

CHAPTER 4

ENVIRONMENTAL JUSTICE AND TITLE VI CERTIFICATION

A. BACKGROUND

The Pioneer Valley Planning Commission (MPO) is required to certify to the Federal Highway Administration and the Federal Transit Administration that their planning process addresses the major transportation issues facing region. This certification assures that planning is conducted in accordance with Title VI of the Civil Rights Act of 1964, and requirements of Executive Order 12898 (Environmental Justice). Under the provisions of Title VI and Environmental Justice PVPC works to assess and address the following:

Civil Rights Act of 1964, Title VI " No person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Executive Order 12898, Environmental Justice "Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing as appropriate disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

The U.S. Department of Transportation (USDOT) issued a DOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations in 1997. It identifies environmental justice as an "undeniable mission of the agency" along with safety and mobility. USDOT stresses three principles of environmental justice:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of reduction in or significant delay in the receipt of benefits by minority and low-income populations.

B. GOALS OF THE PIONEER VALLEY ENVIRONMENTAL JUSTICE PLAN

The Pioneer Valley Planning Commission has been working together with Pioneer Valley Transit Authority (PVTA), MassDOT, Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) on addressing the principles of Title VI and Environmental Justice in the

transportation planning process for the Region. The primary goals of the plan include:

1. Goals Related to Identifying the Region's Minority and Low-Income Populations

- Develop a demographic profile of the Pioneer Valley Region that includes identification of the locations of socio-economic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI provisions.

2. Goals Related to Public Involvement:

- Create a public involvement process that identifies a strategy for engaging minority and low-income populations in transportation decision making, and routinely evaluate this strategy for its effectiveness at reducing barriers for these populations.

3. Goals Related to Service Equity:

- Institutionalize a planning process for assessing the regional benefits and burdens of transportation system investments for different socio-economic groups. Develop an on-going data collection process to support the effort and identify specific actions to correct imbalances in the RTP, TIP and Transit funding.

C. IDENTIFICATION OF MINORITY AND LOW INCOME POPULATIONS AND TARGET POPULATIONS

Strategy - *Identifying minority and low-income populations using 2010 Census data. Review EJ population thresholds and assessment methods from other regions and select a definition that provides the best representation for minority and low-income populations in the Pioneer Valley.*

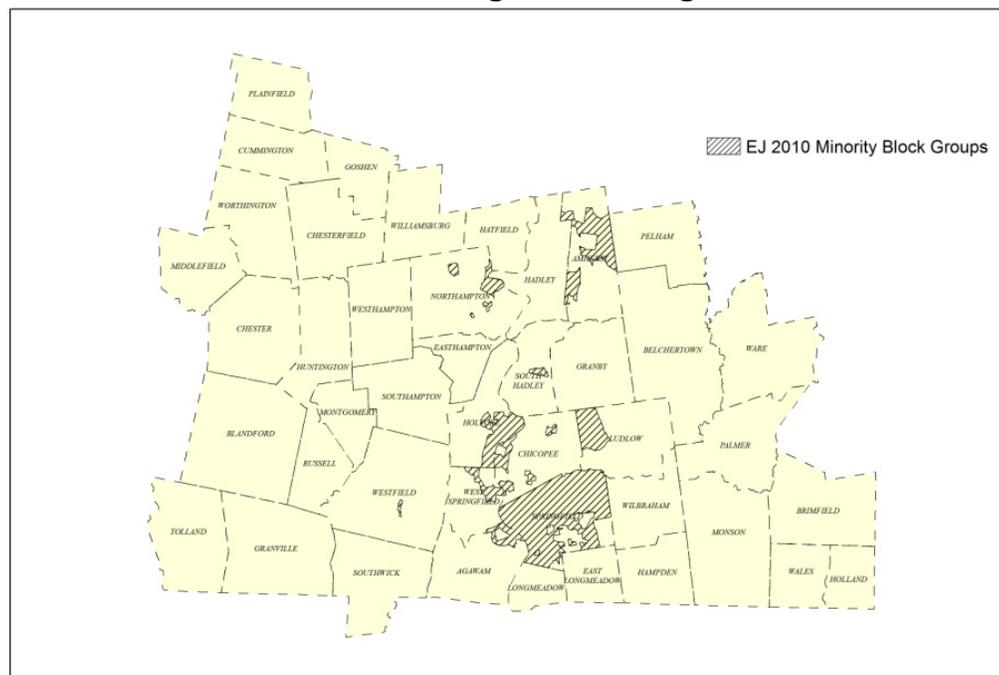
The equity performance measures developed in subsequent sections of the plan are dependent on an accurate definition of the "target population." The 43 communities of the Pioneer Valley Region are diverse in incomes and ethnicity. The region's urban cores of 14 communities comprise the majority of the population and nearly 90 percent of the jobs. To establish the most effective measure of equity, PVPC staff reviewed EJ plans from similar Metropolitan Planning Organizations in other parts of the country. The definition used to define "target populations" in each of these plans was scrutinized and evaluated based on its applicability to our region. From these plans, 8 different population definitions for low income and minority populations were singled out for review in Pioneer Valley. PVPC actively solicited additional feedback and input from stakeholders in the region.

1. Minority Populations

The PVMPO defines “minority” as “the population that is not identified by the census as White-Non-Hispanic” in the ACS (2010 based Census). Under this definition, minority persons constitute 23.48% of the region’s population. The racial or ethnic groups included are:

- White Non-Hispanic
- African-American or Black
- Hispanic or Latino (of any race)
- Asian (including Native Hawaiian, & other)
- American Indian (& Alaska Native)
- Some other race
- Two or More Races

Figure 4-1 – Census Block Groups with Minority Populations Exceeding Regional Average



Source: ACS 2006-10 (2010 based Census)

Minority persons comprise 23.48 percent of the region's population as a whole. The racial or ethnic groups used in the 2010 census include; White Non-Hispanic, African-American or Black, Hispanic or Latino (of any race), Asian (including Native Hawaiian, & other) American Indian (& Alaska Native), Some other race, and Two or More Races. For the EJ tasks minority was defined as “**the population that is not identified by the census as "White-Non-Hispanic."**” (A breakdown of these populations is included in Tables 4 -1 – 3.)

Table 4-1 – Pioneer Valley Population by Race

Race	Population	Percent
White alone	499,593	82.11%
Black or African American alone	39,915	6.56%
American Indian and Alaska Native alone	1,493	0.25%
Asian alone	11,095	1.82%
Native Hawaiian and Other Pacific Islander	390	0.06%
Some other race alone	42,650	7.01%
Two or more races	13,343	2.19%
Total:	608,479	100.00%

Table 4-2 – Pioneer Valley Non-Hispanic or Latino Population Breakdown

	Population	Percent
Not Hispanic or Latino:	534,070	87.77%
White alone	475,944	78.22%
Black or African American alone	36,774	6.04%
American Indian and Alaska Native alone	1,009	0.17%
Asian alone	10,993	1.81%
Native Hawaiian and Other Pacific Islander alone	210	0.03%
Some other race alone	797	0.13%
Two or more races	8,343	1.37%

Table 4-3 – Pioneer Valley Hispanic or Latino Population Breakdown

	Population	Percent
Hispanic or Latino:	74,409	12.23%
White alone	23,649	3.89%
Black or African American alone	3,141	0.52%
American Indian and Alaska Native alone	484	0.08%
Asian alone	102	0.02%
Native Hawaiian and Other Pacific Islander alone	180	0.03%
Some other race alone	41,853	6.88%
Two or more races	5,000	0.82%

