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## Transportation Policy Board of the Chisholm Trail Metropolitan Planning Organization

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### Notice of Meetings

Notice is hereby given that the Transportation Policy Board of the Chisholm Trail Metropolitan Planning Organization will meet in special session at 11:30 AM on Wednesday, November 13, 2024, in Room 403/404 of the Stride Bank Center, located at 301 South Independence Avenue, Enid, Oklahoma, pursuant to notice provided to the Clerk of the City of Enid no less than forty-eight hours prior to said meeting, and which notice was posted no later than 11:30 AM on the 12th day of November, 2024. The agenda for said meeting is as follows:

### - AGENDA -

#### Transportation Policy Board of the Chisholm Trail Metropolitan Planning Organization

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1. Call to Order/Roll Call.	
2. Minutes.	
1. Consider approval of minutes of the September 18, 2024 Transportation Policy Board Special Meeting.	3 - 5
<a href="#">Transportation Policy Board of the Chisholm Trail Metropolitan Planning Organization Special Meeting - September 18, 2024 - Minutes - Pdf</a>	
3. Business.	
1. Introduction of City of Enid's MPO Planner.	
2. Discuss and take action the 2025 Schedule of Regular Meetings.	6
<a href="#">2025 Schedule - TPB</a>	
3. Discuss and take action on the Environmental Justice (EJ) Plan.	7 - 40
<a href="#">Environmental Justice Plan</a>	
4. Discuss and take action on the Limited English Proficiency (LEP) Plan.	41 - 55
<a href="#">LEP Plan</a>	
5. Discuss and take action on the Title VI Complaint Process.	56 - 59
<a href="#">Title VI Complaint Process</a>	
6. Discuss and take action the Title VI Assurances.	60 - 68
<a href="#">Title VI Assurances</a>	

7. Discuss and take action on the Title VI Plan. 69 - 85  
[Title VI Plan](#)
  8. Discuss and take action on a resolution approving the Chisholm Trail MPO's Adjusted Urban Boundary Map. 86 - 88  
[Adjusted Urban Boundary Resolution-Maps](#)
  9. Discuss and take action on a resolution adopting the Chisholm Trail MPO's Transportation Improvement Program (TIP). 89 - 90  
[TIP Resolution](#)
  10. Discuss and take action on the Self-Certification Statement. 91  
[Chisholm Trail MPO Self Certification](#)
  11. Discuss the next steps of the MPO's efforts to meet federal and state objectives concerning transportation and transit planning, civil rights, safety and reporting.
4. Adjourn.

**City of Enid  
Transportation Policy Board of the Chisholm Trail Metropolitan Planning  
Organization  
Minutes**

The Transportation Policy Board of the Chisholm Trail Metropolitan Planning Organization of the City of Enid, County of Garfield, State of Oklahoma, met in special session at 1:30 PM on Wednesday, September 18, 2024, in Room 403/404 of the Stride Bank Center, locate at 301 South Independence Avenue in said city, pursuant to notice provided to the Clerk of the City of Enid no less than forty-eight hours prior to said meeting, and which notice was posted no later than 1:30 PM on the 17th day of September, 2024. The minutes for said meeting are as follows:

**1. CALL TO ORDER/ROLL CALL.**

Chairman Mason called the meeting to order with the following members present and absent:

PRESENT: Enid Mayor David Mason, Enid City Commissioners Derwin Norwood and Rob Stallings, North Enid Mayor Jason Dockins, Chairman of the Garfield County Commissioners Reese Wedel, NODA Executive Director Jonathon Cross, District IV Transportation Director Designee Sarah McElroy, ODOT District IV Engineer Trenton January, and EPTA General Manager Demetria Dixon

ABSENT: Aviation Advisory Board Chairman Ken Girty

Others present were Transportation Technical Committee members Enid City Manager Jerald Gilbert, Enid City Engineer Jason Unruh, Woodring Regional Airport Director Keston Cook, NORTPO Representative Brock Spencer, ODOT Government Affairs Planning Branch Manager Laura Chaney, as well as Enid City Attorney Carol Lahman, Enid City Clerk Summer Anderson, NORTPO Representative Vicki Eggers, ODOT Transportation Manager Travis Rigdon, and consultant from Poe & Associates Craig Moody.

**2. MINUTES.**

- 1. Consider approval of minutes of the August 14, 2024 Policy Board Special Meeting.

Moved by Derwin Norwood, seconded by Rob Stallings, to approve minutes of the August 14, 2024 Policy Board Special Meeting.

Carried by the following votes:

Ayes: David Mason, Derwin Norwood, Rob Stallings, Jason Dockins, Reese Wedel, Jonathon Cross, Sarah McElroy, Trenton January, Demetria Dixon

**3. BUSINESS.**

- 1. Consider approval of the Transportation Improvement Program (TIP).

Moved by Jason Dockins, seconded by Derwin Norwood, to approve the

Transportation Improvement Program (TIP) for the Chisholm Trail Metropolitan Planning Organization.

Carried by the following votes:

Ayes: David Mason, Derwin Norwood, Rob Stallings, Jason Dockins, Reese Wedel, Jonathon Cross, Sarah McElroy, Trenton January, Demetria Dixon

## 2. Presentation and discussion on the Urban Area Boundary Adjustment.

Craig Moody, consultant from Poe & Associates, provided a presentation over the proposed Urban Area Boundary adjustment for the Chisholm Trail Metropolitan Planning Organization (CTMPO). The CTMPO and ODOT were authorized to adjust the urban area boundary proactively, if the urban area was outside of the MPO's Metropolitan Planning Area (MPA). The Chisholm Trail's MPA included all 2020 unadjusted urban area boundaries. It was recommended that the urban area boundary be adjusted to align with the MPA, in consideration of future developments.

Mr. Moody continued the presentation with Functional Classifications, which categorized roads based on the services they provided. It was critical for determining eligibility for federal transportation funds and establishing design criteria for roadways. There were four classifications for urban areas:

- Principal Arterials: Major traffic routes connecting central business districts and communities.
- Minor Arterials: Support intra-community travel, connecting neighborhoods to main roads.
- Collector Streets: Serve as intermediates between local streets and arterials, channeling traffic from neighborhoods.
- Local Streets: Neighborhood roads with the highest access but the lowest speed limits and capacity.

ODOT and the CTMPO should collaborate on revisions to ensure consistency. ODOT would handle functional classification revisions for state highways outside urban areas, while the Federal Highway Administration (FHWA) would review and approve all changes. Due to 2020 Census data being delayed as a result of the Covid-19 Pandemic, the process would not be completed until the end of 2025. Functional Classifications were important as it helped in traffic management, project selection, and maintenance allocation, ensuring efficient transportation systems. The classification considered factors like traffic volumes, land use patterns, and safety requirements. Changes in Average Daily Traffic (ADT) on certain roads may necessitate modifications to their functional classifications. ADT counts vary significantly by day, with some roads experiencing heavy traffic on weekdays compared to weekends. ODOT utilized various methods, including rubber hoses and satellite data, to gather traffic data.

Discussion was held regarding the GIS mapping software, ESRI. ESRI was used by specialists to analyze traffic data. The City of Enid also had access to this software, which would aid in classification decisions. Altering the

Functional Classification of roads could impact maintenance responsibilities and funding opportunities. Coordination and agreements between the CTMPO, local government, and state government was vital for determining who would manage and fund road within the urban boundaries.

3. Discuss the next steps of the MPO's efforts to meet federal and state objectives concerning transportation and transit planning, civil rights, safety and reporting.

Discussion was held regarding the next steps for the CTMPO. These steps would include formal approval of the proposed urban area boundary adjustments, followed by possible functional classification revisions. Additionally, more work was required for the Title II and Title VI plans and processes, as well as the Environmental Justice (EJ) Plan and Limited English Proficiency (LEP) Plan. These items would be considered for approval at a future meeting.

**4. ADJOURN.**

There being no further business to come before the Board at this time, Chairman Mason adjourned the meeting at 2:51pm.

# **2025 SCHEDULE OF REGULAR MEETINGS**

## **TRANSPORTATION POLICY BOARD** **OF THE** **CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION**

<b><u>Date</u></b>	<b><u>Time</u></b>	<b><u>Place of Meeting</u></b>
February 12, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
March 12, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
April 9, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
May 14, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
June 11, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
July 9, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
August 13, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
September 10, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
October 8, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
November 12, 2025	11:30 A.M.	Room 403/404, Stride Bank Center
December 10, 2025	11:30 A.M.	Room 403/404, Stride Bank Center

All Meetings will be held in the **Stride Bank Center**, located at **301 South Independence Avenue, Enid, Oklahoma, 73701.**

Filed in the Office of the City Clerk at \_\_\_\_\_ on \_\_\_\_\_, 2024.

\_\_\_\_\_  
City Clerk



## **CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S ENVIRONMENTAL JUSTICE PLAN**

Adopted November 2024

Chisholm Trail Metropolitan Planning Organization  
401 West Owen K. Garriott Road  
Enid, Oklahoma 73701  
Telephone: 580-616-7246  
<https://www.chisholmtrailmpo.org>

### **Non-Discrimination Policy**

It is the policy of the Chisholm Trail Metropolitan Planning Organization, under Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1968; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-aid Highway Act of 1973; Civil Rights Restoration Act of 1987; and other related authorities and regulations, that no person in the United States shall, on the basis of race, color, national origin, religion, sex, disability, age, or familial status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by Chisholm Trail MPO or its subrecipients. An individual has a right to file a complaint against the Chisholm Trail MPO if they believe the agency did not provide necessary services as appropriate. These complaints include those available under Title VI and the ADA. The Title VI Compliant form is available on the Chisholm Trail MPO website or by contacting the CDBG Coordinator at 580-616-7211 or [kristen.day@enid.org](mailto:kristen.day@enid.org). The ADA Complaint form is available on the Chisholm Trail MPO website or by contacting the ADA Coordinator at [arasmuson@enid.org](mailto:arasmuson@enid.org) or 580-616-7242.

### **Maps and Data Disclaimer**

Maps/data presented in this report were created and assembled by the Chisholm Trail MPO are for informational, planning reference, and guidance only. You are admonished to use these materials only as a starting point and not a final product or document. None of these materials should be utilized by you or other parties without the benefit of advice and instruction from appropriate professional services. These materials are not verified by a Registered Professional Land Surveyor for the State of Oklahoma and are not intended to be used as such. Chisholm

Trail MPO makes no warranty, express or implied, related to the accuracy or content of these materials and data.

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## Introduction

The key functions of MPOs, include:

- a) the identification and evaluation of alternative transportation options;
- b) the preparation and ongoing development of transportation plans and programs, such as the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP);
- c) the use of Performance-based Planning and Programming (PBPP); and,
- d) the encouragement and fostering of public participation that is meaningful.

An MPO's role is to ensure comprehensive, coordinated and continuous transportation planning. The Chisholm Trail MPO works with the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Oklahoma Department of Transportation (ODOT), the Northern Oklahoma Development Association (NODA), the Enid Public Transportation Authority (EPTA), local governments, the public and other stakeholders to prepare and develop transportation plans, programs, and policies. See Appendix I for a map of the Chisholm Trail MPO Area.

### 1. Chisholm Trail's Metropolitan Transportation Plan

The Metropolitan Transportation Plan (MTP) is developed every five years to include priorities over the next twenty-five (25) years. The MTP is a fiscally constrained plan that outlines future investments in multimodal improvements to support growth based upon the goals established by the Chisholm Trail MPO consistent with priorities established by Federal and Oklahoma laws and regulations.

### 2. Chisholm Trail's Transportation Improvement Program

The Transportation Improvement Program (TIP) is a cooperatively developed four-year plan outlining multi-modal transportation improvements and services to be implemented within the Metropolitan Planning Area (MPA). These improvements and services assist the Chisholm Trail MPO in achieving the goals of the MTP. Performance-based planning and programming is also part of the TIP.

### 3. Chisholm Trail’s Unified Planning Work Program

Generally, the Unified Planning Work Program (UPWP) describes the proposed transportation planning activities to be conducted in the MPA during a fiscal year. The UPWP serves as the basis for requesting federal planning funds. It is also a management tool for scheduling, budgeting, and monitoring planning activities. The UPWP outlines the scope and direction of all planning activities and specifies which program tasks will be completed.

### 4. Chisholm Trail’s Public Participation Plan

The Public Participation Plan (PPP) sets the guidelines and standards for soliciting public comments on local transportation plans and programs. The plan includes descriptions of the public participation tools to be utilized and the strategies and guidelines that are essential for meaningful public participation and a series of performance measures to be used to evaluate the effectiveness of the plan.

## Environmental Justice Plan

### 1. Generally

“Environmental Justice” is the fair treatment and meaningful involvement of all, regardless of race, ethnicity, income, national origin, or educational level, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.<sup>1</sup>

### 2. Transportation Planning

The goal is that no population, due to policy or economic disempowerment, is forced to bear a disproportionate burden of the negative human health and environmental impacts, including social and economic effects, resulting from transportation decisions, programs and policies made, implemented and enforced at every transportation level.

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<sup>1</sup> USDOT 5610.2C

### 3. Environmental Justice Laws and Orders

A. Non-discrimination of environment justice populations is a federal requirement for all federal, state, and local agencies that receive federal funds. Both Title VI of the Civil Rights Act of 1964 and Executive Order 12898, (Federal Actions to Address Environmental Justice in Minority and Low-Income Populations) signed by President Clinton on February 11, 1994) ensure that discrimination does not occur.

i. Title VI of the Civil Rights Act explicitly prohibits discrimination on the basis of race, color, and national origin in programs and activities that receive federal financial assistance.

ii. Executive Order 12898 instructs federal agencies to identify and address disproportionately high and adverse effects of federal programs, policies, and activities on low-income and minority populations.

iii. Executive Order 14096, (Revitalizing Our Nation’s Commitment to Environmental Justice for All) signed by President Biden on April 21, 2023 concerns Environmental Justice Strategic Plans.

B. The United States Department of Transportation (USDOT) issued its original Environmental Justice Order in 1997, and the Federal Highway Administration (FHWA) in 1998, (Order 6640.23) issued their own environmental justice orders that adopted and expanded upon the principles and requirements of Executive Order 12898. And throughout the years since 1994, the Environmental Justice principles and strategies have been refined and reaffirmed most recently with USDOT’s cancelation of Order 5610.2B, dated November 18, 2020, which was superseded by Order 5610.2C on May 16, 2021.

### 4. Environmental Justice Requirements

Environmental Justice in transportation planning requires identifying and addressing disproportionately high and adverse effects of federally-funded programs, policies, or activities on low-income and minority populations to ensure the equitable distribution of potential benefits and burdens.

The overall precept of environmental justice in transportation planning is to ensure that transportation projects do not have a disproportionately negative impact on minority or low-income populations. Beyond that, environmental justice also seeks to ensure the full and fair participation in every phase of the transportation decision-making process for those that have been traditionally underserved by the transportation planning process, particularly for those that will potentially be affected by projects.

## 5. Chisholm Trail MPO's Commitment

Chisholm Trail MPO is committed to ensuring fairness and equity in its transportation planning activities. Its approach to environmental justice is to ensure that transportation investments are evenly spread across all populations in terms of access to benefits and burdens. It is necessary to administer and monitor its operations and decision-making to ensure that nondiscrimination and the prevention of disproportionately high and adverse effects are an integral part of its programs, policies, and activities.

## 6. Purpose

The purpose of the Chisholm Trail MPO's Environmental Justice Plan is to identify environmental justice populations of concern based on the most recent census data available. This plan will aid in identifying high-density areas of environmental justice communities of concern. This plan should be used to evaluate planned transportation projects to see how they are distributed amongst the environmental justice communities of concern within the Chisholm Trail MPA.

## 7. Participation

Accordingly, it is necessary to ensure the full and fair participation in the process of making transportation decisions by the potentially affected residents in order to avoid, minimize, and mitigate disproportionately high adverse health and environmental effects, including social and economic effects on minority and low-income populations.

## 8. Definitions

The following terms have particular meanings in the context of environmental justice:

“Adverse Effects” means the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.

“Disproportionately High Adverse Effect” means an adverse effect that:

1. is predominately borne by a minority population and/or a low-income population, or
2. will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

“Elderly Populations” means any person age 65 or older.

“Limited-English Proficiency (LEP) Populations” means any person age 5 or older who reported speaking English less than “very well” (meaning they reported that they spoke English “well”, “not well”, or “not at all”).

“Low-income Person” means a person whose median household income is at or below the Department of Health and Human Services poverty guidelines.

“Minority Person” means a person who is:

1. Black: a person having origins in any of the black racial groups of Africa;
2. Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;

3. Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent;
4. American Indian and Alaskan Native: a person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or the original peoples
5. Native Hawaiian and Other Pacific Islander: people having origins in any of Hawaii, Guam, Samoa, or other Pacific Islands.

“Population” means any readily identifiable group of low-income persons or minority persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

“Populations With a Disability” means any noninstitutionalized civilian reported as having one or more of the following disabilities: Hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, or independent living difficulty.

“Zero-Vehicle Households” means any household in which a vehicle is not owned.

## 9. Process

The Chisholm Trail MPO will use the following processes to identify the risk of discrimination and disproportionately high and adverse effects so that positive corrective action can be taken early in the development and planning of programs, policies, or activities.

- A. In implementing these requirements, the following information should be obtained where relevant, appropriate and practical:
  - a. the population served or affected by the program, policy, or activity by race, color, national origin, and income level; and

- b. the proposed steps to guard against disproportionately high and adverse effects on persons on the basis of race, color, national origin, and income level.
- B. It will consider establishing a planning advisory group with members representing the particular populations potentially affected by the program, policy, or activity.
- C. It will also require:
  - a. Identifying and evaluating environmental, public health, and interrelated social and economic effects of DOT programs, policies, and activities.
  - b. Proposing measures to avoid, minimize and/or mitigate disproportionately high and adverse environmental and public health effects and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by transportation programs, policies, and activities, where permitted by law and consistent with Executive Orders.
  - c. Considering alternatives to proposed programs, policies, and activities, where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts, consistent with the Executive Orders.
  - d. Eliciting public engagement opportunities and considering the results thereof, including soliciting input from affected minority and low-income populations in considering alternatives.
- D. Programs, policies or activities that will have a disproportionately high and adverse effects on protected populations will only be carried out if:
  - a. there is a substantial need for the program, policy, or activity exists, based on the overall public interest; and,
  - b. alternatives that would have less adverse effects on protected populations and that satisfy the identified substantial need, either

- i. would have other adverse social, economic, environmental or human health impacts that are severe; or
- ii. would involve increased costs of extraordinary magnitude.

## 10. Demographic Profiles

### Federal Requirements

Federal requirements for environmental justice involve the identification and analysis of the needs of minority and low-income populations. Specifically, the environmental justice populations identified by the FHWA include low-income populations and the following minority populations: Black or African American, Hispanic, Asian American, American Indian or Alaskan Native, Native Hawaiian or Pacific Islander, and those of two or more races.

However, the USDOT and the FHWA also advise for the inclusion of other populations, particularly those that have been traditionally underserved by existing transportation systems. Race, color, national origin, sex, age, disability, and persons with Limited English Proficiency (LEP) are groups that are protected by other federal laws and orders that should be considered when determining a region's environmental justice populations.

Therefore, Chisholm Trail MPO will take into consideration more groups than just the low-income and racial minority categories prescribed by the FHWA. Minority populations that Chisholm Trail MPO included that are not federally required to include as environmental justice populations include elderly populations, populations with a disability, Limited English Proficiency (LEP) populations, low-income populations, and zero-vehicle households. Chisholm Trail MPO feels that these minority groups are often underrepresented in the transportation planning process and should be included in this environmental justice plan.

## 11. Environmental Justice Populations

The environmental justice populations that Chisholm Trail MPO is concerned with and are considered in this plan are: 1) Black or African American; 2) Asian; 3) American Indian or Alaskan Native; 4) Native Hawaiian or other Pacific Islander; 5) Some other race; 6) Two or more races; 7) Hispanic/Latino ethnicity origins populations; 8) Limited English Proficiency (LEP) populations; 9) Elderly



populations; 10) Populations with a disability; 11) Low-income households; and 12) Zero-vehicle households.

## 12. Data Analysis

The demographics data used for this environmental justice analysis and plan is from the American Community Survey (ACS) 2022 five-year estimates (2018-2022). This is the most current and complete data most suitable for this task at the time. Census tracts were chosen as the geography for the analyses in this plan.<sup>2</sup> See Appendix II for a list of ACS tables. See Appendix III for the 2020 Garfield County, Oklahoma Census Tract Map used in the development of this plan.

The total population number and percentage of the total population was determined from the American Community Survey (ACS) for each of the environmental justice groups. These percentages serve as the regional thresholds for the respective environmental justice populations. The table below gives a summary of the demographic data and environmental justice regional threshold percentages for the Chisholm Trail MPO area.

