

Title VI Plan

City of Vancouver, Public Works Department

November 2022

Agency Administrator/Signatory Authority: Eric Holmes

Public Works Director (interim): Lon Pluckhahn

Prepared by: Chris Malone, Public Works Finance and Asset Manager
chris.malone@cityofvancouver.us

360-487-7711

Table of Contents

I. Title VI Policy Statement.....1
II. Organization, Staff, and Structure.....1
III. Primary Program Area Description & Review Procedures.....3
IV. Review Procedures.....6
V. Data Collection/Reporting/Analysis.....7
VI. Title VI Training.....9
VII. Title VI Complaint Procedures.....10
VIII. Title VI Complaint Form.....13
IX. Public Participation.....15
X. Limited English Proficiency.....15
XI. Environmental Justice.....16
XII. Notice of Title VI Rights.....17

Exhibits

- Exhibit 1 – USDOT Standard Title VI/Non-Discrimination Assurances
- Exhibit 2 – Transportation Organization Chart
- Exhibit 3 – Citywide Organization Chart

I. Title VI Policy Statement

It is the policy of City of Vancouver that no person shall on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of City of Vancouver as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of City of Vancouver, including its contractors and anyone who acts on behalf of City of Vancouver. This policy also applies to the operations of any department or agency to which City of Vancouver extends federal financial assistance. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

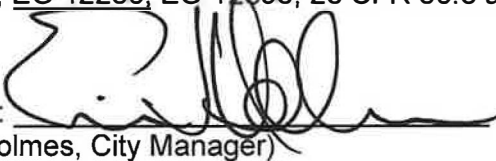
Prohibited discrimination may be intentional or unintentional. Seemingly, neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 USC § 2000d and related statutes, 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3 and 49 CFR part 21.

Signed:

(Eric Holmes, City Manager)



March 30, 2023
Date

II. Organization, Staffing, and Structure

The City Manager, Eric Holmes, is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all LPA employees, contractors, and agents pursuant to 49 CFR Part 21.

The Public Works Director is authorized to ensure compliance with provisions of the City's policy of non-discrimination and with the law, including the requirements of 23 CFR Part 200 and 49 CFR Part 21. The City's grants compliance function and Title VI coordination shall be performed under the authority of the City Manager.

City of Vancouver has created the position of Streets and Transportation Manager to perform the duties of the Title VI Coordinator and ensure implementation of their Title VI program. The position of Streets and Transportation Manager is located within Public Works Department. The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;

- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to WSDOT;
- Developing procedures for the collection and analysis of statistical data;
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination; and
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.
- Coordinate trainings

Additionally, the City has designated Title VI Specialists (Specialists) in departmental and City-wide special emphasis program areas. The Specialists, designated below, will work in concert with the Coordinator. These key programs or areas are subject to receiving Federal assistance through grants or other types of transportation related funding, or are responsible for implementing City of Vancouver directives and policies to ensure civil rights compliance and equal opportunity. The Specialists will work with the Coordinator to ensure their respective department, division, or program complies with Title VI regulations and assurances, meets the objectives of the Title VI Plan, meets Federal and state reporting requirements, and provides adequate training opportunities for applicable staff.

Title VI Specialists will work with the Coordinator to ensure Title VI compliance by contractors, subcontractors, consultants, suppliers and sub-recipients, as applicable, under federally funded projects or programs. Specialists will ensure applicable Title VI provisions and requirements are included in contractual agreements to prime contractors and sub-recipients. Specialists will work with the Coordinator to obtain statistical data on race, color, national origin, handicap/disability, and sex of participants in, and beneficiaries of Federally-funded Department transportation programs.

Each of the Specialists will maintain data relative to his or her respective special emphasis program area, designated below. The Coordinator, or their designee, will use the data to complete annual Title VI reports and for other administrative needs as necessary.

