



Southeastern Regional Planning and Economic Development District

Title VI Program Submittal



September 2017



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Federal Disclaimer, Title VI and Nondiscrimination Notice of Rights of Beneficiaries

The preparation of this report has been financed in part through grant[s] from the Federal Highway Administration and Federal Transit Administration, U.S. Department of Transportation, under the State Planning and Research Program, Section 505 [or Metropolitan Planning Program, Section 104(f)] of Title 23, U.S. Code through Massachusetts Department of Transportation contract 88920. The contents of this report do not necessarily reflect the official views or policy of the U.S. Department of Transportation.

The Southeastern Massachusetts Metropolitan Planning Organization (SMMPO) through the Southeastern Regional Planning and Economic Development District (SRPEDD) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of **race**,

color, or **national origin** (including **limited English proficiency**), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age**, **sex**, and **disability**. These protected categories are contemplated within SRPEDD's Title VI Programs consistent with federal interpretation and administration. Additionally, SRPEDD provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

Individuals seeking additional information or wishing to file a Title VI/Nondiscrimination complaint may contact the SRPEDD Title VI/Nondiscrimination Coordinator at the contact information here. All such complaints must be received, in writing, within 180 days of the alleged discriminatory occurrence. Assistance will be provided, upon request, to individuals unable to provide the complaint form in writing.

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Massachusetts Public Accommodation Law (M.G.L. c 272 §§92a, 98, 98a) and Executive Order 526 section 4 also prohibit discrimination in public accommodations based on religion, creed,

Massachusetts Commission
Against Discrimination (MCAD)
One Ashburton Place, 6th Floor
Boston, MA 02109
617-994-6000
TTY: 617-994-6196

class, race, color, denomination, sex, sexual orientation, nationality, disability, gender identity and expression, and veteran's status, and SRPEDD and the SMMPO assures compliance with these laws. Public Accommodation Law concerns can be brought to SRPEDD's Title VI / Nondiscrimination Coordinator or to file a complaint alleging a violation of the state's Public Accommodation

Law, contact the Massachusetts Commission Against Discrimination (MCAD) within 300 days of the alleged discriminatory conduct.

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Portuguese: Caso esta informação seja necessária em outra idioma, favor contar o coordenador em Título VI do SRPEDD pelo telephone (508) 824-1367.

Spanish: Si necesita esta información en otro idioma, por favor contacte al coordinador de SRPEDD del Título VI al (508) 824-1367.

Haitian / French Creole: Si yo bezwen enfòmasyon sa a nan yon lòt lang , tanpri kontakte Koòdonatè Tit VI SRPEDD a pa telefòn nan (508) 824-1367.

Introduction

This document is the annual Title VI update for the FFY2017 reporting cycle, prepared by SRPEDD staff on behalf of the SMMPO and as a sub recipient of federal funding. It is submitted to MassDOT, and includes both highway and transit specific requirements as requested. This document is a response to a list of submittal requirements, requests and questions, called Title VI Guidance that was submitted to SRPEDD by MassDOT. The Title VI Guidance for this submission included a list of specifically requested components of our Title VI program arranged by tiered hierarchical headings. (The MassDOT Title VI Guidance is attached as Appendix F for reference.)

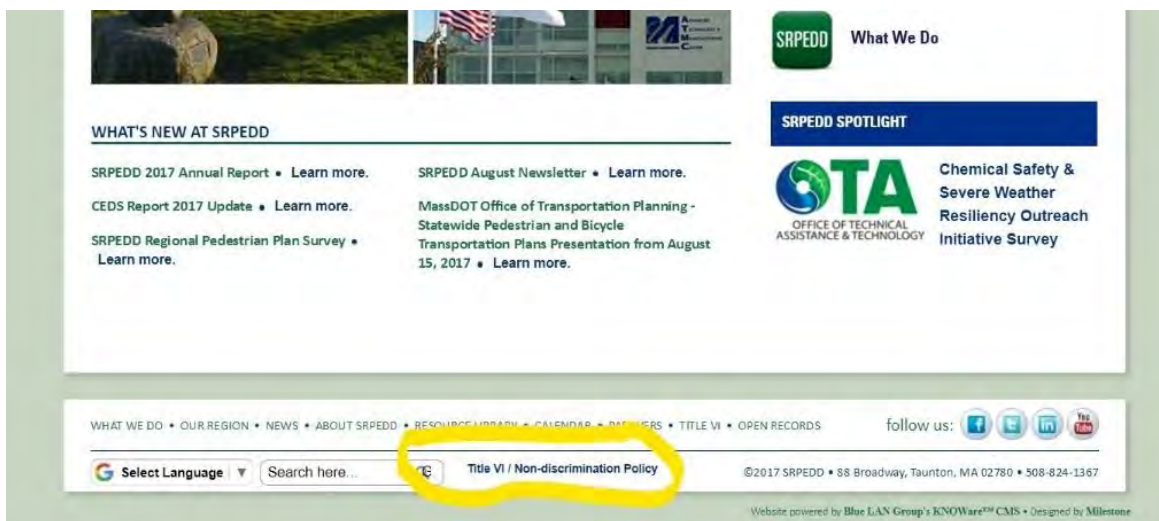
These extensive hierarchical headings of Roman numerals, letters, romanettes and numbers listing requested components and questions made it difficult to follow the sequence of specific components being addressed in the response. For this reason, each hierarchical heading was copied in the order listed in the Title VI Guidance and placed at the top of each response for easier following and comprehension in this document.

I. FHWA-Specific Reporting Requirements

a. Internal Compliance Assessment

- i. Notice: Document the dissemination of the Notice to Beneficiaries. This can include a narrative and photographs documenting electronic (website, email blast, email footer, radio and television media, etc.) and hardcopy (posting in public offices, posting at public meetings, brochures, etc.) notices.

The Notice to Beneficiaries is posted on SRPEDD's website on the Title VI Compliance page and can be directly accessed from the bottom of any page on the website from a dedicated and static link. (See Figure 1 below.) It is available in 4 languages (English and our Safe Harbor languages of Portuguese, Spanish & Haitian Creole) and in two different formats (in both Word and pdf) for greater accessibility. (See Figures 2 on following pages.) <http://www.srpedd.org/title-vi-compliance>




*Figure 1- "Title VI / Non-discrimination Policy" Static Link
at bottom of each page on the SRPEDD website*

Printed and laminated posters of the Notice to Beneficiaries are also located at four separate locations in the SRPEDD office: in the front foyer, at the rear/ accessible entrance, in the main conference room and in the smaller conference room. (See Figures 3-6 on page 4.)

A laminated poster is also posted at every public meeting held outside of the SRPEDD office. (See Figures 7 & 8 on page 4.) The Notice of Beneficiaries is also included on every document produced by SRPEDD, including the TIP, the UPWP, the PPP and all studies and reports. (See Figure 11). A shortened version of the Notice of Beneficiaries (due to space limitations) is included on public meeting notices and other documents (See Figures 9 & 10).

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Southeastern Regional Planning and Economic Development District

Title VI Compliance

COMPREHENSIVE PLANNING & HOUSING ECONOMIC DEVELOPMENT ENVIRONMENT GAMING HOMELAND SECURITY MUNICIPAL PARTNERSHIPS
SOUTH COAST RAIL TECHNICAL ASSISTANCE TRANSPORTATION

Notice of Nondiscrimination Rights and Protections to Beneficiaries

Federal "Title VI/Nondiscrimination" Protections

The Southeastern Massachusetts Metropolitan Planning Organization (SMMPO), through Southeastern Regional Planning and Economic Development District (SRPEDD) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of **race, color, or national origin** (including **limited English proficiency**), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age, sex, and disability**. These protected categories are contemplated within SRPEDD's Title VI Programs consistent with federal interpretation and administration. Additionally, SRPEDD provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

State Nondiscrimination Protections

SRPEDD also complies with the Massachusetts Public Accommodation Law, M.G.L. c. 272 §§ 92a, 98, 98a, prohibiting making any distinction, discrimination, or restriction in admission to or treatment in a place of public accommodation based on **race, color, religious creed, national origin, sex, sexual orientation, disability, or ancestry**. Likewise, SRPEDD complies with the Governor's Executive Order 526, section 4 requiring all programs, activities, and services provided, performed, licensed, chartered, funded, regulated, or contracted for by the state shall be conducted without unlawful discrimination based on **race, color, age, gender, ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, national origin, disability, veteran's status** (including Vietnam-era veterans), or **background**.

Additional Information

To request additional information regarding Title VI and related federal and state nondiscrimination obligations, please contact:

Lilia Cabral, Title VI Coordinator
SRPEDD
88 Broadway
Taunton, MA 02780
508-824-1367 or lcabral@srpedd.org

Complaint Filing

To file a complaint alleging a violation of Title VI or related federal nondiscrimination law, contact the Title VI Specialist (above) within 180 days of the alleged discriminatory conduct.

To file a complaint alleging a violation of the state's Public Accommodation Law, contact the Massachusetts Commission Against Discrimination within 300 days of the alleged discriminatory conduct at:

Massachusetts Commission Against Discrimination (MCAD)
One Ashburton Place, 6th Floor
Boston, MA 02109
617-994-6000/TTY: 617-994-6196

Translation

English: If this information is needed in another language, please contact the SRPEDD Title VI Coordinator at 508 824-1367.

Portuguese: Caso esta informação seja necessária em outro idioma, favor contar o Coordenador em Título VI do SRPEDD pelo telefone 508 824-1367.

Spanish: Si necesita esta información en otro idioma, por favor contacte el coordinador del SRPEDD del Título VI al 508 824-1367.

Haitian Creole: Si yo bezwen enfòmasyon sa a nan yon lòt lang, tanpri kontakte Koòdonatè Tit VI SRPEDD a pa telefòn nan (508) 824-1367.

Figure 2 - Screen shot of the Title VI Compliance Page on the SRPEDD website (top half)

Other Information on Title VI

- 2015 SRPEDD Title VI Program
- 2014 SRPEDD Title VI Program
- 2016 Update SRPEDD Language Access Plan (LAP) Plan
(PDF version)
- 2016 Update SRPEDD Language Access Plan (LAP) Plan
(Word version)
- Nondiscrimination/Title VI Complaint Process (English version)
(PDF version)
- Nondiscrimination/Title VI Complaint Process (English version)
(Word version)
- Nondiscrimination/Title VI Complaint Form (English version)
(PDF version)
- Nondiscrimination/Title VI Complaint Form (English version)
(Word version)
- Nondiscrimination/Title VI Complaint Process (Portuguese version)
(PDF version)
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(PDF version)
- Nondiscrimination/Title VI Complaint Form (Spanish version)
(Word version)
- Nondiscrimination/Title VI Complaint Process (Haitian Creole version)
(PDF version)
- Nondiscrimination/Title VI Complaint Process (Haitian Creole version)
(Word version)
- Nondiscrimination/Title VI Complaint Form (Haitian Creole)
(PDF version)
- Nondiscrimination/Title VI Complaint Form (Haitian Creole)
(Word version)
- Title VI Notice of Rights & Protection to Beneficiaries (English version)
(PDF version)
- Title VI Notice of Rights & Protection to Beneficiaries (English version)
(Word version)
- Title VI Notice of Rights & Protection to Beneficiaries (Portuguese version)
(PDF version)
- Title VI Notice of Rights & Protection to Beneficiaries (Portuguese version)
(Word version)
- Title VI Notice of Rights & Protection to Beneficiaries (Spanish version)
(PDF version)
- Title VI Notice of Rights & Protection to Beneficiaries (Spanish version)
(Word version)
- Title VI Notice of Rights & Protection to Beneficiaries (Haitian Creole)
(PDF version)
- Title VI Notice of Rights & Protection to Beneficiaries (Haitian Creole)
(Word version)
- Title VI Equity Analyses FFY 2017-2021
(PDF version)

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Title VI / Non-discrimination Policy

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Figure 2a - Screen shot of the Title VI Compliance Page on the SRPEDD website (bottom half)