Chisholm Trail MPO Area Environmental Justice Populations	Population	Percent of Total Population
Total Minority Population	22,463	37.9%
Black/African American	1,306	2.2%
Asian	765	1.3%
American Indian/Alaskan Native	1,256	2.1%
Native Hawaiian/Pacific Islander	2,730	4.6%
Some Other Race	2,783	4.7%
Two or More Races	5,205	8.8%
Hispanic Populations	8,418	14.2%

<sup>2</sup> The data used for developing the demographics for the Chisholm Trail MPO area was taken from several ACS 5-year estimate data tables for Garfield County, Oklahoma census tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04. The data used and numbers reflected in the above tables may differ slightly from actual Chisholm Trail MPO populations as some of the census tracts used include portions of Garfield County, Oklahoma which are not included in the Chisholm Trail MPO area.

LEP Populations <sup>3</sup>	2,898	4.9%
Elderly Populations	9,452	16%
Populations With a Disability	9,920	16.8%
Total Chisholm Trail MPO Area Population	58,996	

Chisholm Trail MPO Area Environmental Justice Households	Number of Households	Percent of Total Households
Low-Income Households	3,070	13.8%
Zero-Vehicle Households	931	4.2%
Total Chisholm Trail MPO Area Households	22,277	

### 13. Environmental Justice Communities of Concern

Any census block group where the percentage of an environmental justice population is greater than the regional threshold percentage (environmental justice population percent of the total Chisholm Trail MPO area population) will be determined as being an environmental justice community of concern. See Appendix IV for map results.

### 14. Regional Thresholds

The regional threshold for all minority populations is 37.9%. The total minority population within the Chisholm Trail MPO area is 22,463 which makes up 37.9% of the region's total population. The remaining 72.12% of the population is white. Any block group with a minority population of 37.9.8% or greater is considered a community of concern.

1. Black or African American: The regional threshold for Black or African American populations is 2.2%. The total Black or African American population within the Chisholm Trail MPO area is 1,306 which makes up 2.2% of the region's total population. Any block group with a Black or African American population of 2.2% or greater is considered a community of concern.

<sup>3</sup> Based on the population of persons age 5 years older or older within the Chisholm Trail MPO area.

2. Asian: The regional threshold for Asian populations is 1.3%. The total Asian population within the Chisholm Trail MPO area is 765 which makes up 1.3% of the region's total population. Any block group with an Asian population of 1.3% or greater is considered a community of concern.
3. American Indian or Alaskan Native: The regional threshold for American Indian or Alaskan Native populations is 2.1%. The total American Indian or Alaskan Native population within the Chisholm Trail MPO area is 1,256 which makes up 2.1% of the region's total population. Any block group with an American Indian or Alaskan Native population of 2.1% or greater is considered a community of concern.
4. Native Hawaiian or other Pacific Islander: The regional threshold for Native Hawaiian or Other Pacific Islander populations is 4.6%. The total Native Hawaiian or Other Pacific Islander population within the Chisholm Trail MPO area is 2,730 which makes up 4.6% of the region's total population. Any block group with a Native Hawaiian or Other Pacific Islander population of 4.6% or greater is considered a community of concern.
5. Some other race: The regional threshold for Some other race populations is 4.7%. The total Some other race population within the Chisholm Trail MPO area is 2,783 which makes up 4.7% of the region's total population. Any block group with a Some other race population of 4.7% or greater is considered a community of concern.
6. Two or more races: The regional threshold for Two or More Race populations is 8.8%. The total Two or More Races population within the Chisholm Trail MPO area is 5,205 which makes up 8.8% of the region's total population. Any block group with a Two or More Race population of 8.8% or greater is considered a community of concern.
7. Hispanic/Latino ethnicity origin populations: The regional threshold for Hispanic or Latino origin populations is 14.2%. The total Hispanic or Latino origin population within the Chisholm Trail MPO area is 8,418 which is 14.2% of the region's total population. Any block group with a Hispanic or Latino origin population of 14.2% or greater is considered a community of concern.

8. LEP populations: The regional threshold for LEP populations is 4.9%. The total LEP population within the Chisholm Trail MPO area is 2,898 which makes up 4.9% of the region's total population. Any block group with a LEP population of 4.9% or greater is considered a community of concern.
9. Elderly populations: The regional threshold for elderly populations is 16%. The total elderly population within the Chisholm Trail MPO area is 9,452 which makes up 16% of the region's total population. Any block group with an elderly population of 16% or greater is considered to be a community of concern.
10. Populations with disability: The regional threshold for populations with a disability is 16.8%. The total population with a disability within the Chisholm Trail MPO area is 9,920 which makes up 16.8% of the region's total population. Any census tract with a disability population of 16.8% or greater is considered a community of concern.
11. Low-income Households: The regional threshold for low-income households is 13.8%. The total number of low-income households within the Chisholm Trail MPO area is 3,070 which makes up 13.8% of the region's total households. Any census tract with low-income households of 13.8% or greater is considered a community of concern.
12. Zero-vehicle households: The regional threshold for zero-vehicle households is 4.2%. The total number of zero-vehicle households within the Chisholm Trail MPO area is 931 which makes up 4.2% of the total number of households in the region. Any block group with a Zero-vehicle household of 4.2% or greater is considered a community of concern.

### 15. Using the Environmental Justice Plan

The goal of environmental justice and this plan is to ensure that low-income, minority, and other traditionally underserved populations will not be disproportionately or negatively affected by a given transportation plan or project. And conversely, environmental justice populations should have the same access to and receive the same benefits that non-environmental justice populations will receive from a transportation project. Therefore, Chisholm Trail MPO will refer to this plan during the planning process.

In the planning process, projects should take into consideration the potential burdens and the expected severity that nearby populations will experience. Some burdens of a transportation project may include:

1. Increased traffic and increased travel time;
2. Decreased access to public transportation;
3. Decreased access to employment or businesses;
4. Negative air quality and/or water quality impacts;
5. Increased noise impacts;
6. Separating or bisecting minority and/or low-income communities; and
7. Displacement or relocation of minority and low-income residents.

It is also the Chisholm Trail MPO's goal to ensure that transportation investments and their benefits are equally distributed amongst the people who reside within the Chisholm Trail MPO boundaries. Some benefits of a transportation project may include:

1. Decreased travel time;
2. Increased access to public transportation;
3. Increased access to routes of safe transportation for pedestrians and bicyclists;
4. Increased access to employment or businesses;
5. Improved safety such as a reduction in the number of crashes; and
6. Improved air quality.

## 16. MPO Planning Activities

In order to achieve environmental justice in regards to low-income, minority, and other traditionally underserved populations, the following steps should be taken in the analysis of a potential transportation project:

1. Identify the potential benefits of the project;
2. Identify the potential burdens/adverse effects of the project;
3. Identify which environmental justice populations are present within the project area;
4. Identify the communities of concern block groups that are involved within the boundaries of the project;
5. Note possible mitigation strategies if the disproportionate effects cannot be avoided; and
6. Use targeted public participation strategies throughout the process to keep those involved informed and engaged.

The Chisholm Trail MPO will utilize this environmental justice plan in the evaluation of its major transportation planning activities, such as the MTP, TIP, and the annually prepared UPWP.

Chisholm Trail MPO's Public Participation Plan (PPP) should be used to help identify tools and strategies to better reach environmental justice populations that could be affected by a transportation project. The PPP will aid in the identification of strategies and tools to be used to better reach environmental justice populations and communities identified in this environmental justice plan. For example, translated materials may be necessary to better inform racial minority and LEP populations about transportation projects and activities.

## 17. Conclusion

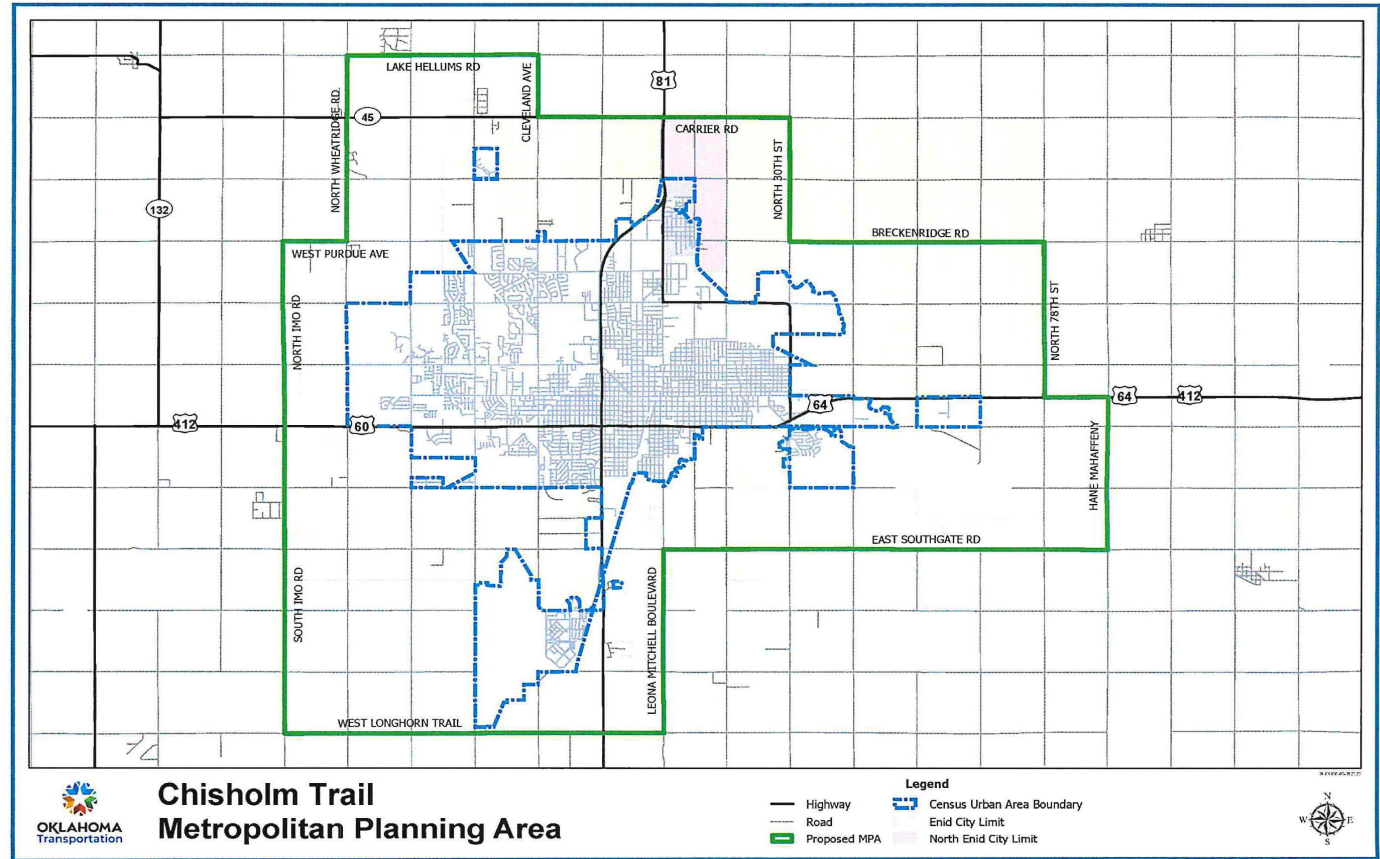
This Environmental Justice Plan and associated maps will be updated every ten years to incorporate new data. At that time, regional threshold data will be updated and communities of concern will be re-evaluated. Chisholm Trail MPO will

continue to maintain this Environmental Justice Plan and update it when new information becomes available.

Chisholm Trail MPO will continue to evaluate and incorporate the particular transportation needs of the environmental justice populations present in the MPA. For example, access to bus stops, schools, community centers, and routes of safe transportation for pedestrians and bicyclists may need to be prioritized for the environmental justice populations in the Chisholm Trail MPO. Whereas the elderly or zero vehicle households whose main transportation priority is easy and prompt paratransit. Minorities and populations with Limited English Proficiency may need more access to signage and plan materials in different languages.

Chisholm Trail MPO will continue to develop the list of potential benefits and burdens that may result from a transportation project as they relate to environmental justice populations.

Chisholm Trail MPO should also consider legal developments and any new laws that might affect non-discrimination and environmental justice in transportation planning.



<sup>1</sup> 23 CFR 450.312 (a)(1) At a minimum, the MPA boundaries shall encompass the entire existing urbanized area (as defined by the Bureau of the Census) plus the contiguous area expected to become urbanized within a 20-year forecast period for the metropolitan transportation plan.



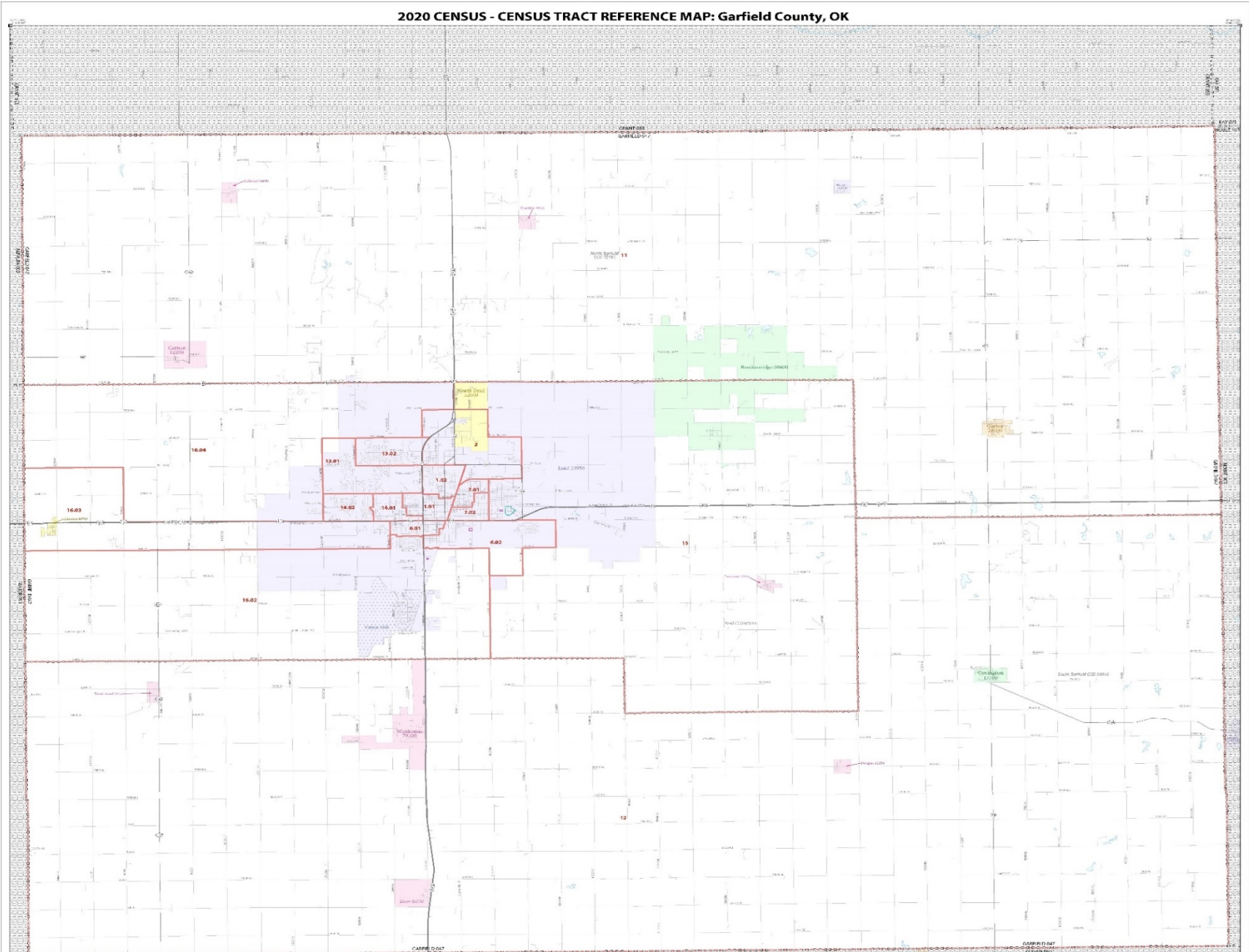
## Appendix II – ACS Tables Used

Environmental Justice Population	ACS Table(s) Used
Total Households	U.S. Census Bureau. “Selected Social Characteristics in the United States.” American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP02, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)
Racial Minority Populations	U.S. Census Bureau. “ACS Demographic and Housing Estimates.” American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP05, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)
Hispanic Populations	U.S. Census Bureau. “ACS Demographic and Housing Estimates.” American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP05, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)
LEP Populations	U.S. Census Bureau. “Selected Social Characteristics in the United States.” American Community Survey, ACS 5-Year Estimates Data Profiles, Table S1602, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)

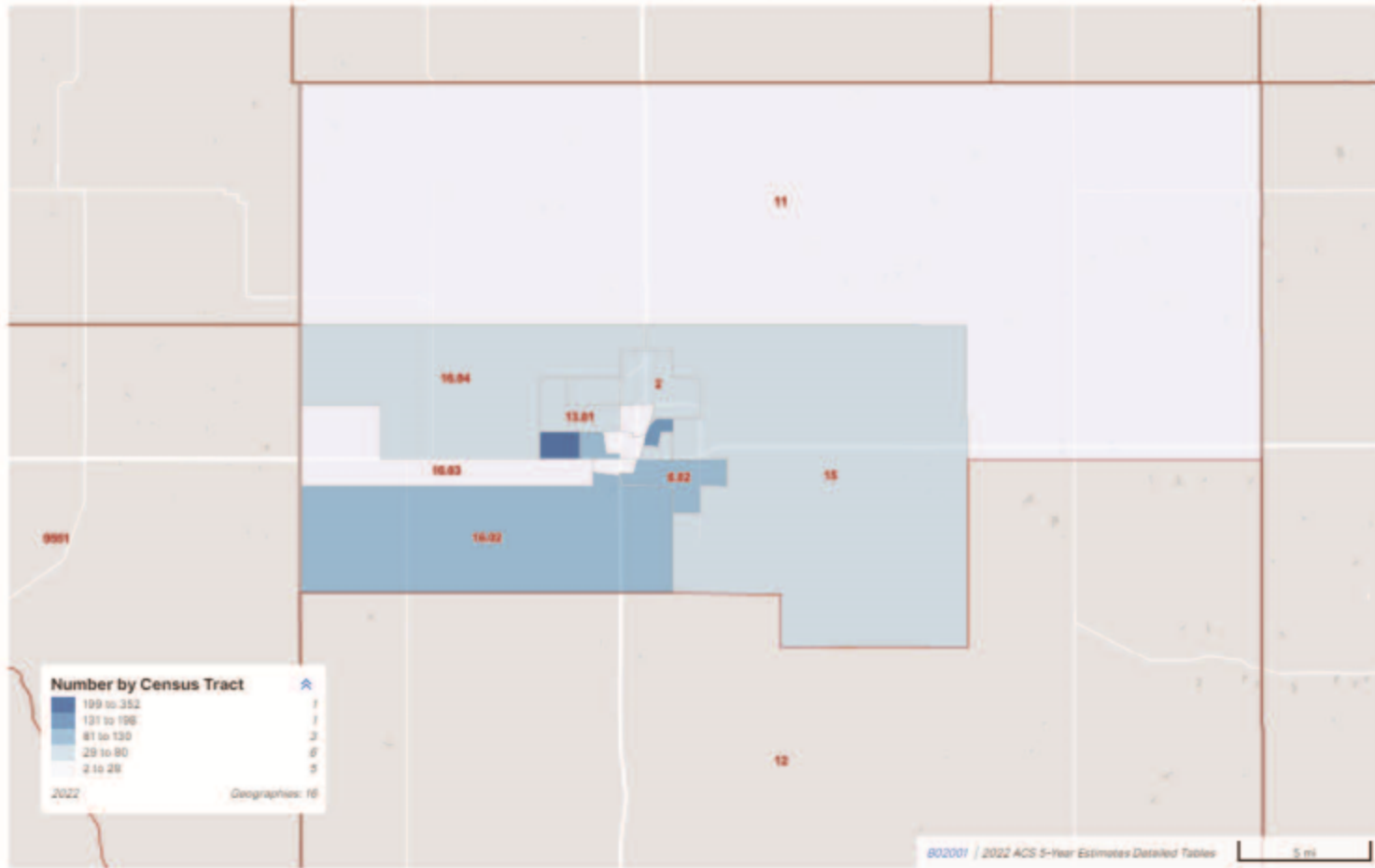
	U.S. Census Bureau. “Limited English Speaking Households.” American Community Survey, ACS 5- Year Estimates Data Profiles, Table DP02, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)
Elderly Populations	U.S. Census Bureau. “ACS Demographic and Housing Estimates.” American Community Survey, ACS 5- Year Estimates Data Profiles, Table DP05, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)
Populations with a Disability	U.S. Census Bureau. “Selected Social Characteristics in the United States.” American Community Survey, ACS 5- Year Estimates Data Profiles, Table DP02, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)  U.S. Census Bureau. “Total Civilian Noninstitutionalized Population – Percent with a Disability.” American Community Survey, ACS 5- Year Estimates Data Profiles, Table S1810, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)
Low-Income Households	U.S. Census Bureau. “Food Stamps/Supplemental Nutrition Assistance Program (SNAP).” American Community Survey, ACS 5-

