastgate Regional Council of Governments (Eastgate), is the designated Metropolitan Planning Organization (MPO) responsible for transportation planning for Mahoning and Trumbull Counties, and a Transportation Management Area (TMA) formally identified and established in ISTEA, included in TEA-21, retained in SAFETEA-LU, and continued under the two-year transportation legislation known as Moving Ahead for Progress in the 21st Century (MAP-21) that was signed into law on July 6, 2012. While MAP-21 expired on October 1, 2014, it remained in effect in 2015 until a long-term transportation bill was approved. MAP-21 transportation legislation was substituted with Fixing America’s Surface Transportation Act (FAST Act) that was signed into law on December 4, 2015, and became effective on October 1, 2015. Eastgate annually develops and documents all transportation related planning activities, work strategies, planning programs, products, and the financial and functional responsibilities of all participating agencies and transportation staff within a given program year. The core planning program activities are financed through the Ohio Consolidated Planning Grant (CPG). The CPG is financed with a combination of FHWA metropolitan planning (PL) and Federal Transit Agency (FTA) 5303 planning funds.

Eastgate will continue to implement FAST Act planning initiatives for the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), the Transportation Work Program to address highway, public transportation, safety programs, rail, and performance measures protocols in consultation from FHWA, ODOT, Public transit operators and other stakeholders. Other emphasis areas include integrating performance measures into the MTP processes. Eastgate will continue to maintain adequate progress in the development of programs and plans committed to achieving short-range and long-term goals which directly affect our planning region.

Eastgate’s Executive Director is authorized to ensure compliance with provisions of Eastgate’s policy of nondiscrimination and the law, including the requirements of Title 23 CFR 200 and Title 49 CFR 21. Eastgate’s grants compliance function and Title VI coordination shall be performed under the authority of the Executive Director.

Eastgate Staff Profile
The breakdown of the agency’s current staff, including two part-time employees, is as follows:

<table>
<thead>
<tr>
<th></th>
<th>Male</th>
<th>Female</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caucasian</td>
<td>7</td>
<td>8</td>
</tr>
<tr>
<td>Non-Caucasian</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Total</td>
<td>7</td>
<td>10</td>
</tr>
</tbody>
</table>
Title VI/DBE Program Coordinator

The Title VI/DBE Coordinator of the Eastgate Regional Council of Governments is responsible for ensuring implementation of the agency’s Title VI Plan and assumes the role of Title VI Coordinator. The Title VI Coordinator has access to senior and executive staff, as well as the Finance/Executive Committee and General Policy Board officers and members. The Title VI Coordinator is responsible for coordinating the overall administration of the Title VI Plan, procedures, and assurances, and is also responsible for supervising staff activities pertaining to Title VI regulations and procedures set forth in federal guidance and according to Eastgate’s Title VI Plan. In support of this, the Title VI Coordinator will:

1. Identify, investigate, and work to eliminate discrimination when found to exist.
2. Process Title VI complaints received by Eastgate, as described in Appendix 1.
3. Meet with appropriate staff to monitor and discuss progress, implementation, and compliance issues related to Eastgate’s Title VI Program, including strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed.
4. Staff will be provided Title VI training on a yearly basis, or as needed.
5. Periodically review Eastgate’s Title VI Program to determine if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
6. Maintain and update Eastgate’s Title VI procedures manual.
7. Prepare any required Title VI reports and updates.
8. Ensure inclusion of Title VI language in contracts and Requests for Proposals (RFP).
9. Conduct Title VI reviews of all consultant contractors and recipients of federal funds directly distributed by Eastgate.

Complaint Procedure

The Eastgate Title VI Complaint Procedure is written to specify the process employed by Eastgate to investigate complaints, while ensuring due process for complainants and respondents. This procedure applies to all external complaints relating to any program or activity administered by Eastgate and/or its sub recipients, consultants and contractors, filed under Title VI of the Civil Rights Act of 1964 and its related statutes that prohibit discrimination based on race, color, national origin (including LEP), age, sex, or disability.

These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Intimidation or retaliation of any kind is prohibited by law.

Eastgate’s Title VI Complaint Procedure and the associated Title VI Complaint Form can be found in Appendix 1 at the end of this document.

Record of Title VI Investigations

There have been no Title VI complaints against Eastgate.
Title VI & The Planning Process

Regional Socio-Economic Profile & Data

The Eastgate MPO area includes Mahoning and Trumbull Counties and is made up of 10 cities, 12 villages, and 38 townships with a population of 437,923. Since 1970, the population of Eastgate’s area has been on a general decline. The projected population for 2040 is 389,880, a 13% decrease from 2010 levels. This projection is based on county-wide data provided by the Ohio Department Service Agency (ODSA). The ODSA predicts that the population decline will continue at least until 2040.