List Title VI Specialists and their Official Job Titles (subject to change)

| Name | Title | Department/Function |
|-----------------|----------------------------------|--|
| Hassan Abdalla | Engineering Manager | Public Works – Design, Engineering, Right of Way, and Environmental Services |
| Brooke Porter | Community Relations Specialist | Public Works – Public Information and Outreach |
| Rebecca Kennedy | Planning Manager | Community and Economic Development-Planning |
| Jeff Azul | Analyst | Human Resources |
| Chris Malone | Finance and Asset Manager | Public Works |
| Anna Vogel | Senior Procurement Specialist | Procurement |
| Gretchen Rose | Construction Project Coordinator | Construction Services |

Please see Exhibit 2 and 3 for the City of Vancouver organizational charts. Exhibit 2 focuses on the Streets and Transportation Department involved in the administration of the Title VI Plan, while Exhibit 3 reflects the entire City of Vancouver organization, (Departments and positions named as Coordinator or Specialists are indicated with bold boxes in Exhibit 3.)

III. Primary Program Area Descriptions & Review Procedures

Title VI Coordinator's Responsibilities and Program Administration – As authorized by the Agency Administrator, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring City of Vancouver's compliance with Title VI requirements as follows:

| Program Area | General Description | Title VI/Non-Discrimination Concerns and Responsibilities | Review Procedures for Ensuring Non-Discrimination |
|--|---|--|--|
| <p>Program Administration/ Procurement</p> | <ul style="list-style-type: none"> • Development and management of contracts and purchasing, including hiring of consultants and contractors. • Work with Transportation Department staff and central procurement to assemble Requests for Proposals and Bid Packages, ensure competitive selection of consultant firms, recommend award of construction contracts based on lowest responsive/responsible bidder, assist with final negotiation, award, and execution. • Responsible for administering Roads contracts and for ensuring compliance with contract provisions, including Disadvantaged Business Enterprise (DBE) goals and Equity and Social Justice Requirements. | <ul style="list-style-type: none"> • Include applicable DBE goals in designated projects and seek to have contractor proactivity achieve the goal(s). • Include Title VI assurance and provision language in all federally funded construction contracts. Documents and language shall be periodically reviewed to ensure compliance with current laws and regulations. • Ensure that prime contractors and prime consultants with DBE requirements award contracted work to qualified DBEs, which perform commercially useful functions. | <ul style="list-style-type: none"> • Maintain necessary data and documentation required for completion of the department's Title VI Annual Report. • Review of directives and operational guidelines to ensure Title VI compliance. • Review and ensure all appropriate Title VI language is placed in bid announcements, requests for proposals and applicable contract documents. |
| <p>Planning</p> | <ul style="list-style-type: none"> • Monitor compliance with Title VI requirements in all aspects of conducting Environmental Impact | <ul style="list-style-type: none"> • Provide a comprehensive summary of the demographic and environmental data | <ul style="list-style-type: none"> • Depending on findings of demographic survey adjust outreach efforts to ensure |

| | | | |
|---------------------|--|--|--|
| | <p>Statements or Assessments.</p> | <p>elements to be considered by the EIS/EIA process to the Coordinator; including updated summary lists as applicable.</p> <ul style="list-style-type: none"> • Incorporate into the review process, adequate time for the Coordinator to review and comment, as applicable, on the draft EIS/EIA to ensure there are no violations of the Federal Civil Rights Act, as amended, as a result of the Department's Federal-aid highway activities. | <p>compliance with Title VI outreach efforts.</p> <ul style="list-style-type: none"> • Depending on the scope, complexity, and impacts of a project, a National Environmental Policy Act (NEPA), NEPA Categorical Exclusion, NEPA Environmental Assessment, State Environmental Policy Act (SEPA) checklist, SEPA Determination of Non Significance, or NEPA and/or SEPA Environmental Impact Statement will be required. |
| <p>Right-of-way</p> | <ul style="list-style-type: none"> • Follow the guidelines in the Right-of-Way Manual for property acquisition as well as applicable laws and regulations, including Title VI and Section 504. • Manages and coordinates the appraisal, acquisition, relocation, disposition, inventory, and management of real property for the streets department. | <ul style="list-style-type: none"> • Ensure equal opportunity in all aspects of procuring real estate service contracting and appraisal agreements. Follow adopted Procurement Department vendor policies in the acquisition of contracted services. • Ensure that appraised values and communications associated with the appraisal and negotiation operations result in equitable treatment. • Ensure comparable replacement dwellings are available and assistance is given to all displaced | <ul style="list-style-type: none"> • Incorporate Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business. • Coordinate the preparation of deeds, permits and leases to ensure the inclusion of the appropriate clauses, including Title VI Assurances. |