	<p>Year Estimates Subject Tables, Table S2201, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)</p> <p>U.S. Census Bureau. “Population for whom poverty status is determined.” American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1701, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)</p>
<p>Zero-Vehicle Households</p>	<p>U.S. Census Bureau. “Selected Housing Characteristics.” American Community Survey, ACS 5- Year Estimates Data Profiles Table DP04, 2022 for Garfield County, Oklahoma, Census Tracts 1.01, 1.02, 2, 6.01, 6.02, 7.01, 7.02, 11, 13.01, 13.02, 14.01, 14.02, 15, 16.02, 16.03, and 16.04)</p>

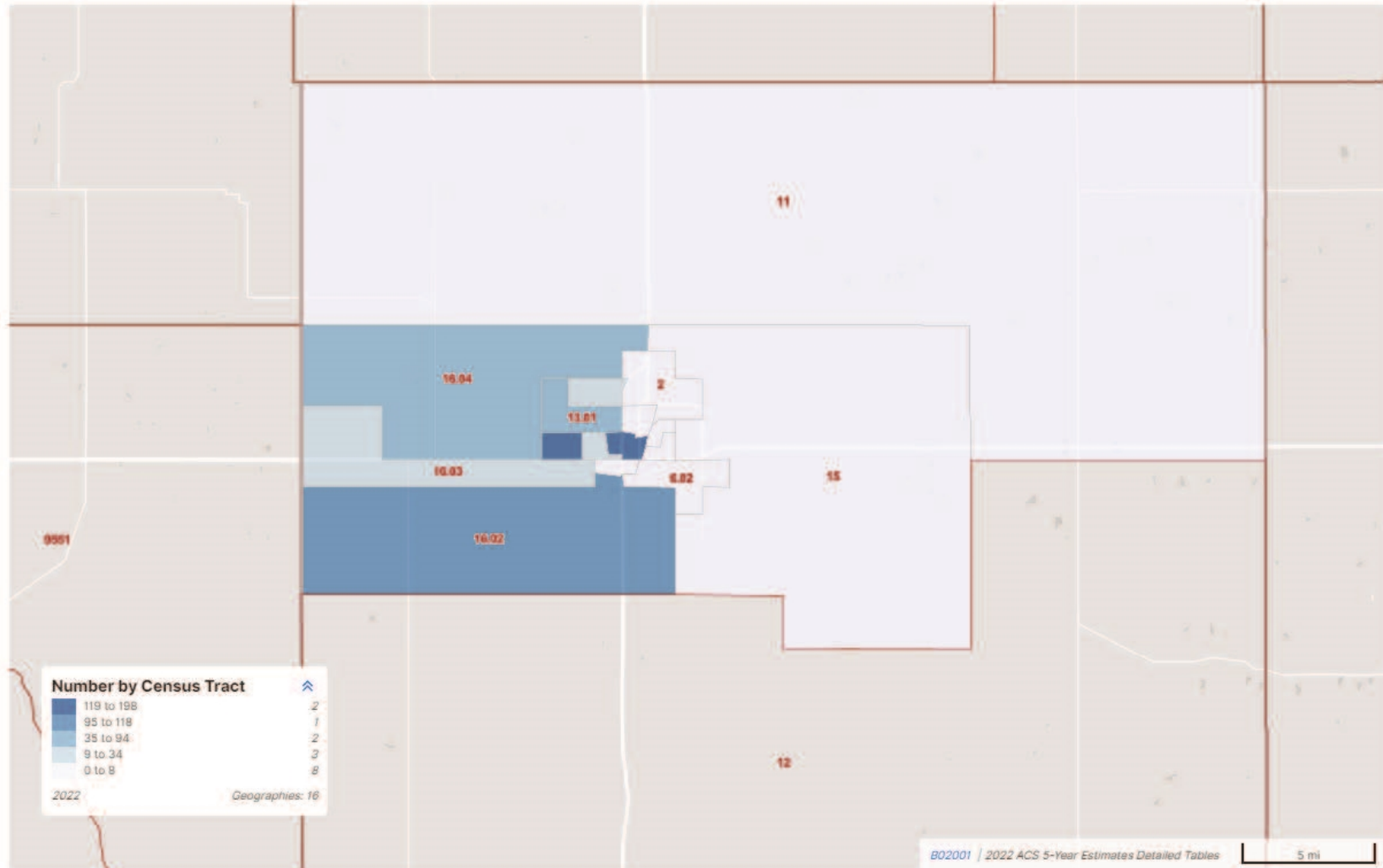
Appendix III  
—  
2020  
Garfield County, Oklahoma  
Census Tracts



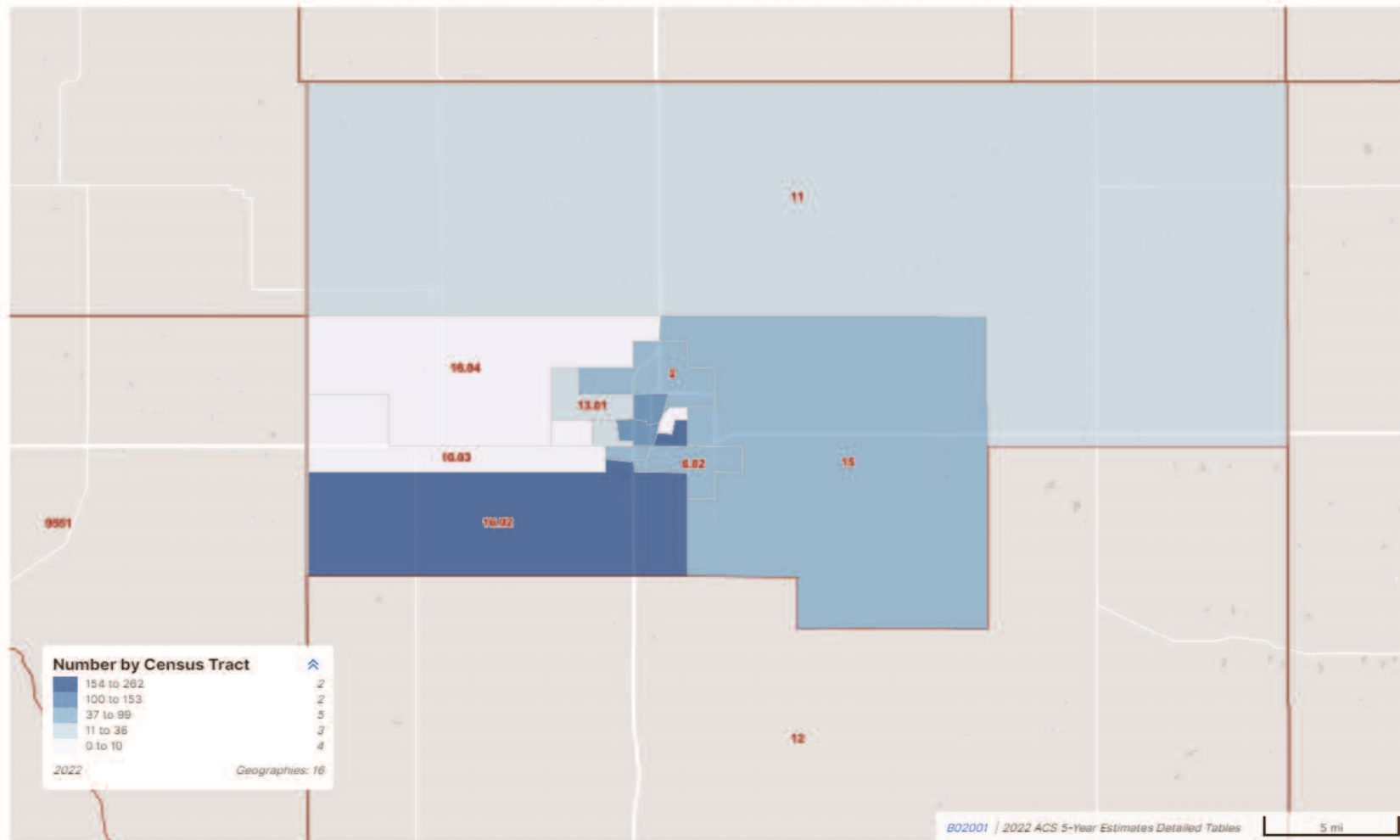
### Black or African American alone - Total:



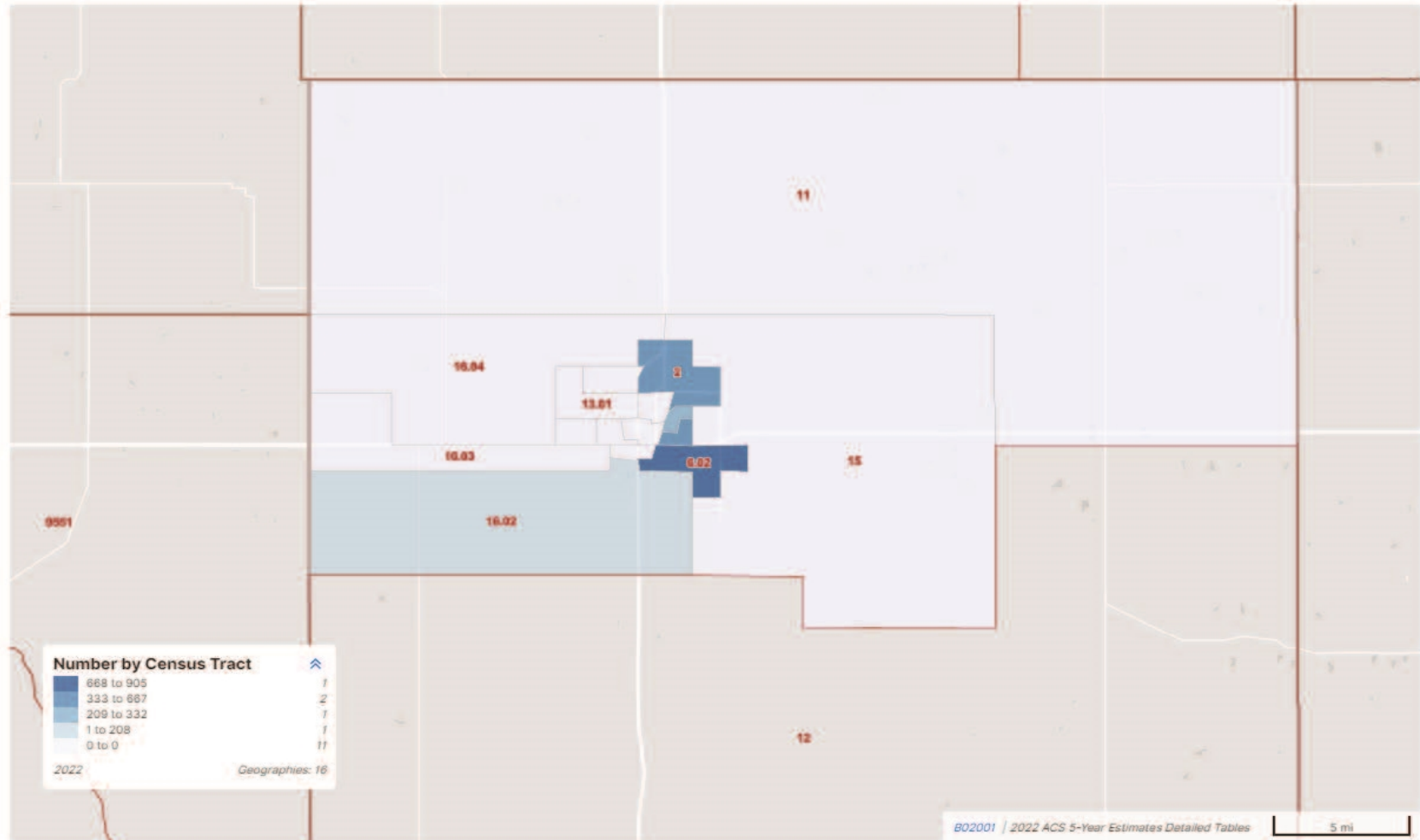
### Asian alone - Total:



### American Indian and Alaska Native alone - Total:

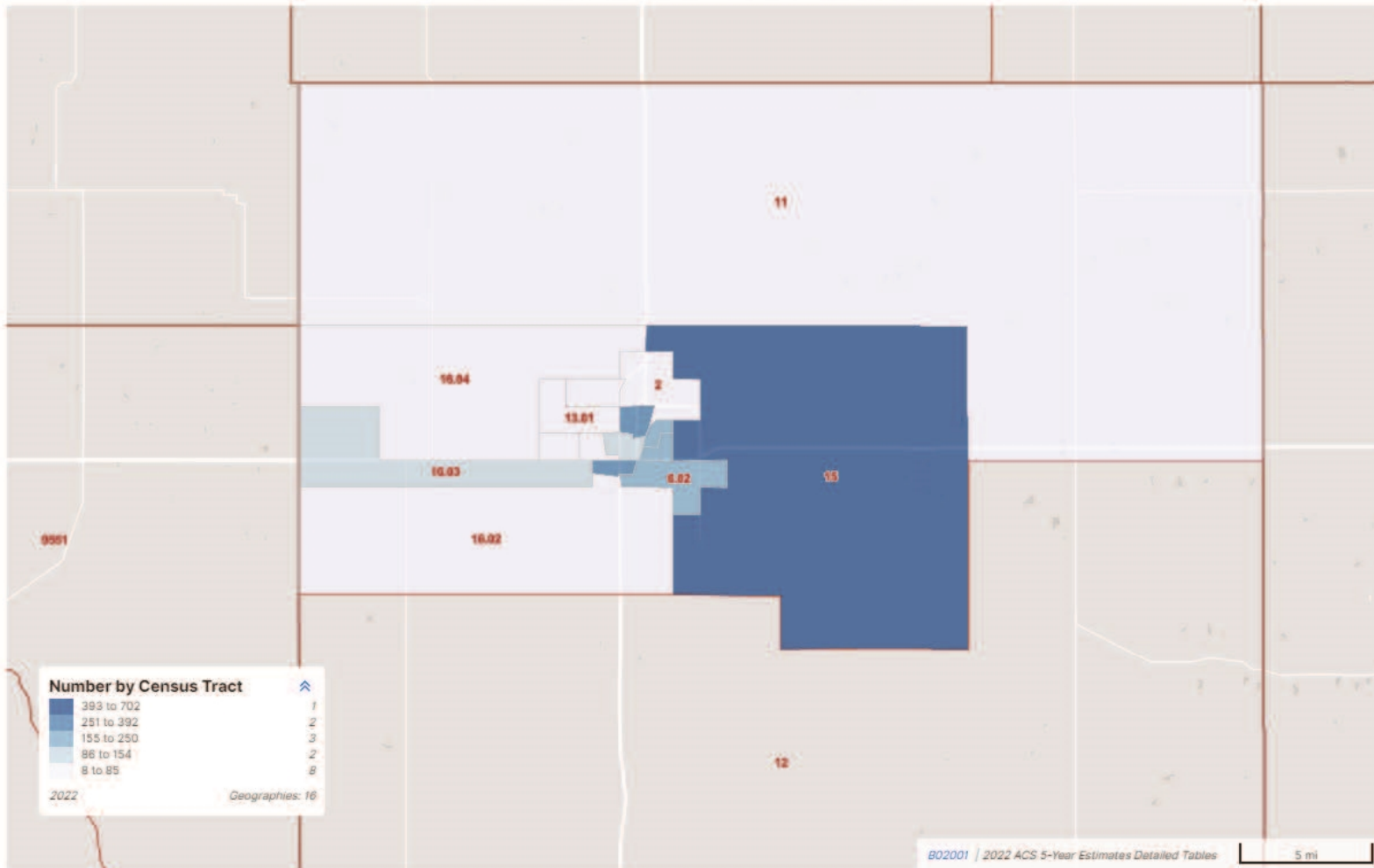


Native Hawaiian and Other Pacific Islander alone - Total:

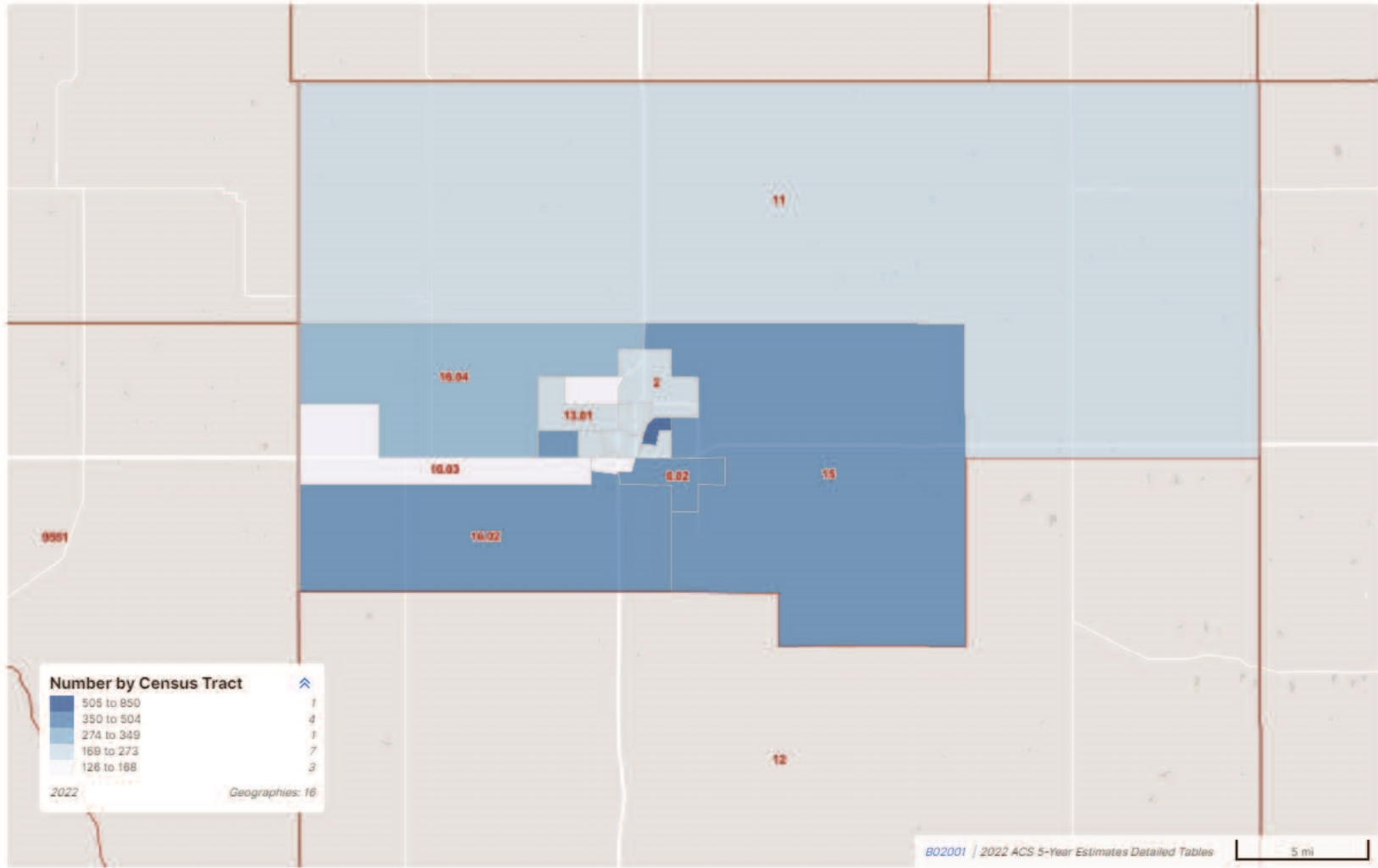




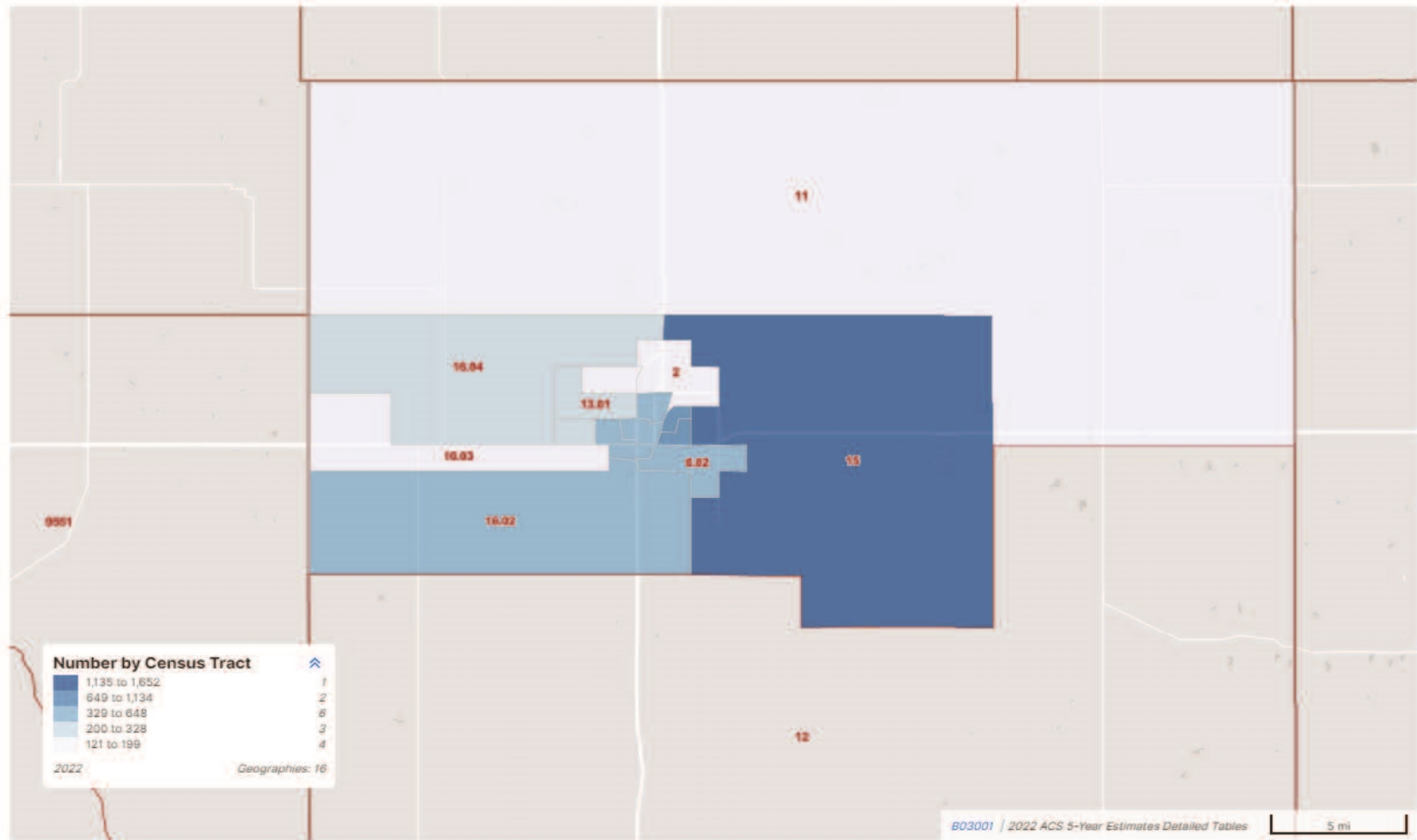
### Some Other Race alone - Total:



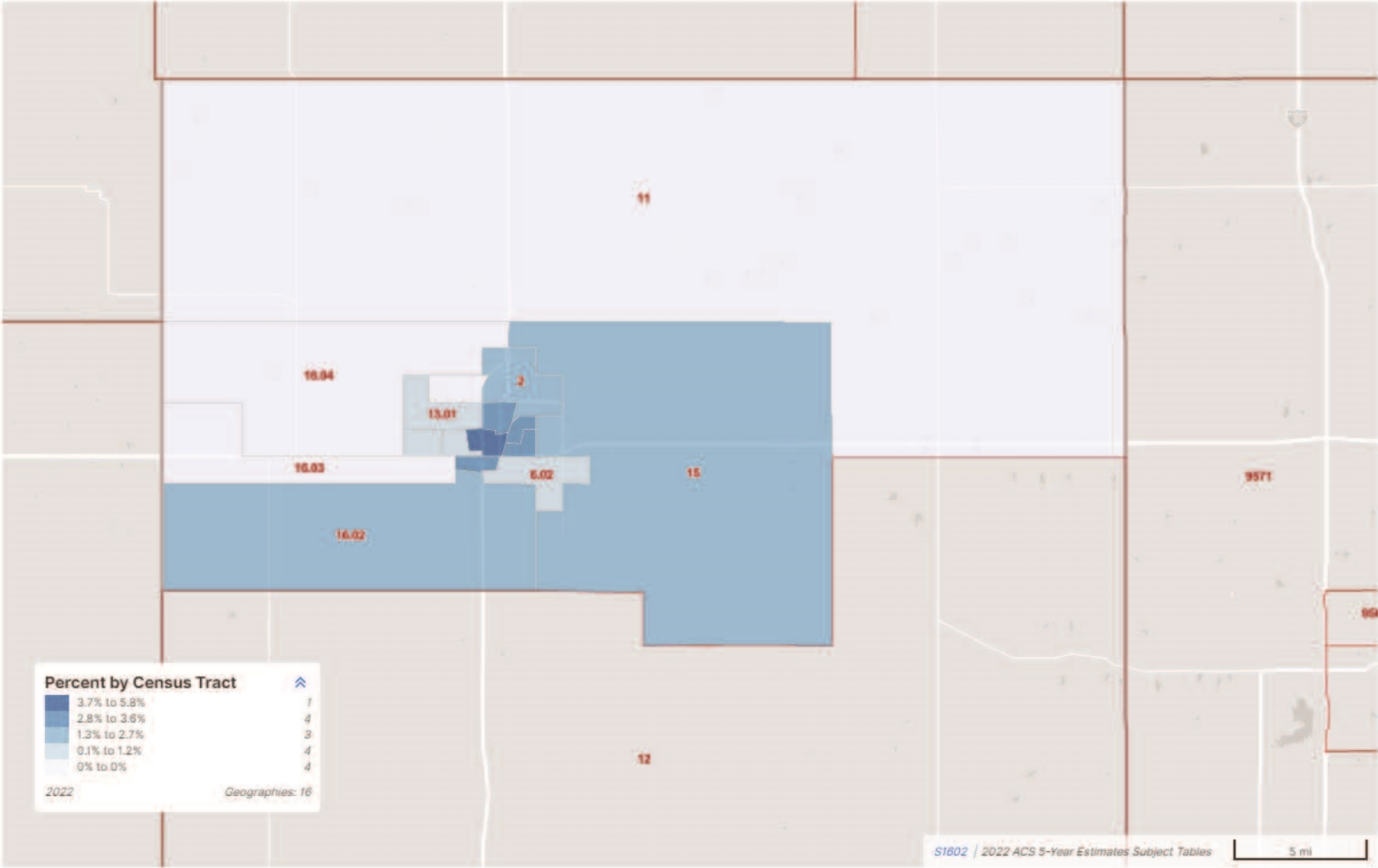
Two or More Races: - Total:



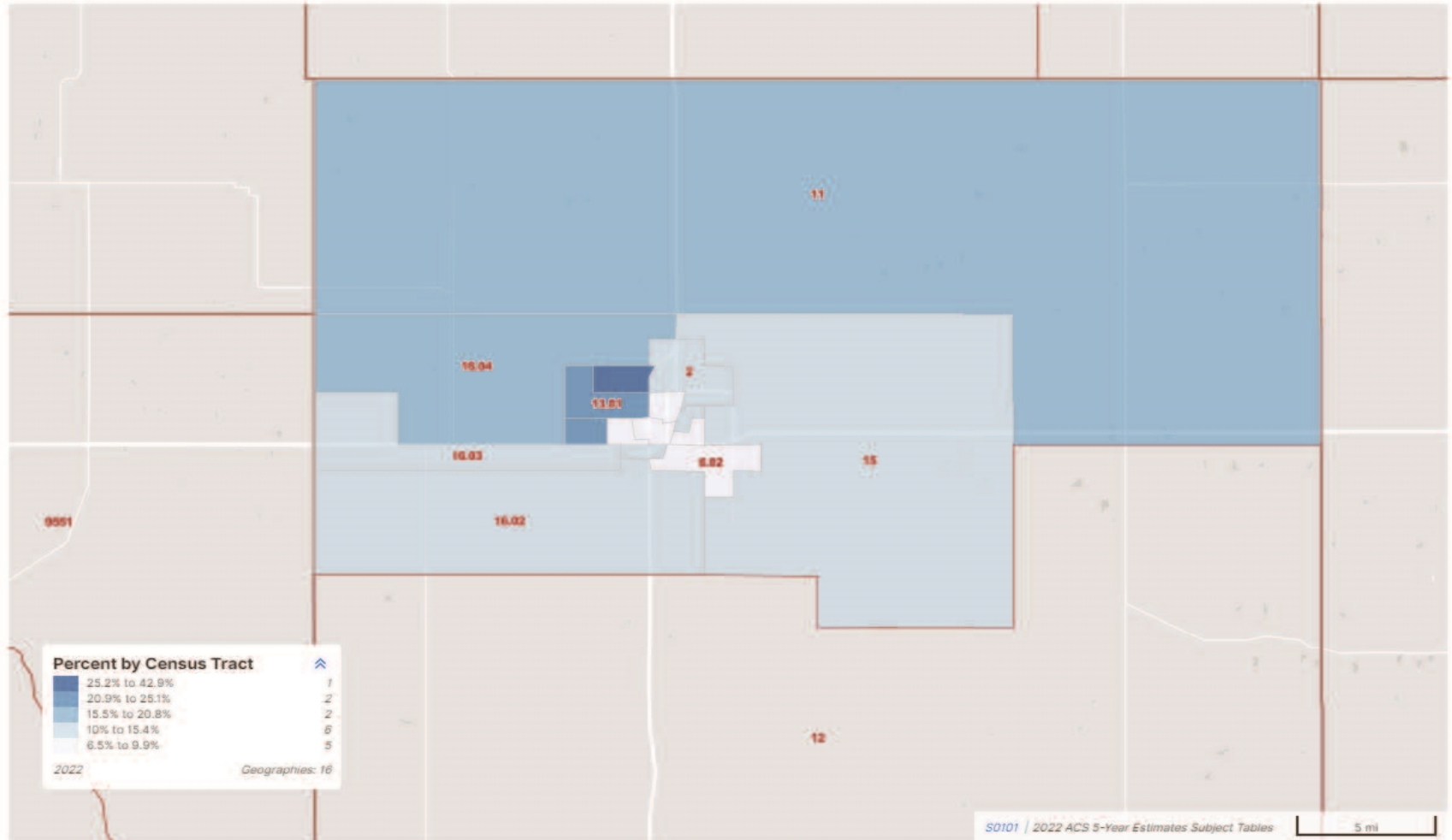
### Hispanic or Latino: - Total:



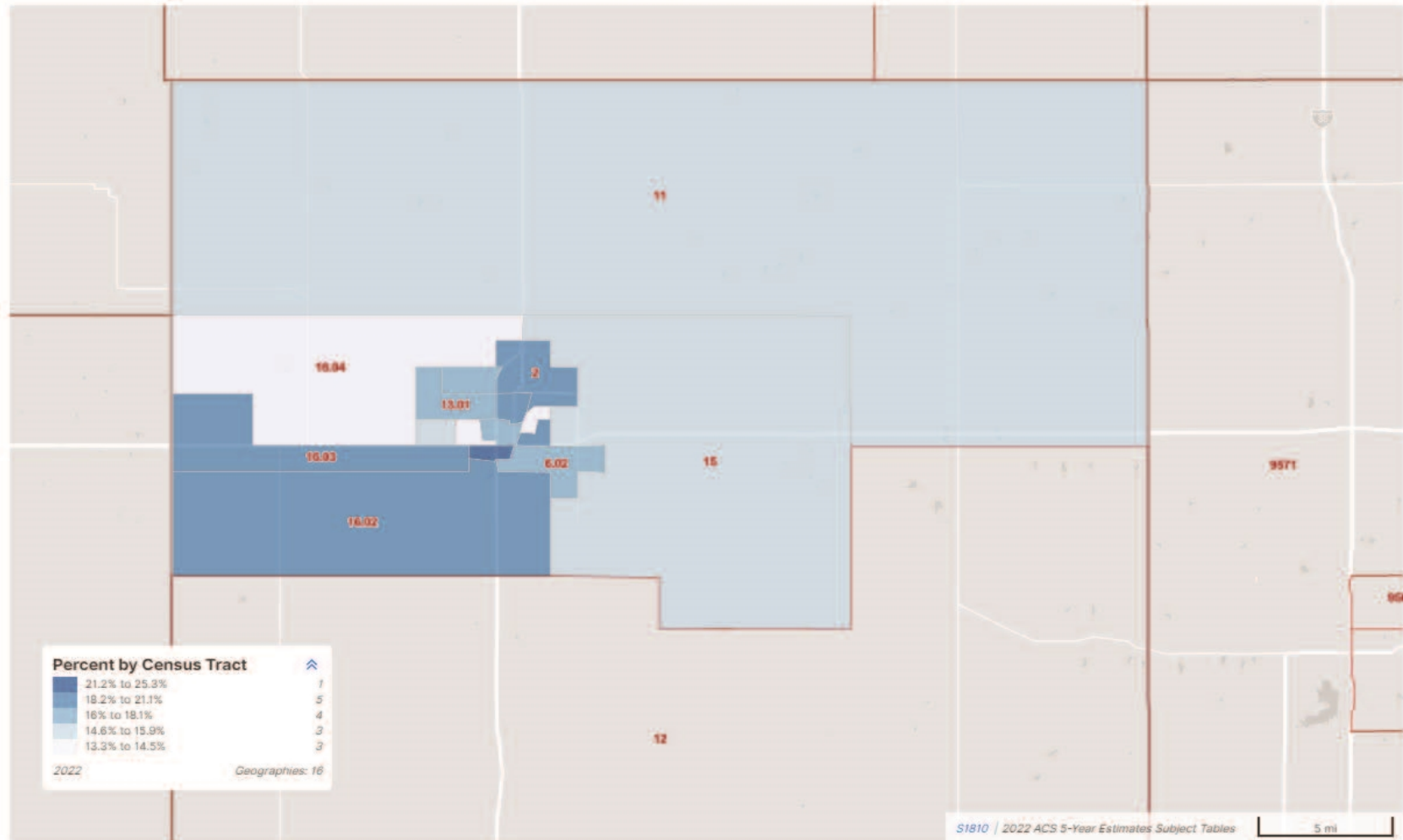
All households - Percent limited English-speaking households



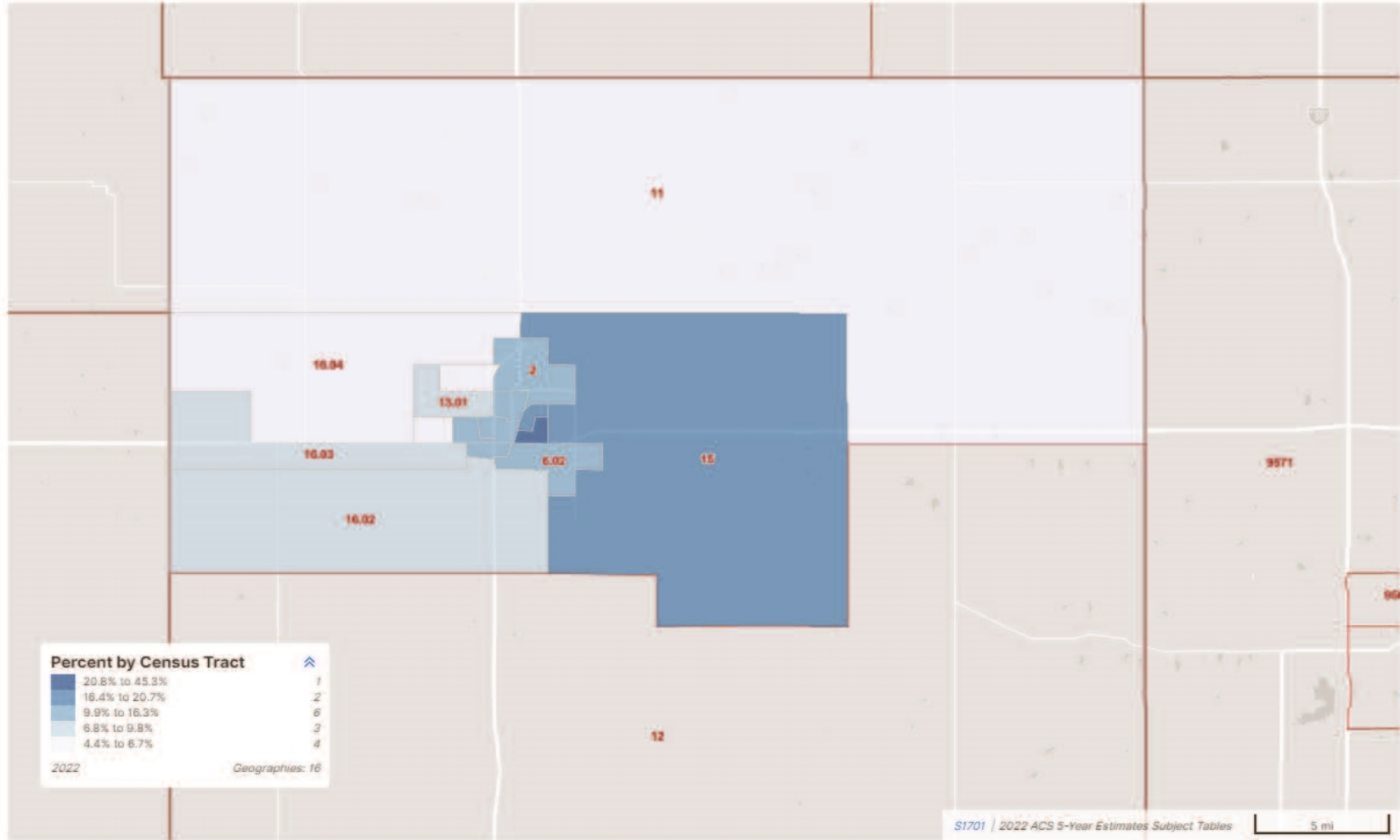
65 years and over - Percent | SELECTED AGE CATEGORIES | Total population



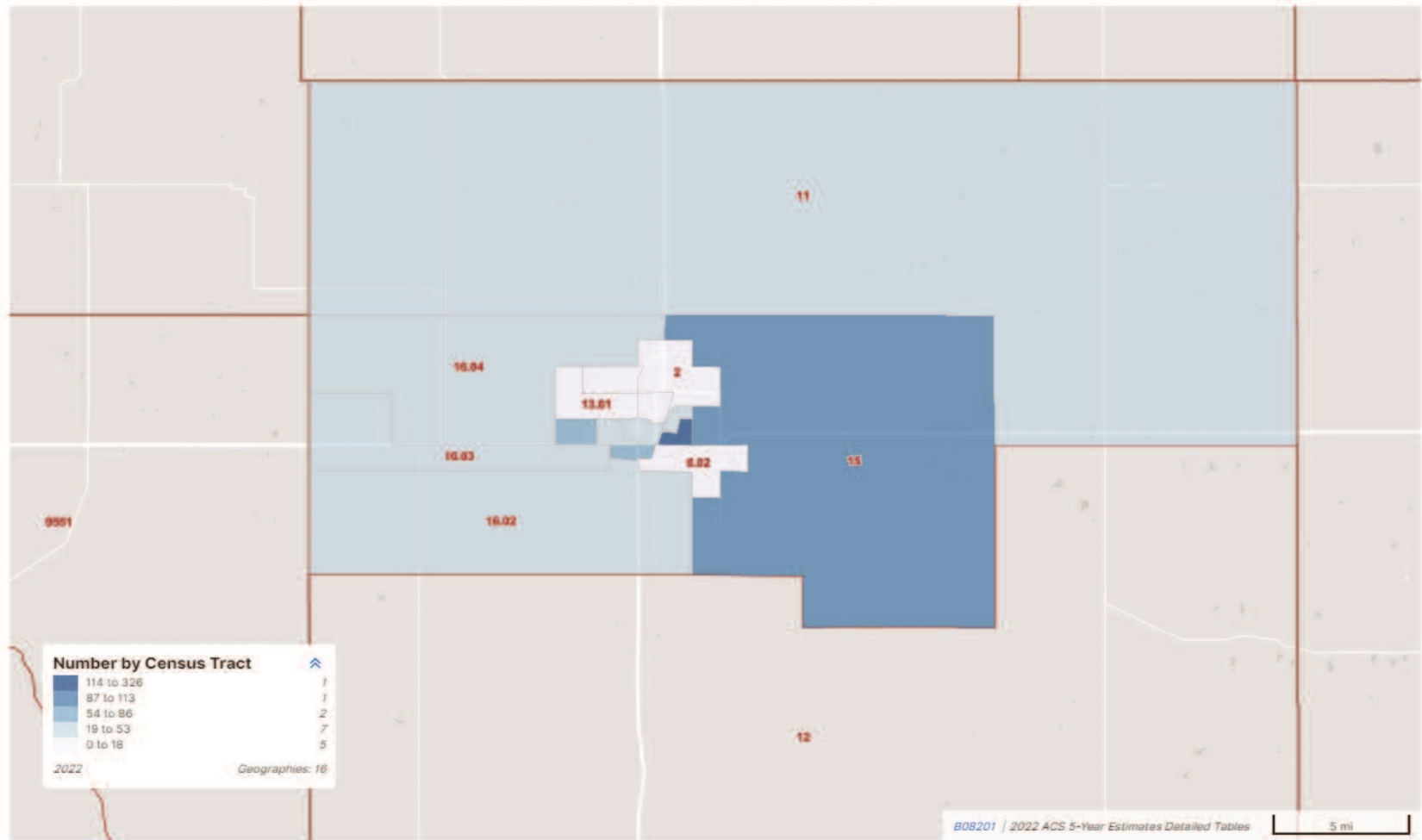
### Total civilian noninstitutionalized population - Percent with a disability



Population for whom poverty status is determined - Percent below poverty level



No vehicle available - Total:







## **CHISOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S LIMITED ENGLISH PROFICIENCY PLAN**

Adopted November 2024

Chisholm Trail Metropolitan Planning Organization  
401 West Owen K. Garriott Road  
Enid, Oklahoma 73701  
Telephone: 580-616-7246  
<https://www.chisholmtrailmpo.org>

### **Non-Discrimination Policy**

It is the policy of the Chisholm Trail Metropolitan Planning Organization, under Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1968; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-aid Highway Act of 1973; Civil Rights Restoration Act of 1987; and other related authorities and regulations, that no person in the United States shall, on the basis of race, color, national origin, religion, sex, disability, age, or familial status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by Chisholm Trail MPO or its subrecipients. An individual has a right to file a complaint against the Chisholm Trail MPO if they believe the agency did not provide necessary services as appropriate. These complaints include those available under Title VI and the ADA. The Title VI Compliant form is available on the Chisholm Trail MPO website or by contacting the CDBG Coordinator at 580-616-7211 or [kristen.day@enid.org](mailto:kristen.day@enid.org). The ADA Complaint form is available on the Chisholm Trail MPO website or by contacting the ADA Coordinator at [arasmuson@enid.org](mailto:arasmuson@enid.org) or 580-616-7242.