Exhibit A: Population trends in Eastgate Area

![Eastgate Area Population Chart]

Source: Ohio Development Services Agency

The current unemployment rates shown in Exhibit B compares Mahoning and Trumbull County to the national and state averages. Higher unemployment rates also contribute to a higher level of poverty in the region. Another contributing factor to high unemployment rates in the region is the number of households that do not own cars. According to the 2015 ACS 5-year projections, 18.8% of households in the City of Youngstown, and 12.9% in the City of Warren do not own vehicles. (1)

Exhibit B: Employment in the Eastgate Area

<table>
<thead>
<tr>
<th>Civilian Labor Force Estimates</th>
<th>Civilian Labor Force</th>
<th>Employed</th>
<th>Unemployed</th>
<th>Unemployment Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S.</td>
<td>159,807,099</td>
<td>93,327,346</td>
<td>7,510,934</td>
<td>7.4%</td>
</tr>
<tr>
<td>Ohio</td>
<td>5,849,603</td>
<td>3,427,867</td>
<td>269,082</td>
<td>7.2%</td>
</tr>
<tr>
<td>Mahoning County</td>
<td>113,044</td>
<td>60,931</td>
<td>5,991</td>
<td>8.9%</td>
</tr>
<tr>
<td>Trumbull County</td>
<td>94,551</td>
<td>49,828</td>
<td>3,687</td>
<td>6.9%</td>
</tr>
</tbody>
</table>

Source: 2012-2016 ACS Estimates CP03, DP03
(1) 2040 Metropolitan Transportation Plan
Exhibit C compares national and state poverty percentages on a county level and in Eastgate's core cities of Youngstown and Warren. From 2013 to 2016, the percentage of families below poverty in Mahoning County increased by .4%, while Trumbull County decreased by .1%. In the core central city of Youngstown, the percentage of families below poverty decreased by .18%, while the percentage of families below poverty in the city of Warren increased by 2.8%. The data correlates that families living in poverty, tend to centralize in core cities for access to community and medical services.

Exhibit C: Poverty in the Eastgate Area

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S.</td>
<td>9.9%</td>
<td>11.3%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Ohio</td>
<td>10.2%</td>
<td>11.6%</td>
<td>11.2%</td>
</tr>
<tr>
<td>Mahoning County</td>
<td>13.3%</td>
<td>13.4%</td>
<td>13.8%</td>
</tr>
<tr>
<td>Youngstown City</td>
<td>27.3%</td>
<td>30.4%</td>
<td>28.6%</td>
</tr>
<tr>
<td>Trumbull County</td>
<td>12.3%</td>
<td>13.4%</td>
<td>13.3%</td>
</tr>
<tr>
<td>Warren City</td>
<td>29.6%</td>
<td>28.2%</td>
<td>30.0%</td>
</tr>
</tbody>
</table>

Source: 2012-2016 ACS Estimates CP03, DP03

Income levels in Eastgate area are still lower than the national and state average. Income levels shown in Exhibit D, do show a slight increase in family median income from 2013 to 2016. Income in the cities of Youngstown and Warren is still lacking behind the county, national and state level. To address this disparity Eastgate’s has partnerships with the Regional Chamber to bring access to high paying jobs.

Exhibit D: Income in the Eastgate Area

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S.</td>
<td>$62,367</td>
<td>$64,719</td>
<td>$67,871</td>
</tr>
<tr>
<td>Ohio</td>
<td>$58,868</td>
<td>$61,371</td>
<td>$64,433</td>
</tr>
<tr>
<td>Mahoning County</td>
<td>$51,714</td>
<td>$54,118</td>
<td>$55,704</td>
</tr>
<tr>
<td>Youngstown City</td>
<td>$33,625</td>
<td>$31,642</td>
<td>$34,828</td>
</tr>
<tr>
<td>Trumbull County</td>
<td>$51,490</td>
<td>$53,975</td>
<td>$55,749</td>
</tr>
<tr>
<td>Warren City</td>
<td>$39,569</td>
<td>$37,047</td>
<td>$37,441</td>
</tr>
</tbody>
</table>

Source: 2012-2016 ACS Estimates CP03, DP03
Exhibit E displays population demographics in Eastgate’s area. From 2009 to 2016, minority population continues to decrease in our region. As educational attainment is achieved by individuals as displayed in Exhibit F, more graduates are leaving the area for high paying jobs. People living in the region are traveling further for employment due to the local economy. (1)