2. Identification of Low Income Populations

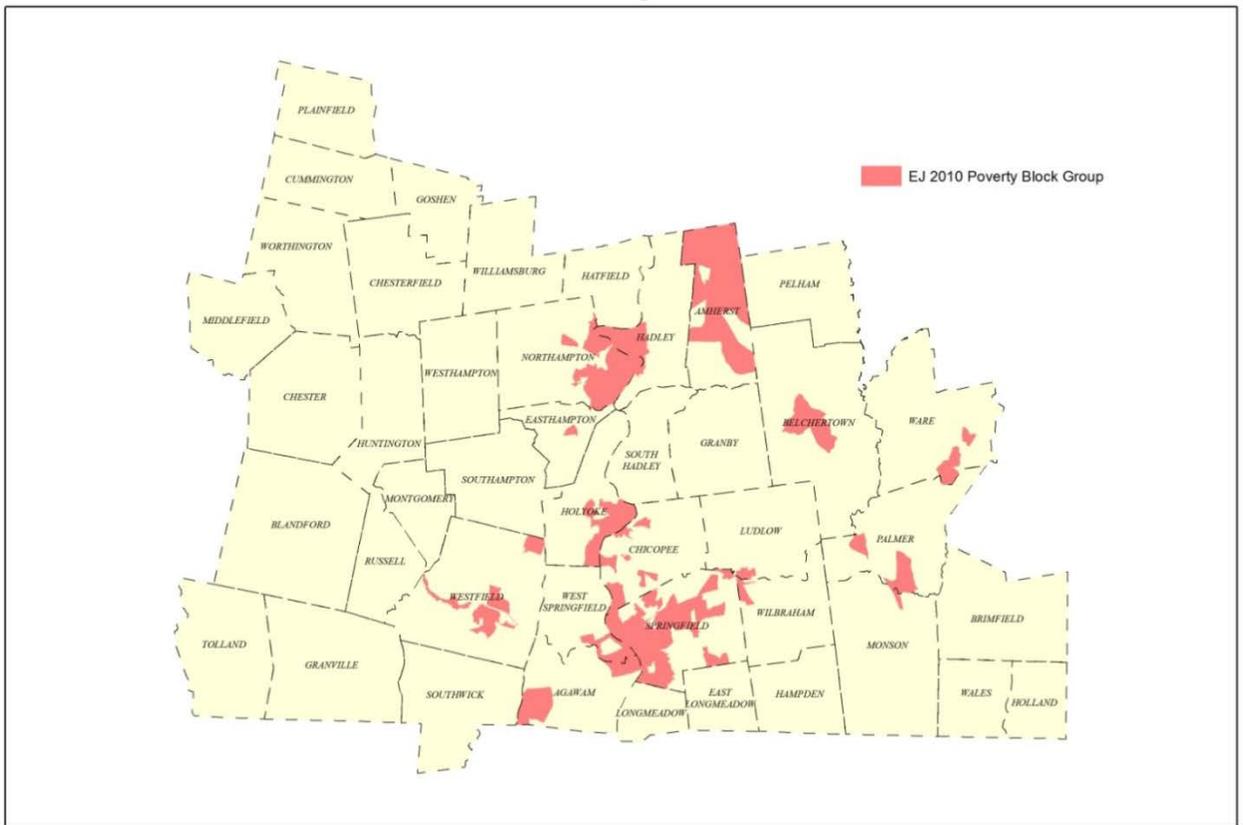
The PVMPO defines a “low income” areas using census block group data. Any block group with a proportion of people in that block group living at or below the federally defined poverty level that exceeds the proportion of people in poverty in the region as a whole, which is 15.47% is defined as “low income.”

3. Region Trends in Low Income Trends in Populations

In the Pioneer Valley region, poverty rates of the general population have climbed from a low of 12.6% in 2002 to 16.7% in 2012. Between 2005 and 2010, poverty rates hovered consistently around 15 percent, dropping slightly in 2008 but then increasing in 2009 to 15.8 and again in 2012 to 16.7 percent,

a rate higher than has existed for over a decade. This rate continues to follow a decade-long pattern of exceeding Massachusetts' overall rate by several percentage points. In 2012, this difference was 5.9 percent. The poverty rate trends, and the per capita income growth patterns suggest that the region did not share equally in the state's economic growth at the end of the 1990s, nor in the middle portion of the 2000s. While in 2010, for the first time in over a decade, the total poverty rate in the Pioneer Valley region was lower than that of the nation as a whole; the current 2012 rate is 1.9% above the national rate.

Figure 4-2 – 2010 Census Block Groups with a Poverty Rate above that of the Region



Source: ACS (2010 based Census)

4. Region Trends in Minority Populations

Continuing an established trend, the region's Hispanic and Latino population grew by 48.2% between 2000 and 2012, a rate of growth that was significant, though slightly lower than that of both the state and nation (see Table 2). While the rate of growth in the Hispanic and Latino population has been slightly slower than that of the state, at approximately 17% of the total population, the Hispanic and Latino population is actually slightly higher than

that of the nation. In this sense, the Pioneer Valley region looks less like the rest of the state as a whole and more like nation-wide demographics. Conversely, the proportion of the Pioneer Valley region population identifying exclusively as White (81.3%) is closer to that of the state (80.1%) than to the nation (73.9 percent).

Table 4-4 – Hispanic or Latino Population in the Pioneer Valley Region 2000-2012

	Hispanic or Latino Persons			% of Total Population		
	2000	2012	% Change	2000	2012	% Change
Pioneer Valley Region	74,409	110,301	48.2%	12.2%	17.6%	5.4%
Hampden County	69,197	102,369	47.9%	15.2%	22.0%	6.8%
Hampshire County	5,212	7,932	52.2%	3.4%	5.0%	1.6%
Massachusetts	428729	673,885	57.2%	6.8%	10.1%	3.3%
United States	35,305,818	52,961,017	50.0%	12.5%	16.9%	4.4%

Sources: U. S. Census Bureau, 2010 Decennial Census and 2012 ACS 1-Year estimates

Table 4-5 – Population by Race 2012

	White	African American	Native American	Asian	Pacific Islander	Other Races
Pioneer Valley Region	81.3%	7.0%	0.3%	2.8%	0.0%	8.6%
Hampden County	78.4%	8.6%	0.3%	2.2%	0.0%	10.5%
Hampshire County	89.8%	2.6%	0.1%	4.4%	0.2%	2.9%
Massachusetts	80.1%	7.1%	0.2%	5.7%	0.0%	6.8%
United States	73.9%	12.6%	0.8%	5.0%	0.2%	7.5%

Source: U.S. Census Bureau, 2012 1-Year County Population Estimates.

Percentages add up to more than 100% because of ability to report more than one racial category. Because the U.S. Census Bureau considers Hispanic/Latino an ethnic category rather than a race category, all race categories include some people who are Hispanic or Latino and some who are not.

D. IDENTIFICATION OF PERSONS WITH DISABILITIES POPULATIONS

In identifying “Persons with Disabilities” PVPC used the Census definition of employed persons with a disability between ages 21-64. A more inclusive definition of people needing transportation services would also include age groups 5 and younger, and children age 5-17. However, because these age groups are not considered part of the workforce that typically needs daily transportation; they are not included in this analysis. The 2015 update of this report used the American Community Survey block level estimates for this data.

Figure 4-3 – Census Block Groups- Individuals in the Pioneer Valley Age 21-64 with Disabilities

