



Cape Fear Public Transportation Authority Title VI Program

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Section 1: Title VI Program Overview

1.1 Introduction

Title VI of the Civil Rights Act of 1964 (“Title VI”) prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on the basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that they provide or the manner in which they provide them.

To demonstrate and ensure compliance with Title VI, Wave Transit has developed a Title VI Program inclusive of the following elements:

- Title VI and environmental justice
- Public involvement process

Although separate, environmental justice and public involvement complement one another in ensuring fair and equitable distribution of transportation services, programs, activities, and facilities. Public participation is essential to the success of any public planning program or project. Without the involvement of local citizens, it is difficult to design a program that meets the needs of the public or to gauge the project’s success. Effective public involvement not only provides transportation officials with new ideas, but it also alerts them to potential environmental justice concerns during the planning stages of a project. These reasons, combined with a national history of discrimination against persons on the basis of race, color, ethnic origin, age, sex, disability, religion and economic status, has led federal and state governments to set requirements to ensure equity of public involvement in federally funded agencies and their associated organizations.

1.2 Program Objectives

The objectives of Wave Transit’s Title VI Program are indicated as follows:

1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations.
2. Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
3. Provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects, or policies.
4. Ensure full and fair participation by all potentially affected communities in the transportation decision-making process.
5. Inform and educate citizens and other interested parties about ongoing Wave Transit planning activities, and their potential role in those activities.

1.3 Purpose

The principle of environmental justice in transportation planning ensures that transportation projects do not have a disproportionately negative impact on minority and low-income populations. The objective is to achieve environmental justice protection for all communities. With respect to transportation, Title VI means assessing the nature, extent, and incidence of probable impacts, both negative and positive, from any transportation-related activity on minority, low-income and other disadvantaged populations.

Section 2: Guidance and Legislation

Title VI of the 1964 Civil Rights Act

Title VI of the 1964 Civil Rights Act, as amended, protects any person in the United States on the grounds of race, color, or national origin from being excluded from participation, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance from the Department of Transportation. The Age Discrimination Acts of 1975 further prohibits exclusion based on age, and Title 23 USC 324 added that no person should be excluded from participation on the basis of sex. The Civil Rights Restoration Act of 1987 reemphasized all of the anti-discrimination laws and the applicability to federal programs.

By participating in FTA-funded (Federal Transit Administration) programs, recipients provide the following assurance: no person, on the grounds of race, color, creed, national origin, sex, age, or disability, be excluded from participation in, or denied the benefits of, or be subject to discrimination under any project, program, or activity funded in whole or in part by the FTA. In addition, the joint participation agreement contains the assurance that the sub-recipient shall not discriminate against any employee or applicant for employment because of race, color, religion, sex, age, or national origin.

Nondiscrimination requirements cover such areas as land acquisition, relocation of residences and businesses, impacts of construction, fixed guideways, placement of routes, vehicle assignments, availability of transit amenities such as bus shelters, headways, passenger loads, environmental considerations, public involvement, and multilingual communication. It is critical that these elements be considered in the context of Title VI. In carrying out the provisions of the Department of Transportation (DOT) Title VI Regulations at 49 CFR part 21, additional documents referenced in the FTA circulars that incorporate Title VI principles are listed below:

- a. DOT Order 5610.2, the Department's Order on Environmental Justice, establishes the procedures used by the Department to comply with Executive Order 12898, "Federal Actions to address Environmental Justice in Minority Populations and Low-Income Populations," dated February 11, 1994. This order establishes procedures for the Department of Transportation to use in complying with EO 12898.
- b. The Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons ("DOT LEP Guidance"), 70 FR 74087, (December 14, 2005). This guidance is based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects limited English proficient persons.
- c. Section 12 of the FTA Master Agreement, which provides, in pertinent part, that the recipient agrees to comply, and assures the compliance of each third-party contractor at any tier and each subrecipient at any tier of the project, with the provisions of 49 U.S.C. Section 5332, which prohibits discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibits discrimination in employment or business opportunity. Furthermore, the recipient agrees to comply, and assures the compliance of each third-party contractor at any tier and each subrecipient at any tier of the project, with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. Sections 2000d et seq., and with 49 CFR part 21, "Nondiscrimination in Federally- Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act."

Unless FTA states otherwise in writing, all recipients shall comply with all applicable Federal directives, current or future, not listed herein.