**Exhibit E: General Demographics of the Eastgate Area**

<table>
<thead>
<tr>
<th>General Demographics of the Eastgate Area</th>
<th>2009/2010</th>
<th>2013</th>
<th>2016</th>
<th>Mahoning County</th>
<th>Trumbull County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>449,135</td>
<td>445,825</td>
<td>437,923</td>
<td>233,015</td>
<td>204,908</td>
</tr>
<tr>
<td>White</td>
<td>377,961</td>
<td>376,499</td>
<td>368,631</td>
<td>186,878</td>
<td>181,753</td>
</tr>
<tr>
<td>Minority</td>
<td>71,174</td>
<td>69,326</td>
<td>69,292</td>
<td>46,137</td>
<td>23,155</td>
</tr>
<tr>
<td>Elderly 65 and</td>
<td>79,319</td>
<td>112,356</td>
<td>149,292</td>
<td>44,610</td>
<td>39,754</td>
</tr>
<tr>
<td>Disabled Non-Institutionalized Population*</td>
<td>64,831</td>
<td>66,567</td>
<td>64,928</td>
<td>35,546</td>
<td>29,382</td>
</tr>
<tr>
<td>Below Poverty Level*</td>
<td>75,239</td>
<td>69,717</td>
<td>59,409</td>
<td>32,156</td>
<td>27,253</td>
</tr>
<tr>
<td>Limited English Proficiency*</td>
<td>7,482</td>
<td>25,111</td>
<td>7,416</td>
<td>5,084</td>
<td>2,332</td>
</tr>
</tbody>
</table>

Source: 2012-2016 ACS Estimates CP02, CP03, DP02, DP03, DP05

(1) 2040 Metropolitan Transportation Plan

**Exhibit F: Educational Attainment in the Eastgate Area, 2016**

<table>
<thead>
<tr>
<th>Educational Attainment in the Eastgate Area</th>
<th>9th to 12th Grade, No Diploma</th>
<th>High School Graduate/No College</th>
<th>Some College/No Degree</th>
<th>Bachelor's Degree</th>
<th>Graduate or Professional Degree</th>
</tr>
</thead>
<tbody>
<tr>
<td>U.S.</td>
<td>7.4%</td>
<td>27.5%</td>
<td>21.0%</td>
<td>18.8%</td>
<td>11.5%</td>
</tr>
<tr>
<td>Ohio</td>
<td>7.5%</td>
<td>33.8%</td>
<td>20.6%</td>
<td>16.7%</td>
<td>10.0%</td>
</tr>
<tr>
<td>Mahoning County</td>
<td>7.4%</td>
<td>37.9%</td>
<td>22.4%</td>
<td>14.8%</td>
<td>8.0%</td>
</tr>
<tr>
<td>Youngstown City</td>
<td>14.5%</td>
<td>43.5%</td>
<td>20.3%</td>
<td>7.2%</td>
<td>3.7%</td>
</tr>
<tr>
<td>Trumbull County</td>
<td>8.0%</td>
<td>45.2%</td>
<td>18.4%</td>
<td>12.5%</td>
<td>5.4%</td>
</tr>
<tr>
<td>Warren City</td>
<td>12.4%</td>
<td>45.8%</td>
<td>19.7%</td>
<td>9.6%</td>
<td>3.2%</td>
</tr>
</tbody>
</table>

Source: 2012-2016 ACS Estimates CP02, DP02
Environmental Justice Evaluation & Assessment Procedures

To ensure that all populations are acknowledged and engaged in Eastgate’s comprehensive planning process which is referred to as the 3C planning process. These three elements of the 3C planning process are described as follows:

- **Continuing:** Planning must be maintained as an ongoing activity and should address both short-term needs and the long-term vision for the region;
- **Cooperative:** The process must involve a wide variety of interested parties through a public participation process; and
- **Comprehensive:** The process must cover all transportation modes and be consistent with regional and local land use and economic development plans.

Eastgate carries out the 3C planning process and maintains specific Environmental Justice procedures for proposed highway and transit projects. Eastgate utilizes a four-step process.

To ensure that all populations are acknowledged and engaged in Eastgate’s 3-C planning process, Eastgate maintains specific Environmental Justice procedures for proposed highway and transit projects. Eastgate utilizes a four-step process.

**Step 1 – Public Outreach**

The objective of Eastgate’s public outreach is to make every attempt to involve all stakeholders regardless of their demographic composition, and, those that may be directly impacted because of a transportation improvement. With the signing of Presidential Executive Order 12898, Eastgate has adopted an aggressive one-on-one approach. Eastgate approaches the communities to inform stakeholders who traditionally tend not to become involved through the regular informational or public involvement process. Eastgate utilizes our Public Participation Process to achieve public participation in all our programs.

**Step 2 – Demographic Profile**

Eastgate uses the most current 2012-2016 ACS Estimates from the U.S. Census data to focus primarily on two population groups: minority and low-income residents. The demographic profile summarizes the data for both population groups by U.S. Census Tract. The U.S. Census Bureau defines a census tract as “a geographic region defined for the purpose of taking a census.” Usually these tracts coincide with the limits of cities, towns and other areas that commonly exist within a county. There are 125 census tracts in Eastgate’s two county area. Although minority and low-income persons live throughout the Eastgate area, many are concentrated in specific locations and neighborhoods. A person is counted as a member of a minority group if he or she claimed any of the following in their Census return: African American/Black, American Indian and Alaskan Native, Asian, Native Hawaiian and other Pacific Islander, and Hispanic or Latino.

