



MONTACHUSETT METROPOLITAN PLANNING ORGANIZATION

2017 Title VI Report

September 2017

Contract No. 88872

Prepared in cooperation with the Massachusetts Department of Transportation and the U.S. Department of Transportation. The views and opinions of the Montachusett Regional Planning Commission expressed herein do not necessarily state or reflect those of the Massachusetts Department of Transportation or the U.S. Department of Transportation.

The Montachusett MPO and the MRPC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Montachusett MPO operates without regard to race, color, national origin, English Proficiency, ancestry, creed, income, gender, age and/or disability. Any person who believes him/herself or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the MRPC or the MMPO. Complaints are to be filed no later than 180 days from the date of the alleged discrimination. Please contact Glenn Eaton at 978-345-7376 ext. 310 for more information.

MONTACHUSETT METROPOLITAN PLANNING ORGANIZATION SIGNATORIES

Massachusetts Department of Transportation (MassDOT) Secretary	Stephanie Pollack
MassDOT Highway Division Acting Administrator	Jonathan Gulliver
Montachusett Regional Planning Commission (MRPC) Chairman	John A. Telepciak
Montachusett Regional Transit Authority (MART) Chairman	Mayor Mark Hawke
Mayor City of Leominster	Mayor Dean Mazzarella
Mayor City of Fitchburg	Mayor Stephen DiNatale
Winchendon Board of Selectmen <i>Subregion 1</i>	Barbara Anderson
Ashburnham Board of Selectmen <i>Subregion 2</i>	Kyle Johnson
Lunenburg Board of Selectmen <i>Subregion 3</i>	Paula Bertram
Lancaster Board of Selectmen <i>Subregion 4</i>	Stanley B. Starr, Jr.

MPO SUB-SIGNATORY COMMITTEE MEMBERS

David Mohler, Director OTP, MassDOT, for Secretary Stephanie Pollack
Arthur Frost, Project Development Engineer for Acting Administrator Jonathan Gulliver
Glenn Eaton, Executive Director, MRPC, for Chairman John Telepciak
Mohammed H. Khan, Administrator, MART, for Chairman Mayor Mark Hawke

EXOFFICIO MEMBERS

Jeffrey H. McEwen, Administrator	Federal Highway Administration
Mary Beth Mello, Administrator	Federal Transit Administration

MONTACHUSETT REGIONAL PLANNING COMMISSION (MRPC) OFFICERS

John A. Telepciak, Chairman	Phillipston
Guy Corbosiero, Vice Chairman	Winchendon
Michael Pineo, Secretary	Sterling
Alan Pease, Treasurer	Ashby
Roger Hoyt, Asst. Treasurer	Ashburnham

MONTACHUSETT JOINT TRANSPORTATION COMMITTEE (MJTC) OFFICERS

Jon Wyman, Chairman	Westminster
Noreen Piazza, Vice Chairman	Lancaster
Doug Walsh, Secretary	Athol

MONTACHUSETT REGIONAL PLANNING COMMISSION STAFF

Glenn Eaton, Executive Director
Linda Parmenter, Administrative/Human Resources Director
Bobbi Jo Johnson, Fiscal Director
Brad Harris, Transportation Director
George Snow, Principal Transportation Planner
Sheri Bean, Principal Planner
Brian Doherty, Transportation Planner
George Kahale, Transit Director
John Hume, Planning and Development Director
Karen Chapman, Principal Planner
Noam Goldstein, Regional Planner
Brian Keating, Community Development Manager
Jason Stanton, GIS/IT Director
Kayla Kress, GIS Technician
Holly Ford, Administrative Assistant

MONTACHUSETT JOINT TRANSPORTATION COMMITTEE

<u>COMMUNITY</u>	<u>APPOINTED BY SELECTMEN/MAYOR</u>	<u>APPOINTED BY PLANNING BOARD</u>
Ashburnham	Jessica Caouette	Joseph McPeak
Ashby		Alan Pease
Athol	Doug Walsh	Doug Walsh
Ayer	Pauline Hamel	
Clinton	Phil Duffy	
Fitchburg		Paula Caron
Gardner	Treavor Beauregard	
Groton		Russell Burke
Harvard		Erin McBee
Hubbardston		
Lancaster		Noreen Piazza
Leominster	David DiGiovanni	
Lunenburg	Michael-Ray Jeffreys	Kenneth Chenis
Petersham	Nancy Allen	
Phillipston	Gordon Robertson	
Royalston	Roland Hamel	
Shirley		Robert Thurston
Sterling	John Kilcoyne	Michael Pineo
Templeton		Charles Carroll II
Townsend	Ed Kukkula	
Westminster		Jon Wyman
Winchendon	Al Gallant	Tracy Murphy

EXOFFICIO MEMBERS

Nicole Tishler	Office of Transportation Planning (OTP) and Massachusetts Department of Transportation (MassDOT)
Jeffrey H. McEwen	Federal Highway Administration (FHWA), Administrator
Mary Beth Mello	Federal Transit Administration (FTA), Administrator
	Department of Environmental Protection (DEP)
Jeffery Hoynoski	MassDOT Highway Division - District 2
Arthur Frost	MassDOT Highway Division - District 3
	Montachusett Regional Planning Commission (MRPC)
Mohammed Khan	Montachusett Regional Transit Authority (MART)

ORGANIZATION MEMBERS

Al Futterman	Nashua River Watershed Association (NRWA)
Tony Salerno	Amalgamated Transit Union #690 (ATU 690)
Kit Walker	Fitchburg Airport Commission
	North Central MA Chamber of Commerce
	Fitchburg Council on Aging
Thatcher W. Kezer III	Mass Development
Peter Lowitt	Devens Enterprise Commission (DEC)
Patricia Pistone	Montachusett Opportunity Council, Inc.
Robert Benoit	The ARC of Opportunity

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Introduction

The following report is presented as the *FFY 2017 Title VI Annual Report* for the Montachusett Metropolitan Planning Organization (MPO). It has been prepared by the Montachusett Regional Planning Commission (MRPC) which acts as staff to the MPO.

In March of 2017, the MRPC received a guidance letter from the Massachusetts Department of Transportation (MassDOT) Office of Transportation Planning (OTP) that outlined current Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) interpretations related to Title VI regulations and reporting criteria. As such, this guidance letter detailed a work plan for the MPO to follow in order to address FHWA (*Section I. FHWA-Specific Reporting Requirements*) and FTA (*Section II. FTA-Specific Reporting Requirements*) requirements. A copy of the MassDOT Guidance letter to the MRPC is provided in Appendix 1 of this report. The sections of this report therefore follow the numbering nomenclature of the MassDOT Guidance Letter in order to address all segments of the work plan for the Montachusett MPO.

I. FHWA-Specific Reporting Requirements

a. Internal Compliance Assessment

i. Notice:

The following appears on MJTC and MPO agendas that are emailed and posted to the MRPC website:

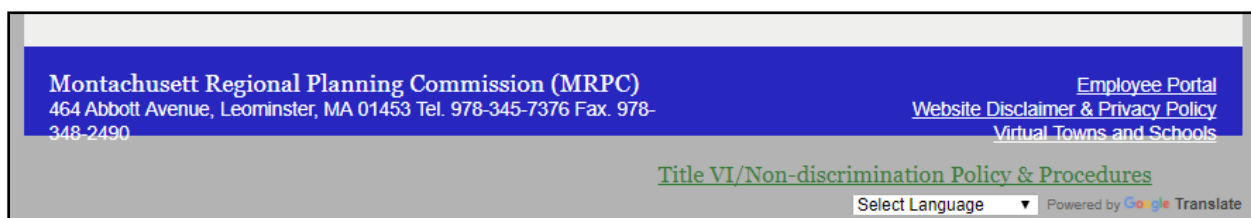
The Montachusett Metropolitan Planning Organization (MPO) and the MRPC fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Montachusett MPO operates without regard to race, color, national origin, English Proficiency, ancestry, creed, income, gender, age and/or disability. Any person who believes him/herself or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the MRPC or the MMPO. Complaints are to be filed no later than 180 days from the date of the alleged discrimination. Please contact Glenn Eaton at 978-345-7376 ext. 310 for more information.

This location is accessible to people with disabilities. MRPC provides reasonable accommodations and/or language assistance free of charge upon request (including but not limited to interpreters in American Sign Language and languages other than English, open or closed captioning for videos, assistive listening devices and alternate material formats, such as audio tapes, Braille and large print), as available. For accommodation or language assistance, please contact MRPC by phone (978-345-7376), fax (978-348-2490) or by email bharris@mrpc.org. Requests should be made as soon as possible prior to the meeting, and for more difficult to arrange services including sign-language, CART or language translation or interpretation, requests should be made at least ten business days before the meeting. Anyone in need of translation services for any Montachusett MPO or MJTC meeting or document should contact the MRPC directly in advance in order to arrange applicable services. Please contact the MRPC at mrpc@mrpc.org or (978) 345-7376 ext. 300 with questions, concerns or assistance needs regarding accessibility and/or language services.