Figure 3 - Title VI Notice in Front Foyer

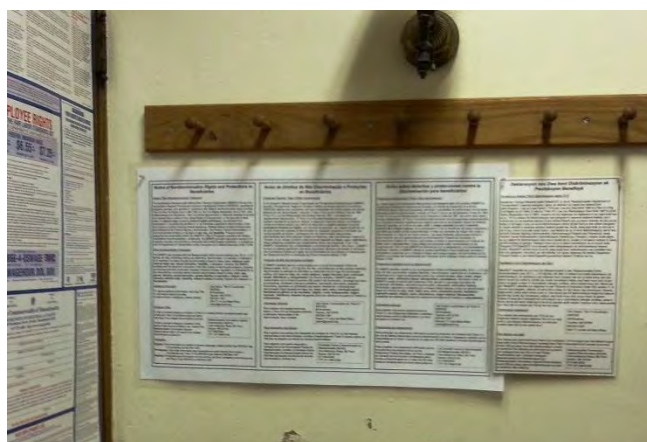


Figure 4 -Title VI Notice at Rear Entrance

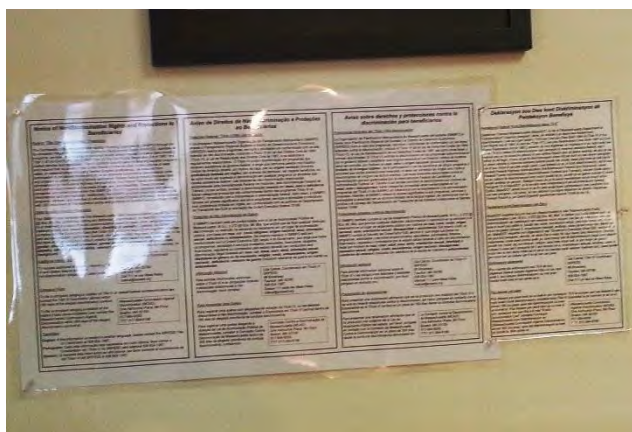


Figure 5 - Title VI Notice in Small Conference Room



Figure 6 - Title VI Notice in Large Conference Room

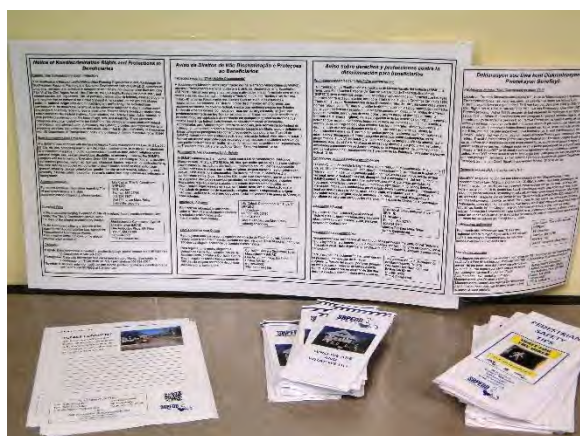


Figure 7 - Title VI Notice at Public Meeting with Comments Sheets & Brochures



Figure 8 - Title VI Notice Attached to Table at Public Meeting



SRPEDD is holding a public information meeting to discuss potential improvements to the **Route 140 Corridor (Mansfield Ave.) in Norton** from Route 123 to the Mansfield town line. Norton residents and business owners are invited to come and learn more, as well as to offer comments and express concerns.

Please come to our drop-in information meeting:
The Norton Public Library
68 E. Main Street
Monday, May 23, 2016
4 pm to 6:30 pm



TO COMMENT ANYTIME:
 Call: 508 824-1364 Use Postal Mail:
 Fax: 508 823-1803 88 Broadway
 E-mail: lcabral@srpedd.org Taunton, MA 02780

~ Or ~
 Visit our website at www.srpedd.org
 Or [SRPEDD Facebook Page](#)

Please Take a Survey about the Route 140 Corridor



<https://www.surveymonkey.com/r/Route140>



Se você preferir isto traduzido em Português, por favor ligue para nos.
 Si desea que esta traducido al español, llámenos.
 Si ou bezwen sa a tradui yo nan lang angle tanpri kontakte nou.



This location is accessible to people with disabilities and is mile from a public transit route. Upon request, every effort will be made to provide accommodation or language assistance. Please contact SRPEDD's Title VI Coordinator by phone (508 824-1367), fax (508 823-1803), or by email lcabral@srpedd.org. Requests should be made as soon as possible prior to the meeting.

Figure 9 - Public Meeting Notice

Title VI Notice of Nondiscrimination

The SMMPO, through SRPEDD, complies with Title VI of the Civil Rights Act of 1964 and related federal and state statutes and regulations. It is the policy of SRPEDD to ensure that no person or group of persons shall on the grounds of Title VI protected categories, including race, color, national origin, or under additional federal and state protected categories including sex, age, disability, sexual orientation, gender identity or expression, religion, creed, ancestry, veteran's status (including Vietnam-era veterans), or background, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by SRPEDD. To request additional information about this commitment, or to file a complaint under Title VI or a related nondiscrimination provision, please contact SRPEDD Title VI Coordinator by phone at (508)824-1367, fax (508) 823-1803 or by e-mail at lcabral@srpedd.org.

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Figure 10 - Title VI Notice of Nondiscrimination on back of Public Meeting Notice



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icipation Program



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Figure 11 - Two-page Notice to Beneficiaries included in the Public Participation Program

I. FHWA-Specific Reporting Requirements

a. Internal Compliance Assessment

- ii. Language Access: Please identify the financial cost and resources that were expended in the past year to provide language and/or disability related accommodations (translation services, interpreters, alternate document format production, etc.). Resources include staff time, direct expenses, etc.

We have estimated the number of staff hours expended from October 1, 2016 to September 30, 2017 to provide language and /or disability related accommodations and associated tasks, as well as the total direct cost of translations, etc.

These tasks include, but are not limited to:

- the update of the Language Access Plan;
- the design and distribution of a Large Print version of a quad-fold brochure on Pedestrian Safety Tips designed specifically for older adults in 4 languages;
- design updates and edits to public outreach pamphlets to accommodate translated languages;
- simple translations of Public Meeting Notices and Comment Sheets for public meetings;
- cost of documents for translation as necessary; (Portuguese translations are completed by staff in-house, other languages are contracted)
- updating Limited English Proficiency (LEP) data and mapping LEP populations by region, by community and by Census tract;
- creating maps for communities to enable better identification of Title VI and Environmental Justice populations and areas;
- conducting presentations on Title VI & EJ issues (including LEP) at Southeastern Massachusetts Metropolitan Planning Organization (SMMPO), Southeastern Regional Planning and Economic Development District (SRPEDD) Commission and other public meetings;
- updates to our website to stay current with translated and/or updated versions of vital documents, as well as embedding public and meeting notices to enable translation;
- the completion of an Equity Analysis (including LEP populations) of both current and past Transportation Improvement Program (TIP) projects;
- the posting of translated versions of notices on our website and on social media;
- the maintenance of an in-house list of accessible meeting sites;
- responding to requests from staff members for guidance on LEP and accessibility issues;
- the set-up and breakdown of the assistive listening sound system for public meetings, both in-house and at off-site locations.

Staff time involved 5 staff members and totaled \$14,075. Direct expenses for translation services totaled \$835, for a grand total of \$14,910. See Table 1 below.

Table 1 - Staff time and direct expenses for Language Access

Staff Time	Cost
Member 1	\$ 8749
Member 2	\$ 3533
Member 3	\$ 1691
Members 4 & 5	\$ 102
Direct Expenses	
Translations	\$ 835
Total	<u>\$14,910</u>

I. FHWA-Specific Reporting Requirements

a. Internal Compliance Assessment

- iii. Equity Analyses:** Reflect on the quality and accuracy of the equity analyses performed on the FFY2017 UPWP and FFY2017-2021 TIP to determine if regional needs are effectively captured or if there are areas for improvement.
 - 1. Are there regional/community equity concerns that you know of that are not effectively reflected in the current analytical approach?
 - a. Ex: particular demographic clusters not present in the data; contextual or anecdotal information about community needs that are not easily identified through demographic data.

A number of communities in our region do not take advantage of the myriad of services and technical assistance that SRPEDD offers. This is demonstrated in the Table attached as Appendix A entitled UPWP Studies Completed within SRPEDD / SMMPO 2011-2016. The number of projects per community varies from 2 projects in Dighton and Raynham to 24 projects in Fall River and 27 projects in New Bedford. This trend is especially true with TIP projects as some communities have expressed hesitation and concern regarding the length of the TIP process, as well as their own unwillingness to be held to MassDOT's stricter design standards, including Complete Streets, which significantly raise the scope and the cost of a project. Unfortunately, an Equity Analysis only reflects the equity of those communities that are involved and are proactive in the process. The equity of

lack of involvement cannot be measured. This is further explained in the FFY2018-2022 TIP Equity Analysis attached as Appendix B.

2. Can you suggest equity analysis methodology improvements to or document those equity considerations more effectively?

Taking into consideration the above mentioned points, the demographics that are regularly mapped for our region and are **not** included in the recent and current Equity Analyses are: population density; persons aged 6-19 years; older adults aged 60+ years of age; housing units with no vehicle; and persons with disabilities. The demographic that could possibly improve the current methods to measure equity considerations, if included in the analysis, is population density.

Population density is determined by taking population and dividing by square mile and this is then mapped by Census tract for our region. Population density is much higher in the 4 cities of our region (New Bedford, Fall River, Attleboro and Taunton) than in the more suburban and rural areas. A case for equity could be made in that more projects and greater expenditures should be made in the areas where they benefit the greatest number of people.

I. FHWA-Specific Reporting Requirements

a. Internal Compliance Assessment

iv. Equity Impacts on MPO Activities: Have equity considerations impacted a project score, work task, or programming decision in your region in the FFY2017-2021 and FFY2018-2022 TIPs and UPWPs?

1. Based on these observations, are there recommendations for improvement as to how equity and context specific considerations are incorporated into these decisions?
2. How are community needs and priorities incorporated into or reflected within these decisions?

All projects in the TIP are scored using Transportation Evaluation Criteria, a process with a set of criteria to evaluate and prioritize the region's TIP projects. All projects included in the TIP have been evaluated and assigned a priority value or score. This process is used as a management tool to identify projects of regional priority and program them accordingly in the TIP. These criteria and this process are reviewed and evaluated annually by the staff, prior to the discussions of scoring for each project. A copy of the evaluation criteria form (scoring sheet) can be found in Appendix C.

Some of the questions related to equity considerations in the Transportation Evaluation Criteria concern adequate public outreach performed, the proximity of the project to an identified EJ area, if

adequate efforts were made to engage EJ and Title VI populations and if the project provides multi-modal access to, from or within an EJ area.

Staff has, with intent, included these questions and the subsequent scoring, to ensure that equity is a factor in the criteria scoring, and that these underserved populations are not negatively impacted. The scoring on these particular questions could represent a 30-point differential in the total scoring of a project for inclusion in the TIP for funding which represents a community's ability to compete for limited funds and get a project into the TIP.

To assist communities in the identification of underrepresented areas and populations, SRPEDD is developing community specific maps for LEP, minority and poverty populations. This effort is intended to improve the communities' efforts in equitable planning and public outreach.

Community needs and priorities are always considered within this process and subsequent decisions, but a community's ability to compete for limited funds and get a project into the TIP is affected by Evaluation Criteria to a lesser degree than is project readiness, which falls upon the communities. A community which is involved in the process, and requests assistance has their needs and priorities met much more readily than those communities that are not involved, whether by indifference or design. Some communities have expressed concern regarding the length of the TIP process, as well as their own unwillingness to be held to MassDOT's stricter design standards that now include Complete Streets, and significantly raise the scope and the cost of a project. Those communities not seeking this assistance will not reap the benefits and assistance that results in the number of projects and amount of funding to the same extent that communities in this region that are proactive.

Appendix A provides a summary by community and region of the various types of studies and/or technical assistance completed by SRPEDD through the UPWP process from 2011-2016. An accompanying map displays the types of studies and/or technical assistance completed within each community and which of those communities are considered an Environmental Justice (minority, LEP or low-income/poverty) municipality.

As the table and map in Appendix A demonstrate, there is a vastly disparate difference in the number of projects completed for our communities. On the low end are Dighton and Raynham with just 2 projects/technical assistance each and the cities of Fall River and New Bedford with 24 and 27 projects/technical assistance, respectively.

I. FHWA-Specific Reporting Requirements

b. External Compliance Assessment

- i. Public Engagement: Has the MPO's participation with partner organizations (such as involvement with a local task force or community event) better connected Title VI and equity principles with the MPO's transportation related activities? Have community relations led to new and/or diversified constituent involvement?
 1. What factors do you think led to the success of these engagements and relationships? What factors do you see as contributing to barriers to success? How does the MPO plan to continue building upon established successes and encountered challenges?

The SMMPO has always had a commitment to integrate transportation equity into every facet of the transportation planning process, including the Regional Transportation Plan (RTP), Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP) and the ongoing public participation process. This includes the Joint Transportation Planning Group (JTPG), the advisory committee to the SMMPO for all transportation related issues, as well as the forum for public involvement in transportation plans and programs. The JTPG enables non-profits, community groups and members of the public to participate in the process. Members of the public, the media, and a representative of the Conservation Law Foundation regularly attend JTPG meetings. The opportunity to participate with the JTPG is extended by our efforts to regularly attend community events, such as job fairs and the Bioneers by the Bay "Connecting for Change" conference, and by public outreach such as a recent event at the SRTA terminal to distribute bus schedules and other transit materials, and garner feedback from bus riders.

Community relations have led to new and/or diversified constituent involvement. In addition to our staff members attending community bicycle group events, the Director of SRPEDD attends Rotary Club meetings where there is opportunity to discuss the First Light Resort and Casino with members of their board. Staff is also heavily involved with organizations such as the South East Regional Coordinating Council on Transportation (SERCCOT). SERCCOT has over 90 active members, including representatives from transit, transportation provider organizations, planning agencies, state agencies, Independent Living Centers, Councils on Aging, businesses, educational institutions, Social service and homeless advocates, transportation advocates, and consumers.