| | | | |
|--------------------------|---|---|---|
| | | <p>persons and entities by the property acquisition process.</p> <ul style="list-style-type: none"> • Provide copies of relocation assistance literature produced by WSDOT and a copy of the Department's Title VI Compliance brochure to all affected parties. | |
| Design/ Environmental | <ul style="list-style-type: none"> • Responsible for analyzing environmental issues, acquiring permits and approvals, and evaluating pending regulations to achieve cost-effective regulatory compliance and avoid or minimize adverse project/program impacts. • Provide technical expertise for project/program analyses, and develops environmental policies, procedures, manuals, and training, as well as criteria to reduce a project's resource consumption and environmental impacts. | <ul style="list-style-type: none"> • Support public notification and make information accessible to public hearings and outreach meetings to review proposed project and subsequent impact. • Develop mechanisms to identify population affected by a project. • Support the distribution of information to the public confirming their rights to call or write the department to view plans and discuss environmental problems. | <ul style="list-style-type: none"> • Monitor compliance with Title VI requirements in all aspects of the environmental process associated with construction projects/programs. • Review environmental information to assess economic and social impacts to ensure compliance with Title VI and Executive Order 12898. |
| Communications | <ul style="list-style-type: none"> • Responsible for public outreach, involvement, and communication support for the Transportation Department. • Assist in conducting background research on all projects to determine the community | <ul style="list-style-type: none"> • Incorporate adequate time into the project communication planning process to invite participation of a cross section of the populace from social, economic, and ethnic groups in the planning and project outreach | <ul style="list-style-type: none"> • Assist Title VI Coordinator and Specialists, program planning, design, right-of-way, maintenance, and other department staff to evaluate applicability of, |

| | | | |
|-------------------------------------|---|--|---|
| | <p>composition and appropriate outreach; ensure translation or interpretation services are available if the need is anticipated.</p> <ul style="list-style-type: none"> • Work with design, environmental and other staff to ensure the public has information pertaining to the right to contact the Transportation Department to view project plans and discuss environmental impacts. | <p>process.</p> <ul style="list-style-type: none"> • Disseminate written program or project information to minority media and ethnic organizations, provide public service announcements for social and traditional media as warranted, engage resident advisory committee or planning boards with diverse representation when available. | <p>and help comply with, Limited English Proficiency (LEP), Environmental Justice (EJ) requirements, and Title VI compliance for transportation improvement programs and projects.</p> <ul style="list-style-type: none"> • Depending on findings of demographic survey adjust outreach efforts to ensure compliance with Title VI outreach efforts. |
| <p>Construction and Maintenance</p> | <ul style="list-style-type: none"> • As appropriate, monitor DBE provisions in those projects with designated goals. • Manage and coordinate Title VI compliance during construction contracts. | <ul style="list-style-type: none"> • Ensure that prime contractors with DBE requirements award contracted work to qualified DBEs which perform commercially useful functions. • Ensure contractors and sub-contractors are complying with Title VI requirements during construction. | <ul style="list-style-type: none"> • Monitor DBE usage during construction. • Monitor contractor and sub-contractors for compliance with Title VI rules during construction. |

IV. Review Procedures

- A. Title VI Review of Sub-recipients of Federal-Aid Highway Funds. Transportation staff and the Title VI Coordinator will assist WSDOT to periodically conduct Title VI compliance reviews. Transportation staff will review the selected recipients of Federal-Aid highway or other Federal funds to ensure adherence to Title VI requirements (see Section V). Transportation and Procurement staff will work cooperatively to periodically confirm operational guidelines provided to consultants, contractors, and sub-recipients, including Title VI language, provisions, and related requirements, as applicable.
- B. Post-Grant Reviews. The Coordinator, in collaboration with other City departments, as necessary, will conduct periodic post grant reviews of the selected recipients of Federal

highway funds or other Federal funds, for roads, sidewalks, bridges, municipal construction, etc. to ensure adherence to Title VI requirements (see Section V).

- C. Remedial Action. When noncompliance occurs in the administration of Federal-aid highway programs at either the Department or sub-recipient levels, corrective action will be taken to resolve identified Title VI issues. The Department will seek the cooperation of the consultant, contractor or other sub-recipient in correcting deficiencies found during periodic reviews. Transportation or Procurement staff will provide technical assistance and guidance, upon request, to support voluntary compliance by the sub-recipient. When conducting Title VI compliance reviews, Transportation or Procurement will reduce to writing any recommended remedial action they and the sub-recipient agree upon, and provide a copy of the letter within a period not to exceed 45 days.