### **Maps and Data Disclaimer**

Maps/data presented in this report were created and assembled by the Chisholm Trail MPO are for informational, planning reference, and guidance only. You are admonished to use these materials only as a starting point and not a final product or document. None of these materials should be utilized by you or other parties without the benefit of advice and instruction from appropriate professional services. These materials are not verified by a Registered Professional Land Surveyor for the State of Oklahoma and are not intended to be used as such. Chisholm Trail MPO makes no warranty, express or implied, related to the accuracy or content of these materials and data.

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## Introduction

The key functions of MPOs include:

- a) the identification and evaluation of alternative transportation options;
- b) the preparation and ongoing development of transportation plans and programs, such as the Metropolitan Transportation Plan (MTP) and the Transportation Improvement Program (TIP);
- c) the use of Performance-based Planning and Programming (PBPP); and,
- d) the encouragement and fostering of public participation that is meaningful.

An MPO's role is to ensure comprehensive, coordinated and continuous transportation planning. The CTMPO works with the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), the Oklahoma Department of Transportation (ODOT), the Northern Oklahoma Development Association (NODA), the Enid Public Transportation Authority (EPTA), local governments, the public and other stakeholders to prepare and develop transportation plans, programs, and policies.

### 1. Chisholm Trail's Metropolitan Transportation Plan

The Metropolitan Transportation Plan (MTP) is developed every five years to include priorities over the next twenty-five (25) years. The MTP is a fiscally constrained plan that outlines future investments in multimodal improvements to support growth based upon the goals established by the Chisholm Trail MPO consistent with priorities established by Federal and Oklahoma laws and regulations.

### 2. Chisholm Trail's Transportation Improvement Program

The Transportation Improvement Program (TIP) is a cooperatively developed four-year plan outlining multi-modal transportation improvements and services to be implemented within the Metropolitan Planning Area (MPA). These improvements and services assist the Chisholm Trail MPO in achieving the goals of the MTP. Performance-based planning and programming is also part of the TIP.

### 3. Chisholm Trail's Unified Planning Work Program

Generally, the Unified Planning Work Program (UPWP) describes the proposed transportation planning activities to be conducted in the MPA during a fiscal year. The UPWP serves as the basis for requesting federal planning funds. It is also a management tool for scheduling, budgeting and monitoring planning activities. The UPWP outlines the scope and direction of all planning activities and specifies which program tasks will be completed.

## 4. Chisholm Trail’s Public Participation Plan

The Public Participation Plan (PPP) sets the guidelines and standards for soliciting public comments on local transportation plans and programs. The plan includes descriptions of the public participation tools to be utilized and the strategies and guidelines that are essential for meaningful public participation and a series of performance measures to be used to evaluate the effectiveness of the plan.

### Limited English Proficiency Plan

#### 1. Limited English Proficiency Plan Overview

Individuals who do not speak English as their primary language and who have limited ability to read, write, or understand English are considered persons with Limited English Proficiency or LEP persons. These LEP persons are entitled to language assistance from the Chisholm Trail MPO. Title VI of the Civil Rights Act requires that responsible steps are taken to provide meaningful access to the MPO’s planning, policies, notices, plans, programs, meetings and activities.

#### 2. Federal Requirements

Title VI explicitly prohibits discrimination on the basis of race, color and national origin in programs and activities that receive federal financial assistance.

Executive Order 13166, “Improving Access to Persons with Limited English Proficiency”<sup>1</sup> provides that differing treatment based upon a person’s inability to speak, read, write or understand English is a type of national origin discrimination prohibited by Title VI.

Executive Order 13166 requires federal agencies to examine the services they provide, identify any need for services for LEP person, develop and implement a system to provide these services so LEP persons can have meaningful access to them.

The meaningful access requirements of Title VI apply to the Chisholm Trail MPO and the MPO will ensure compliance in all its programs and activities. The MPO Title VI Coordinator will administer and monitor the Title VI non-discrimination program.

#### 3. The Chisholm Trail MPO’s Commitment

The MPO will take steps to ensure no LEP person is subjected to discrimination by the programs, services, or activities administered by the MPO or its recipients.

#### 4. Definitions

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<sup>1</sup> 65 FR 50121 (August 11, 2000)

The following definitions are used in this plan:

“Direct Language Communication” means a monolingual communication in a language other than English between a multilingual person and a person who is a LEP person.

“Interpretation” means the act of listening to a communication in one language and orally converting it into another language while retaining the same meaning. There are several types of interpretation, including simultaneous, consecutive, or sight.

“Language Assistance Services” means the oral and written language services needed to assist a LEP person to communicate effectively with the MPO and which allow a LEP person meaningful access to and equal opportunity to participate fully in the service, planning, activities and programs administered by the MPO.

“Limited English Proficient Person” means a person over the age of five for whom English is not their primary language and who has a limited ability to read, write or understand English. A LEP person may be competent in English for certain types of communication and not in others.

“Meaningful Access” means language assistance that results in accurate, timely, and effective communication, at no cost to the LEP person.

“Multilingual Person” means a person who has proficiency in reading, writing, speaking, or understanding at least one other language in addition to English and is able to assist a LEP person in that other language.

“Preferred or Primary Language” means the language that a LEP person identifies as their preferred language that they use to communicate effectively with others.

“Sight Translation” means an oral rendering of a written text into a spoken language by a multilingual person without changing the meaning based upon a visual review of the original text or document.

“Translation” means the replacement of a written text from one language into an equivalent written text in another language.

“TPB” means the Chisholm Trail MPO’s Transportation Policy Board.

“TTC” means the Chisholm Trail MPO’s Transportation Technical Committee.

“Vital Documents” mean paper or electronic written material that contain information that is critical for accessing the MPO’s programs or activities. Vital documents include: the Title VI complaint form and complaint process; Title II complaint form and process; notices of rights and notices advising LEP of the availability of free language assistance.

## 5. Limited English Proficiency Assessment

The following Four Factor Analysis set forth by the U.S. Department of Justice should be considered when developing and administering the Limited English Proficiency Plan:

- a. the number and proportion of LEP persons in the MPA;
- b. the frequency LEP persons come into contact with the MPO's programs, services or activities;
- c. the importance of the program, activities, and services to the LEP persons;
- d. the resources available to the MPO and the costs of these resources.

#### A. Factor One: the number and proportion of LEP persons

The first step is to review data to identify the LEP populations within the MPA. According to the most recent census and data, there are approximately 2,898 LEP persons in the MPA. The most common language spoken by LEP persons is Spanish. Only Spanish is spoken by more than 1,000 LEP persons within the MPA. Therefore, the MPO must translate vital documents into Spanish and the MPO has placed these documents on the MPO website in Spanish. The MPO will also place a translation of the notice of the right to free language assistance services on the MPO website in Spanish and Marshallese. The census data does not break out the Marshallese people so it is difficult to know how many Marshallese live in the MPA and how many are LEP persons. Upon request the MPO will provide a translation of the notice in other languages spoken within the MPA.

#### B. Factor Two: the frequency of encounters with LEP persons

The MPO to date has received no requests for language assistance and no LEP persons have contacted the MPO.

#### C. Factor Three: the importance of the services provided

The MPO programs use federal funds to plan for future transportation needs but does not include direct service or programs that require vital, immediate or emergency assistance. However, the MPO will ensure that all LEP persons have the opportunity to be involved through meaningful access in the transportation planning process including the development of the MPO's MTP, TIP, UPWP and other planning activities.

#### D. Factor Four: resources available and costs

The fourth factor weighs the preceding three factors to assess the needs of LEP persons within the MPA compared with the resources available to the MPO and the cost of providing them. In subsequent sections of this plan the strategies to be implemented will ensure language will not prevent LEP persons from participating with meaningful access in the MPO planning, meetings and activities.

### 10. Language Assistance Strategies

Spanish is the only language that requires language assistance. Language assistance will be provided for LEP persons through the translation of vital documents, which are posted on the MPO's website in Spanish.

#### A. Translation of Written Materials

In addition to the vital documents the MPO will also provide this plan on the MPO website in English and Spanish. Upon request executive summaries of other plans and policies will be placed on the MPO website in English and Spanish.

#### B. Oral Language Services

The MPO is developing the following oral language assistance services:

1. The MPO will provide a person fluent Spanish to provide direct language communication or interpretation to assist the MPO planner to communicate with LEP persons whose preferred language is Spanish.

2. A language ability survey will be developed by the MPO planner in order to create a database of volunteers that can provide direct communication or interpretation for LEP persons in their preferred language.

3. A translated notice about available language services will be provide to the schools and community-based organizations that serve LEP persons.

4. The MPO planner will utilize Census Bureau Language Identification Flash cards for LEP persons to identify their preferred language.

5. The MPO planner will develop and maintain a list of outside sources that can provide oral translation services.

#### C. Outreach and Engagement

The MPO Planner will use the following methods to inform LEP persons and other stakeholders, as well as the general public of available free LEP services:

1. Posting information at the front desk reception area at the Enid City Administration Building to alert LEP persons available direct language and interpretation services and that translations are available in Spanish on the MPO website.

2. The MPO Planner will place in the local newspaper an advertisement requesting translators of all languages spoken in the MPA to contact the MPO if they are willing to assist LEP persons.

#### D. Training

The MPO Planner and multilingual volunteers will receive training in the LEP policies and procedures.

E. Performance-based Assessments and Programming

1. The MPO Planner will keep track of each contact with a LEP person and complete a LEP Reporting Form that will be utilized by the MPO’s TTC in assessing the effectiveness of the Plan provided. A copy of the LEP Reporting Form has been added at the end of this plan.

2. Periodic Review of the LEP contacts, will coincide with the evaluations of the Public Participation Plan and the Title VI Plan. Evaluation results and recommended changes will be shared with the MPO’s TTC and TPB.

This plan was approved on November 13, 2024 for by the Chisholm Trail MPO’s Transportation Policy Board.

\_\_\_\_\_  
David M. Mason, Chairman

ATTEST:

\_\_\_\_\_  
Summer

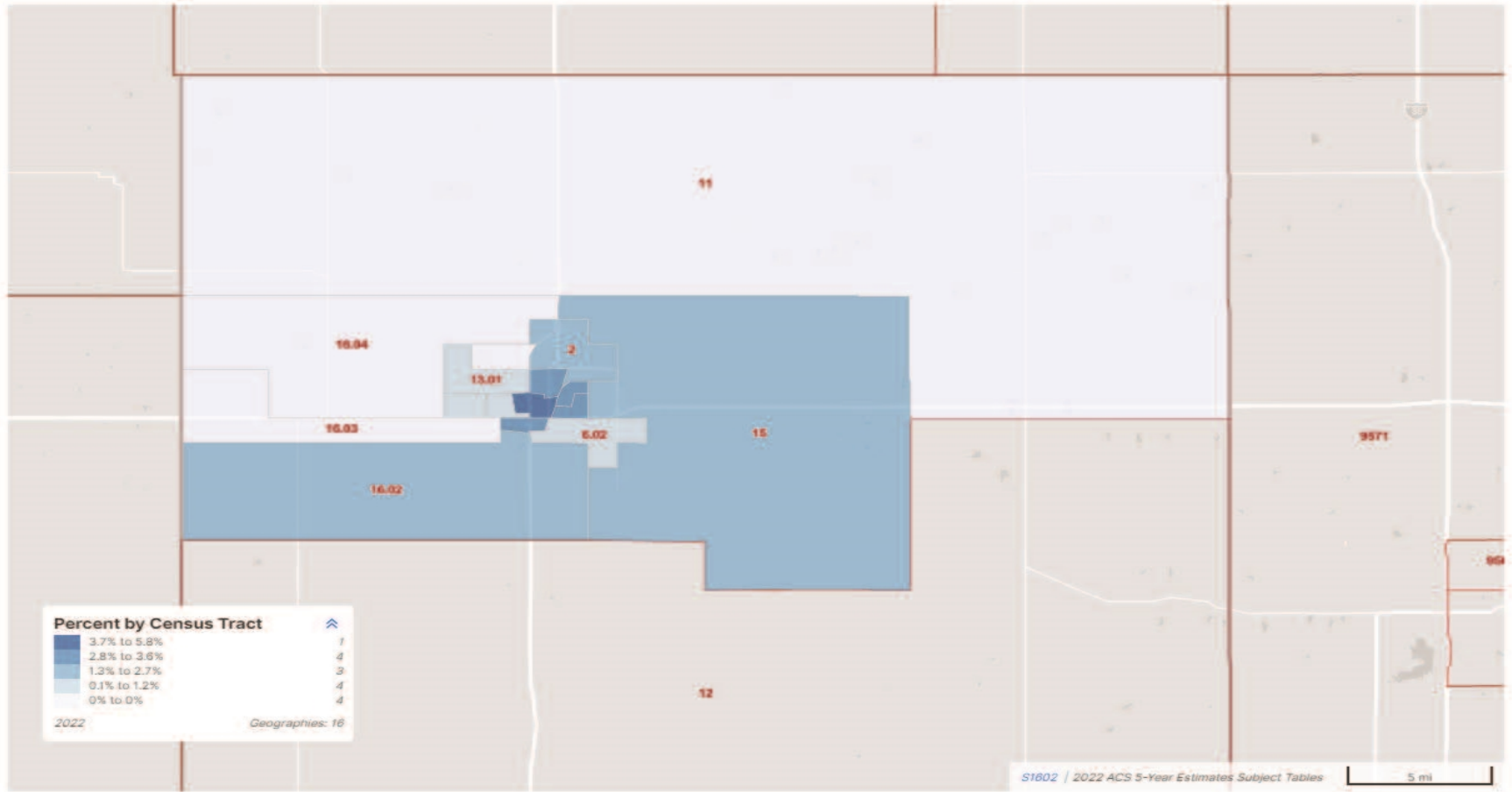
Anderson,

Secretary

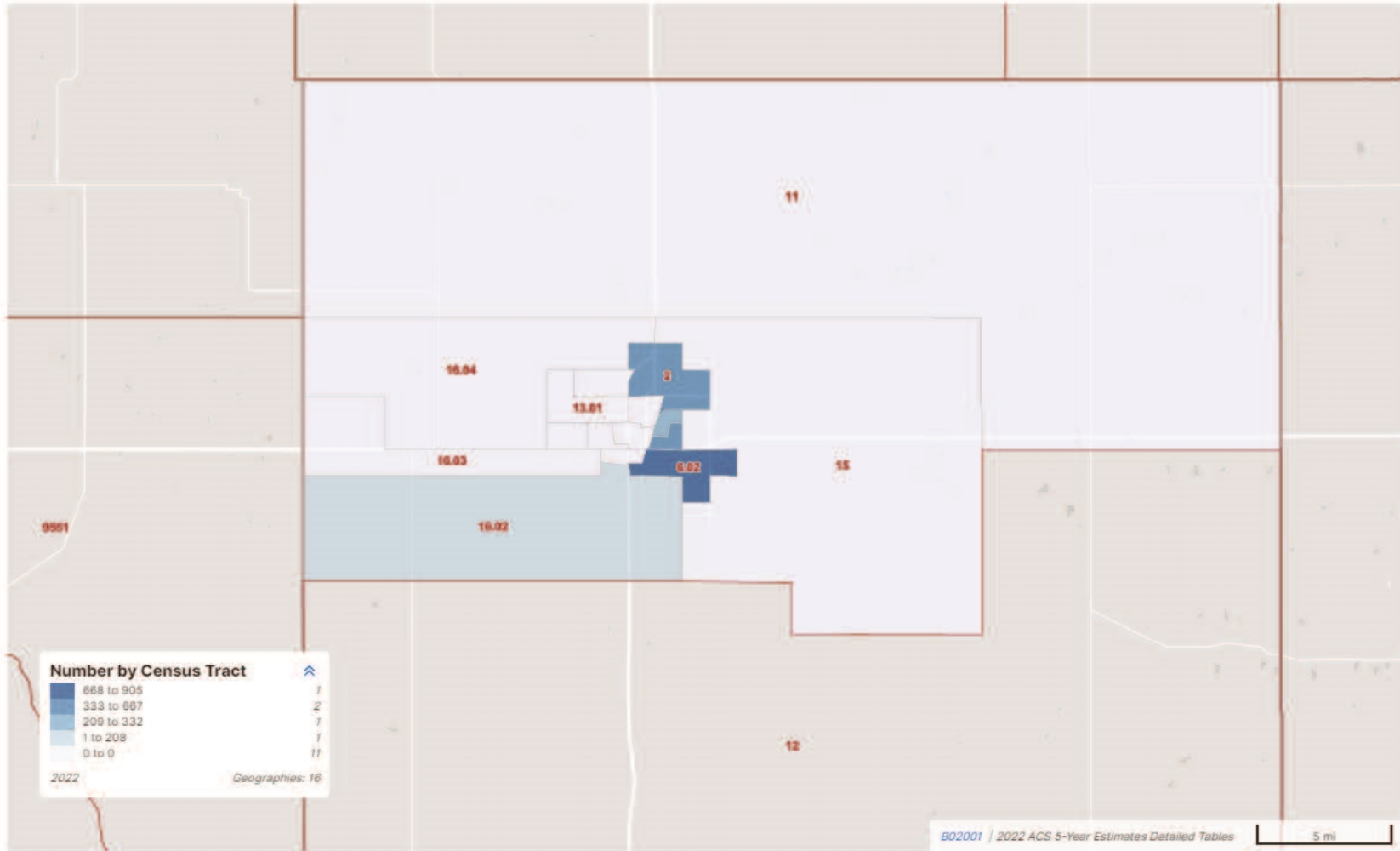


# Appendix A - Maps

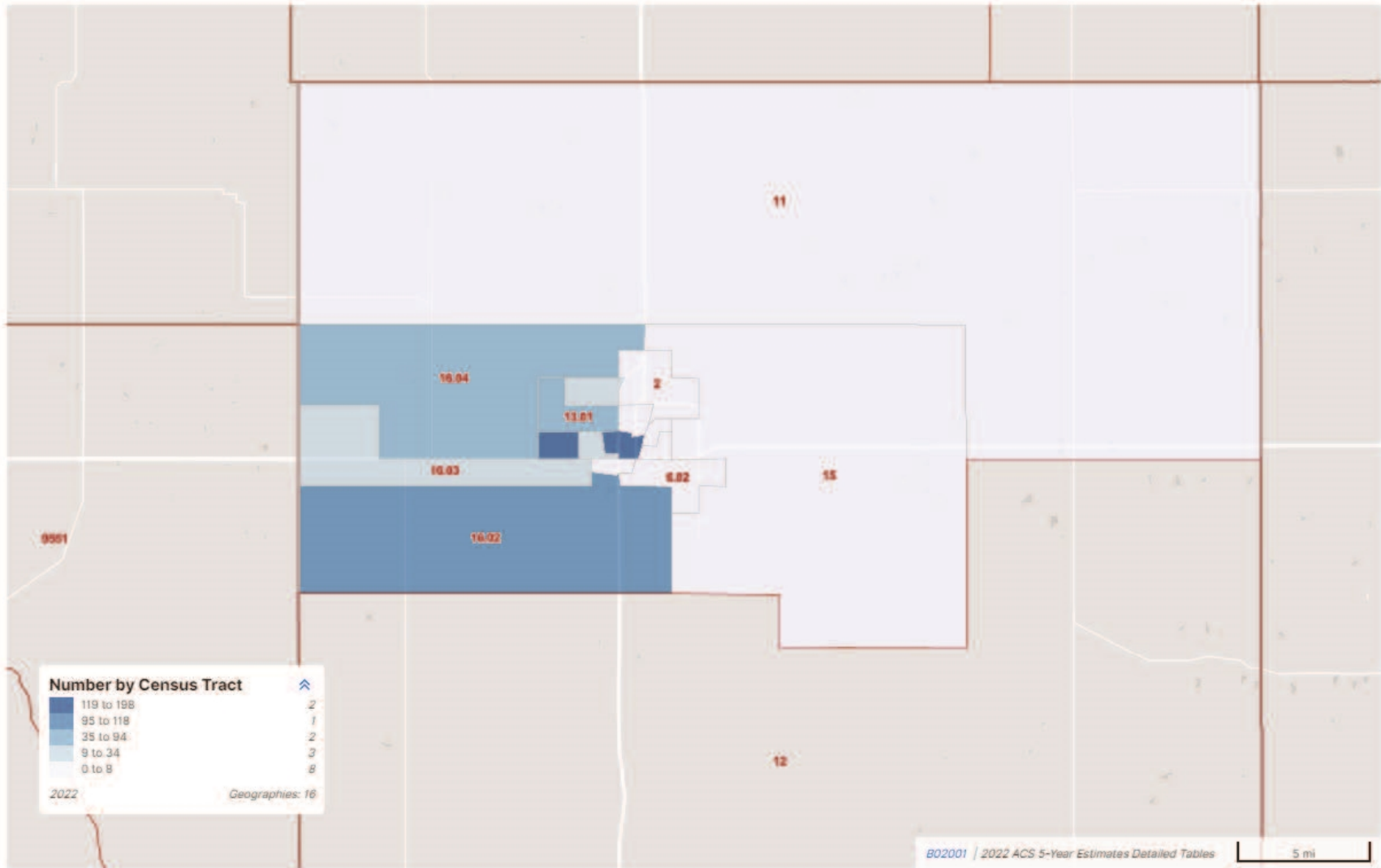
## All households - Percent limited English-speaking households