Staff makes an effort to stop into local organizations to distribute safety pamphlets, bus schedules, etc. and to re-introduce ourselves to let people know who we are and what we do. All of these efforts improve and expand our contacts and relationships in our communities and informs us of new and better methods of outreach to additional groups and populations. Efforts to make personal and face-to-face contact with these front line advocates leads to better relationships.

Barriers to success include indifference and complacency, by communities and by members of the public. We are constantly striving to overcome that by continuously reaching out and letting people and organizations know who we are and what we do. This is accomplished by a myriad of methods and continuous personal contact but always with one small effort at a time.

These efforts have led to an increased and diversified constituent involvement due to several factors. The first is staff involvement with both community officials and community groups. As well as attending meetings and events, staff regularly checks in with community officials, at meetings and with personal phone calls. A recent effort involved taking note of those communities that had not been recently represented at JTPG meetings (and subsequently had no TIP projects) and simply calling one or more of these community's representatives, encouraging them to attend and reminding them of the varied services that staff is able to provide. This resulted in increased attendance by most of these communities.

Additional efforts include an increased presence on social media, including Facebook and Twitter, efforts to increase media coverage about the work we do, especially smaller neighborhood projects, bike and pedestrian planning, etc.

I. FHWA-Specific Reporting Requirements

b. External Compliance Assessment

- ii. Public Engagement:** What efforts did the MPO engage in to meet and forge relationships with constituencies that previously were not effectively being reached? Were planning materials presented in forums besides MPO, Joint Transportation Committee, or public hearing type meetings?

We have attempted to reach particular populations with materials specifically adapted for those populations. Public outreach materials are translated into the Safe Harbor languages (Portuguese, Spanish and Haitian Creole) to reach those populations who are Limited English Proficient. These materials are distributed and posted in neighborhoods with LEP populations and delivered to agencies such as the Immigrant's Assistance Center, Community Economic Development Center (CEDC) and the Casa de Saudade, a branch of the New Bedford Public Library System. These agencies deal with LEP populations on a regular basis. Additional efforts have included a coloring book concerning bicycle safety to reach children, and oversized brochures and posters with large font and large bright photographs to appeal to, and be more accessible for older adults. Safety posters have been distributed to all Councils on Aging in the past and large font pamphlets are being translated for distribution to COAs in the near future.

Planning materials are widely distributed to the public libraries in our region, to communities and to those agencies that work with traditionally underserved populations. We also hold neighborhood

meetings in our communities regularly to discuss local projects and to distribute materials, as well as participate in neighborhood association meetings, such as the Maplewood Neighborhood Association in Fall River. We recently distributed a pedestrian survey notice using a variety of methods, including personal contact to distribute to agencies, libraries, etc., posting in neighborhoods, by e-mail and with social media.

I. FHWA-Specific Reporting Requirements

c. Internal and External Title VI Capacity Building

- i. Training: Did staff or leadership participate in any Title VI and/or equity related trainings?

The Title VI Coordinator has attended over 20 webinars, workshops, conference sessions and watched instructional videos. Those related to Title VI include ‘How to Engage Communities in Regional Decision Making’; a Title VI workshop; ‘How to Reach Vulnerable & Disadvantaged Populations’; ‘Accessibility for Documents’; and ‘Social Media & Marketing’. She has conducted research on ADA accessibility, including ‘Site-Cue’ which allows any webpage to be enlarged and on features to consider, including resolution and lumens for clarity and color contrast, giving consideration to persons with color and / or sight deficiencies for a possible projector purchase.

She consulted with Josefina Reynes, SRPEDD’s Data Specialist, to better understand anomalies and outliers for the Equity Analysis, with Jennifer Chaves, data and GIS, to better understand how minority, LEP and poverty data is calculated and how to properly define these for the Equity Analysis and other documents. She has also conducted extensive discussions and e-mail exchanges with David Chandler of FHWA concerning Safe Harbor translations, the Title VI Complaint Process, providing notices in html for translations on the agency website and other Title VI related issues in preparation for the Federal Certification review.

I. FHWA-Specific Reporting Requirements

d. Addressing Allegations of Discrimination

- i. Complaints: MassDOT has updated and translated a discrimination complaint form. The form is approved by FHWA and FTA is available for MPO use (download from SharePoint at <https://services.eot.state.ma.us/cr>). Please review these materials and document their incorporation into MPO protocols. Document the dissemination of the complaint forms. If the MPO chooses to continue using a different complaint form, please provide an updated copy for MassDOT review and approval.

The SMMPO has downloaded these new Complaint Forms in English and in our 3 Safe Harbor languages of Portuguese, Spanish and Haitian Creole. We have replaced the previous Complaint Forms on our website with the ones provided to us by MassDOT, with one minor change to the forms. In the opening statement we have removed the words “alternate formats” and eliminated the offer, since we do not presently have these forms in alternate formats. However, this is a concern and we would appreciate some guidance on the issue of alternate formats.

I. FHWA-Specific Reporting Requirements

- ii. Identification of Responsible Staff: Check for consistency in identification of Title VI Coordinator and/or Specialist across relevant documents and communication materials.

This check for consistency has been a part of our regular procedures and to our knowledge, the identification of the Title VI Coordinator is included as part of all relevant documents and communication materials. If there has been an oversight, please contact Lilia Cabral-Bernard, the Title VI Coordinator, immediately and the oversight will be rectified immediately.

I. FHWA-Specific Reporting Requirements

- b. Special Emphasis Area
 - i. Public Engagement: Following MassDOT Title VI staff onsite visit in May/June 2017, transition outreach databases to Engage Tool database.

No response necessary.

II. FTA-Specific Reporting Requirements

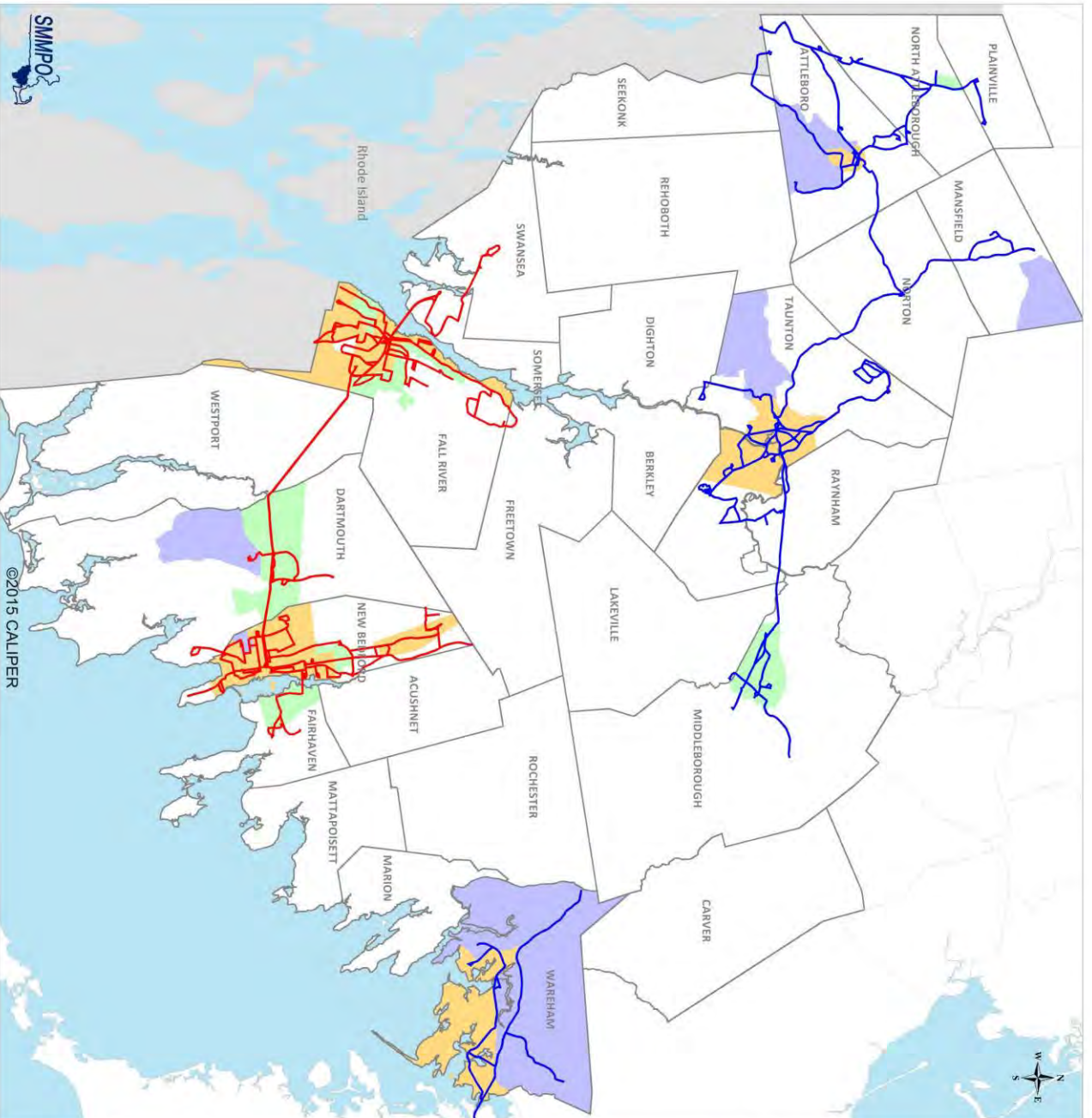
- c. Funding Distribution Analysis: Please provide a map(s) depicting the locations of transit related investments (both federal and state dollars) in the current TIP. The base layer(s) should show percent minority and percent low-income, by Census tract.
 - i. Please include a description of the methodology used to determine the geographic location of transit investments. For instance, how is the MPO representing service-area wide transit investments? What about investments that are not conducive to mapping?

On the next page is a map of the SMMPO region that displays transit bus routes for both Greater Attleboro Regional Transit Authority (GATRA), with routes shown in blue, and Southeastern Regional Transit Authority (SRTA) with routes shown in red. Transit routes are overlaid above low-income and minority tracts to demonstrate how transit serves those populations. We have included an additional map as Appendix D. This map displays transit routes overlaid above the same minority and low-income tracts but with the addition of Limited English Proficiency tracts as well.

Included as Appendix E is a list of transit TIP Projects covering a scope of maintenance and services. These system wide projects are not geographically located and remain consistent from year to year, so are listed by the scope of services rather than by year. Funds are distributed system wide, as are all new vehicles put into service.

According to Section 13.1 Vehicle Assignment Policy of the ***SRTA Title VI Program*** dated March 16, 2016 “It is SRTA’s policy to equitably assign vehicles to its routes. SRTA does not discriminate on assigning its vehicles to routes. Vehicles are randomly assigned. At this time, all of SRTA’s vehicles have basically the same amenities including technologies and as such, the variations in vehicles are age and size. SRTA assigns vehicles to each route based on peak capacity requirements and vehicles are randomly assigned based on where they are parked after servicing.”

According to the ***GATRA Title VI Program Vehicle Assignment Policy*** dated April 7, 2015 “vehicle assignment is based on several factors including usage, vehicle type, road characteristics (street width, congestion, on-street parking, pavement condition) length of run, length of service day, and distance from a maintenance facility. Newer vehicles may be assigned to drivers with longer shifts and those who work later hours when there is less ability to replace a vehicle experiencing a mechanical problem. Full size buses are used in Taunton and Attleboro; minibuses and smaller buses are used in other communities. GATRA’s vehicle replacement schedule is incorporated in the regional Transportation Improvement Program.”



SRPEDD Definitions:

Low Income:

Census tracts that are greater than SRPEDD's low income regional average of 12.13%

Minority:

Census tracts that are greater than SRPEDD's minority regional average of 10.98%

Limited English Proficiency:

Census tracts that are greater than SRPEDD's LEP regional average

Data Sources:

SRPEDD, MassGIS, MassDOT, 2010 Census, ACS 2010-2014.

III. MPO Determined Focus Areas

- a. What goals does the MPO have for FFY2018 to increase capacity and effectiveness in Title VI work?

Our specific goals are to increase our social media presence and to make our agency website more user friendly. The work we do is important but is not always widely known or easily understood. The opportunity to participate is a moot point if most people do not realize there is an opportunity to participate or what they are participating in.

The language on our website should clearly explain what the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), the Regional Transportation Plan (RTP), and the Public Participation Program (PPP) are, and what all of these programs actually accomplish. It should also state what issues, projects, programs and services are involved. This will make it easier and more accessible for an overall understanding and also to access any specific information needed.

Staff will also begin a wide-ranging public outreach effort in FFY2018 to garner input for the update of the 2019 Regional Transportation Plan. This effort is intended to identify the strengths and deficiencies of the transportation system, especially in regard to Title VI and Environmental Justice populations, as always.

- b. Are there outstanding questions or challenges the MPO faces regarding Title VI?

People only seem to be interested if something is happening in their own neighborhoods or if it affects their daily lives, so the biggest challenge is engendering interest in issues not specific to a particular neighborhood or to a specific issue or study. We will continue to reach out to people and to organizations to let them know who we are and what we do. We will try to accomplish this by using a myriad of methods that have worked in the past, as well as attempting new methods, as we continuously do. We feel that continuous and personal contact usually makes the greatest impact and this will continue with one small effort at a time.