Sub-recipients placed in a deficiency status will be given a reasonable time, not to exceed 90 days after receipt of the deficiency letter, to voluntarily correct deficiencies. When a sub-recipient fails or refuses to voluntarily comply with requirements within the allotted time frame, the Department will submit to WSDOT and FHWA copies of the case file and a recommendation that the sub-recipient be found in noncompliance.

A follow-up review will be conducted within 180 days of the initial review to ascertain if the sub-recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified. If the sub-recipient refuses to comply, the Department and WSDOT may, with FHWA's concurrence, initiate sanctions per 49 CFR 21.

V. Data Collection/Reporting/Analysis

| Program Area | Type of Data Collected & Process for Collecting | Intended Outcome of Data Analysis (i.e. Title VI Purpose for Collecting the Data) |
|--|---|---|
| Procurement Activities | <ul style="list-style-type: none"> • Include Title VI assurance and provision language in all Federally-funded consultant contracts. Review documents and language to ensure compliance with current laws and regulations. • Procurement will collect minority and disadvantaged business enterprise data from consultants pertaining to protected classes within the Title VI law. | <ul style="list-style-type: none"> • Procurement will utilize data to improve outreach and access to Title VI protected consultants. • Information will be utilized by the Coordinator to prepare the Title VI annual update to WSDOT. |
| Planning/ Design/ Environmental Review | <ul style="list-style-type: none"> • In order to ensure dissemination of information and foster participation from affected populations, Transportation staff will place public notices in applicable general and minority media; select accessible locations and times for public hearings or meetings, and arrange for | <ul style="list-style-type: none"> • The data from the forms will be analyzed to determine if different forms of outreach should be used for future public meetings including providing additional translation services for Limited English Proficiency (LEP) populations. Additionally, the data can be used to show how the project will benefit |

| | | |
|--------------------------------|--|---|
| | <p>translation services as needed; particularly in projects impacting predominantly minority communities. Ensure the public has information pertaining to their rights to call or write the department to view plans and discuss environmental problems.</p> <ul style="list-style-type: none"> • Transportation staff will obtain demographic data at community meetings and public hearings pertaining to the transportation design phase. Data will be gathered through use of a voluntary form which includes race, gender, and national origin. Copies of the voluntary self-reporting forms will be provided to the Coordinator after each meeting. | <p>the surrounding community (for example, providing alternate modes of transportation for low income, elderly, and young).</p> <ul style="list-style-type: none"> • The Coordinator shall work with the Transportation staff to generate a map of the federally funded transportation projects to include demographic data of the neighborhoods affected by the projects. • Transportation Design is constantly reviewing and changing outreach efforts to ensure we are reaching as many people as possible including populations covered by Title VI. Efforts to improve outreach include providing translation and interpretation services as requested (e.g. in person, over the phone, and for written correspondence), providing financial stipends, providing different meeting options (e.g. virtual, public open houses, one on one, roundtables, etc.), mailing flyers, sending emails, utilizing websites for information and feedback, posting signs in prominent places, creating tactile maps for low-vision community members, and placing ads in local publications (including publications for minority communities). |
| <p>Right-of-way Activities</p> | <ul style="list-style-type: none"> • Utilize current OMWBE directories identifying fee appraiser organizations and the Washington State Department of Transportation's list of certified fee appraisers when seeking services. • Maintain data on awards to minority and female appraisers and provide data to the Title VI Coordinator on a quarterly basis. • Transportation staff will obtain demographic data at community meetings and public hearings pertaining to the transportation design phase. | <ul style="list-style-type: none"> • The data from the forms will be analyzed to determine if different forms of outreach should be used for future public meetings including providing additional translation services for Limited English Proficiency (LEP) populations. Additionally, the data can be used to show how the project will benefit the surrounding community (for example, providing alternate modes of transportation for low income, elderly, and young). • Transportation Right-of-Way is constantly reviewing and changing outreach efforts to ensure we are |