Based on data used in Eastgate’s analysis, minorities comprise 18.2% of the population. Therefore, any census tract with a percentage of population considered minority that was above 18.2% was considered to have a regionally significant concentration of minority population.
High Minority Percentage by Census Tract

Source: American Community Survey 5-Year Estimates 2015 - 2018
A similar approach was taken to establish regionally significant concentrations of low-income populations. Based on the data used in this analysis it was determined that regional poverty rate was 17.8% of the population in Eastgate’s region. Therefore, any census tract with a percentage of population considered “in poverty” that was above 17.8% was considered to have a regionally significant concentration of low-income population.
Eastgate also evaluated high disability populations in the region. Based on the data used in the analysis, 15.1% of the population within the region have a regionally significant concentration of disabled individuals living in the region.
Step 3 - Environmental Effects

To comply with Presidential Executive Order 12898, a list of project control variables was established to qualitatively evaluate the environmental effects of projects that are located in high minority or low-income areas. To accomplish this, the statement "How will this project impact the following" was subjectively applied to the following environmental variables. The variables considered were:

- Air, Noise, and Water
- Safety
- Congestion
- Aesthetics
- Natural Environment
- Character of Existing Community
- Economic Vitality
- Businesses
- Residents
- Accessibility

Step 4 - Analysis of Environmental Effects

To apply the control variables a list of transportation projects that had potential effects on minority or low-income populations is generated. To accomplish the analysis, proposed projects are overlaid onto the minority and low-income census tract maps. Projects are reviewed and a determination of their locality. If a project is determined to be in an area identified as a regionally significant concentration of minority or low-income further analysis is needed. Projects not located in these areas are exempted from further analysis.

Strategies for Engaging Individuals with Limited English Proficiency

According to the 2010 Census, 7,416 (approximately .016%) of persons in the Eastgate region speak a language other than English at home, with Spanish being the most used non-English language.

Exhibit E: General Demographics of the Eastgate area

<table>
<thead>
<tr>
<th>General Demographics of the Eastgate Area</th>
<th>2009/2010</th>
<th>2013</th>
<th>2016</th>
<th>Mahoning County</th>
<th>Trumbull County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>449,135</td>
<td>445,825</td>
<td>437,923</td>
<td>233,015</td>
<td>204,908</td>
</tr>
<tr>
<td>White</td>
<td>377,961</td>
<td>376,499</td>
<td>368,631</td>
<td>186,878</td>
<td>181,753</td>
</tr>
<tr>
<td>Minority</td>
<td>71,174</td>
<td>69,326</td>
<td>69,292</td>
<td>46,137</td>
<td>23,155</td>
</tr>
<tr>
<td>Elderly 65 and</td>
<td>79,319</td>
<td>112,356</td>
<td>149,292</td>
<td>44,610</td>
<td>39,754</td>
</tr>
<tr>
<td>Disabled Non-Institutionalized Population*</td>
<td>64,831</td>
<td>66,567</td>
<td>64,928</td>
<td>35,546</td>
<td>29,382</td>
</tr>
<tr>
<td>Below Poverty Level*</td>
<td>75,239</td>
<td>69,717</td>
<td>59,409</td>
<td>32,156</td>
<td>27,253</td>
</tr>
<tr>
<td>Limited English Proficiency*</td>
<td>7,482</td>
<td>25,111</td>
<td>7,416</td>
<td>5,084</td>
<td>2,332</td>
</tr>
</tbody>
</table>

Source: 2012-2016 ACS Estimates CP02, CP03, DP02, DP03, DP05
To provide meaningful access to Eastgate’s programs and services, special attention is given to ensure equal participation for persons with Limited English Proficiency. Eastgate analyzed and mapped data of individuals in the region by census tracts with a Significant Limited English Proficiency who speak “English Less than Very Well.” The data concluded that 1.8% of the Eastgate population is English Deficient. Therefore, any census tract with a percentage of population considered English Deficient that is above 1.8% is considered to have a regionally significant concentration of those living with Limited English proficiency.

Eastgate will make every effort to the maximum extent possible to provide language assistance when requested. Eastgate’s website has a translation feature available. This provides the capability of easily translating the website, including agency documents, and over 70 languages. At public meetings, maps and other displays are presented in the simplest format possible, to allow for easy understanding.
Consultant Contracts
On occasion, Eastgate will subcontract with consulting firms to conduct studies or compile information. Eastgate operates under its internal contract procedures and all relevant federal and state laws. All Eastgate contracts with consultants will include language specifying the consultant’s responsibilities for non-discrimination and for complying with Title VI requirements.