- c. Anything else you want to share?

Appendix A

FFY 2018 UPWP

Equity Analyses

TABLE 1 – UPWP Studies Completed within SRPEDD/SMMPO 2011-2016

Beneficiary (RTA *)	EJ Designation	Tip **	Pavement	Congestion	Comm. Tech. Asst.	Bike / Ped	Safety	Regional	Service Planning	Mobility MGMT	Public Outreach	TOTAL
Acushnet (S)	L		1			1			1			3
Attleboro (G)	M		1	2	2	1			3	1	2	12
Berkley (G)			1		2				1			4
Carver (G)		2	2	1	6							11
Dartmouth (S)		2	1	1	6	2	1					13
Dighton (G)			1		1							2
Fairhaven (S)			1	1	7	3	3					15
Fall River (S)	M L P		1	1	7	9	2		3		1	24
Freetown (S)			1	1	1		4		1		1	9
Lakeville (G)			1		1		2					4
Mansfield (G)			1	1	5	1			2		1	11
Marion			1		6	4	2					13
Mattapoisett (S)		1	1		1	2	1					6
Middleborough (G)			1		5	2	3			1	1	13
New Bedford (S)	M L P	2	1	6	8	2	5		2		1	27
N. Attleborough (G)		1	1	1		1				2		6


Beneficiary (RTA *)	EJ Designation	TIP **	Pavement	Congestion	Comm. Tech. Asst.	Bike / Ped	Safety	Regional	Service Planning	Mobility MGMT	Public Outreach	TOTAL
Norton (G)		1	1	2	3	8	3		1			19
Plainville (G)			1	1			1					3
Raynham (G)			1		1							2
Rehoboth (G)			1	1	3							5
Rochester			2				1					3
Seekonk (G)			2	2	5	1	4		2	1		17
Somerset (S)			1	4	9	2						16
Swansea (S)			1	3	3							7
Taunton (G)	M L P	1	1	1	7		1				1	12
Wareham (S)	M		2		5	5			5	2		19
Westport (S)			1		3	1	1					6
SRTA									25	11	1	37
GATRA									12	8	2	22
SRPEDD Region		3		1	7	20	2	14	6	16		69
TOTAL		13	31	30	104	65	36	14	64	42	11	410

* Refers to membership with GATRA (G) or SRTA (S)

** This refers to assistance to communities / regional agencies with development (PNF/PIF) of a project, not programming of the TIP.

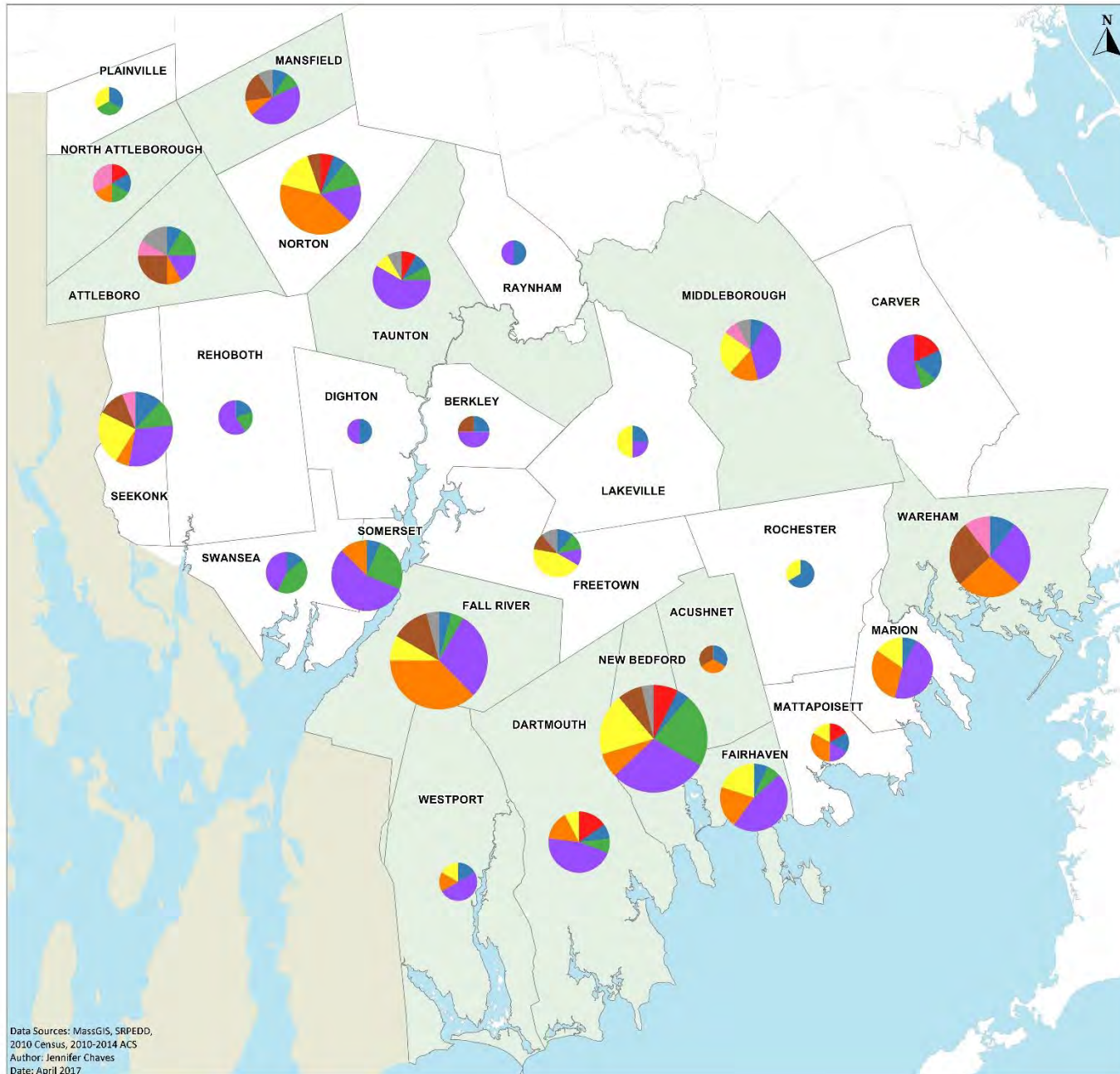
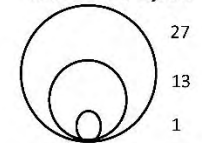
M designated as Minority Communities
L designated as LEP communities
P designated as poverty / low-income

SRPEDD UPWP Projects 2011-2016

 SRPEDD Communities with EJ and or Title VI Populations that exceed SRPEDD's

-  TIP
-  Pavement
-  Congestion
-  Community Tech Assistance
-  Bicycle / Pedestrian
-  Safety
-  Service Planning
-  Mobility Management
-  Public Outreach

Number of Projects



Data Sources: MassGIS, SRPEDD,
2010 Census, 2010-2014 ACS
Author: Jennifer Chaves
Date: April 2017



Appendix B

FFY 2018-2022 Title VI

Equity Analyses



Southeastern Regional Planning and Economic Development District

**Title VI Equity Analyses/
Regional TIP Project Distribution
FFY 2018-2022**



June 2017



Administration:

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Transportation Staff:

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Federal Disclaimer, Title VI and Nondiscrimination Notice of Rights of Beneficiaries

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The Southeastern Massachusetts Metropolitan Planning Organization (SMMPO) through the Southeastern Regional Planning and Economic Development District (SRPEDD) operates its programs, services, and activities in compliance with federal nondiscrimination laws including Title VI of the Civil Rights Act of 1964 (Title VI), the Civil Rights Restoration Act of 1987, and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that no person in the United States of America shall, on the grounds of **race**,

color, or **national origin** (including **limited English proficiency**), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance. Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of **age**, **sex**, and **disability**. These protected categories are contemplated within SRPEDD's Title VI Programs consistent with federal interpretation and administration. Additionally, SRPEDD provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

Individuals seeking additional information or wishing to file a Title VI/Nondiscrimination complaint may contact the SRPEDD Title VI/Nondiscrimination Coordinator at the contact information here. All such complaints must be received, in writing, within 180 days of the alleged discriminatory occurrence. Assistance will be provided, upon request, to individuals unable to provide the complaint form in writing.

SRPEDD
Lilia Cabral-Bernard
Title VI/Nondiscrimination
Coordinator
88 Broadway
Taunton, MA 02780
Phone: (508) 824-1367
Fax: (508) 823-1803
Email: lcabral@srpedd.org
www.srpedd.org

Massachusetts Public Accommodation Law (M.G.L. c 272 §§92a, 98, 98a) and Executive Order 526 section 4 also prohibit discrimination in public accommodations based on religion, creed,

Massachusetts Commission
Against Discrimination (MCAD)
One Ashburton Place, 6th Floor
Boston, MA 02109
617-994-6000
TTY: 617-994-6196

class, race, color, denomination, sex, sexual orientation, nationality, disability, gender identity and expression, and veteran's status, and SRPEDD and the SMMPO assures compliance with these laws. Public Accommodation Law concerns can be brought to SRPEDD's Title VI / Nondiscrimination Coordinator or to file a complaint alleging a violation of the state's Public Accommodation

Law, contact the Massachusetts Commission Against Discrimination (MCAD) within 300 days of the alleged discriminatory conduct.

The SMMPO is equally committed to implementing federal Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." In this capacity, the SMMPO identifies and addresses disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The SMMPO carries out this responsibility by involving minority and low income individuals in the transportation process and considering their transportation needs in the development and review of the SMMPO's transportation plans, programs and projects.

Portuguese: Caso esta informação seja necessária em outra idioma, favor contar o coordenador em Título VI do SRPEDD pelo telephone (508) 824-1367.

Spanish: Si necesita esta información en otro idioma, por favor contacte al coordinador de SRPEDD del Título VI al (508) 824-1367.

Haitian / French Creole: Si yo bezwen enfòmasyon sa a nan yon lòt lang , tanpri kontakte Koòdonatè Tit VI SRPEDD a pa telefòn nan (508) 824-1367.

Introduction

As a recipient of federal funds The Southeastern Regional Planning and Economic Development District (SRPEDD), acting as staff to the Southeastern Massachusetts Metropolitan Planning Organization (SMMPO) complies with Title VI of the Civil Rights Acts of 1964. Title VI prohibits discrimination based upon race, color and national origin. Additional federal nondiscrimination laws prohibit discrimination on the basis of age, sex and disability.

The SMMPO is equally committed to complying with federal Executive Order 12898, entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." In this capacity, the SMMPO identifies and addresses disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The SMMPO carries out this responsibility by involving minority and low-income individuals in the transportation process and considering their transportation needs in the development and review of the SMMPO's transportation plans, programs and projects.

SRPEDD routinely maps minority, low-income (below poverty level) and LEP populations / areas for our Transportation Evaluation Criteria, for public outreach purposes, for the Title VI submissions of our regional transit agencies, for transit route equity analyses and evaluations, and for other general planning purposes. As part of the requirements for the TIP we have extended these efforts into a regional project distribution / Title VI equity analyses.

Methodology

This Equity Analyses is based on projects that are programmed with regional target funds in the FFY2018-FFY2022 TIP in the SRPEDD region. SRPEDD defines a Title VI/EJ community and Title VI/EJ Census tracts as such if they are greater than the regional average for minority, as calculated in the U.S. Census, greater than the regional average for Limited English Proficiency (LEP) or below the regional average poverty level, as calculated in the American Community Survey (ACS). (The Census Bureau uses a set of dollar

value thresholds that vary by family size and composition to determine who is in poverty.)

Minority is defined as those persons who identify as other than white in the 2010 Census and this includes Hispanics. This population is protected under Title VI of the Civil Rights Act. Limited English Proficient (LEP) refers to any person age 5 and older who reported speaking English less than 'very well' in the 2010 Census. Low-income (poverty) is defined as persons living below the regional average poverty level. LEP and low-income populations are ensured participation and consideration of their transportation needs with Federal Executive Order 12898, otherwise known as Environmental Justice (EJ). For minority populations the regional average was 10.98%, and for LEP populations the regional average was 7.40%. The low-income (or percent below the poverty level) is 12.13%.

Minority, low-income (or below poverty level) and LEP areas were mapped for each of the 27 communities in the SRPEDD region, with low income (or below poverty level) and LEP using 2010-2014 ACS data, and minority using 2010 Census data with the intent to determine the level of project distribution equity in areas designated as Title VI/EJ and in areas not designated as Title VI/EJ in our region. We mapped the geographical distribution of Transportation Improvement Program (TIP) projects and compared the number of projects in identified Title VI and EJ census tracts versus the number in non-Title VI and EJ census tracts.

If a project was located directly adjacent to one of the areas designated as low-income (poverty), minority or LEP or if that project directly connected and /or served the designated area, we counted / included the project as falling within one of these areas. There were 19 projects in the FFY2018-2022 TIP that were located within or directly adjacent to these designated areas. (Please see map entitled 2018-2022 Project Locations and Title VI / Environmental Justice.)