Cualquier persona en necesidad de servicios de traducción para cualquier reunión o MPO Montachusett documento pueden dirigirse a la MRPC directamente con antelación para organizar los servicios correspondientes.

Please note the MRPC offices are accessible via the Montachusett Regional Transit Authority (MART) fixed route service. For more information, please visit www.mrta.us

The following is from the MRPC website Homepage:



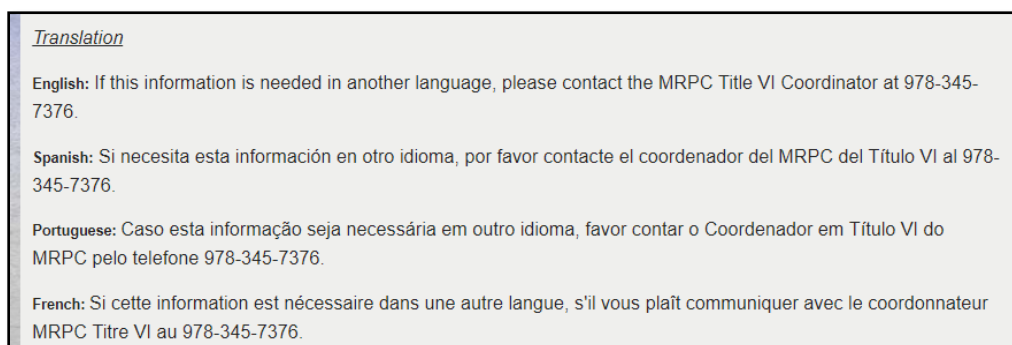
The ***Title VI/Non-discrimination Policy & Procedures*** notice highlighted above appears on each page of the MRPC website. In addition, a link is included under the “About MRPC” main menu item that appears at the top of each webpage within the site.



The following is from the MRPC website page specific to Title VI Policy and Procedures:



The webpage also provides links to copies of the Title VI Notice of Rights & Protections to Beneficiaries, Complaint Procedures and Complaint Forms in English, Spanish, French and Portuguese (as shown below).



Other Information

Title VI Complaint Procedures - **English** (word) (pdf)

Title VI Complaint Form - **English** (word) (pdf)

Title VI Complaint Procedures - **Spanish** (word) (pdf)

Title VI Complaint Form - **Spanish** (word) (pdf)

Title VI Complaint Procedures - **French** (word) (pdf)

Title VI Complaint Form - **French** (word) (pdf)

Title VI Complaint Procedures - **Portuguese** (word) (pdf)

Title VI Complaint Form - **Portuguese** (word) (pdf)

Title VI Notice of Rights & Protection to Beneficiaries - **English** (word) (pdf)

Title VI Notice of Rights & Protection to Beneficiaries - **Spanish** (word) (pdf)

Title VI Notice of Rights & Protection to Beneficiaries - **French** (word) (pdf)

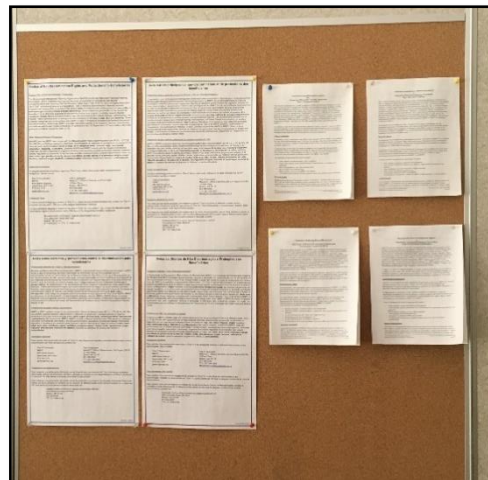
Title VI Notice of Rights & Protection to Beneficiaries - **Portuguese** (word) (pdf)

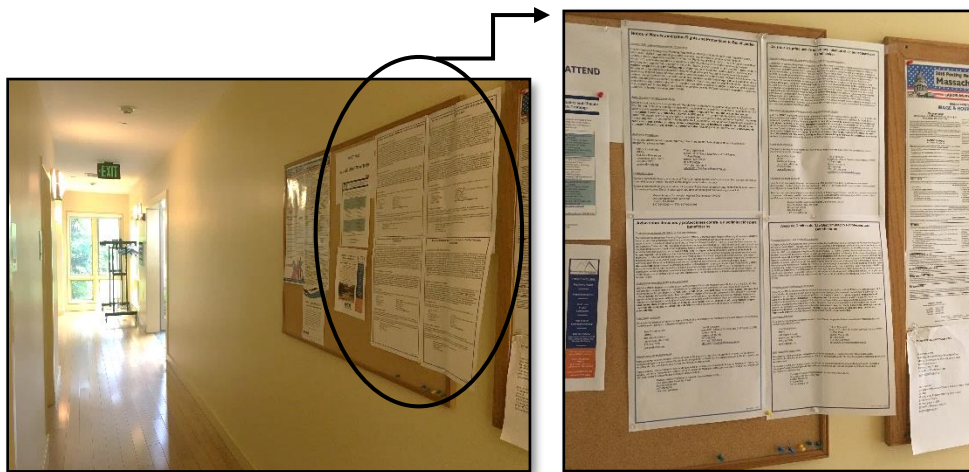
Hardcopies of the Notices to Beneficiaries in the above mentioned four languages are also posted in the regular meeting room for the MJTC and MPO as well as the hallway to the bathrooms of the MRPC offices. See pictures below. Prior to July 2017, these same notices were posted in the Conference Room at the MART Garage & Maintenance Facility at 1427R Water Street, Fitchburg where meetings of the MJTC and MPO were held.

The four languages identified are based upon population analysis conducted for the Montachusett Limited English Proficiency (LEP) Access Plan developed for the MPO in 2013. Translations of the Notice to Beneficiaries, Complaint Form and Procedures in the four identified languages was provided by MassDOT through a state translation contract. Future changes to these documents are expected to be available through MassDOT. If this is not available, the MPO will examine alternate translation services in the Region. Local educational centers, i.e. Fitchburg State University, etc., may be an applicable resource. To date, the MPO has not received any language translation requests.



MRPC Meeting Room





Bathroom Hallway

ii. Language Access:

The MRPC has received no direct requests for language and/or disability accommodations for any documents and/or meetings.

Notices related to the availability of draft documents, i.e. TIP, UPWP, Amendments, etc., are routinely distributed and posted to the website in both English and Spanish. The MRPC utilizes Google Translate for an initial translation and then forwards the document to MART where their bi-lingual staff reviews and corrects the Spanish translation. Discussions with MART indicate that it takes staff approximately 1 hour to review and correct each document. MRPC staff spends approximately 1 hour per document in initial preparation and translation in both English and Spanish before submittal to MART. Upon its translation review and return to the MRPC, staff then spends another hour per document in correcting translation errors, finalizing both versions, producing emails for distribution and posting both versions to the web.

During the 18-month period from January 1, 2016 to June 30, 2017, the MRPC produced seven (7) different announcement documents covering the following twelve (12) MPO action items:

1. FFY 2016-2019 TIP Amendments 1 & 2
2. FFY 2017-2021 TIP
3. FFY 2017-2021 TIP Amendments 1, 2, 3, 4 & 5
4. FFY 2018-2022 TIP
5. FFY 2017 UPWP
6. FFY 2018 UPWP
7. Freight Network Designation Updates

Each document required:

- 1 hour for initial development and translation by MRPC staff
- 1 hour for translation review by MART staff

- 1 hour for final review and correction, email distribution and website posting by MRPC staff

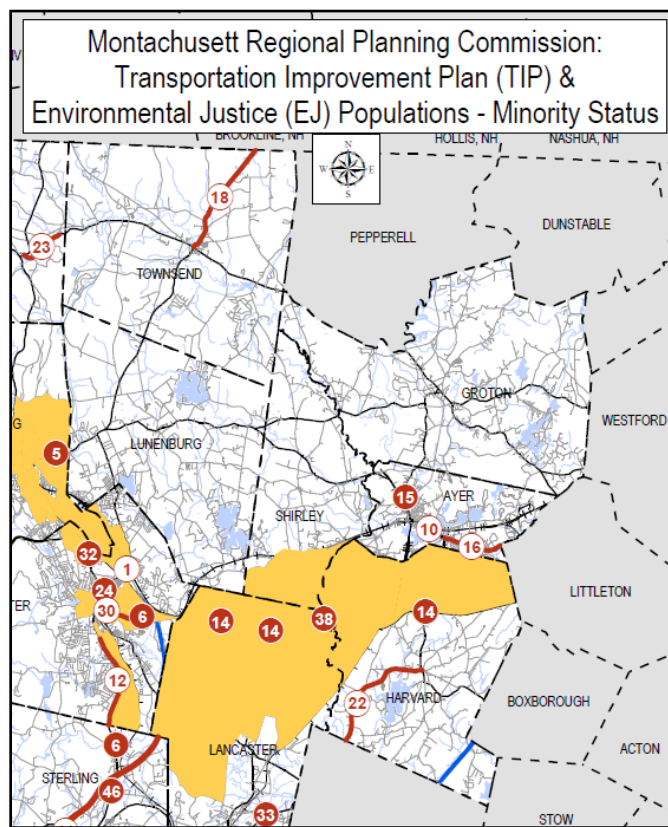
This totaled seven hours of work by MART staff at \$17.31 per hour and 14 hours of work by MRPC staff at \$45.32 per hour. For a total Direct Salary Cost of \$755.65. Utilizing an average overhead rate for the 18-month period for the MRPC of 128.235%, the Total Cost for Translation Expenses is estimated at \$1,724.66 or \$1,725.