| | | |
|------------------------------|---|--|
| | <ul style="list-style-type: none"> Data will be gathered through use of a voluntary form which includes race, gender, and national origin. Copies of the voluntary self-reporting forms will be provided to the Coordinator after each meeting. | <p>reaching as many people as possible including populations covered by Title VI. Efforts to improve outreach include providing translation and interpretation services as requested (e.g. in person, over the phone, and for written correspondence), providing financial stipends, providing different meeting options (e.g. virtual, public open houses, one on one, roundtables, etc.), mailing flyers, sending emails, utilizing websites for information and feedback, posting signs in prominent places, creating tactile maps for low-vision community members, and placing ads in local publications (including publications for minority communities).</p> |
| Construction and Maintenance | <ul style="list-style-type: none"> Monitor all maintenance and construction operations to ensure nondiscrimination throughout all operations. Construction staff will obtain demographic data through use of a voluntary form which includes race, gender, and national origin. | <ul style="list-style-type: none"> Coordinate the gathering of maintenance and construction information regarding DBE participation for the Annual Title VI Report; and provide to the Coordinator. Construction will utilize data to improve outreach and access to Title VI protected residences during construction. |

VI. Title VI Training

In keeping with adopted City of Vancouver policy of nondiscrimination, departmental procedures will be established or followed for Transportation employees to have equal access to applicable educational and training opportunities. Transportation staff and/or Specialists will maintain program administration documentation and data necessary for preparation of annual Title VI reports and will routinely supply the necessary data to the Title VI Coordinator.

- A. National Highway Institute (NHI) Education. The Coordinator will be notified when training for the National Highway Institute courses or workshops become available to Transportation employees. The Streets and Transportation Manager will establish policy for the selection of participants interested in taking part in the National Highway Institute Training workshops to ensure that no one is denied participation or subjected to discrimination on the basis of race, color, national origin or sex. A report will be

completed and forwarded to the Coordinator upon completion of each educational seminar or course throughout the course of the year, which shall include the name of each participant, their title, division, sex and ethnicity for use in completing the annual Title VI accomplishment report.

- B. Title VI Training. The Coordinator is responsible for overall Title VI related training and staff development for Title VI Specialists and other Transportation employees. The Coordinator will organize or conduct a minimum of one internal Title VI training session annually. The Coordinator will organize and facilitate the provision of Title VI training sessions for consultants, contractors, and subcontractors periodically as practical and necessary. WSDOT's Office of Equal Opportunity may be asked to provide applicable training.
- C. Selection of Instructors. The Coordinator or designee will ensure City policy is followed in the selection of instructors for Transportation's training courses/ workshops, and to ensure equal opportunity in the selection process for all training contracts. Per adopted policy, the City will provide accessibility to Minority/Women/Disadvantage Business Enterprise consulting and training firms to compete for training contracts.

VII. Title VI Complaint Procedures

Discrimination Complaint Procedure for City of Vancouver

Federal law prohibits discrimination on the basis of race, color, or national origin in any City of Vancouver program, service, or activity. This prohibition applies to all branches of City of Vancouver, its contractors, consultants, and anyone else who acts on behalf of City of Vancouver.

Complaints related to the Federal-aid programs may be filed with City of Vancouver and will be forwarded to Washington State Department of Transportation – Office of Equal Opportunity. If you need assistance to file your complaint or need interpretation services, please contact ryan.lopossa@cityofvancouver.us or at 360-487-7706.

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any City of Vancouver program, service, or activity because of their race, color, or national origin may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

How do you file a complaint?

Complaints must be filed no later than 180 days from the last date of the alleged discrimination. Contact ryan.lopossa@cityofvancouver.us or at 360-487-7706 if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact ryan.lopossa@cityofvancouver.us or at 360-487-7706.

Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. If a complainant phones City of Vancouver with allegations, the allegations of the complaint will be transcribed as provided by phone and then the written complaint will be sent to the complainant for correction and signature.

A complaint should contain the following information:

- The complainant's contact information, including, if available: full name, mailing address, phone number (and best time to call), and email address (if available);
- The basis of the complaint (e.g., race, color, national origin);
- The names of specific person(s) and/or agencies/organizations alleged to have discriminated;
- A description of the alleged discriminatory actions, meaning sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

All Title VI complaints are logged. The Complaint log must contain the following information for each complaint filed:

- The name and address of the person filing the complaint.
- The date of the complaint.
- The basis of the complaint.
- The disposition of the complaint.
- The status of the complaint.

The Complaint Log and documentation are destroyed four years after the end of the fiscal year in which the case is closed.