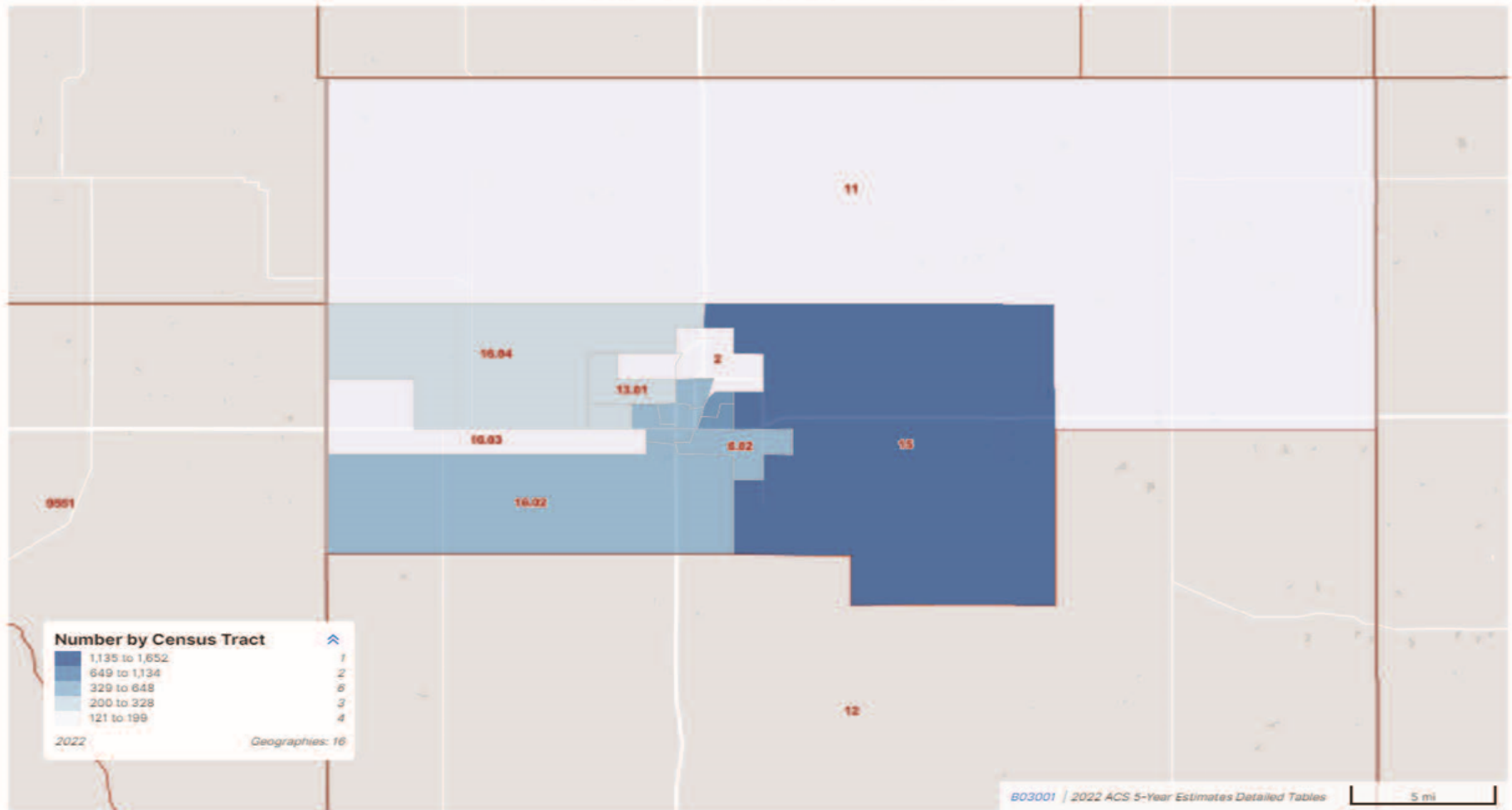
Native Hawaiian and Other Pacific Islander alone - Total:



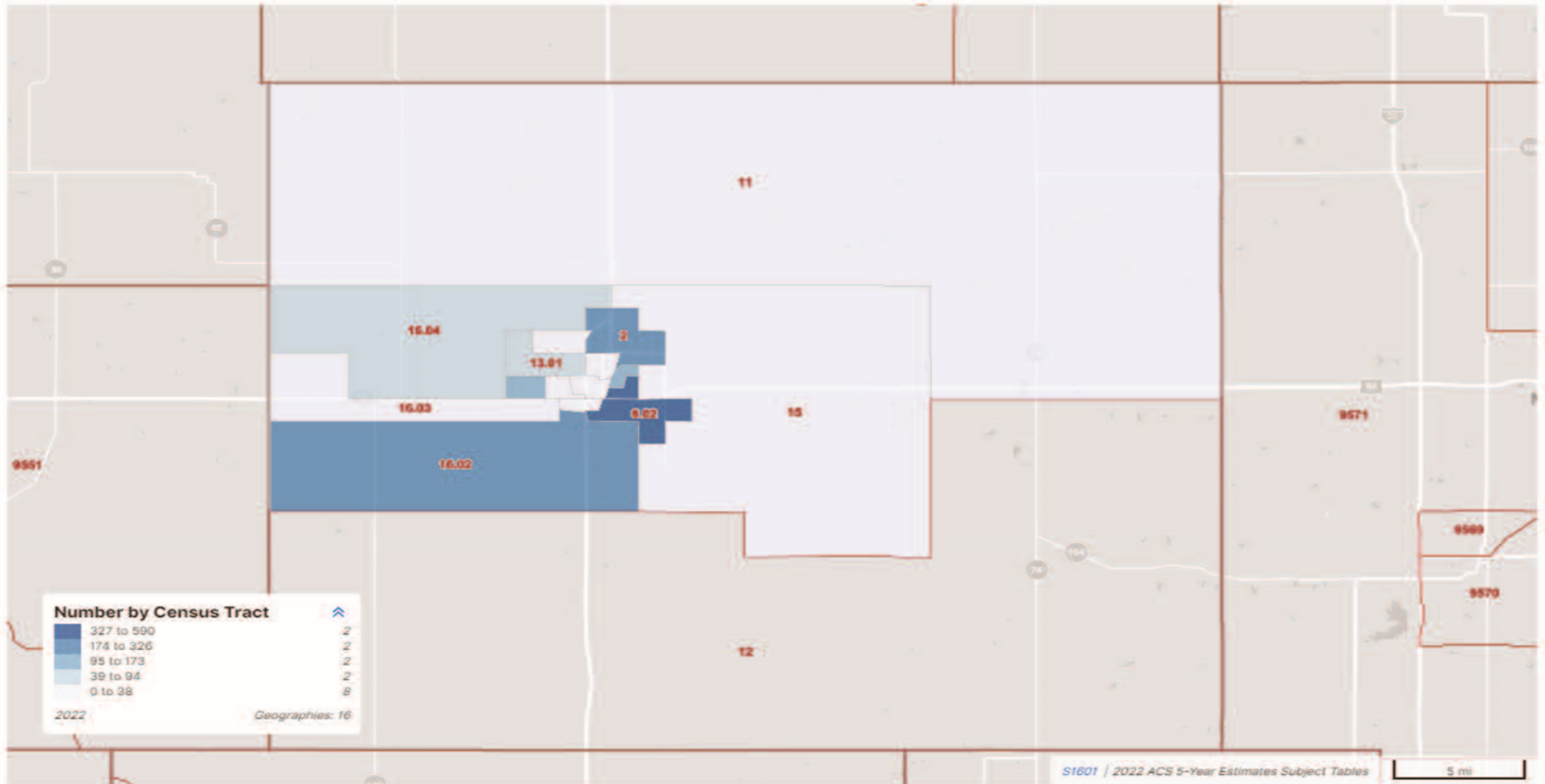
### Asian alone - Total:



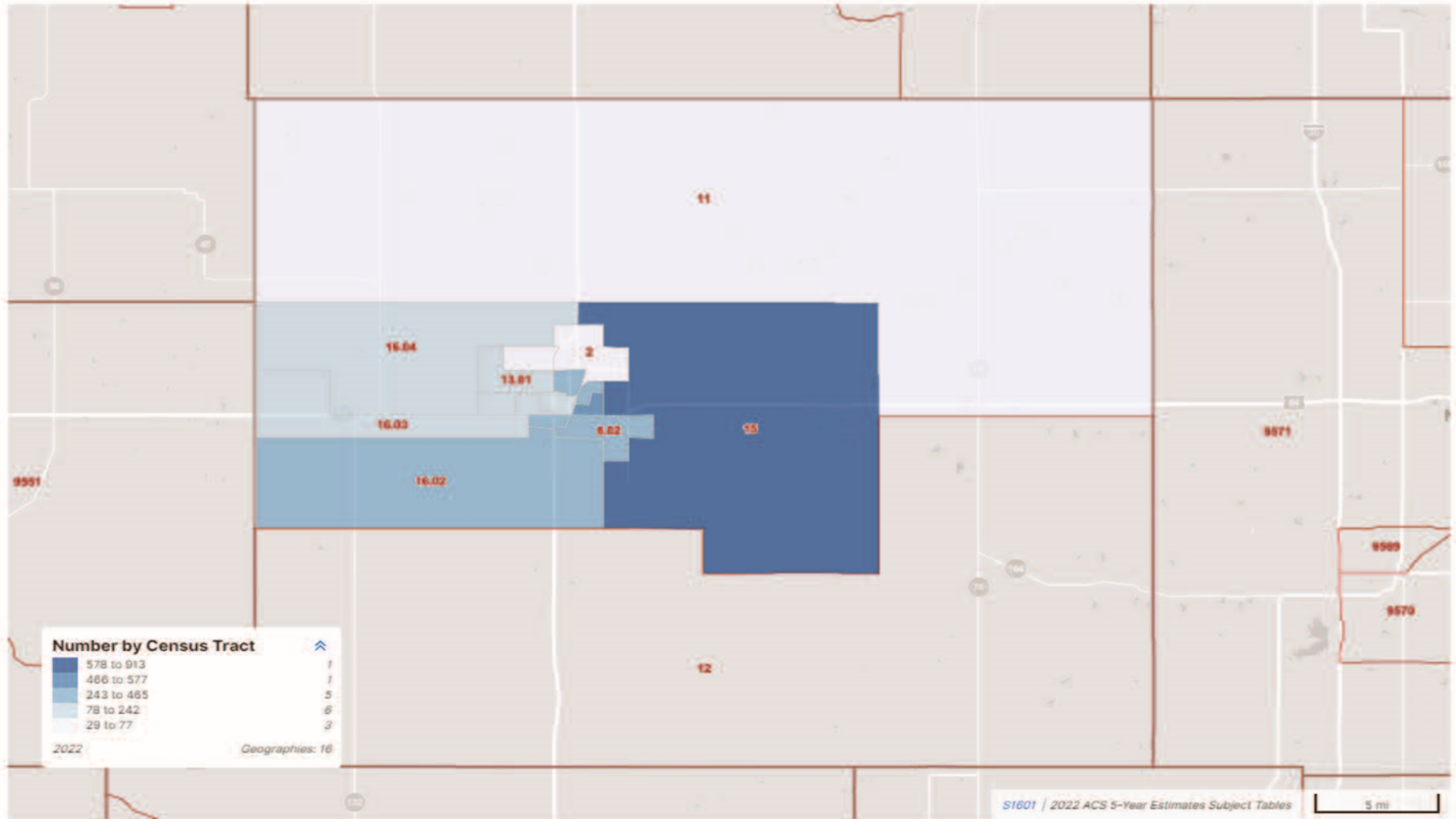
### Hispanic or Latino: - Total:



### Asian and Pacific Island languages - Total | SPEAK A LANGUAGE OTHER THAN ENGLISH | Population 5 years and over



Spanish - Total | SPEAK A LANGUAGE OTHER THAN ENGLISH | Population 5 years and over



# LEP Reporting Form

The Limited English Proficient (LEP) Form is to be filled out when an LEP individual contacts the Chisholm Trail MPO for services or resources. The reporting information is vital for the Title VI program's reporting requirements.



Person Making Contact with LEP Individual \_\_\_\_\_ Time to Provide Service \_\_\_\_\_

Name of LEP Individual \_\_\_\_\_ Telephone \_\_\_\_\_

Preferred Language of the LEP Individual \_\_\_\_\_ Language Spoken \_\_\_\_\_

How did the LEP Individual contact you?

- Telephone     
  In Person     
  In Writing     
  Online     
  Other

If other, please explain: \_\_\_\_\_

Did the LEP person have assistance from some other person who spoke English?  Yes       No

If yes, please provide the following information:

Name	
Relationship to LEP Individual	
Telephone	
Email Address	
Address	

Reason for contacting the Chisholm Trail MPO:

- Questions     
  Request for Documents/Services     
  Complaint     
  Other

If other, please explain: \_\_\_\_\_

Service(s) Provided:  Interpreter       Translator       Other

If other, please explain: \_\_\_\_\_

Service(s) Conducted By:  MPO Planner       Volunteer       Other

If other, please explain: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



## **CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION**

### **TITLE VI FHWA FUNDS COMPLAINT PROCESS**

Chisholm Trail Metropolitan Planning Organization uses the following detailed internal procedures for prompt processing and resolution of all Title VI complaints received directly by any of its divisions having responsibilities under Title VI and the related Nondiscrimination statutes. These procedures include but are not limited to:

1. Any person who believes that he or she, individually, or as a member of any specific class, has been subjected to discrimination by Chisholm Trail Metropolitan Planning Organization or any of their recipients prohibited by Title VI of the Civil Rights Act of 1964, as amended, may file a written complaint with the CDBG Coordinator. A complaint may also be filed by a representative on behalf of such a person.
2. In order to have the complaint considered under this procedure, the complaint must be filed no later than 180 calendar days after:
  - a. the date of the alleged act of discrimination; or
  - b. where there has been a continuing course of conduct, the date on of the most recent incident.
3. Complaints shall be filed using Chisholm Trail Metropolitan Planning Organization's Title VI Complaint Form (available by contacting the CDBG Coordinator or at <https://www.chisholmtrailmpo.org>). Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination, the person shall be interviewed by the CDBG Coordinator. If necessary, the CDBG Coordinator will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner. Complaints should be directed to:



**CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION**

Attention: CDBG Coordinator  
401 Owen K Garriott Avenue  
Enid, Oklahoma 73701

4. Upon receipt of the signed complaint form, the CDBG Coordinator will log in the complaint, determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation.
5. The CDBG Coordinator reviews and determines the appropriate action regarding every Title VI complaint. The department will not proceed with or continue a complaint investigation if:
  - a. The complaint is, on its face, without merit;
  - b. The same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous federal court decisions; or
  - c. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identity) has made it impossible to investigate further.
6. Within ten (10) business days, the CDBG Coordinator will acknowledge receipt of the allegation, inform the complainant of the action taken or the proposed action to be taken to process the allegation(s), and the complainant is advised of other avenues of redress available, such as the Federal Highway Administration (FHWA), Federal Transit Authority (FTA), U.S. Department of Justice, U.S. Department of Transportation, and the Oklahoma Department of Transportation (ODOT). The notification letter contains:
  - a. The basis of the complaint.
  - b. A brief statement of the allegation(s) over which Chisholm Trail Metropolitan Planning Organization has jurisdiction.
  - c. A brief statement of Chisholm Trail Metropolitan Planning Organization's jurisdiction over the recipient to investigate the complaint; and
  - d. An indication of when the parties will be contacted.
7. The CDBG Coordinator also notifies the FHWA's Division Office within ten (10) calendar days of receipt of the allegations, who will notify the appropriate Federal Agency. Generally, the following information will be included in every notification to the ODOT Civil Rights Division:

- a. Name, address, and phone number of the complainant;
  - b. Email address if available;
  - c. Basis of complaint (i.e., race, color, national origin, sex, age, disability/handicap);
  - d. Date of the alleged discriminatory act(s);
  - e. Date of complaint received by the recipient;
  - f. A statement of the complaint;
  - g. Other agencies (state, local, or Federal) where the complaint has been filed; and
  - h. An explanation of the actions the recipient has taken or proposed to resolve the issue(s) raised in the complaint.
8. Within sixty (60) calendar days from the date the original complaint was received, the CDBG Coordinator will conduct and complete an investigation of the allegation(s) and based on the information obtained, will render a recommendation for action in a report of findings to FHWA's Division Office.
9. The CDBG Coordinator will conduct an in-depth, personal interview with the complainant(s). Information gathered in this interview includes: identification of each complainant by race, color, sex, age, national origin, disability/handicap, or income status; name of the complainant; a complete statement concerning the nature of the complaint, including names, places, and incidents involved in the complaint; the date the complaint was filed; and any other pertinent information that is relevant to the complaint. The interviews are recorded using an audio format or by taking notes. The CDBG Coordinator arranges for the complainant to read, make necessary changes to, and sign the interview transcripts or interview notes. Every effort will be made to obtain early resolution of complaints at the lowest possible level.
10. Within ninety (90) calendar days of receipt of the complaint, the CDBG Coordinator will forward the investigative report to the FHWA. Included with the reports is a copy of the complaint, copies of all documentation pertaining to the complaint, the date the complaint was filed, the date the investigation was completed, the disposition and the date of the disposition, and any other pertinent information. If for some reason, the investigation cannot be completed within this timeframe, a status report will be submitted to ODOT and the final report shall follow upon completion. The FHWA reviews and issues the official "Letter of Findings" to the complainant.

11. If the complaint cannot be resolved by Chisholm Trail Metropolitan Planning Organization to the satisfaction of all parties concerned, the party not satisfied will be advised of his or her right to appeal pursuant to Title 49, Code of Federal Regulations, Part 21. The appeal must be filed, in writing no later than 180 calendar days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary to:

**United States Department of Transportation  
Federal Highway Administration  
1200 New Jersey Ave, S.E., Washington, DC 20590**

A complainant may also be filed directly with the Secretary, U.S. Department of Transportation, before, during, or after the complaint has been filed with ODOT.