Section 3: Title VI Analysis and Methodology

The geographic basis for Title VI analysis is based on:

- Demographic data comes from the US Census Bureau, 2017-2021 American Community Survey (ACS) 5-Year Estimates.
- Population
- Low-income status is set at as that of the US federal poverty level.
- Minority status is determined by subtracting the white, non-Hispanic population from the total population.
- Service area is based on block groups.

Per Federal regulations, the following groups are used for analyses:

- Low-income population
- Minority population

Following the identification of the relevant groups for analysis, the next step undertaken was to identify the general distribution of each Title VI population group throughout the Wave Transit service area and then define where each group is most concentrated. Data from the U.S. Census, the Wilmington Urban Metropolitan Planning Organization, and other local non-profit agencies is used and will continue to be used to identify the target groups mentioned above.

Section 4: Policy Statement

It is the policy of Wave Transit to provide equal opportunity to all people who are admitted to, participate in, or are the recipients of Wave Transit services. As a recipient of federal financial assistance, Wave Transit does not exclude, deny benefits to, or otherwise discriminate against any person on the grounds of race, color, religion, sex, national origin, or on the basis of disability or age in admission to, participation in, or receipt of the services and benefits of any of its programs and activities or in employment therein, whether carried out by Wave Transit directly or through a contractor or any other entity with whom Wave Transit arranges to execute its programs and activities. This statement is in accordance with the provisions of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Americans with Disabilities Act of 1990, and Regulations of the

U.S. Department of Health and Human Services issued pursuant to the acts, Title 45 Code of Federal Regulations Part 80, 84, and 91. (Other Federal Laws and Regulations provide similar protection against discrimination on grounds of sex and creed.)

Section 5: Complaint Process

5.1 Filing a Complaint

In case of questions concerning this policy, or in the event of a desire to file a complaint alleging violations of the above, please contact our main office at (910) 343-0106 or the Authority's acting Civil Rights Officer, our Deputy Director, via phone at: (910) 202-2057 or by e-mail at: wavetransit@wavetransit.com. Instructions for filing a Title VI Complaint and a copy of the Authority's Complaint Policy/Form can be obtained through the channels referenced above or the Authority's website at: <https://www.wavetransit.com/contact-us/>. All Title VI complaints are investigated, resolved, and tracked by the Authority's Civil Rights Officer.

5.2 Title VI Complaints

To date, Wave Transit has not been involved in any Title VI lawsuits. Title VI complaints will be investigated and tracked through appropriate procedures as outlined in the Complaint Policy/Form.

Section 6: Public Involvement Plan

Wave Transit will coordinate with individuals, institutions, and/or organizations to reach out to members in the affected minority/low-income communities. In addition to written communication, a virtual option may be offered for participation in community engagement via video conference and audio conference. Opportunities to participate in-person remain available to the public.

6.1 Public Meetings

The following steps will be taken to ensure in-person and/or virtual meetings for the public held by Wave Transit are accessible for all:

- Public meetings will be held in convenient and accessible locations and facilities
- Meeting material(s) will be available in a variety of formats upon previous request
- A variety of advertising means will be used to inform local media outlets and member jurisdictions of public meetings
- Assistance to persons with disabilities and interpretation/translation services will be available upon previous request

6.2 Public Notifications

Wave Transit will provide notice to the public of our Title VI obligations, which are disseminated to the public throughout our service area. The Title VI Policy is posted on the website, at the front desk and public meeting spaces, at offices and facilities, and in all fixed route buses.

6.3 Public Involvement Process

The main objectives of the Public Involvement Process are to:

1. Comply with the public involvement and environmental justice requirements of the Federal and State regulations, and provide specific opportunities for local citizens and citizen-based organizations to discuss their views and provide input on the subject areas addressed in plans, projects, or policies of Wave Transit, and;
2. Inform and educate citizens and other interested parties about ongoing Wave Transit planning activities, and their potential role in those activities.

3. Work with other local and state organizations that have similar goals and requirements.
4. Study other transit organizations that have been successful in public participation efforts.

Federal and State regulations require us to provide the public with information and to reach out and include traditionally under-served populations. Outlined below are several effective outreach tools that will continue to be used to ensure continued compliance with Federal and State requirements for inclusion of under-served populations.

A. General Public Relations

General public relations may be defined as any action that might reach any citizen, whether that citizen has specific interest or knowledge regarding transportation operations and planning efforts. Outreach techniques include announcements targeted at newspapers, radio, television, and social media; posters or pamphlets displayed in public places; and signs posted at public facilities including major transfer stations. Meetings or hearings held in public venues and covered by the media can act as public relations. These strategies keep the public aware of public transportation initiatives and the status of specific projects or planning efforts underway. Educating the community on activities employed by Wave Transit ensures individuals remain informed on pertinent matters related to public transportation and elicits interest and/or participation from interested parties.