\$634.48	MRPC Cost (14 hrs @ \$42.32/hr)
<u>\$121.17</u>	MART Cost (7 hrs @ \$17.31/hr)
\$755.65	Total Direct Cost
\$969.01	Overhead (Based on Avg Overhead Rate of 128.235% over 18 months)
<u>\$1,724.66</u>	TOTAL EXPENSE for TRANSLATION SERVICES (Direct + Overhead)

As stated above, the MPO has received no requests for additional language or disability accommodations for any meeting or document and as such have no measure of the use of current translation efforts by the public.

iii. Equity Analysis

1. When conducting the Equity Analysis required for the TIP and UPWP, the census data used, whether decennial or ACS, is limited within many of the communities of the Montachusett Region. The majority of municipalities have a limited number of Block Groups (BG) or Census Tracts (CT). Fourteen of the 22 MRPC communities have or share only one CT and outside of the cities (i.e. Fitchburg, Gardner and Leominster), the remaining towns have either two or three CT. Subsequently, there is a resulting limited number of BG within the communities. As a result, when the various populations are mapped there can be a somewhat misrepresentation of the distribution and location of these particular groups. As an example, the northern part of the town of Lancaster is identified as meeting the 25% or more minority population under EJ definitions. This carries over into the southern part of Shirley and the northern (north of Route 2) part of Harvard. Refer to illustration below. This can present an appearance of a larger influence area than is actually present and thus possibly encompassing TIP projects that really do not reflect a benefit or burden to the target population. In other words, the limitations of the BG and CT can indicate influences to certain populations that may not actually exist “on the ground.”



Census Tract/Block Group Illustration

With respect to UPWP tasks, the ability to locate areas of influences is difficult to identify in many or most cases. Various tasks that have been conducted are either community or Region wide. As an example, the development of a Regional Trail map involved a review of data from all member municipalities across all BG or CT. Therefore, the equity analysis assumes benefits or burdens to all of the target populations. In cases where a specific roadway, intersection, etc. is the focus of a work task, this equity analysis is easier to conduct.

2. Prior planning efforts conducted by the Comprehensive Planning Department of the MRPC for a smaller defined study area identified other minority populations, in particular the Hmong population in Fitchburg, through local knowledge and feedback. This planning effort was part of a HUD Challenge Grant for a “Wachusett Corridor Smart Growth Plan” conducted in 2014. Although this segment of the population did not reach the level of the EJ thresholds, their identification led to a focused outreach effort that brought their outlooks and concerns into the planning process. This included a focus on green issues in both economic development (promoting green factories) and land use (limited tree cutting in order to maintain the Leominster State Forest and preserve nature for their children).

In order to address what are important demographic clusters that are not reflected in the levels established by the EJ and Title VI definitions, MRPC Transportation efforts should undertake a similar process. Individual communities should be solicited directly and asked to identify any demographic clusters/populations/etc. that are important to the municipality and that are not readily apparent from

traditional population data. This effort should result in an additional dataset of identified target populations, their locations within the Region and an improved equity analysis.

iv. Equity Impacts on MPO Activities

During the development of the FFY 2018-2022 TIP, the MRPC was able to review and revised the Transportation Evaluation Criteria (TEC) for a project in the town of Athol based upon a presentation by the community that presented additional relevant information not readily apparent in the PIF/PNF. The presentation provided information on transit impacts, housing improvements, safety improvements and bike and pedestrian upgrades. All of these would have a direct positive effect on EJ populations in the area and the community. A review of the original TEC scoring resulted in increased scores in Safety, Community Effects and Support and Land use and Economic Development. The TEC questions dealing directly with impacts to EJ populations improved considerably over what could be ascertained from the PNF. Consequently, the project moved to an overall project priority ranking of third in the Region (from approximately 22nd out of 27).

Community Effects and Support	13	Is there any impact or change (positive or negative) to residential areas or neighborhoods related to right-of-way, noise, aesthetics, cut-through traffic, or the development/redevelopment of any housing stock?		4
		Right-of-way	1 (-1 to +1)	
		Noise/aesthetics	1 (-1 to +1)	
		Traffic flow	1 (-1 to +1)	
		Housing stock	1 (-1 to +1)	
	14	Does the project have an effect (positive or negative) on any services to minority, low income or Environmental Justice areas (ex. Transit service, sidewalks, lighting, utilities, etc.)?		3
		Transit services	1 (-1 to +1)	
		Sidewalks/lighting	1 (-1 to +1)	
		Utilities	0 (-1 to +1)	
		Emergency response	1 (-1 to +1)	
	15	Does the project have any other impacts or benefits (positive or negative) to minority, low income or Environmental Justice areas (ex. Job access, development and/or redevelopment of any housing stock, etc.)?		2
		Job access		
		Housing stock	1 (-1 to +1)	
		Safety	1 (-1 to +1)	
		Other		

TEC scoring for Athol project #608723 related to EJ.

These scores were updated and revised after information presented by community.

1. A basic recommendation would be an expansion of the PIF to include more information related to EJ impacts based upon the knowledge of the local community. Currently, when MRPC staff reviews a PIF, or PNF, sufficient information to accurately score a project through the TEC is not available. Basic information related to impacts resulting from the project to the community population as a whole, as well as any possible target populations or clusters, could be provided by the proponents in a paragraph or two.

In addition, the MRPC will seek to expand project presentations by proponents to the MPO and the MJTC as well as any appropriate meeting so designated for that purpose.

2. As mentioned above, the TEC developed by the MPO seeks to incorporate community needs and priorities during the regional project ranking process. A review of the TEC questions that are directly related to community support and equity should be conducted and modified if necessary in order to better reflect and address equity concerns. Any revisions should seek to remove any ambiguities in the questions and result in a clearer scoring determination. Based upon feedback related to the scoring process conducted by other MPOs, the Montachusett MPO will examine its current scoring process in order to establish a more formalize or defined process that could include participation by local communities. This could improve the initial scoring by providing additional data on a proposed project. At a minimum, a similar type process should be undertaken for new projects with no prior TEC scoring review.

b. External Compliance Assessment

i. Public Engagement

Within the last 12 months the MRPC has been involved with the Community Health Network Area 9 (CHNA 9) organization. The Transportation Department is a co-chair to the Transportation and Access group that was developed as a result in the Community Health Improvement Plan (CHIP). This group meets regularly and is involved with community outreach and public input regarding the transportation needs of the region. This partnership has led to increased exposure for the MPO, stronger networking and connections among member communities and additional outreach contacts.

The MRPC, as a whole, is also involved with other areas of CHNA 9 such as the Healthy Eating and Active Living working group and MRPC was just awarded a contract for developing the Community Health Assessment of North Central Massachusetts.

1. The inclusion of the Montachusett MPO into the Community Health Area Network (CHNA) Committee arose out of the Community Health Impact Report (CHIP) developed by CHNA. The MRPC recognized the opportunity for an expansion of our outreach efforts, especially to the EJ populations of elderly, disabled, minority and low income, through participation and cooperation with CHNA. Improving our partnership with this organization has led to an upcoming program year joint work project, i.e. a Regional Transportation Needs Assessment. This survey will be developed in coordination with CHNA and Fitchburg State University (FSU) to identify all transportation needs, gaps and issues throughout the region. This will lead to improved data on the needs of the EJ populations served. Thus, this partnership will likely lead to improve outreach for the survey, better data and greater public outreach.

Possible barriers with this relationship would likely result from the fact that the MPO and CHNA represent different geographical areas with varying areas of interest or emphasis. CHNA is focused on public health issues, while the MPO encompasses areas that likely exceed CHNA's interest. These factors could result in potential data gaps or complications in assessing relevant and key issues for each organization. However, this should not be viewed as an obstacle to continued cooperation and participation.

The MPO's involvement with CHNA has provided us with the opportunity to expand our outreach by putting us in contact with individuals and groups outside of our normal or current levels. This gives us a chance to advocate for greater public involvement and provides us with a chance for better lobbying efforts by giving us access to additional events or meetings. This model of involvement has provided us with greater access to non-traditional groups and should serve as our guide for future efforts. It has also shown that any potential barriers can be addressed to the mutual benefit of all involved and can lead to improved work tasks.

ii. Public Engagement

The MPO has sought to expand its outreach through the monitoring of various meetings and events that are outside of its normal transportation related activities. This has included the CHNA group mentioned previously as well as the Montachusett Regional Trails Coalition and the Freedom Way Heritage Association, where coordination on local trail events and hikes were established. These hikes involved different populations and was a means to continue our efforts in public involvement. As part of this effort, staff has lobbied individuals and groups to attend the MJTC as regular participants and has encouraged their formal membership.