To encourage the use of qualified minority firms and contractors, Eastgate will use goals for Disadvantaged Business Enterprise (DBE) participation as established by ODOT. When preparing to subcontract, Eastgate will use the State of Ohio’s DBE directories listing minority-owned businesses and consultants. Notices of Requests for Proposals (RFPs) will be posted on ODOT’s bulletin board and Eastgate’s website. Consultant contracts will be reviewed for Title VI compliance, with inclusion of Title VI language in contracts and RFPs. If a subcontractor is found to be not in compliance with Title VI, the Title VI Coordinator and relevant staff will work with them to resolve the deficiency status.

Public Participation Process
It is Eastgate’s goal to have significant and ongoing public involvement in the transportation planning process. The agency seeks to engage the public and provide them with ample means to voice their ideas and opinions regarding transportation issues. Eastgate strives to ensure early and continuous public involvement in all major actions and decisions.

As required by federal regulations, Eastgate has developed a Public Participation Process. Eastgate’s Public Participation Process outlines specific techniques to help encourage participation among the traditionally-underserved population. This policy encourages the incorporation of as many techniques as possible to help reach a more specific audience that may be traditionally-underserved during the transportation planning process.

Techniques used by Eastgate include: avoiding technical jargon whenever possible; displaying information in visual manners where possible; having a user-friendly website, which provides comprehensive information on agency activities and regional transportation planning and other issues, as well as agency reports and other documentation; encouraging effective communication among a diverse group of stakeholders; holding public meetings in accessible locations; and involving neighborhood groups and organizations.

The full document can be found in Appendix 2 of this document.
Appendix 1

Nondiscrimination Complaint Procedures for Eastgate’s Programs or Activities

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, 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 programs or activities administered by Eastgate.

Intimidation or retaliation of any kind is prohibited by law. 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. Every effort will be made to obtain early resolution of complaints.

Nondiscrimination Complaint Procedure

1. Submission of Complaint.
Any person who feels that he or she, individually or as a member of any class of persons, based on race, color, disability, sex, age, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by Eastgate may file a written complaint with Eastgate’s Title VI Coordinator. The complaint may be filed by the affected individual or a representative and must be reduced to writing. A sample complaint form is attached and is available on Eastgate’s website: www.eastgatecog.org for downloading, and is available in hard copy at the Eastgate offices. Upon request, Eastgate will mail or email the complaint form. Such complaints must be filed within 180 calendar days after the date the discrimination occurred.

Complaints should be mailed to:
Eastgate Regional Council of Governments
Mirta Reyes-Chapman, Title VI Coordinator
100 E. Federal Street, Suite 1000
Youngstown, OH 44503

2. Referral to Review Officer.
Upon receipt of the complaint, Eastgate’s Title VI Coordinator shall acknowledge the receipt in writing to the complainant and review the complaint for jurisdictional authority. The acknowledgement shall include notification that an investigation will be conducted (if jurisdictionally permitted). A copy of the complaint and the acknowledgement will then be forwarded to ODOT, Title VI Coordinator. The staff review officer(s) shall complete their review no later than 30 calendar days after the date Eastgate received the complaint. Upon completion of the review, the staff review officer(s) shall prepare a written recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the Eastgate’s processes relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations, along with all supporting documentation, to Eastgate’s Executive Director for concurrence. If the Executive Director concurs, Eastgate’s written response to the Complainant will be issued. In addition, a copy of the complaint and the resulting written response shall be forwarded to the appropriate ODOT, FHWA and FTA contacts.

3. Request for Reconsideration.
If the Complainant disagrees with Eastgate’s response, he or she may request reconsideration by submitting the request, in writing, to the Executive Director within 10 calendar days after receipt of the response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were
not fully understood by the review officers. The Executive Director will notify the Complainant of the decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Executive Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2 above.

4. Appeal.
If the request for reconsideration is denied, the Complainant may appeal the response by submitting a written appeal to Eastgate’s Finance/Executive Committee no later than 10 calendar days after receipt of the written decision rejecting reconsideration. Eastgate’s Finance/Executive Committee will decide on the complaint, and will notify the complainant within 60 days.

5. Submission of Complaint to the State of Ohio, Department of Transportation, Division of Chief Legal Counsel & Equal Opportunity. If the Complainant is dissatisfied with the Eastgate’s resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of Ohio, Department of Transportation, Division of Chief Legal Counsel & Equal Opportunity for investigation. The Division of Chief Legal Counsel & Equal will forward the complaint to the Ohio Division of the Federal Highway Administration. Upon conclusion of the investigation, a letter will be sent to the complainant.

Should the results of the investigation or appeals show that Eastgate acted in a manner deemed discriminatory, Eastgate will follow the recommendations detailed in the investigative report to remedy the discriminatory practice.