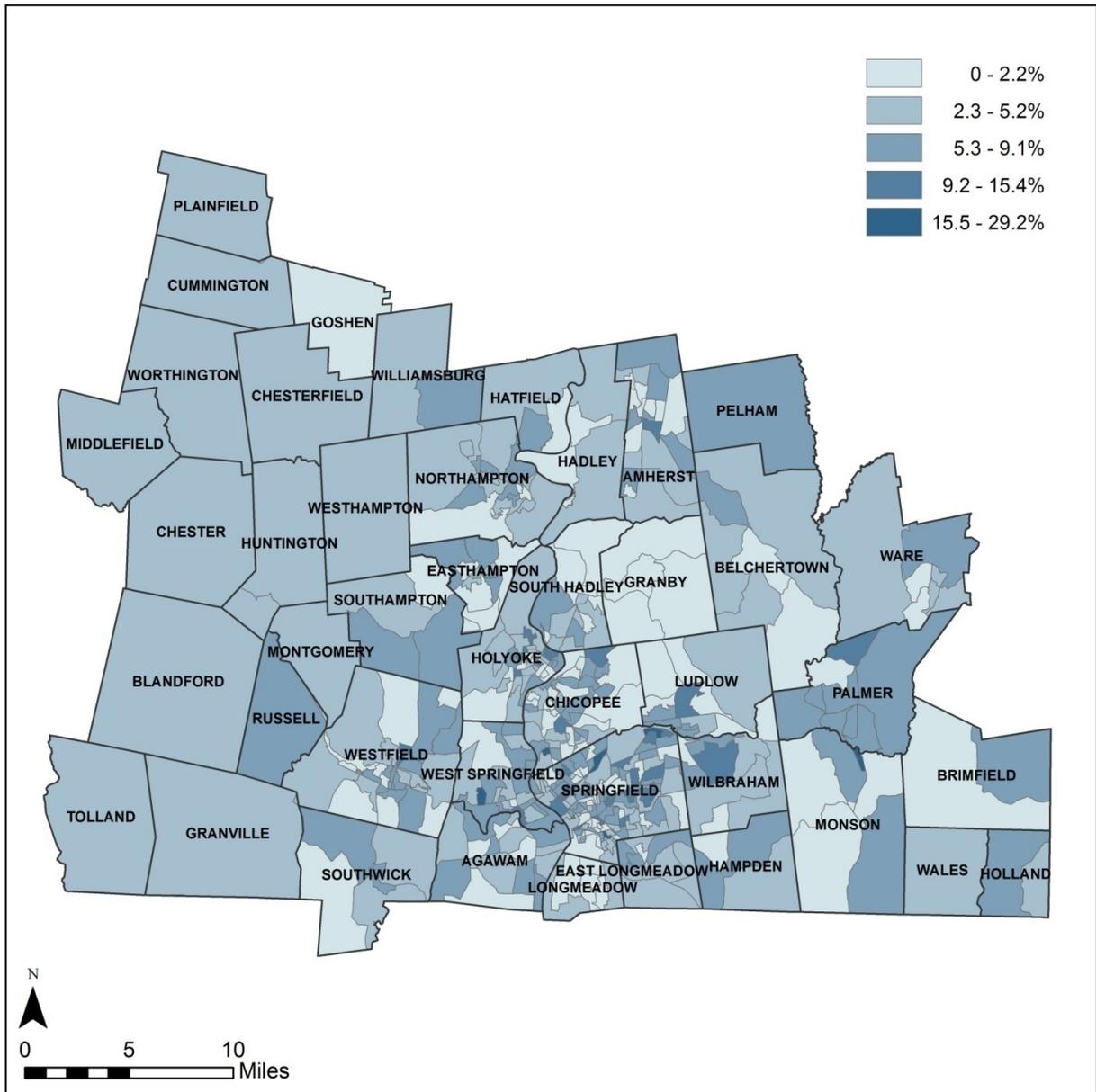
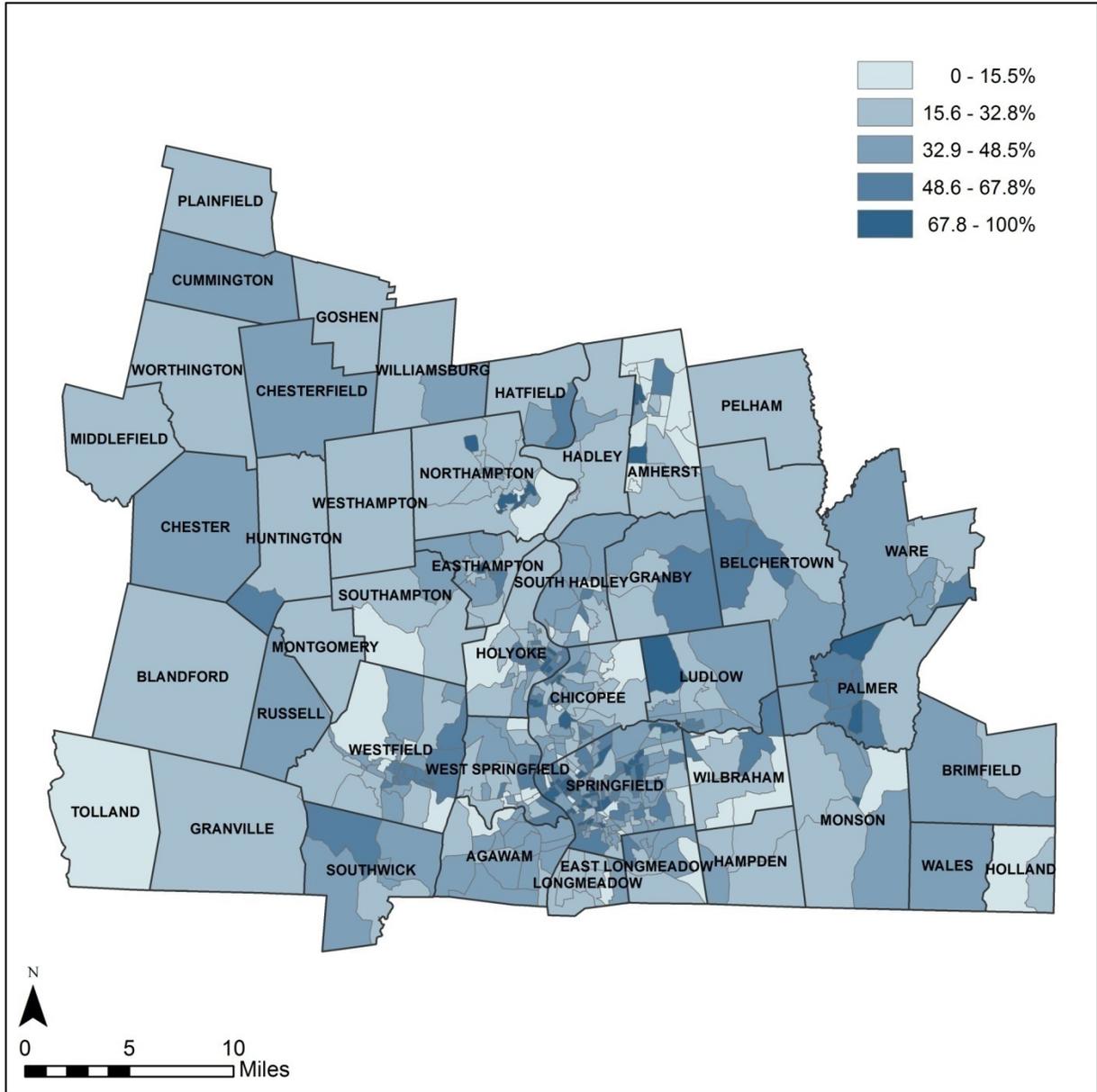


Figure 4-4 – Census Block Groups Individuals in the Pioneer Valley Age 65+ with Disabilities