There are a broad variety of ways to educate and engage the public. In general, the earlier public involvement is sought, the better. Citizens may get frustrated when they are invited to join late in the process - when the values and goals have already been decided and the details have been hammered out. The following tools are arranged from most participatory to least.

B. Events

Special outreach events are held to bring attention to a specific activity, issue, or initiative. This type of engagement strategy maximizes exposure to a project or program. Special events may take the form of a fair or special educational lecture with civic groups or other public entities.

C. Surveys

Conducting surveys is an efficient method of gathering input from many people at an early stage of the planning process. This is particularly useful when trying to understand the goals and aspirations of a community before attempting to address any specific problems. As an outreach tool, surveys are a good way to identify citizens who may want to become further involved. Surveys may be administered in person, on the phone, or distributed via mail, on the Internet, or at public places. A labor-intensive activity, the implementation of a survey might be aided by volunteers and student interns.

D. Public Hearings

Public hearings are usually held when Wave Transit has completed a plan or study or is applying for federal grant funds and needs to present it for public review before moving forward. As with all these tools, care must be taken to ensure that the public is made fully aware of the event well in advance and the goals and values of the plan are clearly stated.

E. Community Information Meetings

Community meetings are held to discuss programs, future plans, and activities within the local area. Informational meetings are held to encourage the public to discuss specific needs.

F. Direct Marketing and Education

Direct marketing provides specific information to targeted parties. For example, landowners or leaders of an ethnic community may be sought out and personally invited to attend a meeting held virtually or in person. Similarly, lower income groups may be specifically targeted for education about their rights, or children or families may be targeted to begin a discussion on a specific program. Direct marketing and education can take place through direct mailings, radio, the local government television channel, press advertising, or through meetings, whether virtual or in-person, with specific groups of people such as local clubs and associations, neighborhood groups, property owners, housing authorities, etc. It can also be through direct phone calls or meeting with key people who desire to participate in each process. This is the most labor intensive and potentially most fruitful way to create a diverse and active public participation process.

6.4 Plan Evaluation

Evaluation of the success of any public involvement effort must be oriented around results. It is not best practice to assume that poor attendance at a meeting or event is a direct translation to interest in an effort, initiative, or project. The goal is to educate and include and engage the public at every phase and level of the planning process and not just to invite them to an event or meeting.

Evaluation, then, must be two-fold. The first part is to track what efforts are being made, and the results of those efforts, and the second part is to make regular assessments of the success of a technique within a given program, and to strategize for future successes.

6.5 Tracking Efforts and Success

To track our public participation efforts, it is necessary for efforts to be recorded and retained for record. Wave Transit employs the following tracking mechanisms:

1. A detailed log of outreach activities is kept on file
2. Copies of print ads and transcripts of any public service announcements are retained for record
3. Minutes and/or notes are captured during and analyzed after every meeting

6.6 Minority Representation on Governing Body and Committees and Subrecipients

The Authority does not have any transit-related, non-elected boards, councils, or committees. The Authority's governing board is comprised of members appointed to serve by the City of Wilmington and New Hanover County.

The Making Waves Foundation is an independent non-profit, 501(c)3 organization created by the Authority in 2011. The Foundation is governed by a three to seven-member Board of Directors appointed by the Authority's Board of Directors as outlined in Article IV of the Foundation's Code of Regulations. Administrative oversight is provided by Authority personnel including the Deputy Director and the Director of Finance and Administration. Every effort to include minority representation on the Foundation's governing body is made in the recruitment and solicitation of new Board members

The Authority does not have any subrecipients

Section 7: Environmental Analysis of Construction Projects

Cape Fear Public Transportation Authority (dba. Wave Transit) shall integrate an environmental justice analysis into their National Environmental Policy Act (NEPA) documentation of construction projects of

which require NEPA. If a Categorical Exclusion (CE) is performed, Wave Transit shall complete the FTA's standard checklist which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), Wave Transit shall integrate into their documents, the following:

1. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population.
2. A discussion of all adverse effects that would affect the identified minority and low-income population.
3. A discussion of all positive effects that would affect the identified minority and low-income population;
4. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project, if applicable;
5. A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
6. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, Wave Transit shall describe why this is so.