The Chisholm Trail Metropolitan Planning Organization ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by Chisholm Trail Metropolitan Planning Organization, its recipients, sub-recipients, and contractors. To request an accommodation please contact the CDBG Coordinator at 580-616-7211. If you have any Title VI questions, please contact the CDBG Coordinator at [kristen.day@enid.org](mailto:kristen.day@enid.org). If you have any ADA questions, please contact the ADA Coordinator at [arasmunson@enid.org](mailto:arasmunson@enid.org) or 580-616-7242.

## TITLE VI ASSURANCES

The **Chisholm Trail Metropolitan Planning Organization** (hereinafter referred to as the Recipient) HEREBY AGREES THAT, as a condition to receiving any federal financial assistance from the Department of Transportation, it will comply with the following:

- a. 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);
- b. 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); and
- c. 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.

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 Federal Highway Administration".*

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.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal-aid Highway Program:

1. That the Recipient agrees that each "activity," "facility," or "program," "as defined in Subsections 21.23(e) and 21.23(b) of 49 C.F.R. Subsection 21, will be (with regard to a "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. That the Recipient shall insert the following notification in all solicitations for all bids, Requests for Proposals for work, or materials subject to the Acts and the Regulations

made in connection with all Statewide Transportation Programs and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

“The Chisholm Trail Metropolitan Planning Organization, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulation, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted Programs of the Department of Transportation, issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that in any contract entered into pursuant to this advertisement, Disadvantaged Business Enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, sex, age, national origin, disability/handicap, or income status in consideration for an award.”

3. The Recipient shall insert the clauses of Appendix A and E of this assurance in every contract subject to the Act and the Regulations.
4. The Recipient will insert 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 shall 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 shall extend to rights to space on, over, or under such property.
7. That the Recipient shall include the appropriate clauses set forth in Appendix C and D of this assurance as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements 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 used for a purpose for which the Federal financial assistance is extended for

another purpose involving the provision of similar services or benefits; of (b) the period during which the Recipient retains ownership or possession of the property.

9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom he or she delegates specific authority, to give reasonable guarantee that it, other recipients, sub-recipients, subgrantee, contractors, subcontractors, consultants, transferees, successors in interest; and other participants of Federal financial assistance under such program will comply with all requirements imposed by 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, the Chisholm Trail Metropolitan Planning Organization 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 Federal Highway Administration access to records, accounts, documents, information, facilities, and staff. The MPO also recognize that it must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration. It must keep records, reports, and submit the material for review upon request to the Federal Highway Administration, 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.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Statewide Transportation Program. This ASSURANCE is binding on Oklahoma, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Statewide Transportation Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

Date: \_\_\_\_\_

Chairman of Chisholm Trail MPO  
Transportation Policy Board

\_\_\_\_\_  
David M. Mason, Chairman

ATTEST:

Secretary of Chisholm Trail MPO

---

Summer Anderson, Enid City Clerk

Attachments: Appendices A, B, C, D, and E

## APPENDIX A

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

1. **Compliance with Regulations:** The Contractor shall comply with the regulations relative to nondiscrimination in federally-assisted programs of the Department of Transportation, Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.
2. **Nondiscrimination:** The Contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, sex, age, national origin, disability/handicap, or income status, in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate, either directly or indirectly, in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in appendix B of the Regulations.
3. **Solicitations for Subcontracts, Including Procurement of Materials and Equipment:** In all solicitations, either by competitive bidding or 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 shall be notified by the Contractor of the Contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, sex, age, national origin, disability/handicap or income status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations, or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information and its facilities as may be determined by the State Department of Transportation or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations or directives. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information, the Contractor shall so certify to the State Department of Transportation, or the Federal Highway Administration, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provision of this contract, the State Department of Transportation shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including but not limited to:

- a. Withholding of payments to the Contractor under the contract until the Contractor complies and/or
  - b. Cancellation, termination, or suspension of the contract in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs 1 through 6 in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the State Department of Transportation or the Federal Highway Administration may direct as a means of enforcing such provisions, including sanctions for noncompliance provided, however, that in the event a Contractor becomes involved in, or is threatened with, litigation by a subcontractor or supplier as a result of such direction, the Contractor may request the State Department of Transportation to enter into such litigation to protect the interests of the State; and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

## APPENDIX B

### CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses shall be included in any and all 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 **Chisholm Trail MPO** will accept title to the lands and maintain the project constructed thereon in accordance with Public Law 114-94 – Fixing America’s Surface Transportation (FAST) Act, the Regulations for the Administration of The Statewide Transportation Program, 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 **Chisholm Trail MPO** 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 Chisholm Trail MPO and its successors forever subject however, to the covenants, conditions, restrictions, and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits, and shall be binding on the Chisholm Trail MPO, its successors, and assigns.



The Chisholm Trail MPO, 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 successor, and assigns that (1) no person shall, on the grounds of race, color, sex, age, national origin, disability/handicap or, income status, 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 Chisholm Trail MPO shall use the lands and interests in lands so conveyed in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted Programs of the U.S. Department of Transportation-Effectuation of Title VI of the Civil Rights of 1964, and as said Regulations may be amended, and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the Department shall have a right to re-enter said lands and facilities on said land; and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assignees as such interest existed prior to the deed.\*

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

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

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the Chisholm Trail MPO, pursuant to the provisions of Assurance 7(a).

- A. The (grantee, licensee, lessee, permittee, etc., as appropriate), for him or herself, his or her heirs, personal representative, 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:

In the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended, or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall maintain and operate such facilities and services in compliance with all other requirements imposed 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, Chisholm Trail MPO 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. \*

With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the Chisholm Trail MPO 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 Chisholm Trail MPO 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 or agreements entered into by Chisholm Trail MPO 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, Chisholm Trail MPO 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, Chisholm Trail MPO will there upon revert to and vest in and become the absolute property of Chisholm Trail 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).



## **CHISOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S TITLE VI PLAN**

### **Non-Discrimination Policy**

It is the policy of the Chisholm Trail Metropolitan Planning Organization, under Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1968; Section 504 of the Rehabilitation Act of 1973; Age Discrimination Act of 1975; Section 324 of the Federal-aid Highway Act of 1973; Civil Rights Restoration Act of 1987; and other related authorities and regulations, that no person in the United States shall, on the basis of race, color, national origin, religion, sex, disability, age, or familial status be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any federally or non-federally funded program or activity administered by Chisholm Trail MPO or its subrecipients. An individual has a right to file a complaint against the Chisholm Trail MPO if they believe the agency did not provide necessary services as appropriate. These complaints include those available under Title VI and the ADA. The Title VI Compliant form is available on the Chisholm Trail MPO website or by contacting the CDBG Coordinator at 580-616-7211 or [kristen.day@enid.org](mailto:kristen.day@enid.org). The ADA Complaint form is available on the Chisholm Trail MPO website or by contacting the ADA Coordinator at [arasmuson@enid.org](mailto:arasmuson@enid.org) or 580-616-7242.

**Adopted November, 2024**

## **Title VI Plan**

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## I. INTRODUCTION

### **Background:**

Title VI of the Civil Rights Act of 1964 states:

“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 subjected to discrimination under any program or activity receiving Federal financial assistance.”

The Chisholm Trail Metropolitan Area Planning Organization (“CTMPO”) is an organization that advocates for regional transportation planning and cooperation that receives Federal financial assistance and annually certifies 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, as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity receiving Federal financial assistance from the Oklahoma Department of Transportation.”

### **Purpose:**

The purpose of this document is to ensure that the CTMPO complies with Title VI of the Civil Rights Act of 1964 and related statutes regarding nondiscrimination and environmental justice.

Enforcement of the latter statutes is covered by this document to the extent that they relate to prohibiting discrimination on the grounds of race, color, and national origin in programs receiving Federal financial assistance. Responsibility for enforcing Title VI and nondiscrimination rests with the federal agencies that extend financial assistance. CTMPO’s actions in enforcing nondiscrimination will include:

1. Considering all individual input;
2. Ensuring that the level and quality of transportation planning and products is provided equitably and without regard to race, color, national origin, disability or income;
3. Recognizing specific and prominent community issues and circumstances;
4. Identifying mechanisms for eliciting involvement from low-income, minority, and other residents and representatives as outlined in the Public Participation Plan;
5. Providing access to information for all individuals and other interested parties;
6. Avoiding, minimizing, or mitigating disproportionately high and adverse human health and environmental effects, including social and economic effects of transportation planning programs and activities on minority populations, persons with disabilities, and low-income populations;

7. Ensuring the full and fair participation of all affected populations to transportation planning programs and activities that affect minority populations, Limited English Proficiency (LEP) individuals, persons with disabilities, and low-income populations;
8. Preventing the denial, reduction, or delay in assistance related to transportation planning programs and activities that benefit minority populations, LEP residents, elderly people, persons with disabilities, and low-income populations;
9. Documenting all outreach, research, planning, project and program development and other activities;
10. Ensuring meaningful access to programs and activities by LEP residents.

## II. NON-DISCRIMINATION STATEMENT

### Statement:

The CTMPO will comply with guidelines for recipients to include having written procedures for investigating Title VI complaints, investigations and lawsuits. The CTMPO shall inform the Federal Transit Administration (FTA) regional office of the filing of any such complaint within 60 days of the complaint. The CTMPO shall identify each complaint; the date the complaint was filed, and investigation completed; the disposition; and other pertinent information. The CTMPO shall include Title VI language in written agreements and shall monitor for compliance. The CTMPO further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

### Publication:

The CTMPO's Title VI Non-Discrimination Statement, in English and Spanish, is posted on CTMPO website, at the CTMPO Office, located at 401 W. Owen K. Garriott, Enid, OK 73701, and posted in the interior of every Enid Public Transit Authority bus.

## III. ORGANIZATION AND RESPONSIBILITIES

### CTMPO Staff:

CTMPO staff are trained to recognize Title VI discrimination issues as defined by applicable state and federal law and how to process complaints received. They are aware of the CTMPO's responsibilities under Title VI and other nondiscrimination legislation, and if discrimination is discovered, they know to refer to the complaint procedures. All aspects of the compliance and complaint process are overseen by the Title VI Coordinator, Kristen Day, [kristen.day@enid.org](mailto:kristen.day@enid.org) 580-616-7211.

As appropriate, CTMPO staff will coordinate efforts with Oklahoma's Department of Transportation (ODOT), the Federal Highway Administration (FHWA), and the Federal Transit



Authority (FTA), especially during nondiscrimination plan reviews and revisions. If appropriate, individuals who need more information on Title VI regulations and responsibilities or other nondiscrimination issues will be referred to:

Katrina Fire  
 Title VI Coordinator  
 Contract Compliance Division  
 Oklahoma Department of Transportation  
 200 N. E. 21st Street, Oklahoma City, OK 73105-3204  
 Phone: 405.522.8000 – [odot-ada-titlevi@odot.org](mailto:odot-ada-titlevi@odot.org)  
<https://Oklahoma.gov/odot/business-center/contract-compliance/title-vi.html>

#### **CTMPO Transportation Technical Committee and Transportation Policy Board:**

The CTMPO’s decisions and work are done by the Transportation Technical Committee and the Transportation Policy Board.

The Transportation Technical Committee, (TTC), provides technical analysis and recommendations to the governing body of the CTMPO, which is the Transportation Policy Board, (TPB), for its consideration and approval. The TTC provides technical advice and guidance for transportation planning. The TTC assists in providing planning and coordination with local governments, ODOT, FHWA, the Federal Aviation Administration (FAA), and the FTA. The TTC reviews all issues related to comprehensive transportation planning processes such as the Unified Planning Work Program, (UPWP), the Transportation Improvement Program, (TIP), transportation plans and policies prior to making a recommendation to the TPB. The TPB reviews, and adopts all policies, plans and processes of the CTMPO.

#### **IV. PUBLIC PARTICIPATION AND ACCESS TO INFORMATION**

##### **Engagement Strategies:**

At the heart of CTMPO’s nondiscrimination efforts, including compliance with Title VI, is to encourage and receive public engagement and participation in the transportation-planning process. The CTMPO encourages and supports active public participation throughout the planning and decision-making process related to the development of proposed transportation plans, programs, and projects so that a safe, efficient transportation system, reflecting the needs and interests of all stakeholders, can be provided. CTMPO aspires to operate many outreach strategies to attain the greatest public participation possible. The following guidelines were developed reflecting federal requirements with the purpose of facilitating this process:

1. Build awareness, interest, and support in the public through the use of local media, publications, and direct public participation techniques;
2. Provide and encourage opportunities for direct resident attendance and involvement in the early stages of the planning process;

3. Develop alternative methods to collect input from residents who do not attend meetings, through direct mail, targeted surveys and web-based input strategies to allow for public comment on the proposed plans or programs;
4. Periodically review and revise the Public Participation Plan in terms of effectiveness to assure that the process provides full and open access to all;
5. Provide the public with timely notice and reasonable access to technical and policy information used in the development of plans or programs;
6. Require a public comment period of 45 days prior to the adoption or amendment of the Public Participation Plan;
7. Develop and tailor public participation plans according to the complexities of particular plans, programs or projects;
8. Ensure compliance with Title VI of the Civil Rights Act of 1964 and subsequent federal legislation, which requires that no person in the United States shall, on the ground of race, color, and national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance;
9. Adopt policies with specific plans and programs, consistent with Environmental Justice principles, to ensure that the needs of those traditionally underserved by existing transportation systems, are fully integrated in the planning process;
10. Engage the public in a proactive effort by going to civic and cultural groups, churches, and neighborhood organizations to promote public involvement in transportation planning; and,
11. Show due consideration to comments from public participants, and respond to public input received during the planning and program development processes.

**Accessibility for Limited English Proficiency (LEP) Residents:**

State and federal policies and regulations reinforce the need of the CTMPO to focus attention on reaching low-income and minority households. Furthermore, there are individuals inside the Chisholm Trail Metropolitan Planning Area (MPA) whose primary language is not English. Individuals who do not speak English as their primary language or who have a limited ability to read, write, or understand English may need assistance in overcoming a language barrier that could prevent individuals from accessing services and benefits. To include traditionally underserved communities in the decision-making process, it is necessary to identify key stakeholders that have low or no participation in the process and determine what is preventing them from participating, and what can be done to overcome barriers and increase the levels of participation.

The CTMPO seeks to overcome hurdles to enhance participation by LEP residents in the transportation-planning process, including cultural and language barriers, disabilities, economic

constraints, and lack of participation opportunities. Within the Chisholm Trail MPA, there are residents that speak Spanish as their primary language. To ensure these residents have access to and are able to provide input towards the CTMPO's transportation planning products, the CTMPO's website is bilingual and the CTMPO will determine what other strategies will effectively reach these residents and increase their participation, including the following platforms:

Print-newspaper and other periodicals;

Radio Stations;

Informational public meetings; and

Social Media.

## V. TITLE VI COMPLAINT PROCESS:

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin, has been excluded from or denied the benefits of, or subjected to discrimination by CTMPO or any of their recipients may file a written complaint by completing and submitting CTMPO's Title VI Complaint Form. A sample complaint form is available as Appendix A. It is also available on CTMPO's website. Such complaints should be filed within 180 days of the date the person believes the discrimination occurred or when there has been a continuing course of conduct, the period of time for which it occurred. If assistance is needed in completing the complaint form or for the preparation of any other complaint material, the CTMPO will assist in preparing the complaint.

An individual may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

1. Your name, address and telephone number;
2. Specific, detailed information (how, why, and when) about the alleged act of discrimination; and
3. Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to Title VI Coordinator, Kristen Day at 401 W. Garriott Road, 73701 or [kristen.day@enid.org](mailto:kristen.day@enid.org), 580-616-7211.

**Acceptance of the Complaint:** The CTMPO will process complaints that are completed and submitted to the CTMPO. Once a completed Complaint Form is received, CTMPO will review it to determine if the CTMPO is the appropriate agency to investigate the complaint of discrimination. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by the CTMPO.

**Investigation of the Complaint:** If the CTMPO is the appropriate agency to investigate the discrimination complaint, the CTMPO will investigate the complaint, which will generally be completed within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, the CTMPO investigator may contact the complainant. Unless a longer period is specified by CTMPO investigator, the complainant will be asked to respond within ten (10) days from the date the CTMPO investigator requested the additional information. If the requested information is not received within a reasonable time following the request of necessary additional information, the complainant's case may be closed. If a complainant wishes their case be close, a case may be administratively closed at that complainant's request.

**Closing or Findings of the Complaint:** After the CTMPO investigator fully investigates the complaint, the investigator will issue a letter to the complainant, informing the complainant that either the complaint has been investigated and closed with no finding of a violation or a Letter of Finding that summarizes the allegations substantiated and provides an explanation of the corrective action taken.

**Appeal of the Complaint Closure or Findings:** If the complainant disagrees with CTMPO investigator's determination, the complainant may request reconsideration by submitting the request in writing to the investigator within ten (10) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. The CTMPO will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the CTMPO will issue a determination letter to the complainant upon completion of the reconsideration review.

## VI. DATA COLLECTION AND ANALYSIS

The CTMPO utilizes data provided by the United States Census Bureau to identify potential LEPE populations located within the Chisholm Trail MPA to ensure meaningful opportunities for participation were provided for those minority groups. The CTMPO will continue utilizing the Census to ensure it provides information to the minority population groups in accessible ways, including literature printed in their primary language, the CTMPO website allows all information to be translated into Spanish.

The CTMPO will also utilize data collected from the Enid Public Transit Authority ("EPTA"), which is the public transportation provider for the City of Enid, and the only public transportation provider within the Chisholm Trail MPA. The EPTA operates a para transit service with a call center that dispatches drivers to the residents in need of a ride from the public transportation system. Because the EPTA drivers are dispatched to the individuals utilizing EPTA's service, the EPTA call center has data that can be utilized by the CTMPO to identify the neighborhoods and areas within the Chisholm Trail Metropolitan Planning Area which may have limited access to transportation.

This data will assist the CTMPO in following state and federal policies and regulations, including Environmental Justice initiatives, that reinforce the need of agencies such as the CTMPO to focus attention on reaching low-income and minority households. There are individuals whose primary language is not English and may be LEP residents. This language

barrier may prevent individuals from accessing services and benefits. To include traditionally underserved communities in the decision-making process, the CTMPO will utilize the Census data and EPTA data to identify the locations of populations with mobility needs and LPE populations within the Chisholm Trail Metropolitan Planning Area. The EPTA data will provide a real time account for the populations with limited access to transportation within the Chisholm Trail MPA and can be used for bi-annual reviews of the efforts and strategies implemented by the CTMPO. The census will provide in greater detail the location and population of minority and LEP residents, but is only updated once every decade. The CTMPO will also be able to utilize data collected to ensure compliance with Environmental Justice initiatives, which includes minority populations, disabled populations, people in poverty, and the elderly.

## **VII. MONITORING AND REPORTING**

The CTMPO will bi-annually review the success of its efforts to reach minority, elderly, low income, and LEP residents. This bi-annual review will provide the CTMPO with the opportunity to augment its efforts to increase the public participation, which in turn, will ensure compliance with Title VI, including Environmental Justice initiatives. Examples of the CTMPO review would include the following:

1. Effectiveness of publications– the CTMPO can analyze the number of responses that occurred from publications that focus on minority, youth, elderly, low-income, or LEP residents.
2. Participation in Meetings– the CTMPO can review the public participation at its TTC and TPB meetings to determine how time, place and accessibility effect participation.
3. Determination of Communication Effectiveness– the CTMPO will determine whether the individuals receiving the information understand it, and if certain mediums of distribution work better than others.
4. Reviewing Environmental Justice Progress– t he CTMPO will review its strategies for engaging minority, youth, elderly, low-income, and LEP residents in the decision-making process to determine effectiveness.

The CTMPO's efforts to involve public participation are dynamic and must remain so to address the needs of the community. As techniques are proven effective and institutionalized, the CTMPO's processes will evolve to reflect those advancements. Participating stakeholders and CTMPO staff will assess the effectiveness of each public participation activity. The CTMPO will review possible revisions after consultation with stakeholders and a thorough opportunity for public comment. To ensure the process is periodically evaluated, the CTMPO will, at a minimum, review and assess the process and results every two years and recommend any revisions that may be appropriate. The CTMPO will update the Plan every three years as required by the Federal Government.

In accordance with federal regulations, the CTMPO documents all aspects of the public participation process, and makes available for public review these documents during normal business hours at the CTMPO offices. This information includes sign-in sheets, meeting minutes, outreach materials, and various other essential meeting details and data.