City of Vancouver then forwards complaints to WSDOT-Office of Equal Opportunity for processing by FHWA. [WSDOT investigates complaints only if delegated by FHWA after acceptance of a complaint.] FHWA is responsible for all determinations regarding whether to accept, dismiss, or transfer the complaint and finding no violation or failure to comply.

Complainants have the right to file a complaint directly with the federal funding agency. The following address is where Title VI complaints may be filed directly with FHWA:

Federal Highway Administration
U.S. Department of Transportation Office of Civil Rights
8th Floor E81-105
1200 New Jersey Avenue, SE
Washington, DC 20590

CivilRights.FHWA@dot.gov

What happens after a complaint is filed?

If your complaint is forwarded to another agency, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

FHWA will render final decisions in all cases including those investigated by WSDOT. There are no administrative appeal forums in Title VI complaints. Once FHWA issues its final agency decision, a complaint is closed.

There is no prohibition against a complainant filing a Title VI complaint simultaneously with an LPA, WSDOT, and FHWA.

What remedy are you seeking for the alleged discrimination? Please note that this process will not result in the payment of punitive damages or financial compensation.

List any other persons that we should contact for additional information in support of your complaint. Please list their names, phone numbers, address, email address below.

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____

Status (pending, resolved, etc.) _____ Result, if known _____

Complaint number, if known _____

Do you have an attorney in this matter? _____

Name (print) _____

Phone _____ Address _____

City _____ Zip _____

Signed _____ Date _____

IX. Public Participation

- A. Invite participation of a cross section of the populace from a range of social, economic, and ethnic groups, including low income and limited English proficiency (LEP) populations, in the planning process by disseminating written program information to minority media and ethnic organizations, and providing public service announcements for all local media, when forming citizen advisory committees or planning board, and requesting involvement.
- B. Transportation staff will obtain demographic statistics at applicable community meetings and public hearings involving transportation planning sessions. Data will be gathered through use of a voluntary [self-reporting form](#) (available in different languages) which includes race, gender, and national origin. Copies of the completed forms will be provided to Title VI Coordinator after each meeting.
 - a) The data from the forms will be analyzed to determine if different forms of outreach should be used for future public meetings including providing additional translation services for Limited English Proficiency (LEP) populations. Additionally, the data can be used to show how the project will benefit the surrounding community (for example, providing alternate modes of transportation for low income, elderly, and young).
- C. To ensure access to public meetings, evening meetings will be conducted in a variety of community buildings throughout the city, including those along transit routes, ensure translation services are available if anticipated, and ensure public meetings are held in predominantly minority communities when transportation projects will specifically impact those communities.
- D. Transportation staff is constantly reviewing and changing outreach efforts to ensure we are reaching as many people as possible including populations covered by Title VI. Efforts to improve outreach include providing translation and interpretation services as requested (e.g. in person, over the phone, and for written correspondence), providing financial stipends, providing different meeting options (e.g. virtual, public open houses, one on one, roundtables, etc.), mailing flyers, sending emails, utilizing websites for information and feedback, posting signs in prominent places, creating tactile maps for low-vision community members, and placing ads in local publications (including publications for minority communities).

X. Limited English Proficiency

City of Vancouver reviews and ensures that targeted communication materials and vital documents are translated into Spanish and other languages where the population meets or exceeds 5% speaking and reading languages other than English. City of Vancouver makes available language maps to help guide which documents need to be translated into which languages; Spanish, Vietnamese, Russian, Chinese, Korean, and some African languages based on percentage of population that speaks the language. City of Vancouver translates public communication materials and vital documents into needed languages on an ad hoc basis.

City of Vancouver utilizes best practices per City of Vancouver's Office of Equity and Social Justice guidance from City of Vancouver's Language Tiers, and direct feedback from staff that work on public facing programs. City of Vancouver utilizes Language Line translation services for oral interpretation services on an as needed basis when assisting customers over the

phone and contracted translation services for in-person interactions at remote work sites or community events. The City of Vancouver Language Access Program provides guidance and tools to departments, agencies, residents, and business as it pertains to accessible communications to individuals with LEP and barriers to communication so that all services, programs, and activities are meaningfully accessible to all constituents.