Section 8: Service Standards and Policies

Service standards are resourceful for the planning and operation of a transit agency as it provides the foundation for route design and resource management. The service standards adopted by the Authority support and enhance the Authority's commitment to providing quality transit service to customers. The Authority monitors its level and quality of service under quantitative service standards and qualitative service policies on an ongoing basis to ensure equity in access to public transportation.

The Authority uses the following six indicators, as outlined in Federal Transit Administration (FTA) Circular 4702.1B, as service standards and policies:

STANDARDS:

- Vehicle load- the ratio of passengers to the total number of seats on a vehicle (how full the vehicle is);
- Vehicle headways- the amount of time between two vehicles traveling in the same direction on a given line or combination of lines;
- On-time performance - a measure of runs completed as scheduled;
- Service availability - a general measure of the distribution of routes within a transit provider's service area;

POLICIES:

- Distribution of transit amenities- items of comfort, convenience and safety that are available to the general riding public (shelters, benches, trash receptacles, etc.); and

- Vehicle assignment - the process by which transit vehicles are placed into service on routes throughout the transit provider’s system (which bus goes where).

8.1 Vehicle Load

The maximum vehicle loading refers to the maximum number of passengers per vehicle, including standees. The maximum number of passengers a vehicle can accommodate is dependent upon vehicle type. Load factors are based on the type of vehicle and service route classification type. The Authority’s fixed route system consists of three types of vehicles, each having varying seating and standee limitations. The loading standards by service type are indicated in the table below:

Passenger Loading Standards by Service Type

Vehicle Type	Maximum Seated Capacity	Maximum Standees	Total Capacity (Seated and Standing)
35’ Gillig Bus	31	16	47
30’ Hometown Trolley Replica	28	14	42
29’ Light Transit Vehicle (LTV) Shuttle	28	14	43

8.2 Vehicle Headways

Headway, also known as frequency, is the maximum interval between each scheduled fixed route vehicle. Headways are essential to the quality of service. Most fixed bus routes operate on 60-minute headways Monday through Friday 6:00 am to 9:00 pm, Saturday 8:00 am to 6:00 pm, and Sunday 9:00 am to 5:00 pm. Fixed bus routes 101, 108, 201, and 205 operate on 30-minute headways during clearly identified Peak times, as warranted by demand and density. Peak time is Monday through Friday from 6:00 am to 6:00 pm. The table below outlines the headways for each service type offered by the Authority:

Headway Limits by Service Type

Service Type	Peak	Off Peak
Fixed Bus Routes 101, 108, 201, 205	30	60
All Other Fixed Bus Routes	60	60
Port City Trolley	40	40
UNCW Shuttle	5	10 - 20

8.3 Amenities

Wave Transit regularly conducts studies on areas that are most in need of transit amenities. This list is compiled and, as funding is available, the most heavily used location receives the new amenity. Wave Transit has maintained all current amenities in the same fashion; each location is serviced at the same level unless there is reason for special attention on an as needed basis.

8.4 Service Access/Availability

On-time performance, also known as schedule adherence reporting, is the deviation of actual arrival and departure time from the timetable or schedule. This standard ensures a high level of service reliability. Factors such as density and route distances are considered in setting an on- time performance standard.

Transit agencies typically set a standard in percentages of on-time arrivals that they desire to achieve as a measure of good service quality. Among medium-sized transit agencies, the typical desired level of system-wide on-time performance is between 80% and 95%. The Authority is considered a medium-sized operator and requires that no vehicle shall leave a time point more than one minute early and should arrive at a time point no later than five-minutes after the scheduled arrival time. This five-minute window is appropriate for the Authority’s service area due to the average distance traveled by each route. The Authority’s on-time performance standards and targets are summarized below:

Service Type	Routes	Standard	Target
Fixed Route Bus Medium to High Density	<ul style="list-style-type: none"> • 101 Princess Place Dr. • 103 Oleander East • 104 Northeast • 105 Medical Center • 106 Shipyard Blvd. • 107 College Rd. • 108 Market St. • 201 Carolina Beach Rd • 202 Oleander West • 205 Long Leaf Park • 210 17th Street 	85%	90%
Fixed Route Trolley	<ul style="list-style-type: none"> • Port City Trolley 	85%	90%
UNCW Shuttle and Express Shuttle	<ul style="list-style-type: none"> • 701 Blue Shuttle • 702 Green Shuttle • 703 Red Shuttle • 704 Yellow Shuttle • 707 Red Express Shuttle • 711 Grey Shuttle • 712 Teal Shuttle 	85%	90%

At the time of publishing, Wave Transit is working with Nelson\Nygaard to develop a new Short-Range Transit Plan. It is possible that a substantial network redesign may be appropriate. Revised service targets and standards will be established as route modifications are developed in accordance with any revised framework.