For additional information on Eastgate’s complaint process, please contact:

Eastgate Regional Council of Governments
Mirta Reyes-Chapman, Title VI Coordinator
100 E. Federal Street, Suite 1000
Youngstown, OH 44503
(330) 779-3800

Title VI Complaint Form

This form may be used to file a complaint with the Eastgate Regional Council of Governments based on purported violations of Title VI of the Civil Rights Act of 1964. You are not required to use this form; a letter that provides the same information will be sufficient to file your complaint.

If you need assistance in completing this form, please contact us by phone at (330) 779-3800, or by email at: TitleVI@eastgatecog.org
Eastgate Regional Council of Governments
Title VI Discrimination Complaint Form

Name: ________________________________

Street Address: ________________________

City: __________________ State: _______ Zip Code: ____________

Telephone: __________________ Email: ______________________

Name of persons who allegedly discriminated against you:

____________________________________

Basis of Discriminatory Action(s):

□ Race □ Color □ National Origin □ Sex □ Age □ Disability

Date of Alleged Discrimination:

Date discrimination began: ________________ Last or most recent date of discrimination: ________________

Explain:

Please explain as clearly as possible what happened and in what manner you were discriminated against. Provide the name(s) of witnesses and others involved in the alleged discrimination. Attach additional pages if necessary and provide a copy of written materials pertaining to your complaint.

____________________________________

____________________________________

____________________________________

____________________________________

____________________________________

____________________________________

____________________________________

____________________________________

____________________________________

Signature __________________________ Date ____________________
Appendix 2

Eastgate’s Public Participation Process

1. Introduction

1.1 Strategy

Eastgate Regional Council of Governments (Eastgate) remains committed to a proactive transportation planning and public involvement process. Eastgate supports early and ongoing public involvement in developing the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP) and all other program activities.

It is Eastgate’s objective to reaffirm this commitment through a specific plan of action designed to provide maximum opportunity for public involvement in consultation with all interested parties who participate in the transportation planning process. In conjunction with public involvement, this process will include, as appropriate, consultation with those representatives from state and local agencies, and public officials responsible for land use management, natural resources, environmental protection, conservation, and historic preservation. This process is intended to guide and facilitate meaningful discussion throughout the transportation planning process, as well as confirm that stakeholders, interest groups, and the public can comment on all transportation plans and programs.

The goal of the Public Participation Process is to provide a fully engaged public forum between those decision-making entities from state and local agencies, public officials, and citizens concerning transportation issues and the participation process. The participation process provides reasonable opportunities for interested parties to comment on the content of plans and provides the opportunity for public input. Citizens and interested parties contribute to the public review, and are encouraged to enter an active dialogue regarding Eastgate’s planning process and plan developments. The Public Participation Process is designed to educate the public on the process and issues involved in transportation planning and the associated activities and mandated federal requirements prior to approval.

1.2 Identification of Interested Parties and Participation Issues

The Public Participation Process will recognize participants who are interested in or affected by the activities linked to Eastgate’s plans and programs. To achieve active public participation, Eastgate uses a variety of outreach combinations through direct mailings to interested parties, direct contact with the public through universal methods such as advertisements and notices in newspapers, press releases and other mass media associated activities, social media, electronic formats, to the maximum extent possible.

Eastgate used several outreach efforts outlined in the Public Participation Process throughout the development of the MTP. The MTP is a comprehensive transportation plan for Mahoning and Trumbull Counties. This plan is to serve as the blueprint where federal funding is to be used for highway, transit, non-motorized, and multimodal systems within Eastgate’s planning area. Due to the significance and complexity of the MTP, sufficient notification, adequate information, and opportunities for resolution of conflicts must be made available. Public participation insures that project and planning activities evolve from and address public needs. Once the draft plan has been completed, at least two public meetings will be held; news releases will be sent to newspapers, radio and television stations; and advertisements may be placed in local newspapers and on social media.
The TIP is a comprehensive listing of specific transportation improvement projects scheduled for implementation over a four-year time span. The projects included in the TIP are first included in the MTP. The TIP is updated every two years, and the public will be provided the opportunity to comment and be involved in the decision-making process leading to the adoption of the TIP. This review is used by the Western Reserve Transit Authority and Trumbull County Transit Board to satisfy the Program of Projects requirements as established by the Federal Transit Administration pursuant to 49 U.S.C. Section 5307 (c). Once the draft TIP has been completed, a public meeting will be held during the two-week public comment period; advertisements will be placed in local newspapers; news releases will be sent to area newspapers, radio and television stations; and copies of the draft TIP will be made available at disclosed locations in our planning area.

1.3 Information and Education

One of the purposes of the Public Participation Process is to inform and educate the public regarding the purpose and development of the MTP and the TIP. Information disseminated must be clear, concise, and represent a solid foundation that allows for the public to provide their input to recommendations that will result from the planning process conducted by Eastgate. To enhance this effort, Eastgate proposes to expand various visualization techniques to be more “user friendly” for those participants not traditionally involved in developing/reviewing the transportation planning process, enabling complex concepts to be easily understood.