The project's website ensures that the project information is accessible by all within the community. City of Vancouver works to identify any vital documents requiring translation services. Outreach materials for projects are translated if warranted based on the population of English as a second language speakers in the impacted communities. If time is too short for translation services, we include a brief message in the various languages and offer access in any needed format.

XI. Environmental Justice

- A. Monitor compliance with Title VI requirements in all aspects of conducting Environmental Justice Assessments. Provide a comprehensive summary of the demographic and environmental data elements to be considered by the Coordinator; including updated summary lists as applicable. Incorporate into the review process, adequate time for the Coordinator to review and comment, as applicable, on Environmental Justice Assessments to ensure there are no violations of the Federal Civil Rights Act, as amended, as a result of the Department's Federal-aid highway activities.
- B. In order to ensure dissemination of information and foster participation from affected populations, Transportation staff will place public notices in applicable general and minority media; select accessible locations and times for public hearings or meetings, and arrange for translation services as needed; particularly in projects impacting predominantly minority communities. Ensure the public has information pertaining to their rights to call or write the department to view plans and discuss environmental problems.
- C. Transportation staff will obtain demographic data at community meetings and public hearings pertaining to the transportation design phase. Data will be gathered through use of a voluntary form which includes race, gender, and national origin. Copies of the voluntary self-reporting forms will be provided to the Coordinator after each meeting.
 - a. The data from the forms will be analyzed to determine if different forms of outreach should be used for future public meetings including providing additional translation services for Limited English Proficiency (LEP) populations. Additionally, the data can be used to show how the project will benefit the surrounding community (for example, providing alternate modes of transportation for low income, elderly, and young).
- D. The Coordinator shall work with the Transportation staff to generate a map of the federally funded transportation projects to include demographic data of the neighborhoods affected by the projects.
- E. Transportation staff are constantly reviewing and changing outreach efforts to ensure we are reaching as many people as possible including populations covered by Title VI. Efforts to improve outreach include providing translation and interpretation services as requested (e.g. in person, over the phone, and for written correspondence), providing financial stipends, providing different meeting options (e.g. virtual, public open houses, one on one,

roundtables, etc.), mailing flyers, sending emails, utilizing websites for information and feedback, posting signs in prominent places, creating tactile maps for low-vision community members, and placing ads in local publications (including publications for minority communities).

XII. Notice of Title VI Rights

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

City of Vancouver hereby gives public notice that it is the Agency'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 programs and activities. Title VI requires that no person 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 Federal Aid Highway program or other activity for which Agency 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 City of Vancouver. Any such complaint filed with the City of Vancouver Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence. Title VI discrimination Complaint Forms may be obtained from the City of Vancouver Human Resources office at no cost to the complainant.

To file a Title VI discrimination complaint, contact:

City of Vancouver
Public Works Department
P.O. Box 1995
Vancouver, WA 98668-1995
ryan.lopossa@cityofvancouver.us
Phone: (360) 98668-1995

Washington Department of Transportation
Office of Equal Opportunity – Title VI
Box 47314
Olympia, WA 98504-7314
TitleVI@wsdot.wa.gov
Phone: (800) 259-9143

**The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination
Assurances**
DOT Order No. 1050.2A

The City of Vancouver (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through Washington State Department of Transportation (WSDOT), is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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, "for which the Recipient receives Federal financial assistance from DOT, including the Washington State Department of Transportation.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non-discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard

to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.

2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all Federal-Aid Highway Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

"The City of Vancouver, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award."

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:

- a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
 - b. the period during which the Recipient retains ownership or possession of the property.
9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, City of Vancouver also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Washington State Department of Transportation access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Washington State Department of Transportation. You must keep records, reports, and submit the material for review upon request to Washington State Department of Transportation, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

City of Vancouver gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Federal Highway Administration. This ASSURANCE is binding on Washington State Department of Transportation, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Federal-Aid Highway Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

City of Vancouver
(Name of Recipient)

by 
(Signature of Authorized Official)

DATED 09/26/2024

APPENDIX A

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

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Washington State Department of Transportation, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations for Subcontracts, Including Procurements of Materials and Equipment:** In all solicitations, either by competitive bidding, or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials, or leases of equipment, each potential subcontractor or supplier will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Washington State Department of Transportation to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Washington State Department of Transportation, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Washington State Department of Transportation may determine to be appropriate, including, but not limited to:
 - a. withholding payments to the contractor under the contract until the contractor complies; and/or
 - b. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment,

unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Washington State Department of Transportation may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

APPENDIX B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

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

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the City of Vancouver will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, United States Code, the Regulations for the Administration of Washington State Department of Transportation, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252; 42 U.S.C. § 2000d to 2000d-4), does hereby remise, release, quitclaim and convey unto the City of Vancouver all the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

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

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

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

APPENDIX C

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

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the City of Vancouver pursuant to the provisions of Assurance 7(a):

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

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX D

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

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by City of Vancouver pursuant to the provisions of Assurance 7(b):

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

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.)