Planning materials have usually been limited to the regular transportation planning meetings attended by the MPO. However, through the development of the Regional Trail Guide, staff was able to present and distribute the Guide at the Moving Together 2016 Conference, at the Johnny Appleseed Visitor Center on Route 2 in Lancaster and at city and town halls throughout the Region. The Trail Guide helped to expand the MPO's exposure. Additionally, materials related to various MPO efforts are regularly made available at the monthly MRPC meetings.

c. Internal and External Title VI Capacity Building

i. Training

During 2016 and 2017, staff did not engage in any Title VI or equity related training activities. Staff did meet with MassDOT staff to discuss Title VI reporting requirements on June 7, 2017. Prior to that, MRPC staff did attend a Title VI Workshop conducted by MassDOT and held in the city of Lawrence, MA on October 19, 2015. All transportation and transit personnel attended.

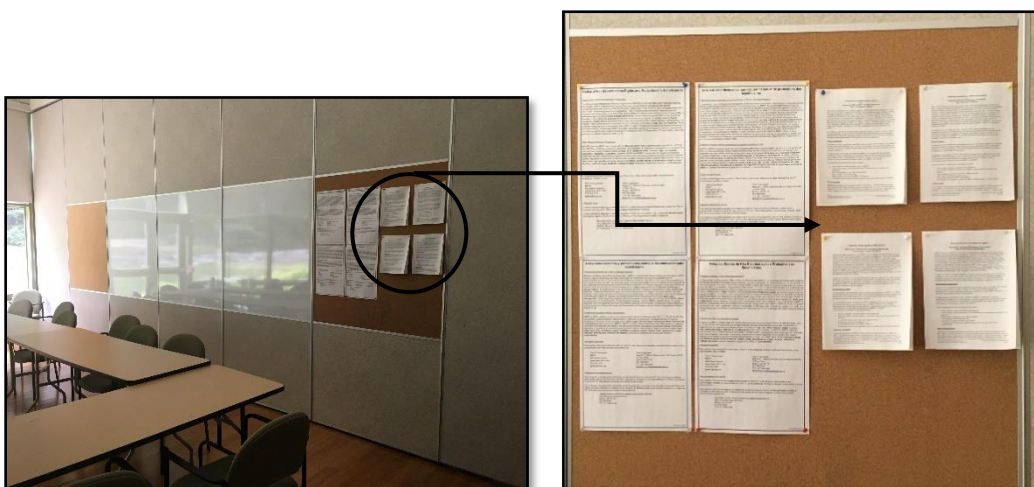
d. Addressing Allegations of Discrimination

i. Complaints

Complaint forms have been updated based upon MassDOT revisions after FHWA and FTA approval. Versions in English, Spanish, French and Portuguese have been incorporated and posted onto the MRPC website as well as in the MRPC main conference room. As indicated in the response to item I.a.i above, Complaint Forms are available in the Region's four major languages, English, Spanish, French and Portuguese, on the MRPC website under the Title VI Policy and Procedures page. In addition, copies of the forms and procedures are posted in the MRPC conference room.



MRPC Website – Compliant Procedures and Forms Links



Complaint Procedures & Forms – MRPC Meeting Room

ii. Identification of Responsible Staff

All relevant documents as well as the website identify Glenn Eaton as the MRPC staff responsible for Title VI coordination and compliance.

e. Special Emphasis Area

i. Public Engagement

Staff has conducted an initial review of information contained on the MassDOT Engage Tool database in an effort to identify inconsistencies, incomplete contact information, and contacts that could be added or deleted for the Montachusett Region. No changes have been made to date but final reviews by senior staff should be completed by the end of the calendar year and forwarded to MassDOT in a formal response.

II. FTA-Specific Reporting Requirements

a. Funding Distribution Analysis

i. Mapping Methodology:

1. Transit projects from current FFY 2017-2021 TIP and its subsequent Amendments were identified and separated by Federal Fiscal Year.
2. Each project was reviewed and categorized based on existing project descriptions as:
 - Operating Funds
 - Vehicle Purchase
 - Support Equipment
 - Structure (i.e. building related)
 - Equipment (i.e. new or replacement purchase outside of maintenance)
3. Each project was then reviewed with RTA personnel to determine scope of project in order to identify if a physical location could be assigned to the project.
4. Where a physical location could be identified, projects were then assigned to that location and/or community.
5. Most projects were identified as impacting systemwide fixed route service. This is true for operating funds as well as vehicle purchases. In this instance, the existing fixed routes were mapped and then identified as the project location. For ADA Para Service, information from the RTA indicated that these services were run within approximately 0.75 miles of the fixed bus routes. Therefore, for location purposes, these projects were assigned to a 0.75-mile buffer around the fixed route system.
6. Many projects repeat over the various Federal Fiscal Years (ex. Operating funds for fixed routes, ADA Para Services, Preventive Maintenance, etc.). These projects are group together and mapped as one occurrence but are then identified to occur in multiple years.
7. For mapping identification purposes, the MRPC assigned a unique number to each project that is then reflected on the maps contained within Appendix 2 of this report. This identifier is labeled “Project Number Key” and is listed with its particular project in the table below.

Project Number Key	FFY	FTA Program	FTA Activity Line Item	Project Description	Total Cost	Type
1-17	2017	5307	300901	UP TO 50% FEDERAL SHARE	\$4,228,000	Operating
1-18	2018				\$3,000,000	
1-19	2019				\$2,560,000	
1-20	2020				\$2,140,000	
1-21	2021				\$2,140,000	
2-17	2017	5307	117C00	NON-FIXED ROUTE ADA PARA SERV	\$357,500	Operating
2-18	2018				\$375,000	
2-19	2019				\$400,000	
2-20	2020				\$412,500	
2-21	2021				\$412,500	
3-17	2017	5307	111215	BUY REPLACEMENT VAN (5)	\$325,000	Vehicles
3-18	2018	5307	111215	BUY REPLACEMENT VAN (8)	\$384,000	Vehicles
3-19.1	2019	5307	111215	BUY REPLACEMENT VAN (8)	\$500,000	Vehicles
3-19.2			111202	BUY REPLACEMENT 35-FT BUS (3)	\$1,387,500	Vehicles
3-20.1	2020	5307	111215	BUY REPLACEMENT VANS (5)	\$325,000	Vehicles
3-20.2			111203	BUY REPLACEMENT 30-FT BUS (3)	\$1,000,000	Vehicles
3-21.1	2021	5307	111215	BUY REPLACEMENT VAN (6)	\$406,250	Vehicles
3-21.2			111209	BUY REPLACEMENT TROLLEY BUS	\$500,000	Vehicles
4-17	2017	5307	114220	ACQUIRE - MISC SUPPORT EQUIPMENT	\$100,000	Support
4-18	2018				\$50,000	
4-19	2019				\$200,000	
4-20	2020				\$60,000	
4-21	2021				\$90,000	
5-17.1	2017	5307	114403	REHAB/RENOVATE - ADMIN/MAINT FACILITY	\$362,400	Structure
5-17.2	2017				\$332,600	
5-18	2018				\$200,000	
5-21	2021				\$500,000	
6-17.1	2017	5307	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$250,000	Structure
6-17.2	2017	Other Federal	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$150,000	Structure
6-17.3		Other Non- Federal	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$66,000	Structure
6-17.4	2017	Other Non- Federal	113104	ENG/DESIGN - BUS PARK & RIDE LOT	\$106,500	Structure
7-18	2018	5307	117A00	PREVENTIVE MAINTENANCE	\$250,000	Support
7-19	2019				\$375,000	
7-20	2020				\$500,000	
7-21	2021				\$500,000	
8-17	2017	Other Federal	113220	ACQUIRE - MISC BUS STATION EQUIP	\$46,000	Equipment
8-18	2018	5307	113209	ACQUIRE - BUS ROUTE SIGNING	\$750,000	Equipment
8-20	2020	5307	119202	PURCHASE BUS SHELTERS	\$100,000	Equipment
9-17	2017	Other Federal	119305	CONSTRUCT PED ACCESS / WALKWAYS	\$100,000	Structure
9-18	2018	5307	129405	REHAB/RENOV PED ACCESS / WALKWAYS	\$175,000	Structure
10-19	2019	5307	113403	TERMINAL, INTERMODAL (TRANSIT)	\$100,000	Structure
10-21	2021				\$750,000	
11-17.1	2017	5310	114208	ACQUIRE – ADP SOFTWARE	\$210,500	Equipment
11-17.2	2017	5310	114208	ACQUIRE – ADP HARDWARE	\$39,500	Equipment

The following tables provide complete information on the Transit projects mapped for this analysis.