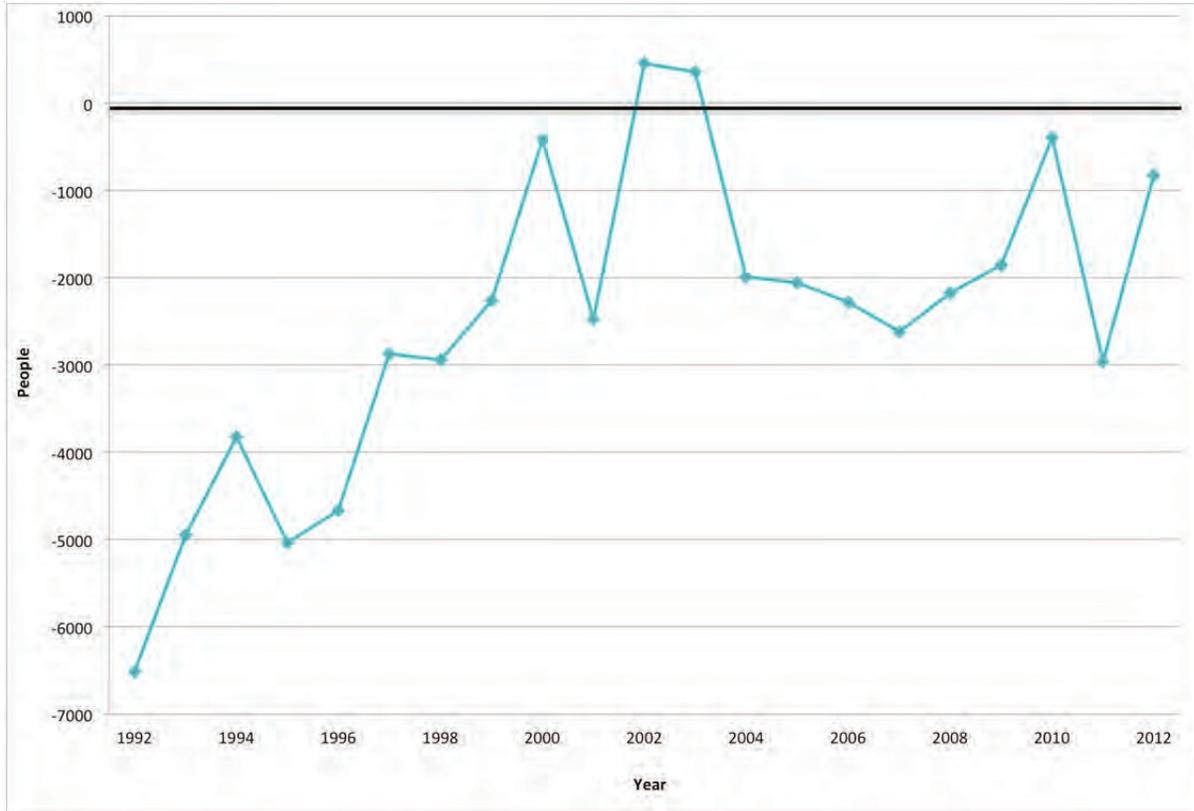


1. Foreign Born Demographics and Migration

Retaining the population base has been a challenge in the Pioneer Valley region, although trends of out-migration have decreased to half of what they formerly were. In the 1990s, there was a net domestic out-migration of nearly 40,000 people. While the first decade of the 21st century has still seen net domestic out-migration, the loss between 2000-2010 was less than half of the previous decade with net out-migration of about 15,500 people and just under 4,000 additional people lost by 2012. . Migration out of the Valley peaked in

2007 at 2,621 and decreased significantly in the years following. This was also the period during the recession of the 2000s when the housing market crashed and reflected similar trends to those in previous economic downturns. Of concern, 2011 saw another spike in outmigration to 2,963; however, 2012 saw that trend slow again to 831. Although 2012 was hopeful, this trend will need to be watched closely to determine if recent improvements will be negated over the coming years.

Figure 4-5 – Net Domestic Migration in the Pioneer Valley Region



Source: U. S. Census Bureau Population Division, 2012

The Pioneer Valley has always been a destination for foreign immigrants and this continues to be the case. From 1990 to 1999 inclusive, a total of 12,703 new immigrants settled in the Pioneer Valley region. In fact, if not for foreign born immigration, the Pioneer Valley region would have experienced a net loss of population between 1990 and 2000. This trend of foreign immigration has continued and the first decade of the 2000s saw an even larger influx. During the period 2000-2012 inclusive, an additional 23,283 people immigrated to the region from another country representing 3.7% of the 2012 population.

E. CONSULTATION AND ACTIVE SOLICITATION OF PUBLIC PARTICIPATION

The Public Participation program was developed around a process that includes outreach to representatives of the target populations. The Pioneer Valley Planning Commission has an ongoing working relationship with representatives of minority and low-income populations. The Plan for Progress, the Urban Investment Strategy Team, and the Welfare to Work Program and Regional Comprehensive Land Use Plan have created relationships with opened lines of communication into the needs and issues of minority and low-income populations.

In developing the EJ program PVPC started with a review of the existing public participation program. With this document serving as a foundation, staff began actively soliciting participation from representatives of minority and low-income population that had previously not participated in the planning process. PVPC reorganized the public participation process to focus more staff resources towards consultation with organizations representing low income and minority populations and coordinated the transportation outreach into the meetings and schedules of these stakeholders. The goal was to examine all aspects of the transportation planning process and allow PVPC to be actively involved in creating programs and projects that directly addressed the need of these groups that actively serve the populations. The issues and needs identified in this ongoing process are incorporated into projects, programs, and specific tasks through the Unified Planning Work Program, Transportation Improvement Program, and the Regional Transportation Plan.

1. Methods to Engage Populations in the Planning Process

Many neighborhoods in Pioneer Valley Region receive a high influx of immigrant populations from a wide range of nationalities. PVPC staff develop and employ a strategic public engagement process with an open approach to engage, inform and involve ethnically diverse neighborhoods in the decision making process.

PVPC's guiding principles in this process include:

- Effective public participation is about relationship and trust building. Engaging people is challenging work and engaging people in transportation issues is especially challenging.
- As outsiders (PVPC is viewed as an outsider) we approach the low-income, minority, LEP populations where they live and where they gather and through established community-based organizations that interact with them. This is how to connect.

- Finally, think of outreach as an “ongoing process” that we are constantly working to improved and refine as our needs change and our communities change.

2. Previous Work

PVPC has continued to solicit input from minority and low income stakeholder groups and organizations regarding transportation planning efforts, including the Regional Transportation Plan and Transportation Improvement Plan and the Unified Planning Work Program. Public participation efforts related to the RTP and TIP have been expanded to include Spanish language notices in local media, interpretive serviced and translation services upon request. PVPC has conducted presentations at neighborhood council meetings, and attended community activities. A new complaint procedure was developed in 2014 for responding to issues and concerns regarding Title VI. PVPC gave a presentation to MPO members regarding Title VI and Environmental Justice and continues to improve on coordination of efforts on Title VI and Environmental Justice between PVPC, FRCOG, and CRCOG. PVPC revised the Public Participation Plan to include bilingual outreach for all public participation efforts that impact target populations. This effort includes public notices for major planning documents (RTP, TIP, and UPWP) and transit surveys. In 2015 staff attended training workshops sponsored by FHWA on improving public outreach. MassDOT’s Office of Diversity and Civil Rights staff has presented and met with staff regarding Title VI and opportunities to expand outreach. Title VI program updates and revisions have been presented to the Joint Transportation Committee and the MPO. The Joint Transportation Committee and the MPO review and approve the scope of work for Title VI tasks in the UPWP and reviewed many of the planning products. Demographic data on target populations was used to schedule the location of public outreach efforts to assure that public hearings for the Regional Transportation Plan were held in communities with significant Title VI and EJ populations.

Examples of Title VI and EJ related outreach are described in the following:

a) Merrick Memorial Project

In the Merrick Memorial Project PVPC staff met with local officials and interviewed the Memorial Elementary school principal with regard to the language groups and minority groups frequently encountered, when working in the neighborhood. PVPC asked specifically what type translation services are frequently needed or requested and how these needs are typically met. During and after meetings, community groups and neighborhood contacts were asked about the best way to notify residents of future meetings or project development. This notification included:

- Email notice
- Ads in the newspaper with translations
- PVPC website
- Announcement from community group (religious, political, etc.)
- Telephone calls to key elected officials and city staff.
- To facilitate involvement PVPC placed an emphasis on low tech visual aids with less text and more interaction and discussion. Handouts, maps, charts effectively engaged residents and contributed to overcoming language and cultural barriers. Healthy food and beverages were provided and Interpreters were on-site and available when needed. Staff encouraged responses and feedback; “we would like to know if our assumption are correct from your perspective.” Oral comments and a scribe was assigned to take notes or record comments.

b) Springfield Complete Streets Bicycle and Pedestrian Plan

In developing the Springfield Bicycle and Pedestrian Plan, PVPC staff engaged a broad group of neighborhood community organizations to assist in public outreach and coordination. This coalition included:

- Baystate Health Brightwood Health Center
- Caring Health Center
- City of Springfield Office of Elder Affairs
- City of Springfield Office of Planning and Economic Development
- City of Springfield Parks Department
- Concerned Citizens of Mason Square
- Develop Springfield Corporation
- Enterprise Farm
- Gardening the Community
- HAP Housing
- Health New England
- Mason Square Health Task Force
- Mass in Motion
- Mass Mutual
- Massachusetts Department of Public Health Western Region
- MassBike
- New North Citizens Council
- Partners for a Healthier Community
- Pioneer Valley Asthma Coalition
- Pioneer Valley Riverfront Club
- Springfield Housing Authority
- Springfield Partners for Community Action
- Springfield Vietnamese American Civic Association
- University of Massachusetts Amherst

- Vietnamese Health Project/ Mercy Medical Center

c) Equity Caucus Agenda 2015

The Pioneer Valley Planning Commission is one of just six organizations across the country to receive an award from the Leadership Conference Education Fund and PolicyLink to advance affordable, accessible transportation policy. PVPC will use funds to embed transit equity principles into LiveWell Springfield and will host local activities to engage, educate, and empower local leaders within communities of color to lift up the Equity Caucus Agenda locally and federally. Specifically, PVPC is collaborating with Joseph Krupczynski and the Center for Design Engagement, Natalia Muñoz of Verdant Multicultural Media, and Evelín Aquino to expand the successful Capacity Building sessions implemented in 2014 for emerging leaders in Springfield. (For a summary of this work, go to:

<http://www.pvpc.org/content/new-video-building-skills-equity-and-engagement-planning>).

When PVPCP completed a three-and-a-half-year HUD-funded equity and engagement project in 2014, a need was identified to expand capacity building. With this effort PVPC's civic engagement goal is not just to engage individuals from under-represented groups, but also to create pathways for them into positions of power. Participation from communities that are often left out brings important voices to the table.

The five other grant recipients are Metropolitan Organization for Racial and Economic Equality (Kansas City, MO), Puget Sound Sage/Tacoma-Pierce County Equity Network (Seattle, Washington), Services for Independent Living (Euclid, Ohio), Urban Habitat (Oakland, California), and WISDOM (Milwaukee, Wisconsin). Emerging leaders from Springfield will meet with representatives from these communities in Washington, D.C. this June to share information about the work.

Equitable transportation investments are crucial to connecting people to jobs, educational opportunities, affordable housing, health care, and other basic needs. Through a coalition of over 100 organizations, the Transportation Equity Caucus is charting a new course for transportation investments, one that is focused on policies that advance economic and social equity in America.

d) PVTA Service Change Meetings and Public Outreach

In December 2013, four public information meetings were held to share ideas for improving PVTA service and to gain input from riders and the general public. These meetings included a formal presentation of potential service improvement options being considered by the PVTA study team, and the

opportunity for attendees to discuss their ideas and concerns about particular routes. Meetings were held in Springfield, Holyoke, Northampton and Amherst; more than 75 individuals attended. These meetings were supplemented with rider drop-in sessions at the Springfield Bus Terminal and the Holyoke Transportation Center.

In March and April of 2014, fourteen formal public meetings were held around the service area to get final public input on specific route changes. A third party hearings officer presided over the meetings. The hearings officer was responsible for allocating time to individuals for public testimony; all meetings were recorded and transcribed for the PVRTA Advisory Board. PVRTA provided a Spanish translator at all of the meetings and all meeting locations were ADA accessible. Individuals who attended the meeting were provided an informational sheet with the recommended service change and a map of the particular route(s) they were interested in commenting on. These informational sheets were provided in English and Spanish. If the individual had further questions, the PVRTA provided staff that could provide details as needed.

e) Executive Order 530 and Regional Coordinating Councils Outreach

In 2011 Gov. Patrick signed Executive Order 530 to examine and offer suggestions to improve/reform Community, Social Service and Paratransit transportation. The Order established a Commission of 16 members charged with making recommendations to improve transportation services used by persons with disabilities, low incomes, limited English proficiency, and seniors and visitors to the Commonwealth. The Commission held public listening sessions across the state and based on the findings, developed over 60 recommendations ranging from making more wheelchair-accessible taxis available to facilitating paratransit transfers between transit regions. One recommendation of the report (Executive Order 530 Final Report July 2012) was to establish Coordinating Councils (RCCs) as part of a statewide initiative to improve service quality and increase efficiency. PVPC has been engaged with coordinating regular meetings of the Pioneer Valley RCC.

f) Identification of Unmet Needs for Human Mobility Services and Stakeholder Outreach

PVPC updated the Pioneer Valley Coordinated Human Services Plan (in 2014) with a range of transportation stakeholders in the region that included representatives of public, private, and nonprofit transportation and human-services providers, as well as members of the public. Public input for the CHST was incorporated from the PVRTA 2014 Comprehensive Service Analysis, the 2014 PVRTA Paratransit Service Analysis, the 2014 Pioneer Valley Regional Coordinating Council Survey, and the 2014 Getting to

Healthy: Improving Access to Care study for Cooley Dickinson Health Care. Additional opportunities for public comment were scheduled after the release of the draft document and at the scheduled MPO public meeting.

g) GovDelivery topic and contacts distribution list

PVPC worked with the Massachusetts Office of Diversity and Civil Rights to create a comprehensive database of contacts. MassDOT maintains a Civil Rights related GovDelivery topic and contacts list, which is a compilation of individuals and entities identified by MassDOT as well as those on the contact lists maintained by each of the thirteen (13) MPOs/RPAs across the Commonwealth. MassDOT's Office of Diversity and Civil Rights recently coordinated an effort in each MPO/RPA to expand their outreach lists with Title VI- and ADA-related stakeholders and organizations that had not yet been incorporated into MPO/RPA outreach. This effort saw the statewide list of contacts swell from 3,000 to 5,000.

h) Outreach Consultation and Coordination with PVTA

As a member of the PVMPO, the PVTA is an active participant in the metropolitan planning process. The PVTA Advisory Board Chair (or, in his or her absence, the PVTA Administrator) is a permanent PVMPO board member; PVTA participates in the activities of the Joint Transportation Committee (JTC), the principal advisory body to the PVMPO, as an ex-officio member; PVTA submits specific comments on projects in the Transportation Improvement Program (TIP) as they are brought forward; and PVTA coordinates planning activities and services through direct and frequent meetings with PVMPO staff. PVTA, in coordination with PVMPO, places transit projects on the TIP and Regional Transportation Plan (RTP).

PVTA's principal goals for the PIP are to seek out and integrate the needs and views of all transit customers, especially those of minority, low income, and Limited English Proficiency (LEP) populations—people who may have comparatively fewer resources to present their concerns about transit. PVTA's PIP is structured to offer regular and continuous opportunities for the public to be involved in the agency's planning and operational decisions. Multiple channels of communication are available to PVTA customers, businesses served by PVTA, and non-riders of the region. PVTA staff is accessible by telephone, e-mail, and in person. Agency contact information is posted on the website (www.pvta.com), on transit vehicles, on route schedules, and in all publications. Public meetings are held in transit accessible locations, with notices posted on vehicles and the agency's website. PVTA also utilizes local media (i.e., newspapers, television stations, websites) to publicize public meetings and events.

The activities outlined in the PIP are geared to provide meaningful opportunities for the residents of PVTA's service region to participate in aspects of transit planning and service for which the authority is responsible. These activities include:

- Facilitation of the monthly PVTA Advisory Board.
- Operation of the PVTA Information Center.
- Providing service information and reports.
- Responding to media inquiries.
- Fostering community participation in bus rider forums and paratransit rider committees.
- Conducting outreach to transit stakeholders, including employers, businesses and community based organizations.
- Conducting regular surveys of transit customers and potential transit markets.
- Facilitating the participation of municipal governments and state and local agencies in PVTA planning activities.
- Meetings with the Directors of municipal councils on aging.
- Outreach workshops or tabling events about PVTA services at social service and elder care agencies (approximately 8 per year).
- Monthly meetings with City of Northampton Public Transportation Committee.
- System wide bus rider forums (May 13 and 20, 2009).
- Public hearings for the Comprehensive Service Analysis and proposed modification.
- Public hearing for Paratransit Service Analysis.
- Media releases.
- Meetings with stakeholders.
- Public events to publicize PVTA service improvements and capital projects.