1.4 Federal and State Guidelines and Requirements

In accordance with federal guidelines, the Eastgate Regional Council of Governments is the designated Metropolitan Planning Organization for Mahoning and Trumbull Counties. Eastgate’s previous “Public Participation Plan” was revised to meet the Safe, Accountable, Flexible, Efficient, Transportation Equity Act: A Legacy for Users (SAFETEA-LU) legislation, and was approved by the General Policy Board in April 2007. The Moving Ahead for Progress in 21st Century Act (MAP-21) was signed into law on July 6, 2012, and became effective on October 1, 2012. MAP-21 retained all the SAFETEA LU Metropolitan Planning Regulations, in which transportation planning requirements became effective immediately; Eastgate remains in compliance with MAP-21 planning provisions. In October 2013, Eastgate updated the Public Participation Process to reference MAP-21. The Fixing America’s Surface Transportation Act (FAST Act) was signed on December 4, 2015. The FAST Act explicitly adds public ports and certain private providers of transportation, including intercity bus operators and employer-based commuting programs to the list of interested parties that an MPO must provide with reasonable opportunity to comment on the transportation plan. [23 U.S.C. 134(l)(6)(A)]. Eastgate will comply with FAST Act’s public participation requirements. Eastgate’s Public Participation Process was reviewed and revised in 2018 to coincide with updates of our MTP and Title VI Programs.
2. **Achievement Strategies**

2.1 **Objectives**

The primary objectives of this policy are to:

- Bring a diverse cross-section of the public into the public policy decision making process,
- To maintain meaningful public participation from the initial stages of the planning process,
- To utilize combinations of public participation and visualization techniques to meet the needs of the public, and
- To provide ongoing outreach to traditionally underserved communities, including but not limited to, low income, the elderly, persons with disabilities, and minority populations to ensure environmental justice issues are addressed.

2.2 **Public Participation Core Components**

To achieve the objectives outlined above, several core components must be included in the participation process. These include:

- The confirmation that stakeholders, interest groups, and the public can comment on transportation plans and programs,
- The ongoing early involvement of key stakeholders throughout the planning process,
- Personalizing public participation meetings and activities to obtain productive input,
- Expand visualization techniques to present transportation plans and programs,
- Publicize transportation plans and programs in electronic formats, alternative formats upon request, and on the agency's website,
- To continue to develop relationships with local media, and
- To utilize social media.

2.3 **Stakeholders**

The previously approved Public Participation Program, now known as the Public Participation Process, identified possible stakeholders linked to the MTP and TIP. Stakeholders are individuals and/or groups who have a direct interest, involvement, or are generally affected by projects, programs, or plans. Identifying “interested Parties” outside of the formal organizational structure of Eastgate is necessary to obtain adequate public input. Stakeholders commonly include but are not limited to:

- People who live in a project area,
- Businesses in a project area,
- Civic and community associations,
- Environmental or special interest groups,
- State and local agencies responsible for land use management, natural resources, conservation, and historic preservation groups as appropriate, and
- Public ports and certain private providers of transportation, including intercity bus operators and employer-based commuting programs in the project area.
3. Public Participation Tools

The Public Participation Process exhibits the importance of effective public participation as a component to a project or plan’s success, therefore, various techniques are needed to engage the public in the decision-making process. As appropriate, new techniques will be incorporated as they become available and are shown to be successful.

Below is a list of outreach activities, followed by a discussion of the technique including the specific objective of each and procedures to be used in implementation. Eastgate will use all or a combination of the following techniques, dependent on available resources, to involve the public in the transportation planning process through:

- Direct mailings
- Newsletters
- Press releases
- Advertisements
- Webpage
- Community events
- Office open-houses
- Citizens Advisory Board
- Public opinion surveys
- Social media

3.1 Objectives and Procedures Involving Public Participation Tools

Direct Mailings

Objectives: To inform specific audiences through the distribution of pertinent information.

Procedures: Using mailing lists, disseminate letters, newsletters, plan information, etc. to inform the public and encourage response.

Newsletters

Objectives: To inform audiences through the distribution of pertinent information; to encourage involvement through promotion of opportunities for the public to become active in the process.

Procedures: Using e-mail and when requested direct mailing list, Eastgate will continue to distribute the quarterly agency newsletter as well as any pertinent special edition newsletters published by Eastgate. Newsletters are also made available on the agency website.
**Press Releases**

**Objectives:** To inform the public through a wide-range distribution of pertinent information; to encourage involvement through promotion of opportunities for the public to become active in the process.