8.5 Service Access/Availability

The Authority provides fixed route transportation services to Southeastern North Carolina. The current fixed-route service covers 58 square miles including the City of Wilmington and surrounding areas in New Hanover County. Wave Transit has authority to serve an area up to 30 miles outside the limits of New Hanover County. The Authority also provides shuttle service to the University of North Carolina Wilmington, on campus and off campus, through the UNCW Seahawk Shuttle Program.

Population Density

The level of service to provide is determined by the number of people to serve in a particular area. Population density can be measured in miles, by ZIP Code, Census zone, neighborhoods, or any number of logical factors. Typically, density is measured in the amount of people per square mile since FTA recognizes coverage based on distance from service in miles. Density is determined in two fundamental ways: number of people per square mile, or number of employees per square mile. When evaluating the density of an area, the demand for service was also considered and used to inform route modifications included in the proposal as referenced.

Bus Stop Spacing

Route coverage refers to the spacing distance between adjoining routes. The criterion is used to guide spacing distance between bus stops to maximize accessibility to transit service within the resources available. Determining the most effective spacing between stops depends on the context of the route, including speed limits, presence of sidewalks and crosswalks, and locations that allow a bus to safely service the stop.

Among the Authority's non-UNCW local routes, bus stops are spaced at an average of every 1,787 feet, or about 1/3 of a mile apart. Stops are more closely spaced in areas of denser development and spaced further apart in lower density areas.

The Authority's current stop spacing appropriately balances the need to reduce walking distances for riders with the need to provide expedient service that can operate within 60-minute headways.

8.6 Vehicle Assignment

The Authority's fixed route fleet consists of heavy and medium duty vehicles. In addition, a trolley is used for a circulator route in five districts located in downtown Wilmington. Heavy duty vehicles (35 ft.) are typically assigned to medium to higher density areas where ridership is greater. Medium duty vehicles (29 ft.) are used for services which are typically located in low and rural density areas and on UNCW campus. All vehicles have air conditioning and heating units, have either wheelchair lifts or wheelchair ramps, and are kept in a state of good repair as required by FTA. The Authority routinely replaces all vehicles according to FTA regulations to keep up with the high mileage service areas especially in outlying areas where origins and destinations are further apart.

Every operator providing contract-operated service for the Authority must be familiar with and able to drive every vehicle designated for service, regardless of age, make, model or manufacturer. Three times per year, at minimum, operators request operating preferences (or bids) for the next period's operating assignments. Route assignments are selected by operator seniority. Vehicle route assignments are revised at least monthly. Vehicle route assignment is dependent upon vehicle type and route operating profile. The age and condition of every heavy-duty fixed route vehicle is congruent amongst the fleet. The same applies for the Authority's medium duty vehicles. The procedure for vehicle assignment, along with the congruency of the condition of the fleet, ensures that vehicle conditions are equitable for all demographics and geographic locations across the public transportation system.

Section 9: Annual Title VI Certification and Assurance

Cape Fear Public Transportation Authority (dba. Wave Transit) hereby agrees that as a condition to receiving Federal financial assistance from the Department of Transportation (DOT), it will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) and all requirements imposed by 49 CFR Part 21, - Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”) to the end that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this agreement. Without limiting the above general assurance, Wave Transit agrees to the following:

1. Each “program” and “facility” (as defined in Sections 21.23(e) and 21.23(b)) will be conducted or operated in compliance with all requirements of the Regulations.
2. It will insert the clauses of this assurance in every contract subject to the Act and the Regulations.
3. Where Federal financial assistance is received to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
4. Where Federal financial assistance is in the form or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
5. It will include the appropriate clauses set forth in this assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the sponsor with other parties:
 - a. for the subsequent transfer of real property acquired or improved with Federal financial assistance under this Project; and
 - b. for the construction or use of or access to space on, over, or under real property acquired or improved with Federal financial assistance under this Project.
6. This assurance obligates the Sponsor for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the sponsor or any transferee for the longer of the following periods:
 - a. the period during which the property is used for a purpose for which Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits, or
 - b. the period during which the sponsor retains ownership or possession of the property.
7. It will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other sponsors, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants or Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this assurance.

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

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

**Adopted at a regular meeting on:
October 26, 2023**

By:

Anthony Caudle, Chairman

(seal)

Attest:

Mark Hairr, Secretary

Annual Certifications and Assurances are posted annually in TrAMS as required.