We also determined the number of projects in a community, the total dollar amount of funding per community and per capita to analyze the distribution of TIP projects and funding in our region. Both data sheets and mapping of project data was utilized.

Regardless of the results of this analysis, there are a number of factors that would affect one or more communities having a disparate number of projects

or funding compared to other communities in this region. Although the SMMPO (SRPEDD) offers a myriad of services and technical assistance to all 27 communities in the region on request, including intersection analysis, signal warrants analysis, safety and congestion studies for intersections and corridors, as well as road safety audits, including the accompanying public outreach efforts, some communities simply do not take advantage of this, whether by indifference or design.

Some communities have expressed concern regarding the length of the TIP process, as well as their own unwillingness to be held to MassDOT's stricter design standards that now include Complete Streets, and significantly raise the scope and the cost of a project. Those communities not seeking this assistance will not benefit in the number of projects and amount of funding to the same extent that communities in this region that are proactive.

Results

The total number of projects programmed in the existing FFY2018-2022 TIP, total 19 in 12 communities, leaving 15 communities out of the 27 in the SRPEDD region with no projects. However, 4 of these 15 communities (Carver, Fall River, North Attleborough and Westport) had projects programmed in the FFY2013-2017 TIP. The remaining 11 communities (Acushnet, Berkley, Dighton, Fairhaven, Freetown, Marion, Mansfield, Plainville, Rochester, Somerset, Swansea) have had no recent or future projects in the TIP.

Anecdotal observations are that 8 out of these 11 communities have had limited or no presence at Joint Transportation Planning Group (JTPG) meetings nor have they taken advantage of the array of services and technical assistance offered by the staff of the SMMPO. The exceptions to this are the towns of Fairhaven and Mansfield which have always been, and continue to be, active participants in the JTPG and the town of Plainville, which has recently become more active in participation.

Of the 12 communities with projects in the FFY2018-2022 TIP, there are 8 communities with 1 project in the TIP. These communities are Attleboro, Lakeville, Mattapoisett, Middleborough, Norton, Seekonk, Raynham, and Rehoboth. There are 2 communities, Taunton and Wareham, with 2 projects in the TIP. One community, Dartmouth, has 3 projects in the tip and the city

of New Bedford has 4 projects in the current TIP. (Please see maps entitled Number of 2018-2022 Projects by Municipality and Number of Projects and Title VI / Environmental Justice.)

The location of each FFY2018-2022 TIP project was mapped and overlaid with the areas that met the criteria previously discussed and designated as low-income (poverty), minority and LEP areas. As far as the geographical distribution of projects, out of the 19 total projects in the region, 11 projects fell within areas designated as meeting the criteria for low-income (poverty), minority or LEP populations. (Please see map entitled 2018-2022 Project Locations and Title VI & Environmental Justice & please see Table entitled 2018-2022 TIP Projects.)

Five of the SRPEDD communities met the criteria to be designated as Minority Municipalities. These communities are Attleboro, Fall River, New Bedford, Taunton and Wareham. (See map entitled 2018-2022 Minority Municipalities.) Attleboro has 1 project in the FFY2018-2022 TIP, New Bedford has 4, Taunton has 2, Wareham has 2, and Fall River has 0, although Fall River had 1 projects in the previous FFY2013-2017 TIP.

The median per capita spending for the 12 communities with projects programmed in the FFY2018-2022 TIP is \$245. Three of the minority communities, Attleboro (\$153), New Bedford (\$183), and Taunton (\$194) show per capita spending below the median and one minority community, Wareham (\$1082) is well above the median per capita spending. The remaining minority community, Fall River, has no projects in the existing TIP. (See map entitled 2018-2022 Project Expenditures per Capita in Minority Municipalities.)

Once again, the median per capita for 12 communities with projects programmed in the FFY2018-2022 TIP is \$245. Among those communities per capita spending ranges from \$45 per capita in Middleborough to \$1082 in Wareham. The exceptionally high per capita amount in the town of Wareham is due to the large scope and cost of the Route 6 & 28 reconstruction project. (See the map entitled 2018-2022 Project Expenditures and the Table within the map entitled Municipality Per Capita.)

Total project expenditures were calculated and mapped by community and per capita for minority municipalities, LEP and low-income (poverty) areas. (See maps entitled 2018-2022 Project Expenditures per Capita in Minority

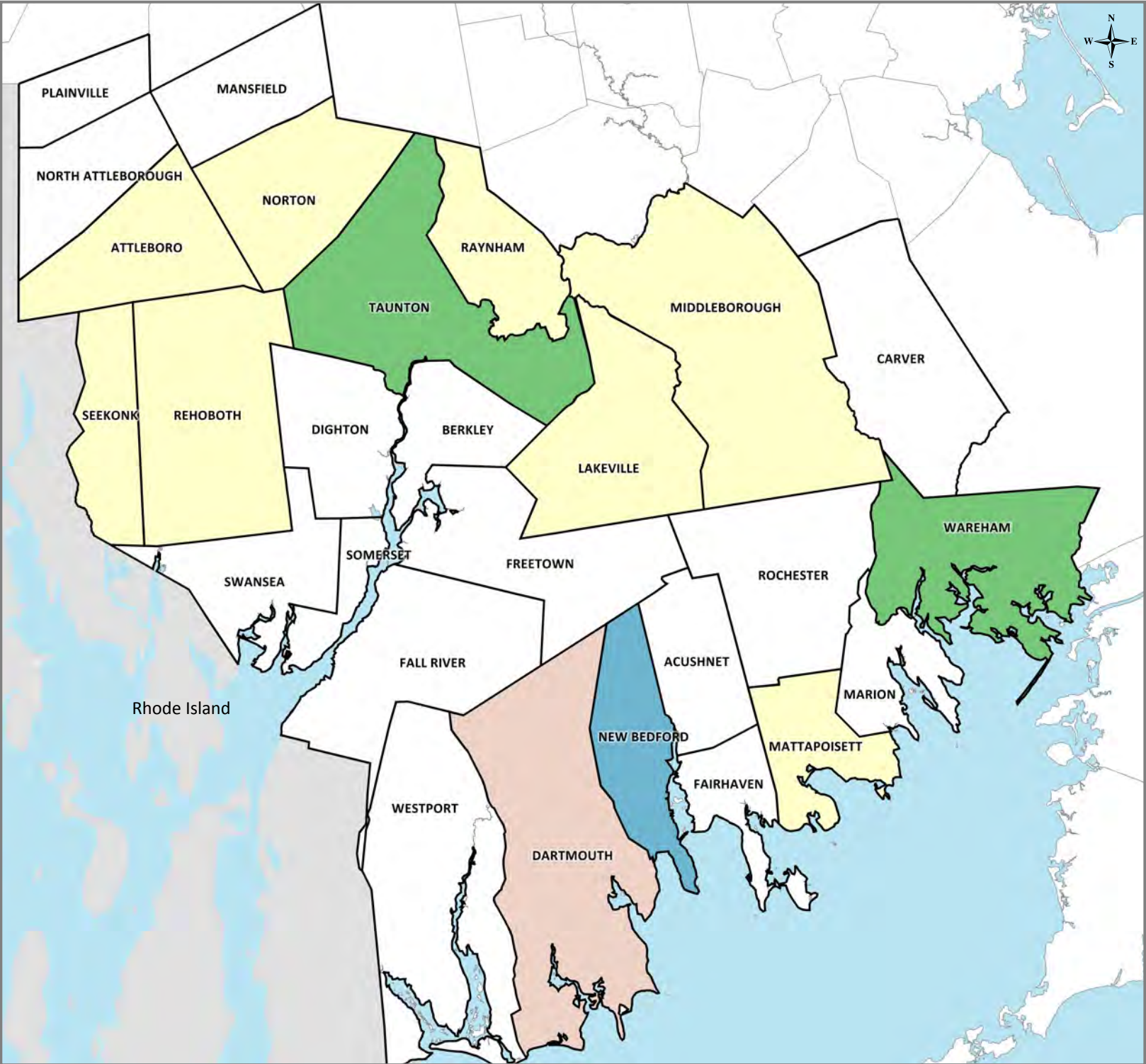
Municipalities & 2018-2022 Project Expenditures and Title VI / Environmental Justice.)

Of the 15 communities with no projects in the FFY2018-2022 TIP, 9 did not meet any of the criteria for minority, poverty or LEP. Of the remaining 6 communities, Acushnet, Fairhaven, Fall River, Mansfield, North Attleborough and Westport; 3 of these, Fall River, North Attleborough and Westport had a total of 5 projects in the FFY2013-2017 TIP; leaving only 3 communities that meet these criteria, Acushnet, Fairhaven, and Mansfield with no recent past or future TIP projects. Two of these communities, Fairhaven and Mansfield, have always been active participants in the JTPG and continue to have a presence in the regional planning process.

Out of the 27 SMMPO communities a total of 15 did not meet the criteria for Title VI or EJ populations leaving 12 communities that did meet that criteria. (See map entitled Number of 2018-2022 Projects and Title VI / Environmental Justice.)

Our results show that 13 out of the 19 projects in the FFY2018-2022 TIP fall within a community that meets the criteria for Title VI or EJ populations, which is 68% of the projects, while 11 out of the 19 projects, which is 58% of the projects, fell directly within minority, low-income (poverty) and LEP areas.

Number of 2018-2022 Projects by Municipality



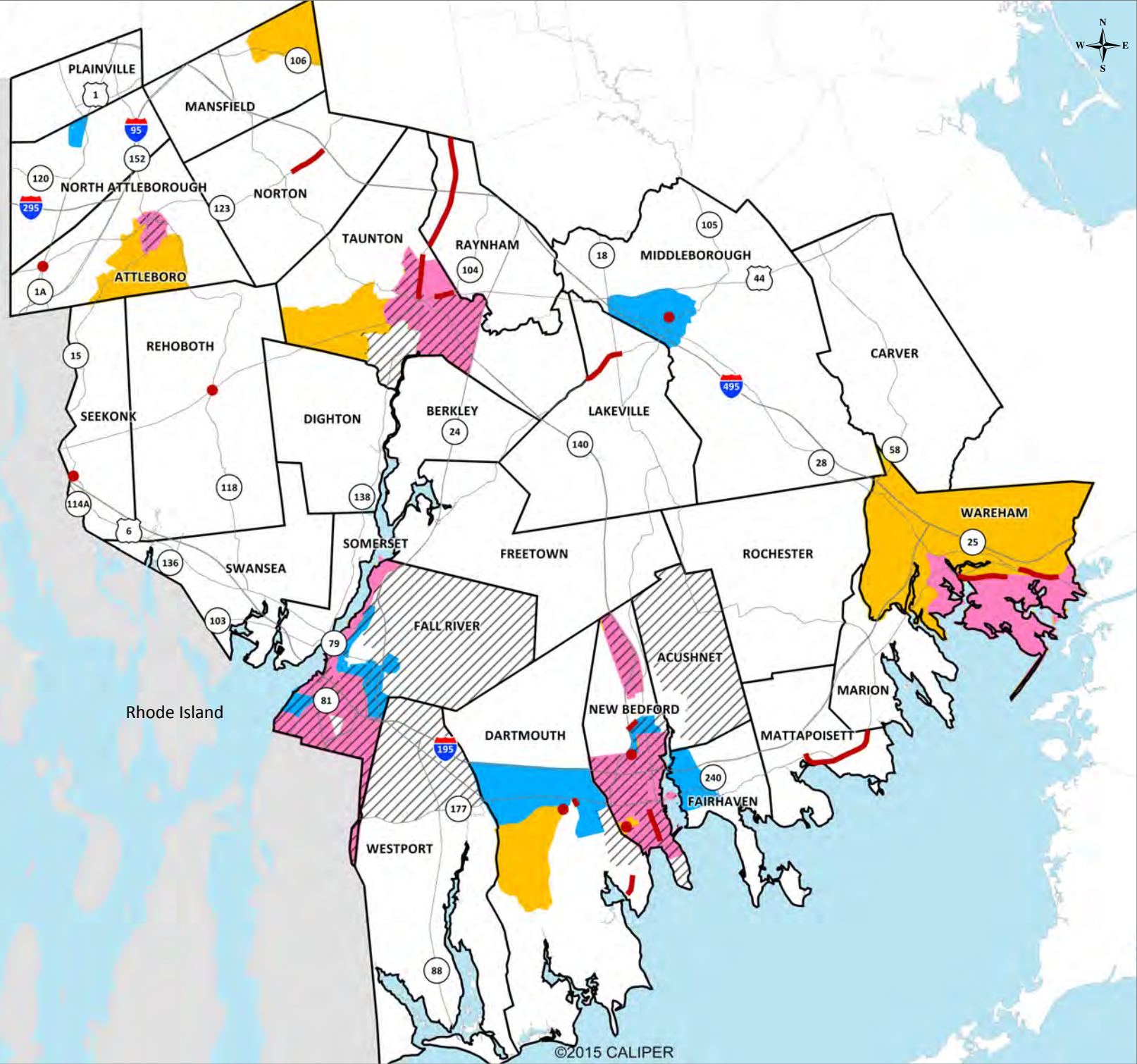
Number of Projects

- No Projects
- 1
- 2
- 3
- 4

Data Sources:
SRPEDD, MassGIS, MassDOT



2018-2022 Project Locations and Title VI / Environmental Justice



Title VI / EJ Criteria

- Low Income
- Minority
- Low Income & Minority
- Limited English Proficiency
- TIP Project
- TIP Project