FFY	FTA Program	FTA Activity Line Item	Project Description	Total Cost	Type	Location	Project Info
2017 2018 2019 2020 2021	5307	300901	UP TO 50% FEDERAL SHARE	\$4,228,000 \$3,000,000 \$2,560,000 \$2,140,000 \$2,140,000	Operating	Systemwide - Fixed Route	Operating for Fixed Routes systemwide
2017 2018 2019 2020 2021	5307	117C00	NON FIXED ROUTE ADA PARA SERV	\$357,500 \$375,000 \$400,000 \$412,500 \$412,500	Operating	Systemwide - Fixed Route Communities	ADA services around Fixed Route System
2017 2018 2019 2020 2021	5307	111215	BUY REPLACEMENT VAN (5)	\$325,000	Vehicles	Systemwide	Vans into Systemwide fleet
2018	5307	111215	BUY REPLACEMENT VAN (8)	\$384,000	Vehicles	Systemwide	Vans into Systemwide fleet
2019	5307	111215	BUY REPLACEMENT VAN (8)	\$500,000	Vehicles	Systemwide	Vans into Systemwide fleet
		111202	BUY REPLACEMENT 35-FT BUS (3)	\$1,387,500	Vehicles	Systemwide	Buses into Systemwide fleet
2020	5307	111215	BUY REPLACEMENT VANS (5)	\$325,000	Vehicles	Systemwide	Vans into Systemwide fleet
		111203	BUY REPLACEMENT 30-FT BUS (3)	\$1,000,000	Vehicles	Systemwide	Buses into Systemwide fleet
2021	5307	111215	BUY REPLACEMENT VAN (6)	\$406,250	Vehicles	Systemwide	Vans into Systemwide fleet
		111209	BUY REPLACEMENT TROLLEY BUS	\$500,000	Vehicles	Systemwide	Fitchburg/Leominster/Gardner
2017 2018 2019 2020 2021	5307	114220	ACQUIRE - MISC SUPPORT EQUIPMENT	\$100,000 \$50,000 \$200,000 \$60,000 \$90,000	Support	Systemwide	Equipment for Existing Facilities
2017 2017 2018 2021	5307	114403	REHAB/RENOVATE - ADMIN/MAINT FACILITY	\$362,400 \$332,600 \$200,000 \$500,000	Structure	Fitchburg/Leominster	Water St Facility

FFY	FTA Program	FTA Activity Line Item	Project Description	Total Cost	Type	Location	Project Info
2017	5307	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$250,000	Structure	Fitchburg/ North Leominster/ Wachusett	3 Existing facilities; ITC/Wachusett/N Leominster
2017	Other Federal	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$150,000	Structure	Fitchburg	Wachusett Station
	Other Non-Federal	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$66,000	Structure	Fitchburg	Wachusett Station
2017	Other Non-Federal	113104	ENG/DESIGN - BUS PARK & RIDE LOT	\$106,500	Structure	Ayer	New Rail Lot in Ayer
2018 2019 2020 2021	5307	117A00	PREVENTIVE MAINTENANCE	\$250,000 \$375,000 \$500,000 \$500,000	Support	Fitchburg/ Gardner	Maintenace Equipment for services at Fitchburg & Gardner garages
2017	Other Federal	113220	ACQUIRE - MISC BUS STATION EQUIP	\$46,000	Equipment	Fitchburg	Wachusett Station
2018	5307	113209	ACQUIRE - BUS ROUTE SIGNING	\$750,000	Equipment	Fitchburg & Systemwide	Buses systemwide; ITC/N Leominster/ Wachusett
2020	5307	119202	PURCHASE BUS SHELTERS	\$100,000	Equipment	Systemwide	Fixed Route Locations; 15 to 20
2017	Other Federal	119305	CONSTRUCT PED ACCESS / WALKWAYS	\$100,000	Structure	Fitchburg	Wachusett Station
2018	5307	129405	REHAB/RENOV PED ACCESS / WALKWAYS	\$175,000	Structure	Fitchburg	ITC
2019 2021	5307	113403	TERMINAL, INTERMODAL (TRANSIT)	\$100,000 \$750,000	Structure	Fitchburg	ITC Upgrade
2017	5310	114208	ACQUIRE – ADP SOFTWARE	\$210,500	Equipment	Systemwide	Rides to Wellness Grant; Fitchburg/ Leominster/Ashby/Athol
2017	5310	114208	ACQUIRE – ADP HARDWARE	\$39,500	Equipment	Systemwide	Rides to Wellness Grant; Fitchburg/ Leominster/Ashby/Athol

III. MPO Determined Focus Areas

a. In an effort to increase the capacity and effectiveness of the MPO related to Title VI, the following goals have been identified:

1. Hold a Public Outreach Training Forum for member communities. The forum would outline current efforts undertaken by the MPO as well as by local municipalities related to public outreach and involvement of Title VI advocates. An emphasis would be placed on an information exchange between the MPO and the communities that includes effective forms of notification and/or publication; identification of Title VI groups and organizations; and techniques that can foster increased participation.
2. Increase and expand the use of the state's GeoDOT website Engage database for public outreach. Additionally, monitor and update the data for the Montachusett region on a more consistent basis.
3. Continue to monitor public events and meetings in the region to identify opportunities to expand our outreach and improve public engagement.

b. During efforts to involve the public, and in particular Title VI advocates, the Montachusett MPO has had difficulty in identifying advocate groups and personnel. With many of the organizations in our area, personnel turnover is difficult to track leading to erroneous contact information and unresponsive notifications. This also tends to impact the level of involvement of the organization as interests can change with the individual. This leads to a need to re-establish a relationship between the MPO and the advocate group. In addition, there is a need to bring the new individual "up to speed" with the MPO's role and responsibilities. Thus, continuity with Title VI populations is difficult to maintain. The other challenge lies in creating interest in the transportation planning activities of the MPO with the advocate groups. Many groups have a limited field of concern and do not always recognize the need for their input to the process. Maintaining their interest in the MPO is also tied to the continuity issue between the advocate and the MPO.

c. MRPC is continuing to build a relationship with Fitchburg State University (FSU) that entails the development of projects where students are involved and that provides a mutual benefit to the school and the MRPC. This partnership has been growing and strengthening each year. These projects are then presented by the students at an end of the year event. By doing this, it allows the students to share their experiences and outcomes with their peers and provides the MRPC with a usable product. This is a great avenue for MPO staff and students to collaborate and work towards a similar goal; creating quality products that educate and involve all populations.

Appendix 1 – FFY 2017 Title VI Guidance Letter



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



March 20, 2017

Mr. Glenn Eaton Executive Director
Montachusett Regional Planning Commission
1427R Water Street
Fitchburg, MA 01420

Dear Mr. Eaton:

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

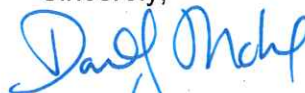
- a. Funding Distribution Analysis: Please provide a map(s) depicting the locations of transit related investments (both federal and state dollars) in the current TIP. The base layer(s) should show percent minority and percent low-income, by Census tract.
 - i. Please include a description of the methodology 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,



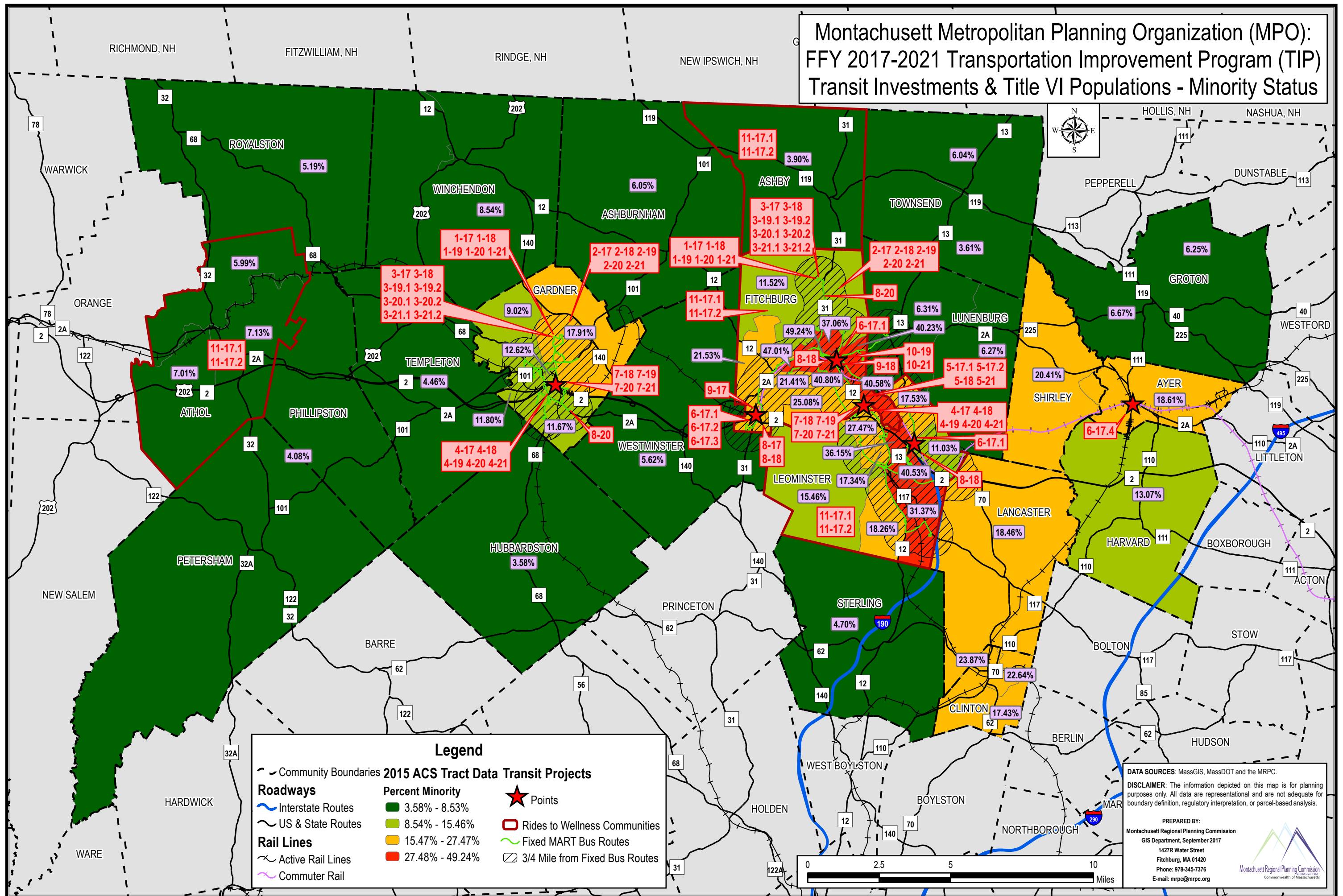
David J. Mohler
Executive Director,
Office of Transportation Planning