APPENDIX E

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

Pertinent Non-Discrimination Authorities:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations;
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);
- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq).

Exhibit 2 – Transportation Organization Chart

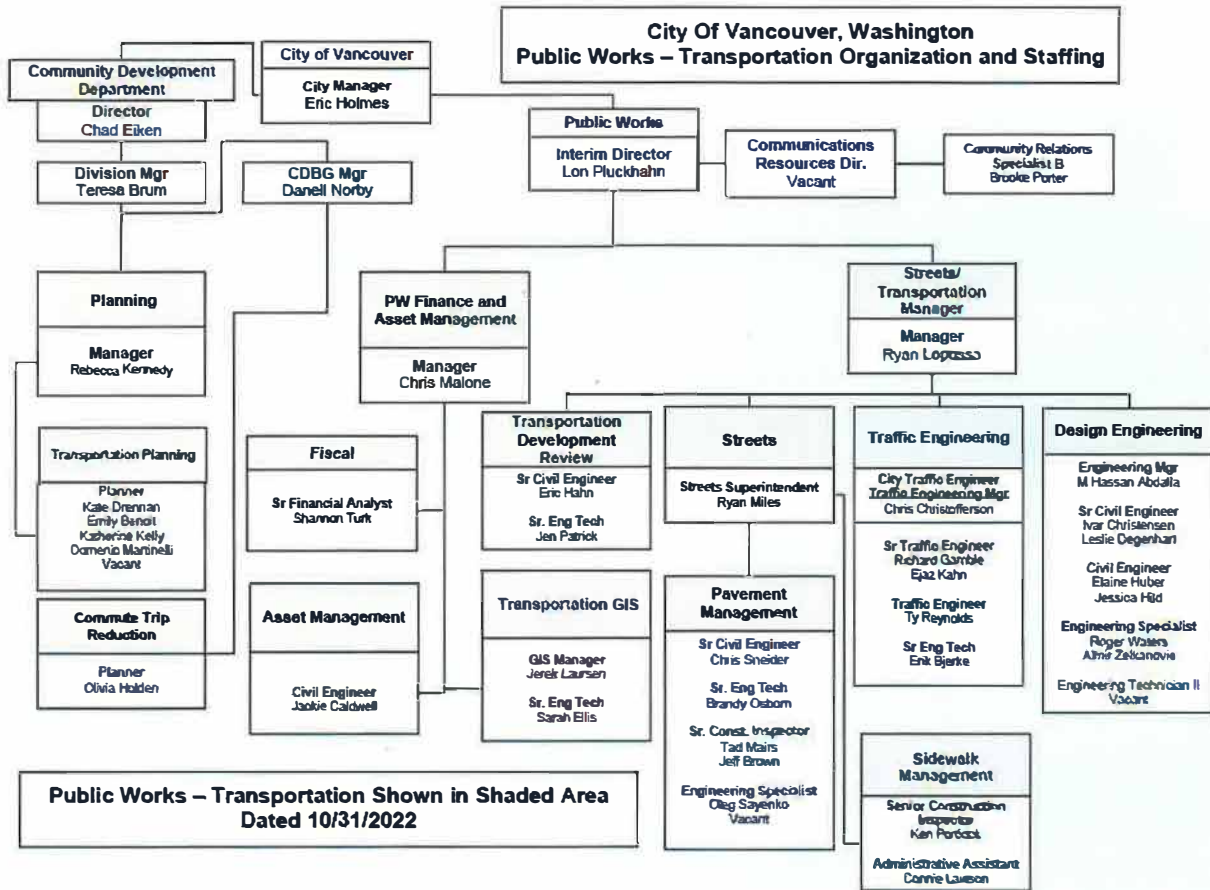


Exhibit 3 – Citywide Organization Chart