The specific actions that PVTA has taken during the last three years to ensure that minority and low-income people of the service region had meaningful access to transit services include:

- Development and implementation of the PVTA Limited English Proficiency (LEP) Plan.
- Recruiting and hiring of bilingual call center staff (English and Spanish).
- Production in 2015 of a new system wide route maps in Spanish and English.
- Spanish radio and print advertisements for Sumner Express and All-day pass services.
- Web site multi-language translation feature added.

- Biannual bus rider forums with bilingual staff and translators available.
- Quarterly paratransit rider meetings.
- Spanish versions of paratransit services guide and manual.
- Spanish and sign language interpreters at public meetings upon request.
- Onboard rider surveys available in Spanish from bilingual surveyors.

F. EQUITY ASSESSMENT MEASURES

1. Equity Assessment Strategies

Title VI and the executive orders of Environmental Justice call for programs that quantify the benefits and burdens of the transportation investments and evaluate the impacts for different socio-economic groups. To accomplish this task PVPC worked with the JTC to establish measures of effectiveness that would reflect quantifiable transportation expenditures in the Region. These measures were used to evaluate capital expenditures in the Regional Transportation Plan and Transportation Improvement Program and to evaluate transit service. The evaluations provide a barometer of the distribution of resources and also assist decision-makers in achieving an equitable balance of in future years.

2. Equity Distribution Analysis

Information collected from census data, GIS, transit route inventory, and regional models was used to identify and assess transportation deficiencies, benefits, and burdens. The evaluation of each measure of effectiveness included the following:

a) Distribution of Transportation Investments in the Region

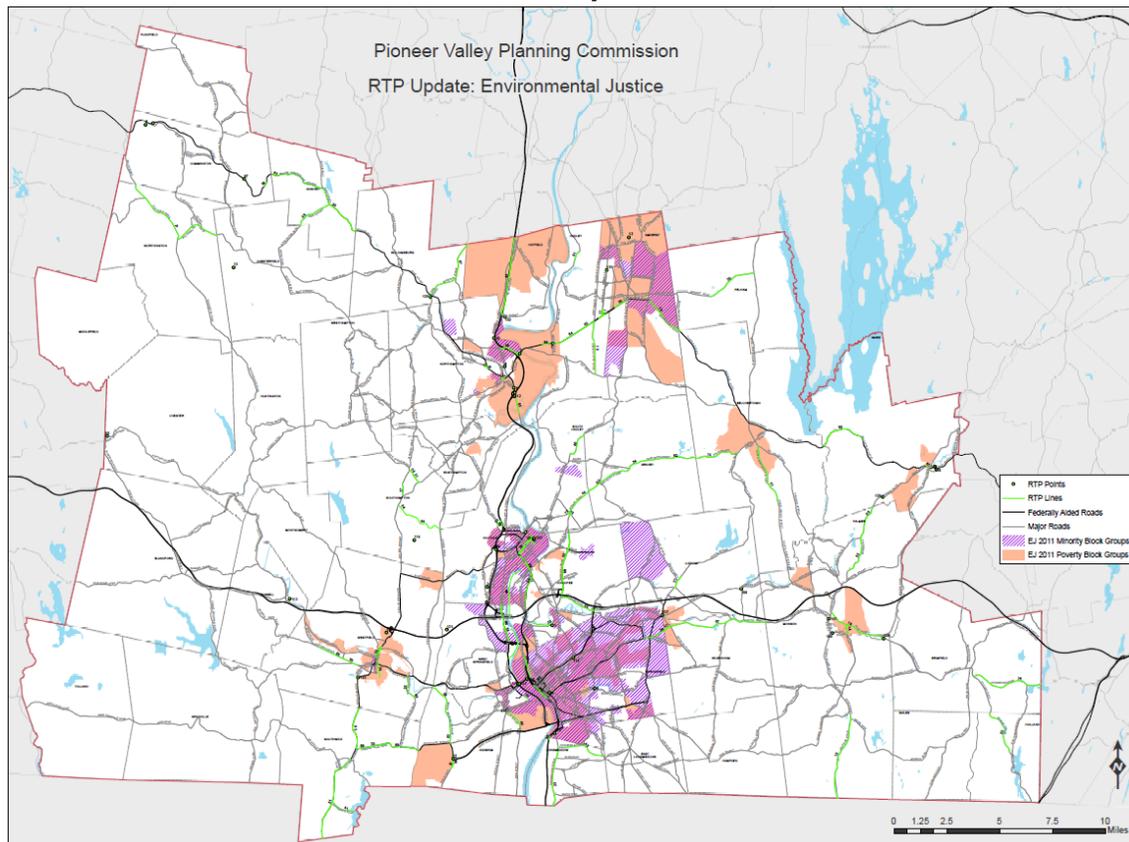
Past and proposed funding allocations for TIP projects were calculated for defined low income and minority populations. PVPC completed an inventory of projects included on the RTP and mapped these projects. GIS tools were used to determine the amount of transportation funds (including bridge projects) allocated to each population group and also compared these values to regional average allocations using census block group data. This analysis is also conducted annually for the Transportation Improvement Program. PVPC is also working to conduct analysis on other Title VI protected classes. The RTP analysis is presented in the Table 4-6.

The analysis shows that 49.14 percent of projects on the RTP are located in low block groups and that 27.59 percent of projects are located in minority block groups. The table also shows that 70.89 percent of funding was distributed to defined low income block groups compared to 26.82 percent to other block groups in the region.

Table 4-6 – Distribution of Projects in the RTP to Low Income and Minority Populations

	PVPC Total	Low Income Block Groups	Minority Block Groups	% PVPC Total in Low Income Block Groups	% PVPC Total in Minority Block Groups	Other Block Groups	% PVPC Total in Other Block Groups
Transportation Analysis Zones (Block Groups)	442	158	163	35.74%	36.87%	233	52.71%
Population	621570	207727	212230	33.41%	34.14%	346117	55.68%
Minority Population	171475	110607	130808	64.50%	76.28%	30535	17.80%
Number of Projects	116	57	32	49.14%	27.59%	56	48.28%
Number of Funded Projects	116	57	32	49.14%	27.59%	56	48.28%
Projects not Funded	0	0	0	0.00%	0.00%	0	0.00%
Projects	\$753,320,372	\$534,037,612	\$392,707,857	70.89%	52.13%	\$202,049,770	26.82%
Funded Projects	\$753,320,372	\$534,037,612	\$392,707,857	70.89%	52.13%	\$202,049,770	26.82%
Projects Not Funded	0	0	0	0.00%	0.00%	0	0.00%
Total Project Dollars per Capita	1,211.96	2,570.86	1,850.39	2.12	1.53	583.76	0.48
Funded Project Dollars per Capita	\$1,211.96	\$2,570.86	\$1,850.39	212.12%	152.68%	\$583.76	48.17%
Not Funded Project Dollars per Capita	0	0	0	0.00%	0.00%	0	0.00%

Figure 4-6 – Distribution of Projects in the RTP to Low Income and Minority Populations