Appendix 2 – FTA Funding Distribution Analysis Maps

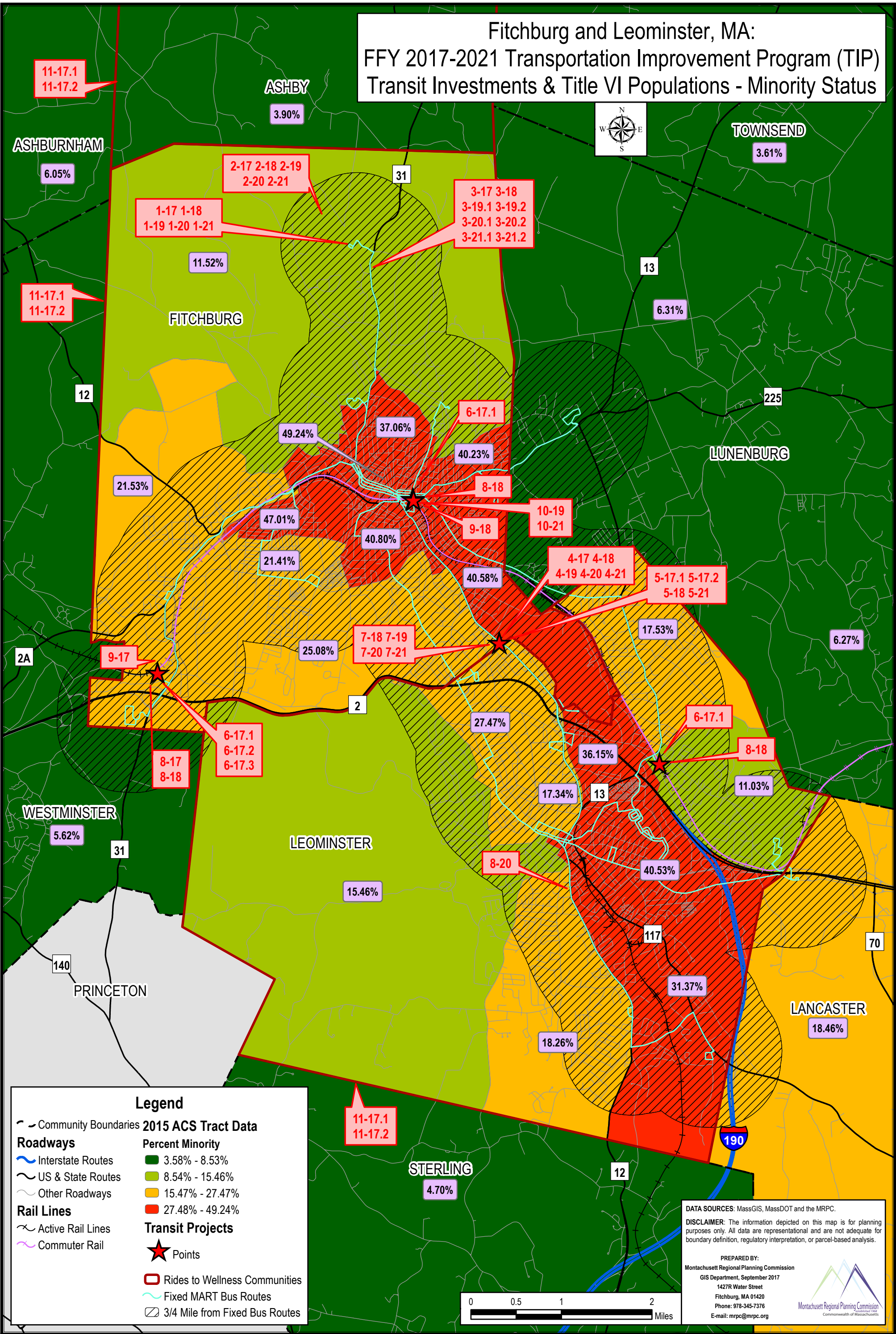
FFY 2017-2021 TIP Montachusett Transit Investments – Project Identification Key

Project Number Key	FFY	FTA Program	FTA Activity Line Item	Project Description	Total Cost	Type
1-17	2017	5307	300901	UP TO 50% FEDERAL SHARE	\$4,228,000	Operating
1-18	2018				\$3,000,000	
1-19	2019				\$2,560,000	
1-20	2020				\$2,140,000	
1-21	2021				\$2,140,000	
2-17	2017	5307	117C00	NON-FIXED ROUTE ADA PARA SERV	\$357,500	Operating
2-18	2018				\$375,000	
2-19	2019				\$400,000	
2-20	2020				\$412,500	
2-21	2021				\$412,500	
3-17	2017	5307	111215	BUY REPLACEMENT VAN (5)	\$325,000	Vehicles
3-18	2018	5307	111215	BUY REPLACEMENT VAN (8)	\$384,000	Vehicles
3-19.1	2019	5307	111215	BUY REPLACEMENT VAN (8)	\$500,000	Vehicles
3-19.2			111202	BUY REPLACEMENT 35-FT BUS (3)	\$1,387,500	Vehicles
3-20.1	2020	5307	111215	BUY REPLACEMENT VANS (5)	\$325,000	Vehicles
3-20.2			111203	BUY REPLACEMENT 30-FT BUS (3)	\$1,000,000	Vehicles
3-21.1	2021	5307	111215	BUY REPLACEMENT VAN (6)	\$406,250	Vehicles
3-21.2			111209	BUY REPLACEMENT TROLLEY BUS	\$500,000	Vehicles
4-17	2017	5307	114220	ACQUIRE - MISC SUPPORT EQUIPMENT	\$100,000	Support
4-18	2018				\$50,000	
4-19	2019				\$200,000	
4-20	2020				\$60,000	
4-21	2021				\$90,000	
5-17.1	2017	5307	114403	REHAB/RENOVATE - ADMIN/MAINT FACILITY	\$362,400	Structure
5-17.2	2017				\$332,600	
5-18	2018				\$200,000	
5-21	2021				\$500,000	
6-17.1	2017	5307	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$250,000	Structure
6-17.2	2017	Other Federal	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$150,000	Structure
6-17.3		Other Non- Federal	113404	REHAB/RENOVATE - BUS PARK & RIDE LOT	\$66,000	Structure
6-17.4	2017	Other Non- Federal	113104	ENG/DESIGN - BUS PARK & RIDE LOT	\$106,500	Structure
7-18	2018	5307	117A00	PREVENTIVE MAINTENANCE	\$250,000	Support
7-19	2019				\$375,000	
7-20	2020				\$500,000	
7-21	2021				\$500,000	
8-17	2017	Other Federal	113220	ACQUIRE - MISC BUS STATION EQUIP	\$46,000	Equipment
8-18	2018	5307	113209	ACQUIRE - BUS ROUTE SIGNING	\$750,000	Equipment
8-20	2020	5307	119202	PURCHASE BUS SHELTERS	\$100,000	Equipment
9-17	2017	Other Federal	119305	CONSTRUCT PED ACCESS / WALKWAYS	\$100,000	Structure
9-18	2018	5307	129405	REHAB/RENOV PED ACCESS / WALKWAYS	\$175,000	Structure
10-19	2019	5307	113403	TERMINAL, INTERMODAL (TRANSIT)	\$100,000	Structure
10-21	2021				\$750,000	
11-17.1	2017	5310	114208	ACQUIRE – ADP SOFTWARE	\$210,500	Equipment
11-17.2	2017	5310	114208	ACQUIRE – ADP HARDWARE	\$39,500	Equipment