### **VIII. PLAN DISTRIBUTION**

The CTMPO, in all activities, will seek out and consider the viewpoints of LEP residents, the elderly, minority and low-income populations. The CTMPO will translate this plan into Spanish and post it on the CTMPO website and providing copies of the plan at public access areas such as the city and town halls, county offices, public school systems, Autry Technology Center, and institutions of higher education. CTMPO will prioritize reaching out and corresponding with organizations that represent LEP residents, minority, youth, elderly, and low-income residents, such as minority places of worship, elder care providers, Our Daily Bread, Salvation Army, Hope Outreach, Community Development Support Organization, other nonprofit organizations, and after-school programs.

### **IX. ADOPTION**

The Chisholm Trail Metropolitan Planning Organization, through its Transportation Policy Board has reviewed and approved its Title VI Plan on November 13, 2024.

Chairman of Chisholm Trail MPO  
Transportation Policy Board

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David M. Mason, Chairman

ATTEST:  
Secretary of Chisholm Trail MPO

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Summer Anderson, Secretary

**X. APPENDICES**

**TITLE VI COMPLAINT FORM**

The CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.



Submit Complaints to:  
**CHISHOLM TRAIL METROPOLITAN  
 PLANNING ORGANIZATION**  
**C/O CDBG Coordinator**  
**401 Owen K Garriott**  
**Enid, OK 73701**  
**Phone: 580-616-7211**  
**Email: [kristen.day@enid.org](mailto:kristen.day@enid.org)**  
<https://www.chisholmtrailmpo.org/title-vi-civil-rights>

Date of Filing:	
Name:	
Address:	
City, State, Zip Code:	
Work Phone:	
Home Phone:	
E-mail Address:	

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

- Race                       Color                       Sex                       Religion                       National Origin  
 Age                       Retaliation                       Genetic Information

Indicate the person(s) who you believe discriminated against you:

Name(s):	
Work Location (if known):	
Work Phone:	
Date of alleged incident	

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name:	
Address:	
Work Phone:	
E-mail Address:	

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses and telephone numbers. Be sure to include how other persons were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.



What remedy are you requesting? Please be specific:

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local):

Yes  No

If so, please provide the following information:

Agency:	
Address:	
Name of Investigator (if known):	
Phone Number:	
E-mail Address:	
Date Filed:	
Status of case:	

I confirm that I have read the above charge(s) and it is true to the best of my knowledge.

Print or typed name of complainant:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Completed forms must be submitted to the CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION. If you require any assistance in filling out this form, please contact the Community Development Director at 580-616-7225.

The CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION, its recipients, sub-recipients, and contractors. To request an accommodation please contact the CDBG Coordinator at 580-616-7211. If you have any Title VI questions, please contact the CDBG Coordinator at kristen.day@enid.org



**CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION**  
**TITLE VI FHWA FUNDS COMPLAINT PROCESS**

Chisholm Trail Metropolitan Planning Organization uses the following detailed internal procedures for prompt processing and resolution of all Title VI complaints received directly by any of its divisions having responsibilities under Title VI and the related Nondiscrimination statutes. These procedures include but are not limited to:

1. Any person who believes that he or she, individually, or as a member of any specific class, has been subjected to discrimination by Chisholm Trail Metropolitan Planning Organization or any of their recipients prohibited by Title VI of the Civil Rights Act of 1964, as amended, may file a written complaint with the CDBG Coordinator. A complaint may also be filed by a representative on behalf of such a person.
2. In order to have the complaint considered under this procedure, the complaint must be filed no later than 180 calendar days after:
  - a. the date of the alleged act of discrimination; or
  - b. where there has been a continuing course of conduct, the date on of the most recent incident.
3. Complaints shall be filed using Chisholm Trail Metropolitan Planning Organization's Title VI Complaint Form (available by contacting the CDBG Coordinator or at <https://www.chisholmtrailmpo.org>). Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination, the person shall be interviewed by the CDBG Coordinator. If necessary, the CDBG Coordinator will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner. Complaints should be directed to:

**CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION**

Attention: CDBG Coordinator  
401 W. Owen K. Garriott Avenue  
Enid, Oklahoma 73701

4. Upon receipt of the signed complaint form, the CDBG Coordinator will log in the complaint, determine the basis of the complaint, authority/jurisdiction, and who should conduct the investigation.
5. The CDBG Coordinator reviews and determines the appropriate action regarding every Title VI complaint. The department will not proceed with or continue a complaint investigation if:
  - a. The complaint is, on its face, without merit;
  - b. The same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous federal court decisions; or
  - c. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identity) has made it impossible to investigate further.
6. Within ten (10) business days, the CDBG Coordinator will acknowledge receipt of the allegation, inform the complainant of the action taken or the proposed action to be taken to process the allegation(s), and the complainant is advised of other avenues of redress available, such as the Federal Highway Administration (FHWA), Federal Transit Authority (FTA), U.S. Department of Justice, U.S. Department of Transportation, and the Oklahoma Department of Transportation (ODOT). The notification letter contains:
  - a. The basis of the complaint.
  - b. A brief statement of the allegation(s) over which Chisholm Trail Metropolitan Planning Organization has jurisdiction.
  - c. A brief statement of Chisholm Trail Metropolitan Planning Organization's jurisdiction over the recipient to investigate the complaint; and
  - d. An indication of when the parties will be contacted.
7. The CDBG Coordinator also notifies the FHWA's Division Office within ten (10) calendar days of receipt of the allegations, who will notify the appropriate Federal Agency. Generally, the following information will be included in every notification to the ODOT Civil Rights Division:

- a. Name, address, and phone number of the complainant;
  - b. Email address if available;
  - c. Basis of complaint (i.e., race, color, national origin, sex, age, disability/handicap);
  - d. Date of the alleged discriminatory act(s);
  - e. Date of complaint received by the recipient;
  - f. A statement of the complaint;
  - g. Other agencies (state, local, or Federal) where the complaint has been filed; and,
  - h. An explanation of the actions the recipient has taken or proposed to resolve the issue(s) raised in the complaint.
8. Within sixty (60) calendar days from the date the original complaint was received, the CDBG Coordinator will conduct and complete an investigation of the allegation(s) and based on the information obtained, will render a recommendation for action in a report of findings to FHWA's Division Office.
  9. The CDBG Coordinator will conduct an in-depth, personal interview with the complainant(s). Information gathered in this interview includes: identification of each complainant by race, color, sex, age, national origin, disability/handicap, or income status; name of the complainant; a complete statement concerning the nature of the complaint, including names, places, and incidents involved in the complaint; the date the complaint was filed; and any other pertinent information that is relevant to the complaint. The interviews are recorded using an audio format or by taking notes. The CDBG Coordinator arranges for the complainant to read, make necessary changes to, and sign the interview transcripts or interview notes. Every effort will be made to obtain early resolution of complaints at the lowest possible level.
  10. Within ninety (90) calendar days of receipt of the complaint, the CDBG Coordinator will forward the investigative report to the FHWA. Included with the reports is a copy of the complaint, copies of all documentation pertaining to the complaint, the date the complaint was filed, the date the investigation was completed, the disposition and the date of the disposition, and any other pertinent information. If for some reason, the investigation cannot be completed within this timeframe, a status report will be submitted to ODOT and the final report shall follow upon completion. The FHWA reviews and issues the official "Letter of Findings" to the complainant.

11. If the complaint cannot be resolved by Chisholm Trail Metropolitan Planning Organization to the satisfaction of all parties concerned, the party not satisfied will be advised of his or her right to appeal pursuant to Title 49, Code of Federal Regulations, Part 21. The appeal must be filed, in writing no later than 180 calendar days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary.

**United States Department of Transportation  
Federal Highway Administration  
1200 New Jersey Ave, S.E., Washington, DC 20590**

A complainant may also be filed directly with the Secretary, U.S. Department of Transportation, before, during, or after the complaint has been filed with ODOT.

**Oklahoma Department of Transportation  
Contract Compliance Division  
Attention: Katrina Fire  
200 N.E. 21st Street, Room 1-C1  
Oklahoma City, OK 73105**

The Chisholm Trail Metropolitan Planning Organization ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by Chisholm Trail Metropolitan Planning Organization, its recipients, sub-recipients, and contractors. To request an accommodation please contact the CDBG Coordinator at 580-616-7211. If you have any Title VI questions, please contact the CDBG Coordinator at [kristen.day@enid.org](mailto:kristen.day@enid.org). If you have any ADA questions, please contact the ADA Coordinator at [arasmunson@enid.org](mailto:arasmunson@enid.org) or 580-616-7242.

**RESOLUTION****A RESOLUTION APPROVING THE CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S ADJUSTED URBAN BOUNDARY MAP.**

WHEREAS, every ten years the Oklahoma Department of Transportation and its Metropolitan Planning Organizations review the census data and adjust the urban boundaries as needed after study and review;

WHEREAS, on September 18, 2024, the Chisholm Trail Transportation Technical Committee (TTC) and its Transportation Policy Board (TTB) reviewed a census data and were presented with a recommended adjusted urban boundary;

WHEREAS, on November 6, 2024, the TTC recommended that the TTB approve the adjusted urban boundary map;

WHEREAS, on November 13, 2024, the TTB considered the census data and the TTC's recommendation.

NOW THEREFORE, BE IT RESOLVED BY THE CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION BY AND THROUGH ITS TRANSPORTATION PLANNING BOARD:

That the Chisholm Trail Metropolitan Planning Organization has approved and adopted its Adjusted Urban Boundary Map, which is an attachment to this resolution on November 13, 2024.

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David M. Mason, Chairman  
Chisholm Trail MPO

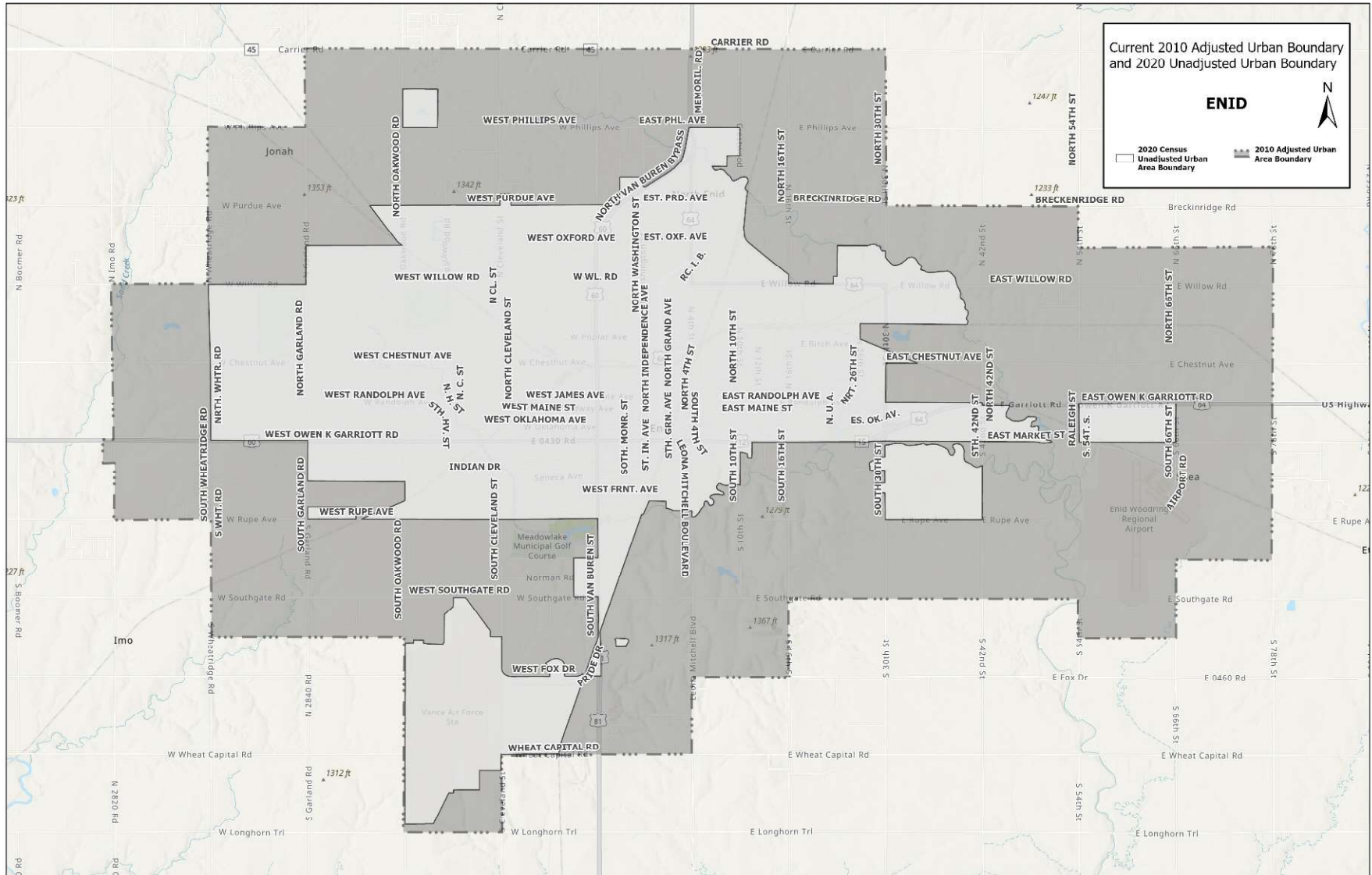
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Summer Anderson, Secretary  
Chisholm Trail MPO

# 2020 Urban Boundary Map



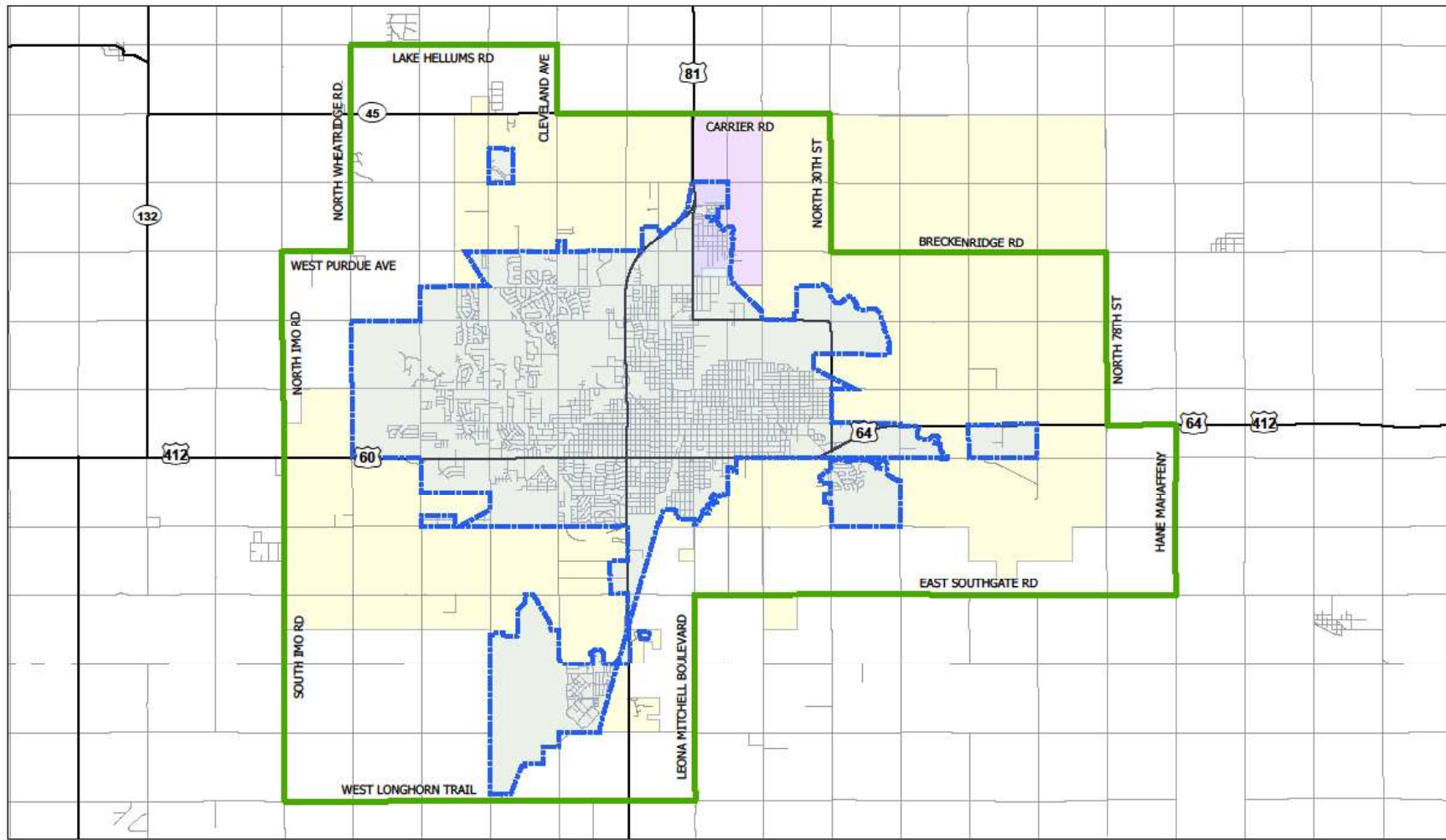
**OKLAHOMA**  
Transportation



# Chisholm Trail Metropolitan Planning Area



OKLAHOMA  
Transportation



## Chisholm Trail Metropolitan Planning Area



- Legend**
- Highway
  - Road
  - MPA
  - Census Urban Area Boundary
  - Enid City Limit
  - The Town of North Enid City Limit





## RESOLUTION

**A RESOLUTION ADOPTING THE CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S TRANSPORTATION IMPROVEMENT PROGRAM FOR FEDERAL FISCAL YEARS 2024, 2025, 2026, 2027 FOR THE CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S METROPOLITAN PLANNING AREA.**

WHEREAS, Section 134 of Title 23 of the United States Code requires a Transportation Improvement Program (TIP) to be adopted and approved by Metropolitan Planning Organizations;

WHEREAS, the Chisholm Trail Metropolitan Planning Organization's Designation Agreement was executed and effective on December 29, 2023;

WHEREAS, the Tip is a four year prioritized program of transportation projects receiving federal funding;

WHEREAS, the Chisholm Trail Metropolitan Planning Organization in accordance with its Public Participation Plan posted the Draft TIP on the Chisholm Trail MPO's website on August 27, 2024 for public review and comment and published a notice of the Public Notice in the Enid Newspaper on August 28, 2024 that the Chisholm Trail MPO's Transportation Technical Committee and the Chisholm Trail MPO's Transportation Policy Board would hear and take action on the TIP at their meetings on on September 16, 2024.

WHEREAS, the Chisholm Trail MPO's Transportation Technical Committee recommended approval of the TIP at its meeting on September 16, 2024; and,

WHEREAS, the Chisholm Trail MPO's Transportation Policy Board hear and approved the TIP at its September 16, 2024 meeting.

NOW THEREFORE, BE IT RESOLVED BY THE CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION BY AND THROUGH ITS TRANSPORTATION PLANNING BOARD:

That the Chisholm Trail Metropolitan Planning Organization's Transportation Improvement Plan for Federal Fiscal Years 2024 through 2027 is adopted.

Approved and Adopted on November 13, 2024.

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David M. Mason, Chairman  
Transportation Policy Board

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Summer Anderson, Secretary

Chisholm Trail MPO

Approved as to form and legality:

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Carol Lahman, City Attorney

**CHISHOLM TRAIL METROPOLITAN PLANNING ORGANIZATION'S  
SELF-CERTIFICATION STATEMENT OF THE CHISHOLM TRAIL MPO'S  
METROPOLITAN TRANSPORTATION PLANNING PROCESS**

In accordance with Section 450.336 of 23 CFR part 450, the Oklahoma Department of Transportation (ODOT) and the Chisholm Trail Metropolitan Planning Organization certify that the transportation planning process is addressing the major issues in the Chisholm Trail Metropolitan Planning Area and it is being conducted in accordance with all applicable requirements of: following laws and regulations are to govern the MPO transportation planning:

1. 23 U.S.C. 134 and 49 U.S. C. 5303;
2. Title VI of the Civil Rights Act of 1964, as amended (42 U.S. C. 2000d-1) and 49 CFR part 21;
3. 49 U.S. C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex or age in employment of business opportunity;
4. 1101(e) of the IIIA (Pub. L. 117-58) and 49 CFR part 26, regarding the involvement of disadvantaged business enterprises in USDOT funded projects;
5. 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
6. The provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 1201 et seq.) and 49 CFR parts 27, 37, and 38;
7. The Older American Act, as amended (42 U.S.C.6101), prohibiting discrimination on the basis of age in programs and activities receiving federal financial assistance;
8. Section 324 of Title 23 U.S.C. regarding the prohibition based upon gender; and
9. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disability.

Chisholm Trail MPO

Oklahoma Department of Transportation

\_\_\_\_\_  
David M. Mason, Chairman

\_\_\_\_\_  
Dawn Sullivan, Deputy Director, ODOT

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date