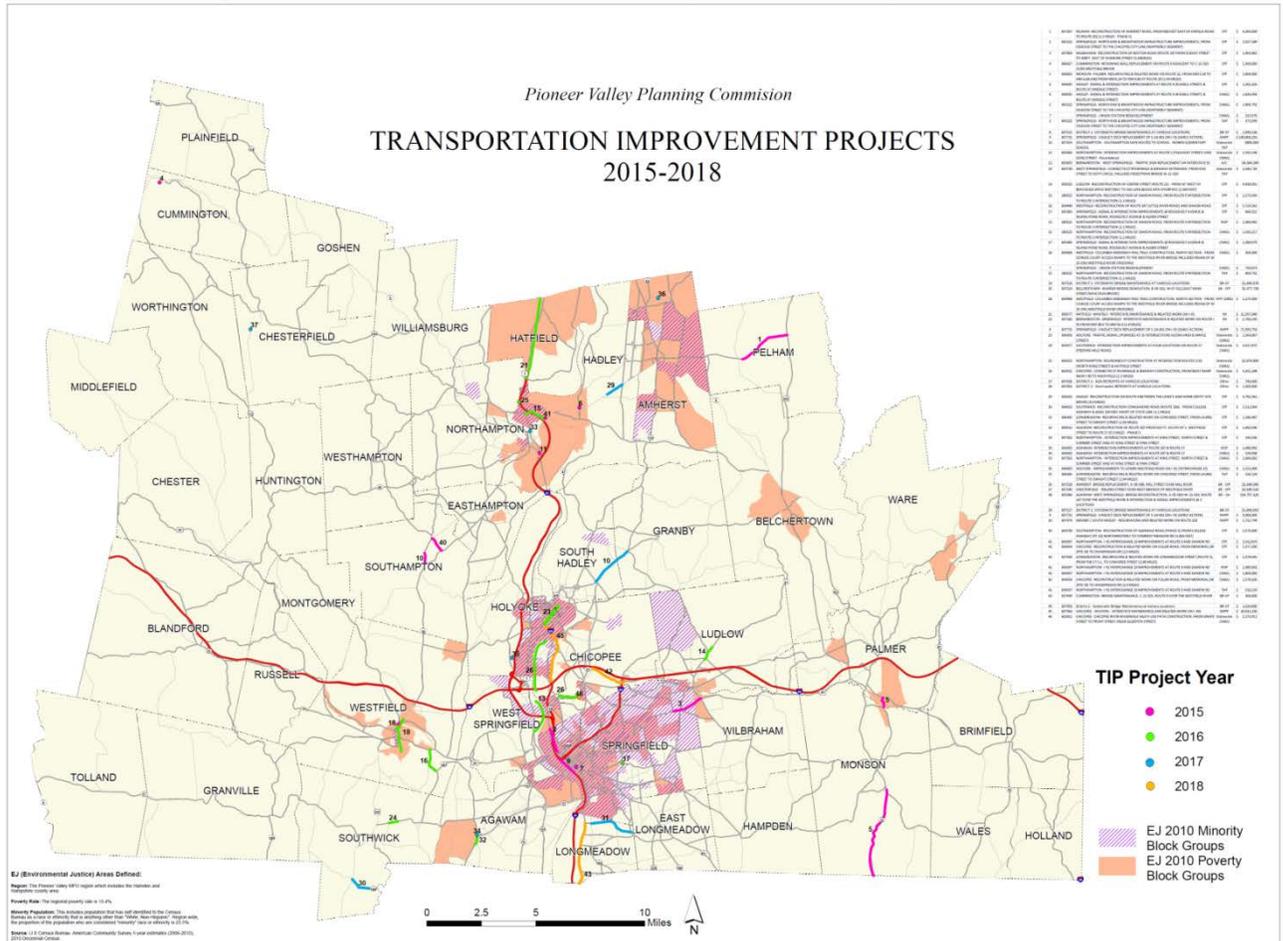


b) Annual Equity Assessment of Distribution of TIP Funding

PVPC conducted an equity assessment on the transportation planning tasks completed as part of previous UPWP's this assessment process has previously been used on the Regional TIP and identifies how regional transportation improvement projects have potential impacted defined minority and low-income block groups in the region. The following demographic map displays an overlay of federally funded projects from the Transportation Improvement Program (TIP) to minority and low income census block groups.

<http://pvpc.maps.arcgis.com/apps/StorytellingTextLegend/index.html?appid=f54bf3b6dfd04033980dcd9a898b85a3>

Figure 4-7 – Distribution of Transportation Projects

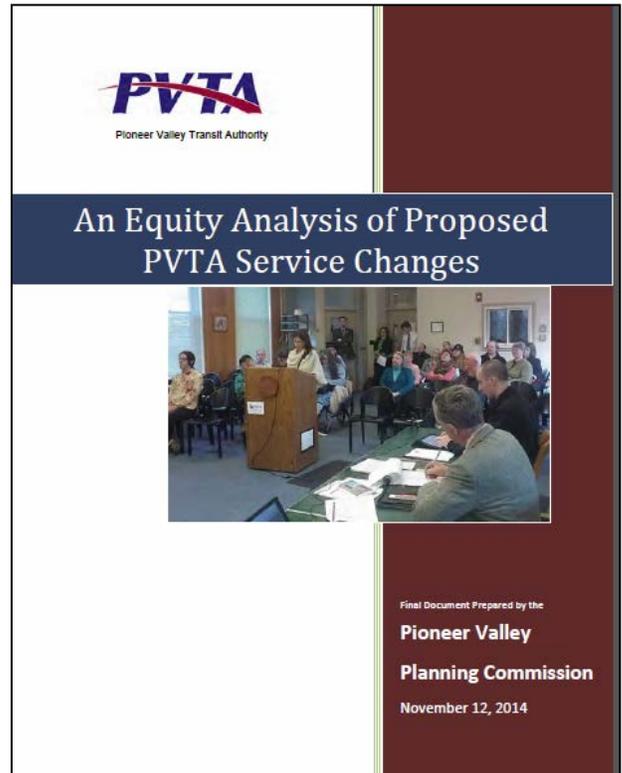


c) Transit Access to Major Employers

PVPC staff reviewed transit service access to major employers in the region as part of the Coordinated Human Services Plan. The results of this analysis are shown in Figure 4-8. Major Employers with frequent service are circled in green, employers with less frequent service are circled in blue, and those employers with no PVTA service are circled in red.

d) Equity Analysis of PVTA Comprehensive Service Changes

In 2014 PVPC conducted a equity analysis of proposed changes to the PVTA transit service in the region. A crucial objective of the Comprehensive Service Analysis and the fall service changes informed by it is the streamlining of PVTA's route network. This improves the system's efficiency, resulting in expanded service hours, increased service frequencies, new bus routes, added travel options, and new destinations to the network. This is accomplished by the elimination of duplicative service and minor route deviations that increase travel time without significantly improving access. Overall a total of 48.7 route miles will be discontinued in the fall service changes; a 7.5% reduction. Of the route miles scheduled to be discontinued, 21.5 are in Environmental Justice areas (44% of total), while the other 27.2 miles are outside Environmental Justice areas (56% of total). The burden of total mile reduction is mostly borne outside of Environmental Justice areas.



e) Distribution of UPWP Tasks

PVPC conducted an equity assessment on the transportation planning tasks completed as part of previous UPWP efforts. UPWP tasks are an important barometer as they provide assistance to Towns that might not have the resources to complete the task and also because the planning studies and reports generated through UPWP task can result in recommendations that prepare a project for future development. For this assessment process work plans from the previous five years were reviewed to identify the transportation planning tasks that were completed for each of the 43 communities in the PVPC region. Tasks included data collection, planning studies, local technical assistance requests, and regional activities such as the update to the TIP or CMP. All total, nearly 499 tasks were identified over the five year period. While the total number of projects for each community is often a function of the size of the community, at least on task was completed for each community over the five year period. This information is summarized in the Table 4-7.