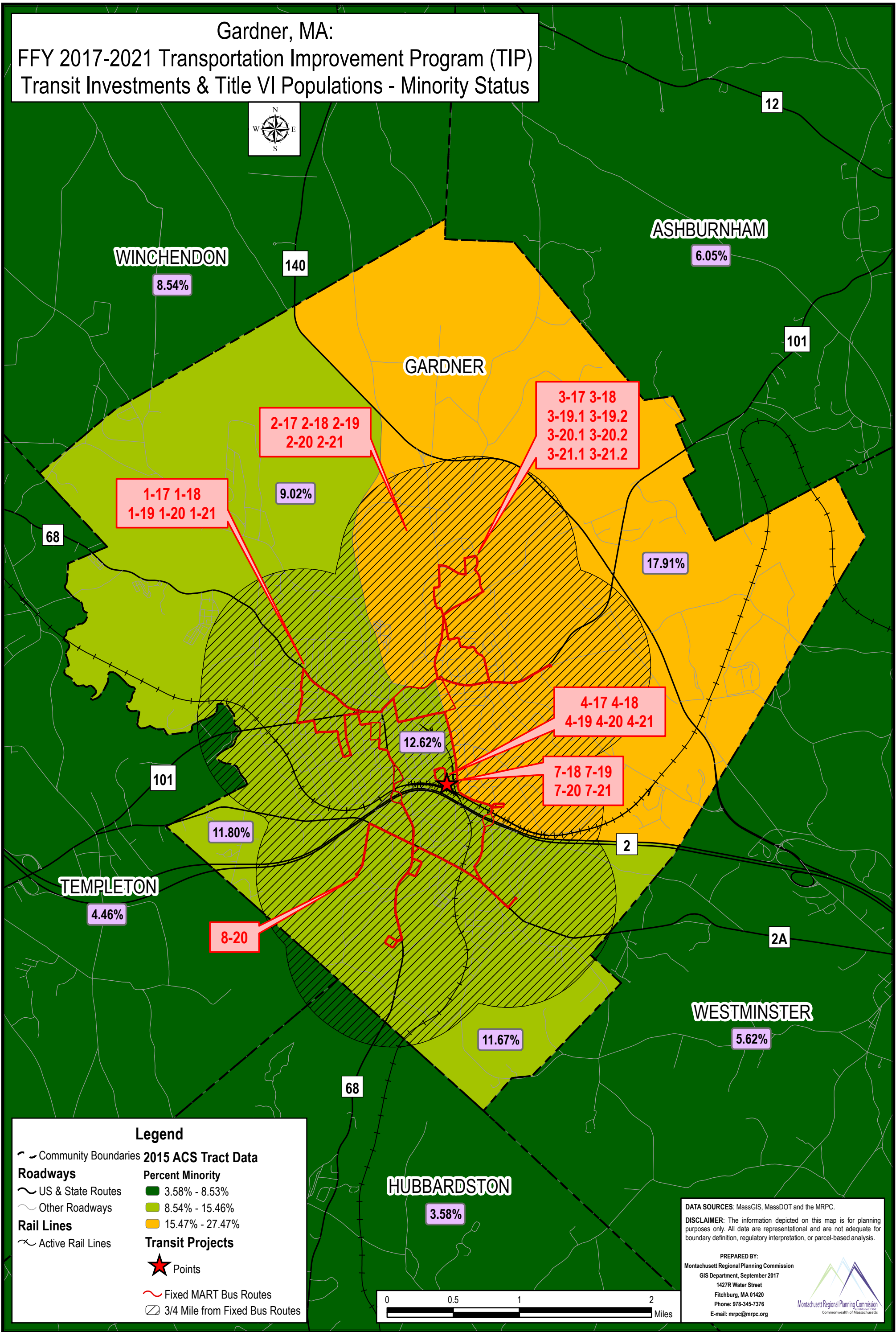
Montachusett Metropolitan Planning Organization (MPO):
FFY 2017-2021 Transportation Improvement Program (TIP)
Transit Investments & Title VI Populations - Minority Status



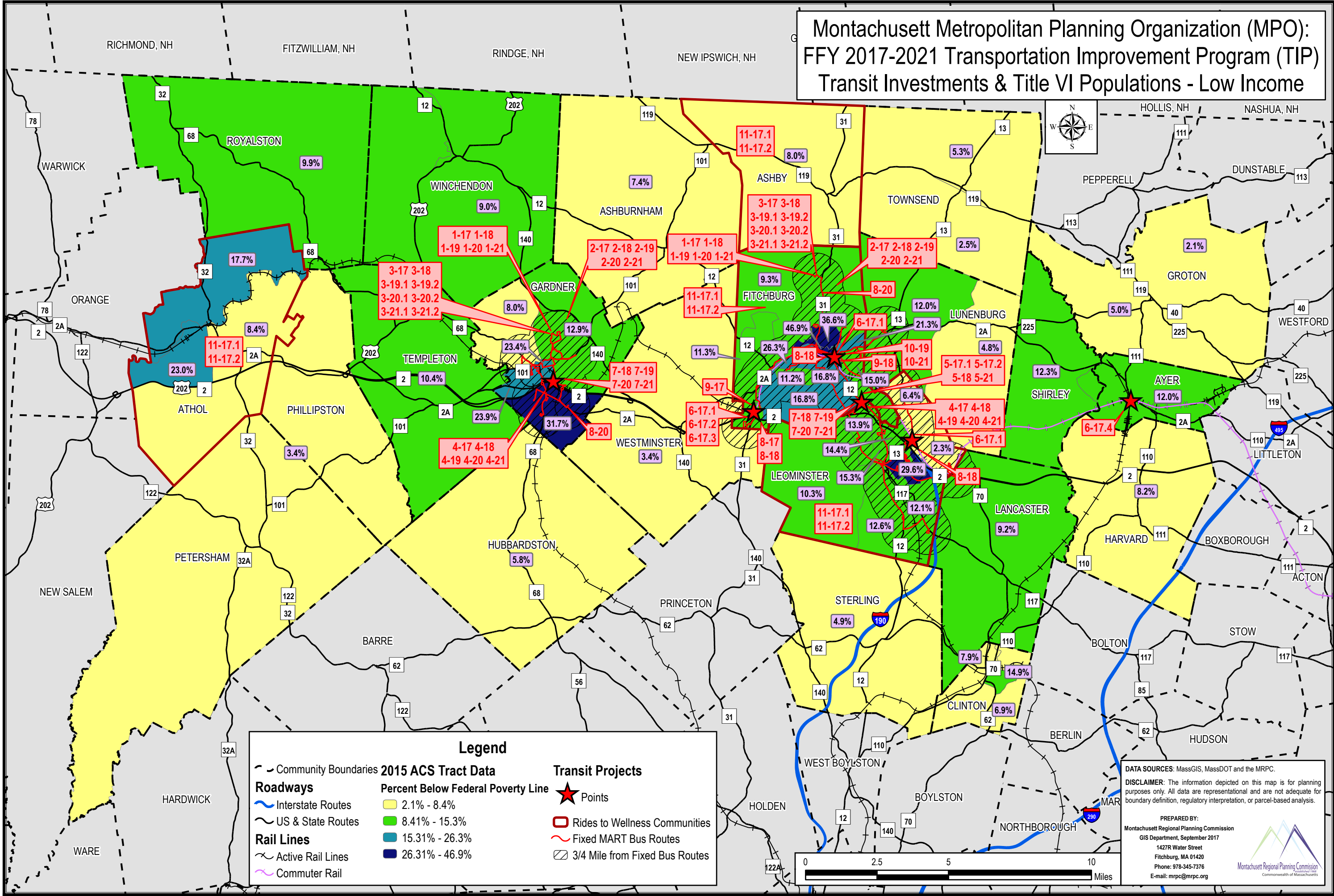
Fitchburg and Leominster, MA:
FFY 2017-2021 Transportation Improvement Program (TIP)
Transit Investments & Title VI Populations - Minority Status



Gardner, MA:
FFY 2017-2021 Transportation Improvement Program (TIP)
Transit Investments & Title VI Populations - Minority Status



Montachusett Metropolitan Planning Organization (MPO):
FFY 2017-2021 Transportation Improvement Program (TIP)
Transit Investments & Title VI Populations - Low Income



Legend

Community Boundaries

Roadways

- Interstate Routes
- US & State Routes

Rail Lines

- Active Rail Lines
- Commuter Rail

2015 ACS Tract Data

Percent Below Federal Poverty Line

- 2.1% - 8.4%
- 8.41% - 15.3%
- 15.31% - 26.3%
- 26.31% - 46.9%

Transit Projects

- Points
- Rides to Wellness Communities
- Fixed MART Bus Routes
- 3/4 Mile from Fixed Bus Routes