**Procedures:** Distribute news releases to newspapers and radio stations.

**Advertisements**

**Objectives:** To inform the public of information available for review and/or public meetings to be held.

**Procedures:** Whenever possible and appropriate, advertisements will be placed in newspapers, in addition to major regional newspapers. Radio announcements will also be aired when possible and appropriate.

**Web Page**

**Objectives:** To provide access to the latest public information, upcoming events and meetings 24-hours a day; to allow the public to provide comments and feedback on projects and plans.

**Procedures:** Information regarding upcoming public meetings will be posted on the agency’s website; agency programs and plans will be placed on the website; the public can also comment on plans throughout the public review process using e-mail, paper format, and/or any accessible format.

**Community Events**

**Objectives:** To provide the public with the opportunity to review, comment, and provide feedback on transportation plans, and activities by setting up displays at public events and places.

**Procedures:** Set up displays featuring pertinent information and relevant transportation plans and reports available for review.

**Office Open House**

**Objectives:** To provide the public with the opportunity to tour agency offices and observe the tools and equipment used in the transportation planning process as well as review, comment, and provide feedback on transportation plans, reports, and activities.

**Procedures:** Hold periodic office open-houses and have relevant plans and reports available for review.

**Citizens Advisory Board**

**Objectives:** To inform specific and general audiences through the focused distribution of pertinent information; to encourage involvement through promotion of opportunities for the public to become active in the process.

**Procedures:** At each monthly meeting of the Eastgate Citizens Advisory Board, provide details on transportation projects and related issues to inform the public and encourage response.

**Public Opinion Surveys**

**Objectives:** To access widespread public opinion on various transportation plans and reports, activities, and miscellaneous issues in the area.

**Procedures:** Distribute public opinion surveys to members of the public.
Social Media

Objectives: To inform audiences through the distribution of pertinent information; to encourage involvement through promotion of opportunities for the public to become active in the process.

Procedures: Using social media such as Facebook and Twitter to provide information.

3.2 Consideration of Public Comments

Public comments from the various sources will be organized and analyzed, where appropriate, so that the suggestions and comments may be considered by Eastgate staff and decision makers.

Summaries will be prepared and disseminated to Eastgate Committees and the General Policy Board.

When possible, Eastgate staff will respond to those who participated to demonstrate the results of their involvement through direct mailings, e-mail, newsletters, webpage, and news releases. All comments and responses will be placed on Eastgate’s webpage.

4. Evaluating the Program

Eastgate will review the Public Participation Process at the end of each state fiscal year to determine if the objectives of the program were fulfilled.

The Public Participation Process is available for download on Eastgate’s website: www.eastgatecog.org

Appendix 3

Eastgate Title VI Notice to the Public

The Eastgate Regional Council of Governments hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, 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 the Eastgate Regional Council of Governments 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 Eastgate. Any such complaint must be in writing and filed with Eastgate’s Title VI Coordinator within one hundred and eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discriminatory Complaint Form, please refer to the Title VI Plan on our website at: www.eastgatecog.org or call 330.779.3800.

This notice is posted at:
Eastgate Regional Council of Governments
100 E. Federal St., Suite 1000
Youngstown, OH 44503
Appendix 4

Standard DOT Title VI Assurances

The Eastgate Regional Council of Governments (hereinafter referred to as the Sponsor) hereby agrees that as a condition to receiving Federal financial assistance from the Department of Transportation (DOT), it will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) and all requirements imposed by 49 CFR Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation -- Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") to the end 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 otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this agreement. Without limiting the above general assurance, the Sponsor agrees concerning this grant that:

1. Each "program" and "facility" (as defined in Section 21.23(a) and 21.23(b)) will be conducted or operated in compliance with all requirements of the Regulations.

2. It will insert the clauses of Attachment 1 of this assurance in every contract subject to the Act and the Regulations.

3. Where Federal financial assistance is received to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

4. Where Federal financial assistance is in the form or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.

5. It will include the appropriate clauses set forth in Attachment 2 of this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Sponsor with other parties:
   
   (a) for the subsequent transfer of real property acquired or improved with Federal financial assistance under this project; and

   (b) for the construction or use of or access to space on, over, or under real property acquired or improved with Federal financial assistance under this Project.

6. This assurance obligates the Sponsor for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the Sponsor or any transferee for the longer of the following periods:

   (a) the period during which the property is used for a purpose for which Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or

   (b) the period during which the Sponsor retains ownership or possession of the property.
7. It will provide for such methods of administration for the program as are found by the Secretary of transportation of the official to whom he delegates specific authority to give reasonable guarantees that it, other sponsors, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the act, the Regulations, and this assurance.

8. It agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining Federal financial assistance for this Project and is binding on its contractors, the Sponsor, subcontractors, transferees, successors in interest and other participants in the Project. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Sponsor.

James G. Kinnick, P.E., Executive Director
Eastgate Regional Council of Governments

Date 5/4/18