SRPEDD Definitions:

Low Income:
Census tracts that are greater than SRPEDD's low income regional average of 12.13%

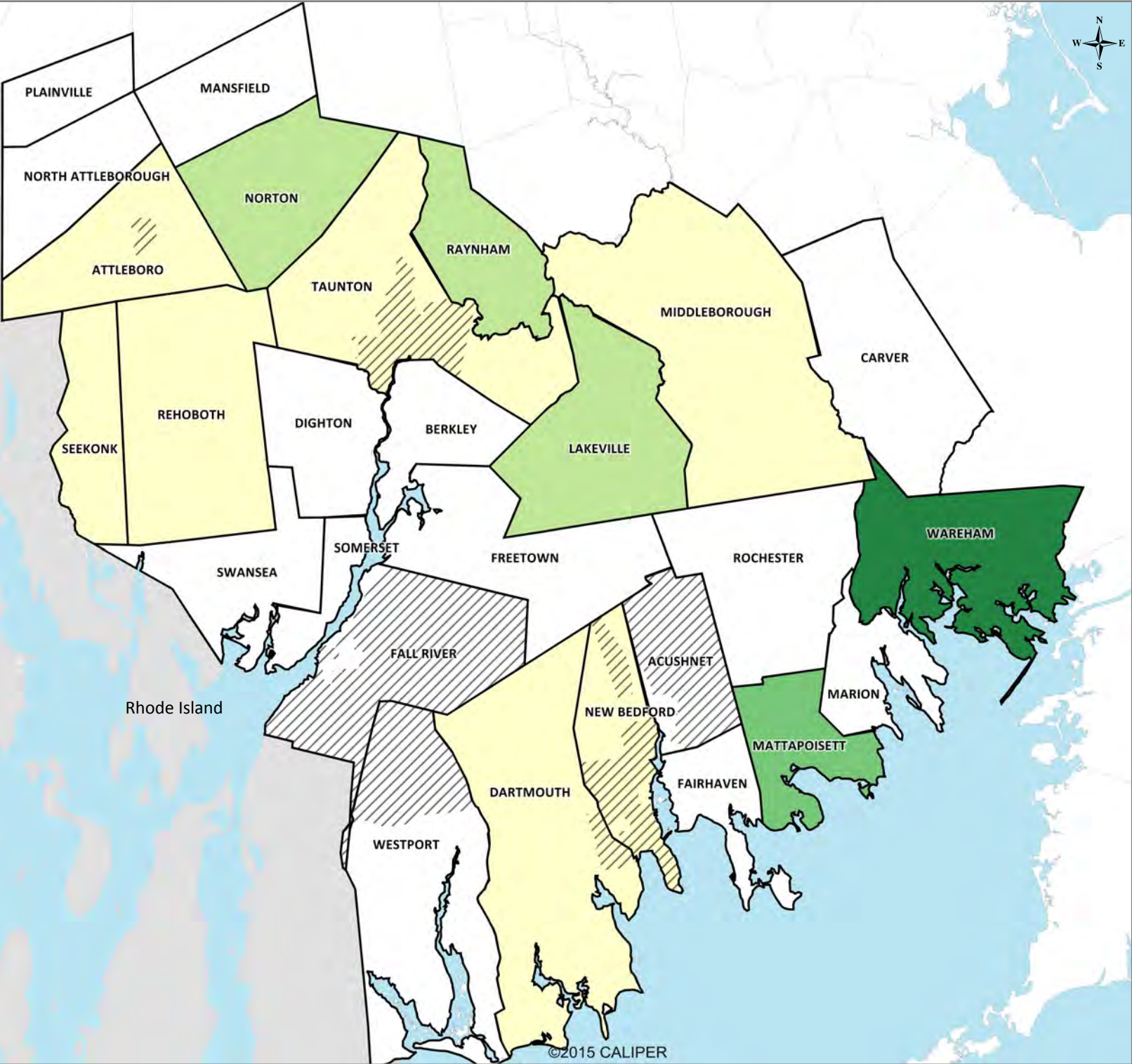
Minority:
Census tracts that are greater than SRPEDD's minority regional average of 10.98%.

Limited English Proficiency:
Census tracts that are greater than SRPEDD's LEP regional average of 7.40%

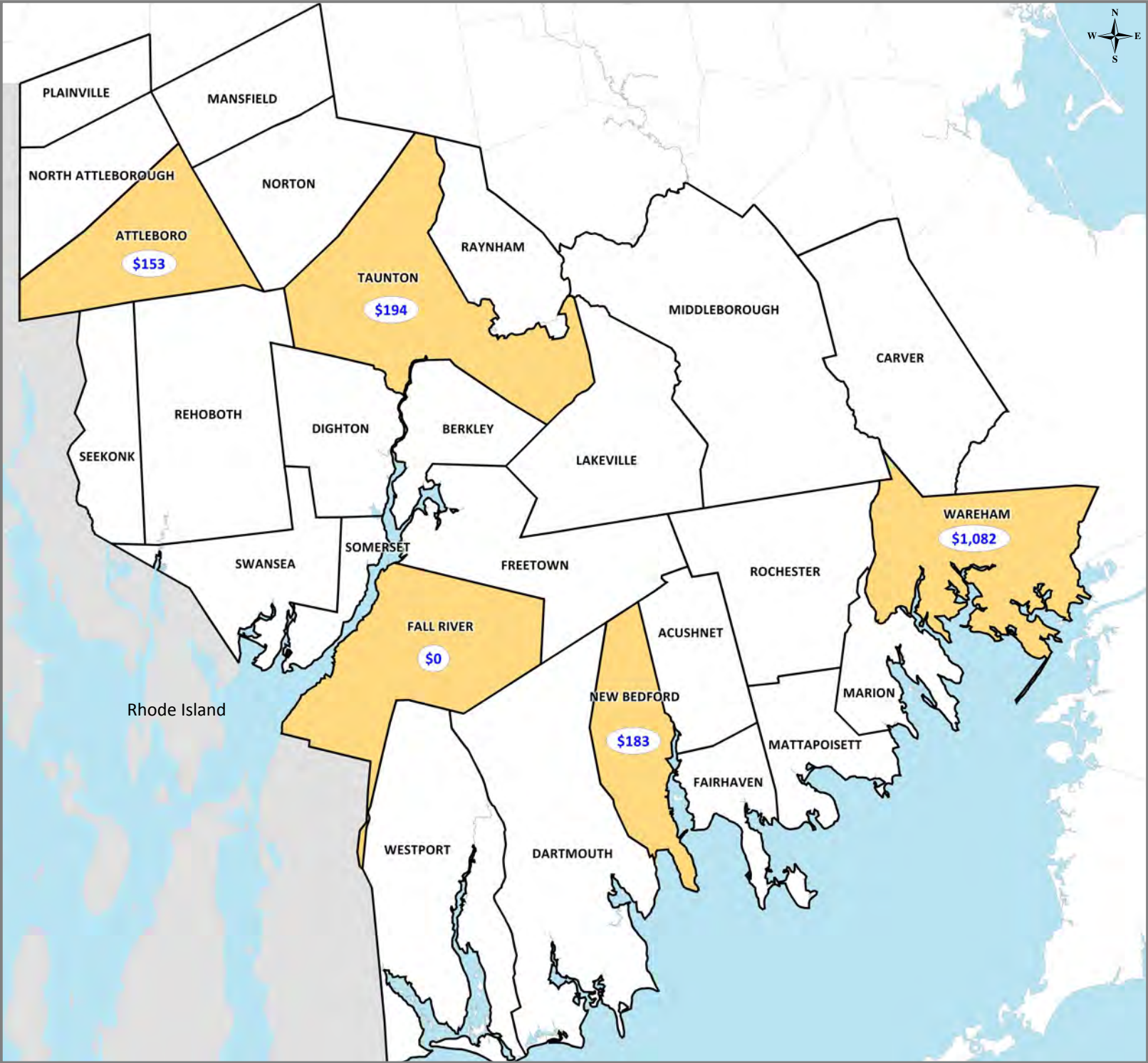
Data Sources:
SRPEDD, MassGIS, MassDOT, 2010 Census, ACS 2010-2014.



2018-2022 Project Expenditures and Limited English Proficiency (LEP)



2018-2022 Project Expenditures Per Capita in Minority Municipalities



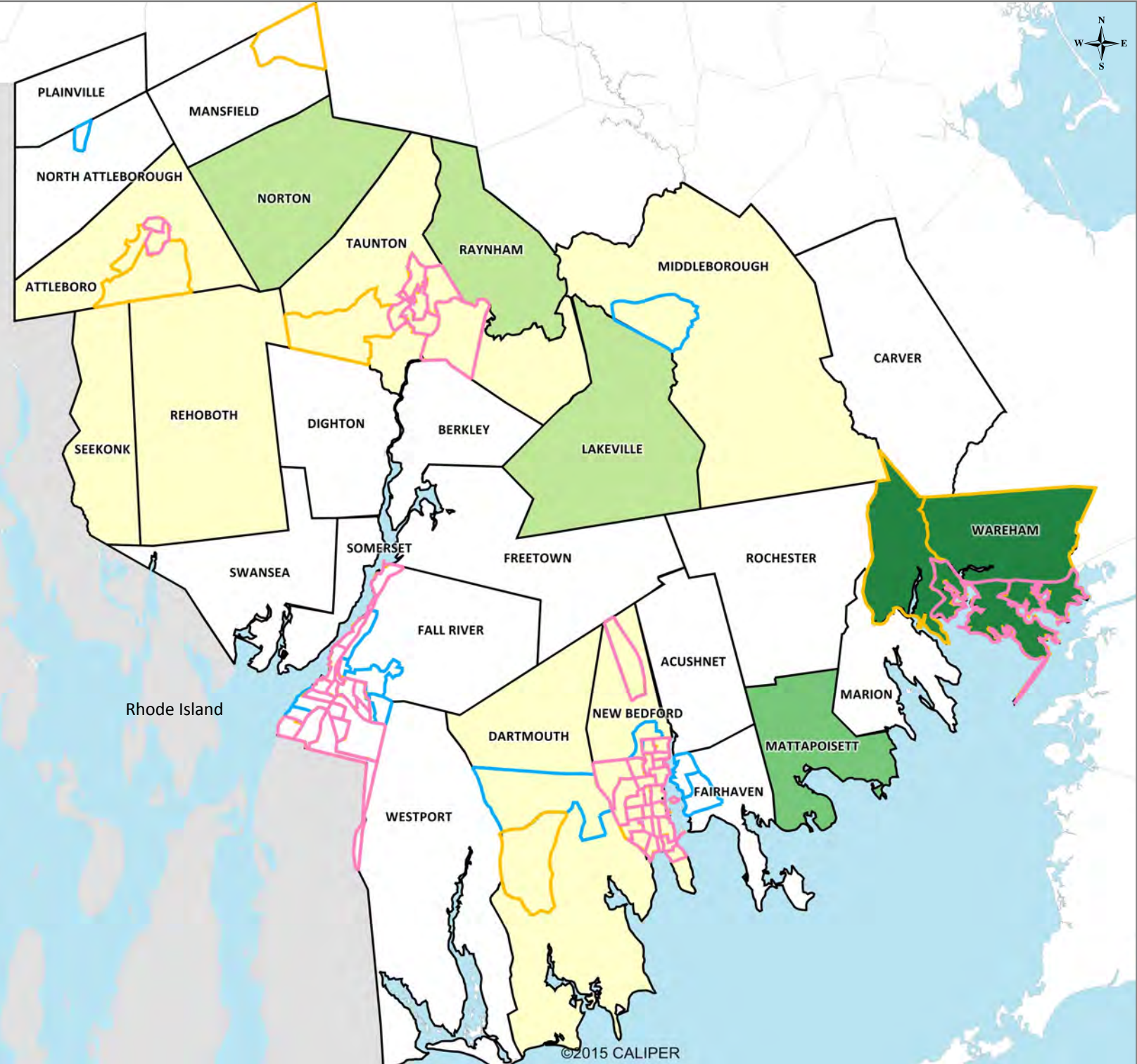
SRPEDD Definition:

Minority Municipality: Municipality whose total minority population is greater than SRPEDD’s minority regional average of 10.98%.