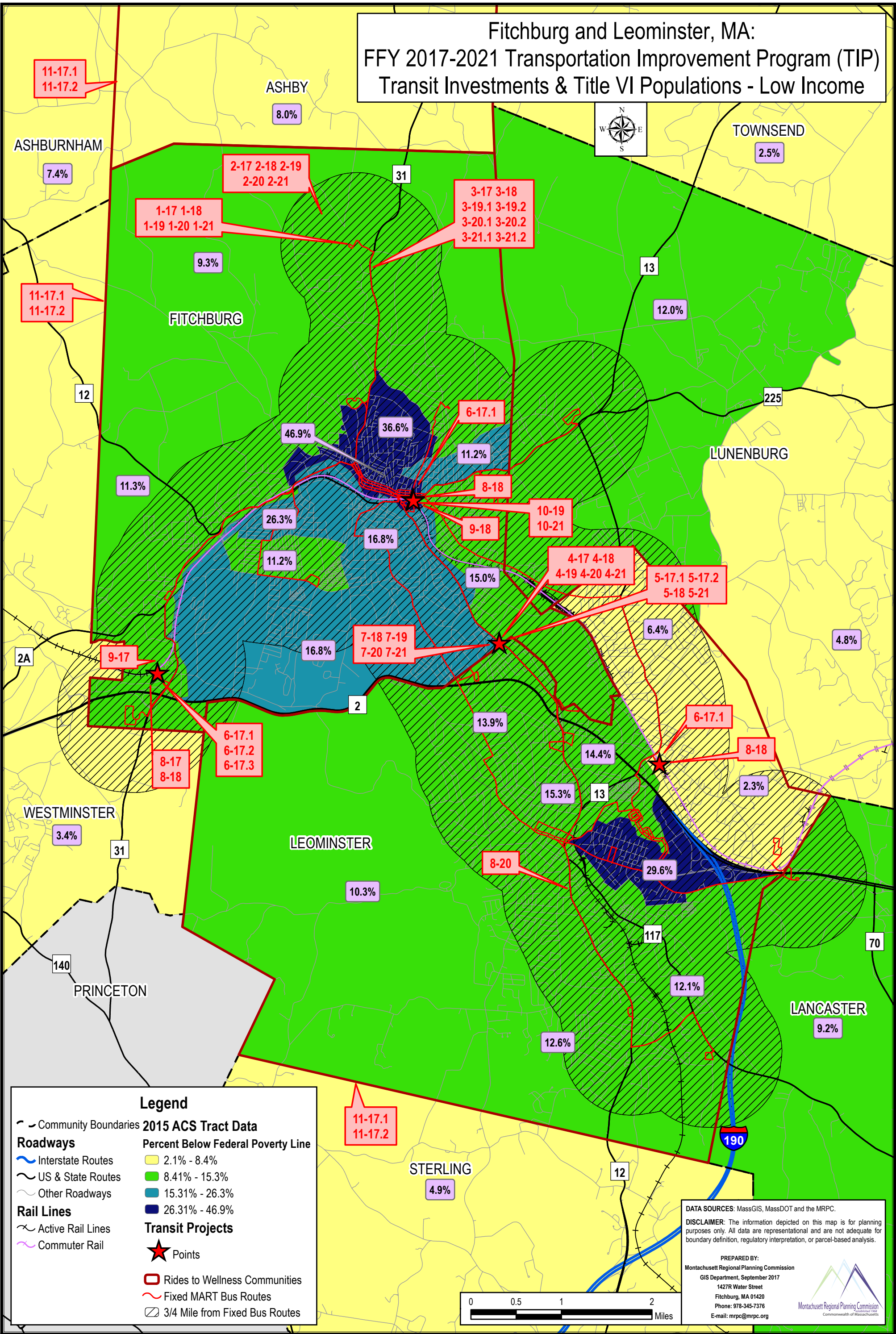
DATA SOURCES: MassGIS, MassDOT and the MRPC.

DISCLAIMER: The information depicted on this map is for planning purposes only. All data are representational and are not adequate for boundary definition, regulatory interpretation, or parcel-based analysis.

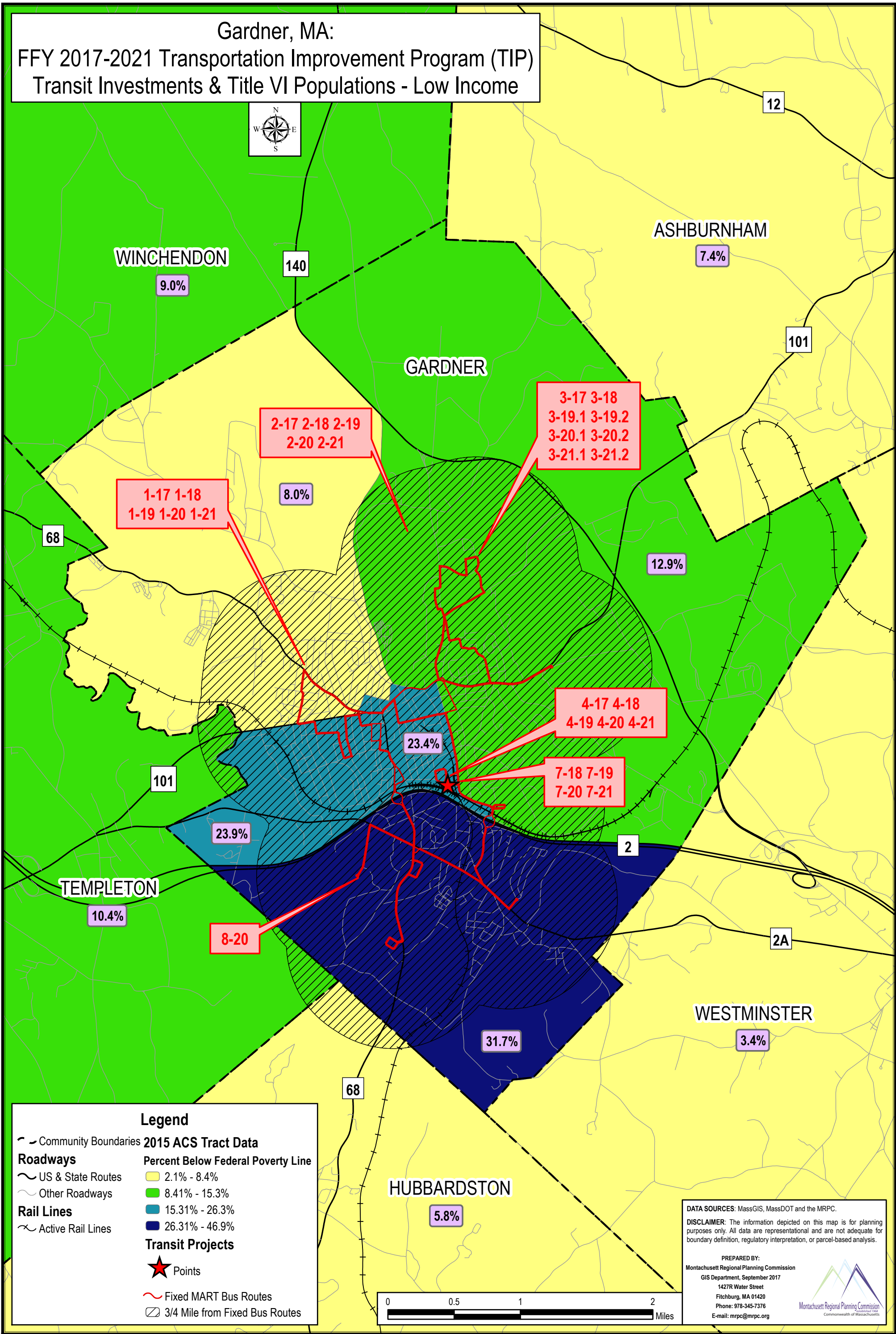
PREPARED BY:
Montachusett Regional Planning Commission
GIS Department, September 2017
1427R Water Street
Fitchburg, MA 01420
Phone: 978-345-7376
E-mail: mrpc@mrpc.org

Montachusett Regional Planning Commission
Commonwealth of Massachusetts

Fitchburg and Leominster, MA: FFY 2017-2021 Transportation Improvement Program (TIP) Transit Investments & Title VI Populations - Low Income



Gardner, MA:
FFY 2017-2021 Transportation Improvement Program (TIP)
Transit Investments & Title VI Populations - Low Income



Legend

Community Boundaries

Roadways

US & State Routes

Other Roadways

Rail Lines

Active Rail Lines

2015 ACS Tract Data
Percent Below Federal Poverty Line

2.1% - 8.4%

8.41% - 15.3%

15.31% - 26.3%

26.31% - 46.9%

Transit Projects

Points

Fixed MART Bus Routes

3/4 Mile from Fixed Bus Routes

DATA SOURCES: MassGIS, MassDOT and the MRPC.

DISCLAIMER: The information depicted on this map is for planning purposes only. All data are representational and are not adequate for boundary definition, regulatory interpretation, or parcel-based analysis.

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