Data Sources:
SRPEDD, MassGIS, MassDOT, 2010 Census,



2018-2022 Project Expenditures and Title VI / Environmental Justice



Title VI / EJ Criteria

- Low Income
- Minority
- Low Income & Minority

Project Spending Per Capita

- No Projects
- < \$300
- \$301 — \$600
- \$601 — \$900
- > \$900

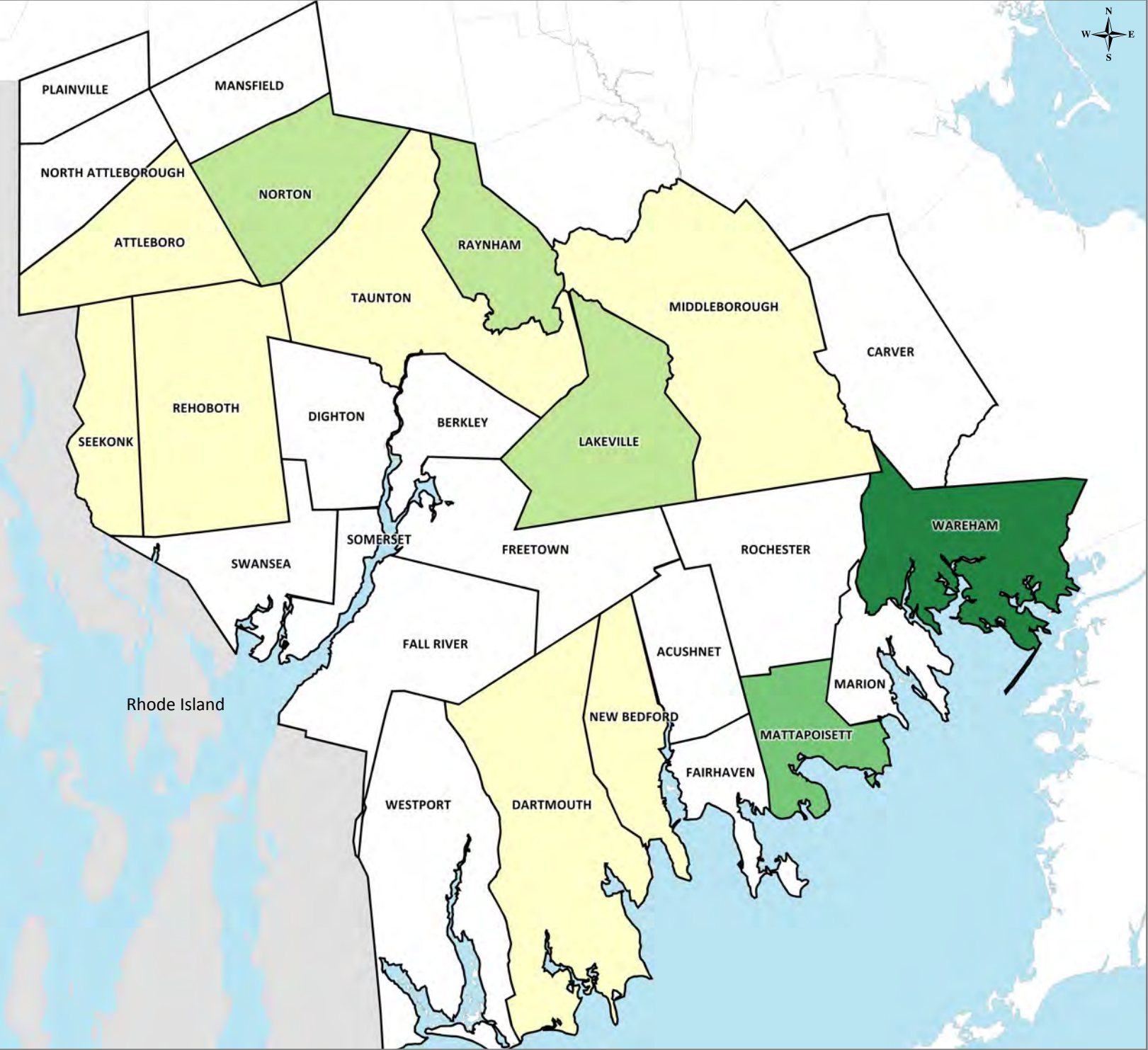
SRPEDD Definitions:

- Low Income:**
Census tracts that are greater than SRPEDD’s low income regional average of 12.13%
- Minority:**
Census tracts that are greater than SRPEDD’s minority regional average of 10.98%.

Data Sources:
SRPEDD, MassGIS, MassDOT, 2010 Census, ACS 2010-2014.



2018-2022 Project Expenditures



Project Spending Per Capita

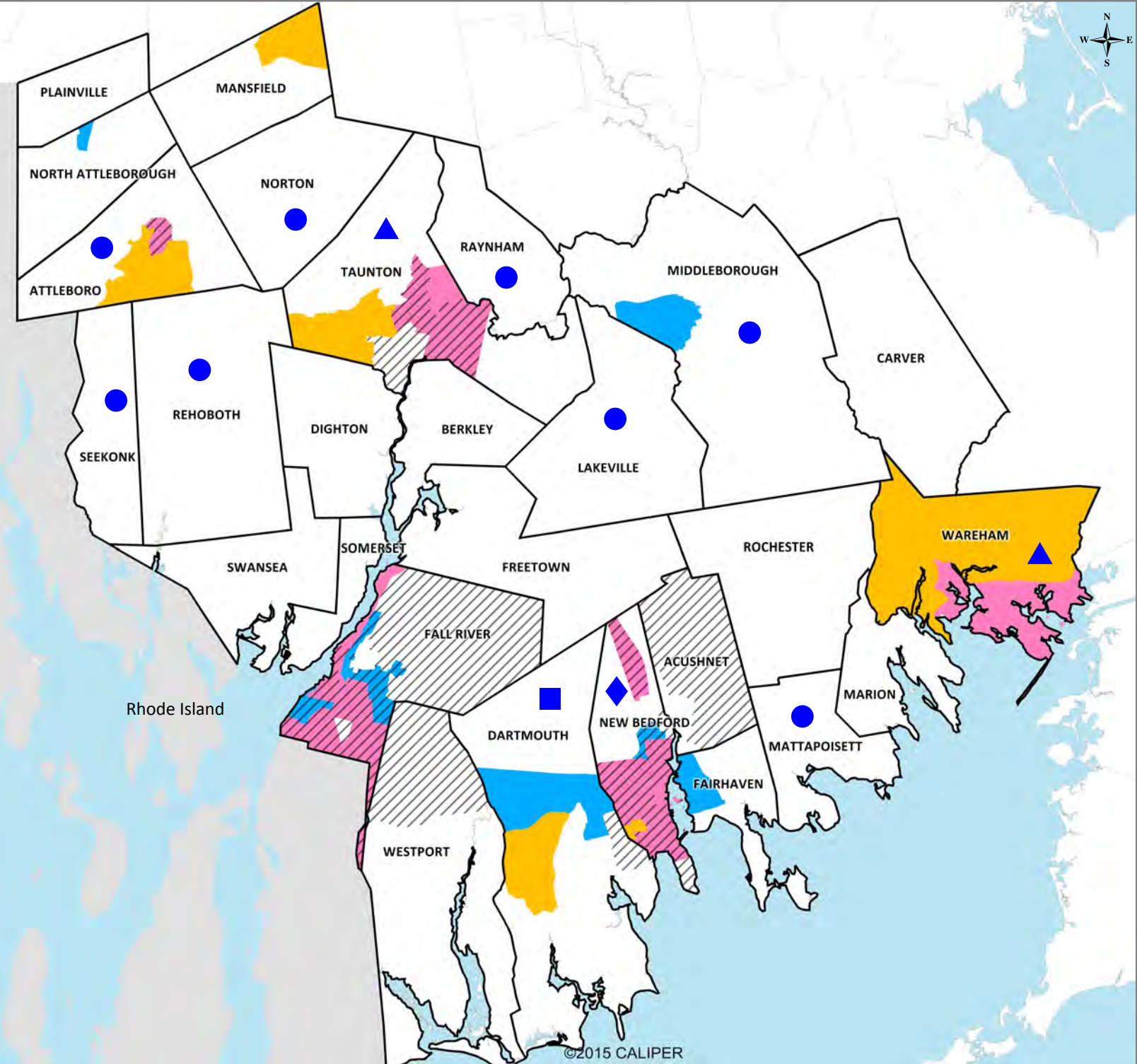
- No Projects
- < \$300
- \$301 — \$600
- \$601 — \$900
- > \$900

Data Sources:
SRPEDD, MassGIS, MassDOT

Municipality	Per Capita
Middleborough	\$45
Seekonk	\$112
Attleboro	\$153
New Bedford	\$183
Taunton	\$194
Rehoboth	\$210
Dartmouth	\$280
Norton	\$379
Raynham	\$402
Lakeville	\$427
Mattapoisett	\$695
Wareham	\$1,082



Number of 2018-2022 Projects and Title VI / Environmental Justice



Title VI / EJ Criteria

- Low Income
- Minority
- Low Income & Minority
- Limited English Proficiency

Number of Projects

- 1
- 2
- 3
- 4

SRPEDD Definitions:

- Low Income:**
Census tracts that are greater than SRPEDD's low income regional average of 12.13%
- Minority:**
Census tracts that are greater than SRPEDD's minority regional average of 10.98%.
- Limited English Proficiency:**
Census tracts that are greater than SRPEDD's LEP regional average of 7.40%

Data Sources:
SRPEDD, MassGIS, MassDOT, 2010 Census, ACS 2010-2014.



Appendix C

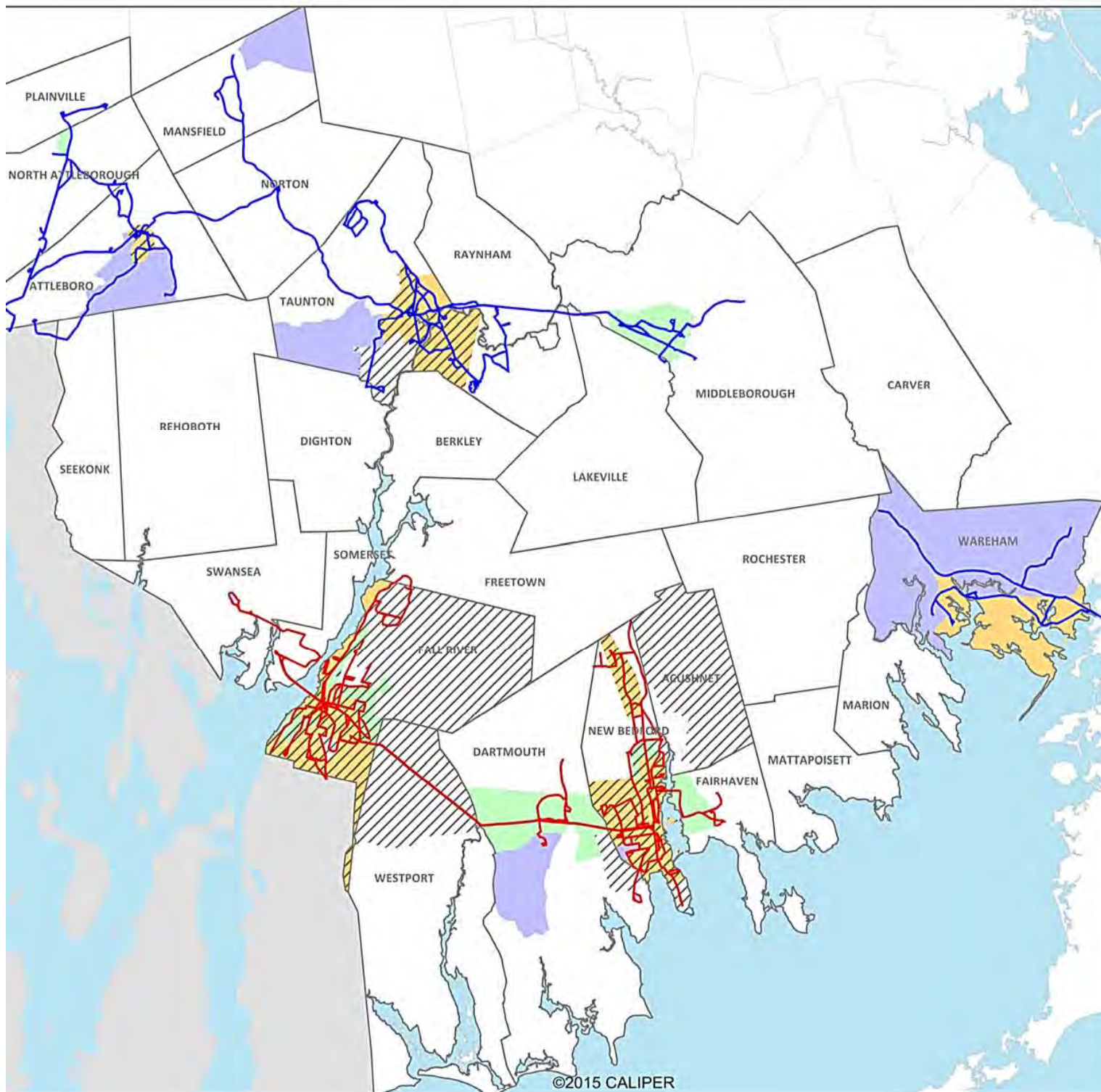
Transportation Evaluation Criteria
Worksheet

Community :
Project Description:

COMMUNITY IMPACT & SUPPORT (15 Points Total)	Explanation / Additional Comments	Point Range	POINTS
Has the project been identified as a need in the Regional Transportation Plan or is it part of a planning or engineering study?		0 to +3	
Has there been adequate public outreach performed?		-3 to +3	
If the project falls within or near an Environmental Justice area, has the proponent made adequate efforts to reach the affected populations?		-3 to +3	
Does the project negatively affect or benefit an Environmental Justice area?		-6 to +6	
Total COMMUNITY IMPACT & SUPPORT Points			0
MAINTENANCE & INFRASTRUCTURE (12 Points Total)	Explanation / Additional Comments	Point Range	POINTS
Does the project improve substandard pavement conditions?		-3 to +3	
Has the project been identified as a need through a Pavement Management program?		-3 to +3	
Does the project improve traffic control devices?		-3 to +3	
Does the project address drainage issues?		-3 to +3	
Total MAINTENANCE & INFRASTRUCTURE Points			0
SAFETY & SECURITY (21 Points Total)	Explanation / Additional Comments	Point Range	POINTS
Is the project identified on High Crash Listings from SRPEDD or MassDOT?		-6 to +6	
Does the design address the primary safety concerns identified through safety analysis?		-6 to +6	
Does the project affect bicycle and pedestrian safety?		-3 to +3	
Does the project improve an emergency evacuation route or access to emergency facilities?		-3 to +3	
Does the project improve freight related safety issues?		-3 to +3	
Total SAFETY & SECURITY Points			0
MOBILITY/CONGESTION (18 Points Total)	Explanation / Additional Comments	Point Range	POINTS
Does the project address an existing or projected congestion problem (Bottlenecks)?		-6 to +6	
Does the project improve mobility, connectivity or access for multi modes of travel?		-6 to +6	
Is the project on an existing freight route AND does it address issues identified by a State or SMMPO documented Freight Plans?		-3 to +3	
Does the project improve reliability for Transit/Emergency Vehicles and/or includes pre-emptive technologies (ITS)?		-3 to +3	
Total MOBILITY/CONGESTION Points			0
LIVABILITY / SUSTAINABLE DEVELOPMENT EFFECTS (12 Points Total)	Explanation / Additional Comments	Point Range	POINTS
Does the project meet all of the Complete Streets criteria and reduce auto dependency?		-3 to +3	
Does the project improve residential effects or Quality of Life?		-3 to +3	
Does the project provide or improve multimodal access to/ from/within Economic Target Areas, Economic Opportunity Areas, Priority Development Areas, 43D sites, Transit Oriented Developments (TOD's) or Environmental Justice areas?		-3 to +3	
Does the project have a negative or positive impact on or access to Historical / Cultural Resources?		-3 to +3	
Total LIVABILITY / SUSTAINABLE DEVELOPMENT EFFECTS Points			0
ENVIRONMENTAL & CLIMATE CHANGE (9 Points Total)	Explanation / Additional Comments	Point Range	POINTS
Does the project have a negative or positive impact on Air Quality?		-3 to +3	
Does the project have a negative or positive impact on Water Quality?		-2 to +2	
Does the project have a negative or positive impact on Habitat / Wildlife?		-2 to +2	
Does the project have a negative or positive impact on an identified flooding and/or sea level rise area?		2 to +2	
Total ENVIRONMENTAL & CLIMATE CHANGE Points			0
Total Project Possible Score 87 Points - Total PROJECT SCORE			0

Appendix D

Map of Transit Routes over Low-Income, Minority & LEP Tracts



Minority and/or Low Income Status

- Low Income
- Minority
- Low Income & Minority
- Limited English Proficiency

Transit Bus Routes

- Greater Attleboro Taunton Regional Transit Authority
- Southeastern Regional Transit Authority

SRPEDD Boundary

SRPEDD Definitions:

Low Income:

Census tracts that are greater than SRPEDD's low income regional average of 12.13%

Minority:

Census tracts that are greater than SRPEDD's minority regional average of 10.98%.

Limited English Proficiency:

Census tracts that are greater than SRPEDD's LEP regional average

Data Sources:

SRPEDD, MassGIS, MassDOT, 2010 Census, ACS 2010-2014.

Appendix E

Transit TIP Projects

Transit TIP Projects

These system wide projects remain consistent across the years, so are not listed by year but rather by project name.

Greater Attleboro Taunton Regional Transit (GATRA)

Acquire – Misc Support Equipment

This is a system wide project with no geographic specificity. The vehicles are used by operations staff in support of fixed route and demand response transit services.

Non-Fixed Route ADA Paratransit Service

These funds are used to support the operation of GATRA Dial-a-Ride service. Service is available in every community served by GATRA and is provisioned in accordance with the Americans with Disabilities Act.

Operating Assistance

These funds are used to support system wide fixed route transit operations.

Preventative Maintenance

These funds are used to maintain fixed route and demand response vehicles used in regular service.

Short Range Transit Planning

These funds are used to support service planning efforts provided to GATRA by SRPEDD. Planning efforts include: evaluating system performance, identifying under-served transit corridors and providing recommendations for service, conducting service change equity analysis, and public outreach and engagement.

Bus and Van Replacement

According to the GATRA Title VI Program Vehicle Assignment Policy dated April 7, 2015 “vehicle assignment is based on several factors including usage, vehicle type, road characteristics (street width, congestion, on-street parking, pavement condition) length of run, length of service day, and distance from a maintenance facility. Newer vehicles may be assigned to drivers with longer shifts and those who work later hours when there is less ability to replace a vehicle experiencing a mechanical problem. Full size buses used in Taunton and Attleboro; minibuses and smaller buses are used in other communities. GATRA’s vehicle replacement schedule is incorporated in the regional Transportation Improvement Program.”

Southeastern Regional Transit Authority (SRTA)

Up to 50% Federal Share

These funds are used to support system wide fixed route transit operations.

ADA Operating Projects

These funds are used to support system wide demand response transit operations.

Preventative Maintenance

These funds are used to maintain fixed route and demand response vehicles used in regular service.

Short Range Transit Planning

These funds are used to support service planning efforts provided to SRTA by SRPEDD. Planning efforts include: evaluating system performance, identifying under-served transit corridors and providing recommendations for service, conducting service change equity analysis, and public outreach and engagement.

Bus and Van Replacement

According to Section 13.1 Vehicle Assignment Policy of the SRTA Title VI Program dated March 16, 2016 “It is SRTA’s policy to equitably assign vehicles to its routes. SRTA does not discriminate on assigning its vehicles to routes. Vehicles are randomly assigned. At this time, all of SRTA’s vehicles have basically the same amenities including technologies and as such, the variations in vehicles are age and size. SRTA assigns vehicles to each route based on peak capacity requirements and vehicles are randomly assigned based on where they are parked after servicing.”

Acquire Support Vehicles

This is a system wide project with no geographic specificity. The vehicles are used by operations staff in support of fixed route and demand response transit services.

Lease Associated CAP Maintenance

This project is to purchase equipment necessary for the operation of fixed route transit and demand response transit services.

Purchase Vehicle Locator System/ ENG/Design ITS

This project will develop and deploy a vehicle locator system that will be available for use through a public facing website and mobile application. Vehicle estimated arrival time, and vehicle location will be available to customers freely.

Rehab Terminal HVAC

This project will make necessary repairs to the New Bedford SRTA Terminal HVAC system.

Appendix F

MassDOT Guidance for FFY 2017 Title VI Reporting Submittal



Charlie Baker, Governor
Karyn Polito, Lt. Governor
Stephanie Pollack, MassDOT Secretary & CEO



March 20, 2017

Mr. Jeffrey Walker Executive Director
Southeastern Regional Planning and Economic Development District
88 Broadway
Taunton, MA 02780

Dear Mr. Walker:

For several reporting cycles, MassDOT has followed FHWA's approach to Title VI reporting for subrecipients, namely a triennial cycle for comprehensive program submissions. For FFY2017, FHWA reinterpreted Title VI regulations and eliminated the triennial program development reporting approach in favor of a more streamlined annual update submission. The report elements detailed below, in Section I, mirror this new approach. FTA's annual reporting remains unchanged from previous cycles and the tasks in Section II reach those transit-specific requirements.

As Highway and Transit Title VI requirements have not changed, much of this new reporting paradigm is consistent with past practice. MassDOT encourages regional innovation in Title VI activities and as such, Section III below should be used to develop goals and strategies to focus on specific components of Title VI work that will strengthen the MPO's engagement with stakeholders, response to local communities, and improvement of organizational effectiveness. You are encouraged to use this section to set the goals and priorities that make the most sense for your organizational and regional needs.

MassDOT Title VI staff will conduct site visits to each MPO in May and June 2017. These meetings will provide an opportunity to discuss this work plan in more detail and MassDOT staff will share log in credentials for the "Engage" outreach tool and provide any necessary technical assistance for staff to begin using the platform.

Looking ahead, MassDOT's Office of Transportation Planning and Office of Diversity and Civil Rights are developing improved Title VI GIS data layers, including age, sex, disability, and race/ethnicity, aiming to advance equity analyses from project distribution to a more nuanced understanding of the impacts of transportation related activities on individuals and communities. These GIS layers will be shared with MPOs when complete. These layers will not be available for the 2018-2022 TIP development cycle, but will be useful for future TIPs, UPWPs, and your upcoming Regional Transportation Plan.

MPO Title VI Reports for FFY2017 are due by September 30, 2017. Please see the following pages for guidance.

I. FHWA-Specific Reporting Requirements

a. Internal Compliance Assessment

- i. Notice: Document the dissemination of the Notice to Beneficiaries. This can include a narrative and photographs documenting electronic (website, email blast, email footer, radio and television media, etc.) and hardcopy (posting in public offices, posting at public meetings, brochures, etc.) notices.
- ii. Language Access: Please identify the financial cost and resources that were expended in the past year to provide language and/or disability related accommodations (translation services, interpreters, alternate document format production, etc.). Resources include staff time, direct expenses, etc.
- iii. Equity Analyses: Reflect on the quality and accuracy of the equity analyses performed on the FFY2017 UPWP and FFY2017-2021 TIP to determine if regional needs are effectively captured or if there are areas for improvement.
 1. Are there regional/community equity concerns that you know of that are not effectively reflected in the current analytical approach?
 - Ex: particular demographic clusters not present in the data; contextual or anecdotal information about community needs that are not easily identified through demographic data.
 2. Can you suggest equity analysis methodology improvements to capture or document those equity considerations more effectively?
- iv. Equity Impacts on MPO Activities: Have equity considerations impacted a project score, work task, or programming decision in your region in the FFY2017-2021 and FFY2018-2022 TIPs and UPWPs?
 1. Based on these observations, are there recommendations for improvement as to how equity and context specific considerations are incorporated into these decisions?
 2. How are community needs and priorities incorporated into or reflected within these decisions?

b. External Compliance Assessment

- i. Public Engagement: Has the MPO's participation with partner organizations (such as involvement with a local task force or community event) better connected Title VI and equity principles with the MPO's transportation related activities? Have community relations led to new and/or diversified constituent involvement?
 1. What factors do you think led to the success of these engagements and relationships? What factors do you see as contributing to barriers to success? How does the MPO plan to continue building upon established successes and encountered challenges?
- ii. Public Engagement: What efforts did the MPO engage in to meet and forge relationships with constituencies that previously were not effectively being reached? Were planning materials presented in forums besides MPO, Joint Transportation Committee, or public hearing type meetings?

- c. Internal and External Title VI Capacity Building
 - i. Training: Did staff or leadership participate in any Title VI and/or equity related trainings?
- d. Addressing Allegations of Discrimination
 - i. Complaints: MassDOT has updated and translated a discrimination complaint form. The form is approved by FHWA and FTA is available for MPO use (download from SharePoint at <https://services.eot.state.ma.us/cr>). Please review these materials and document their incorporation into MPO protocols. Document the dissemination of the complaint forms. If the MPO chooses to continue using a different complaint form, please provide an updated copy for MassDOT review and approval.
 - ii. Identification of Responsible Staff: Check for consistency in identification of Title VI Coordinator and/or Specialist across relevant documents and communication materials.
- e. Special Emphasis Area
 - i. Public Engagement: Following MassDOT Title VI staff onsite visit in May/June 2017, transition outreach databases to Engage Tool database.

II. FTA-Specific Reporting Requirements

- a. Funding Distribution Analysis: Please provide a map(s) depicting the locations of transit related investments (both federal and state dollars) in the current TIP. The base layer(s) should show percent minority and percent low-income, by Census tract.
 - i. Please include a description of the methodology used to determine the geographic location of transit investments. For instance, how is the MPO representing service-area wide transit investments? What about investments that are not conducive to mapping?

III. MPO Determined Focus Areas

- a. What goals does the MPO have for FFY2018 to increase capacity and effectiveness in Title VI work?
- b. Are there outstanding questions or challenges the MPO faces regarding Title VI?
- c. Anything else you want to share?

If you have any questions or comments on this guidance please contact Nikki Tishler at Nicole.Tishler@state.ma.us.

Sincerely,



David J. Mohler
Executive Director,
Office of Transportation Planning