Table 4-7 – Transportation Tasks by Community and Year

Community	2010	2011	2012	2013	2014	Total
Agawam	2	2	2	1	3	10
Amherst	4	2	4	4	1	15
Belchertown	1	3	1		1	6
Blandford	1	1		1		3
Brimfield		2	3	2	1	8
Chester	1	2	1	1	1	6
Chesterfield	1					1
Chicopee	4	1	3	3	3	14
Cummington	1		1		1	3
East Longmeadow	2	2		1	1	6
Easthampton	3	3	2	1	3	12
Goshen	1	1	1		1	4
Grandby		2		3		5
Granville		1	1	1	1	4
Hadley	1	3	4	2	1	11
Hampden	1		2		1	4
Hatfield				1		1
Holland	1	1				2
Holyoke	3	5	6	3	3	20
Huntington	1	1	1	2	1	6
Longmeadow	3		1	4	2	10
Ludlow	7	1			2	10
Middlefield		1				1
Monson	1	1		1		3
Montgomery			1	2	1	4
Northampton	7	6	5	7	3	28
Palmer	1					1
Pelham	1	1		1		3
Plainfield	1	1	1	1	1	5
Region Wide	38	29	33	34	28	162
Russell	1	1	1	1		4
South Hadley	3	1	2	4	3	13
Southampton	1	1	2	1		5
Southwick	6	2	1	2	3	14
Springfield	8	12	10	6	6	42
Tolland			1	1	1	3
Wales			1	1		2
Ware	5	2	1	2	2	12
West Springfield	4	3	2	2	1	12
Westfield	1	1	3	3	1	9
Westhampton	2			1	1	4
Wilbraham	1		1	1	1	4
Williamsburg	1		3	1	1	6
Worthington	1					1
Grand Total	121	95	101	102	80	499

In addition to counts completed for MassDOT and as part of ongoing planning studies, PVPC offer two free traffic counts for each member community per calendar year. Traffic counts over the last five years were reviewed for each community to determine how much data has been collected across the region and as a way to identify how many communities may not be aware of the traffic counting services we offer. This information is summarized Table 4-8. Traffic counts include both automatic traffic counts and manual turning movement counts.

There is a wide range of traffic count data that has been collected across each of the 43 communities. In general, a higher number of completed traffic counts is an indication that a transportation safety or congestion study was conducted in that community during the calendar year. No traffic counts were performed for the Town of Middlefield and less than five traffic counts were performed in the communities of Blandford, Chesterfield, Hatfield, Holland, Huntington, Montgomery, Palmer, and Worthington. This could be an indication of the need for the transportation section to alert each of these communities of the availability of our regional traffic counting program.

PVPC also collects pavement distress data for all federal aid eligible roadways in the region. This data is collected on a five year rotation and is summarized in Table 4-9. No pavement distress data is currently collected for the Town of Middlefield as there are no federal aid eligible roadways. Pavement distress data was collected and distributed to each of the remaining 42 communities over this five year period. New pavement data is not collected under this program until pavement data has been collected for the entire region.

Travel time data is collected for select communities and corridor as part of the regional congestion management process (CMP). CMP corridors are identified based on input from communities and the JTC. Data collection occurs on a four year cycle but is also constrained by ongoing construction or other activities that could skew travel time data. There are currently CMP corridors or a portion of a CMP corridor in 20 of our 43 communities. The three largest cities of Springfield, Chicopee, and Holyoke have the most corridors as they typically have the most congestion. This information is summarized on in Table 4-10.

Table 4-8 – Traffic Counts by Community and Year

Community	2010	2011	2012	2013	2014
Agawam	5		1		1
Amherst	5	7	5	8	4
Belchertown	5	7			
Blandford	1	2		1	
Brimfield			17		
Chester	1	1	1	2	2
Chesterfield	4				
Chicopee	10	1	1	1	16
Cummington	2		2		2
East Longmeadow	8	4		1	
Easthampton	10	4	3		3
Goshen	3	1	1		2
Granby		1		6	
Granville		3	2	1	1
Hadley	1	1	3	8	1
Hampden	6		2		2
Hatfield				1	
Holland		1			
Holyoke	11	29	13	2	10
Huntington	3			1	
Longmeadow	4		1	3	1
Ludlow	9	1			1
Middlefield					
Monson	2	7		2	
Montgomery			2		
Northampton	18	8	16	34	8
Palmer	3				
Pelham	3	7		1	
Plainfield	1	2	6		2
Russell	4	4	1	1	
South Hadley	6	12	1	4	3
Southampton	4	14			
Southwick	21	2	1	2	28
Springfield	10	15	35	31	24
Tolland			2	1	2
Wales			2	4	
Ware	9	1			15
West Springfield	10	1	36	1	8
Westfield	1	4	5	20	2
Westhampton	1			1	3
Wilbraham	6		3	2	7
Williamsburg	1		13		3
Worthington	1				

Table 4-9 – Pavement Data Collection by Community and Year

Community	2010	2011	2012	2013	2014
Agawam					X
Amherst					X
Belchertown					X
Blandford		X			
Brimfield	X				
Chester	X				
Chesterfield	X				
Chicopee			X		
Cummington		X			
East Longmeadow		X			
Easthampton		X			
Goshen		X			
Granby	X				
Granville		X			
Hadley	X				
Hampden		X			
Hatfield	X				
Holland	X				
Holyoke			X		
Huntington		X			
Longmeadow					X
Ludlow					X
Middlefield	No Federal Aid Eligible Roadways				
Monson	X				
Montgomery	X				
Northampton				X	
Palmer	X				
Pelham	X				
Plainfield				X	
Russell	X				
South Hadley	X				
Southampton	X				
Southwick		X			
Springfield			X		
Tolland		X			
Wales	X				
Ware	X				
West Springfield					X
Westfield				X	
Westhampton		X			
Wilbraham	X				
Williamsburg		X			
Worthington	X				

Table 4-10 – CMP Data Collection by Community and Year

Community	Total Corridors	2010 - 2011	2011 - 2012	2012 - 2013	2013 - 2014
Agawam	5	X	X	X	
Amherst	4				
Belchertown	2		X		X
Chicopee	12	X	X		X
East Longmeadow	3		X	X	
Easthampton	3		X	X	X
Granby	1		X		
Hadley	3			X	X
Holyoke	10	X	X	X	X
Longmeadow	4		X	X	
Ludlow	3		X		X
Northampton	5			X	X
Palmer	1			X	
South Hadley	2		X		
Southwick	1			X	
Springfield	23	X	X	X	X
Ware	1		X		
West Springfield	4		X		X
Westfield	3		X	X	
Wilbraham	3			X	X

3. Pioneer Valley Limited English Proficiency Plan and Analysis of Language-related U.S. Census Data

The Pioneer Limited English Proficient (LEP) Plan was been developed by the Pioneer Valley Planning Commission (PVPC) in consultation with the FTA and MassDOT. This plan describes the strategic approach that PVPC is pursuing to achieve its program to better engage people who are Limited English Proficient (LEP) in metropolitan transportation planning activities. PVPC’s goal is to ensure that LEP persons have meaningful access to the public involvement process for PVMPO activities. This LEP Plan clarifies PVMPO’s responsibilities with respect to LEP requirements as a recipient of federal financial assistance from the U.S. Department of Transportation to people who are Limited English Proficient in accordance with:

PVMPO identifies LEP persons who need language assistance through the following activities and services:

- Coordination with municipal, regional and state agencies engaged in transportation planning processes.
- Outreach to community based organizations and municipal agencies to ask their assistance in identifying LEP persons who may need language assistance.
- Outreach to social service agencies in the region.
- Planning coordination and public involvement services and activities with the Pioneer Valley Transit Authority.
- Inclusion of instructions on how to request language translation of key written documents on public meeting notices.
- Asking persons attending public hearings if Spanish language translation and/or signing interpreter services are desired or needed (services are always available).
- Demographic assessment of census data to ascertain likely geographic location of potential LEP customers.

Information regarding PVMPO transportation planning processes is made available through multiple means, including translated public meeting notices and providing a bilingual staff whenever possible. PVMPO's future programs and services to enhance accessibility of transit services to LEP persons include:

- Maintenance of a written translation and oral interpreter service provider's database. This effort improves the speed and convenience with which written documents can be translated for the public, and reduces the need to have public requests for them.
- Ensuring that PVMPO members are aware of the USDOT LEP guidance and support their LEP planning activities, as appropriate.
- Regular updates to this LEP Plan, as needed by new events, such as the release of language-related demographic data from the decennial census and/or indications of increases in LEP population.
- Identification of community based organizations that are not being contacted through existing outreach.

This section presents analysis of demographic data related to the ability to speak English from the 2010 U.S. Census and the American Community Survey (ACS). Table 4-11 shows the wide range of languages other than English spoken at home in the Pioneer Valley and speaks to the cultural diversity of the region.

Table 4-11 – Languages other than English Spoken at Home in the PVPC Region

Languages	Total	Percent	Cumulative
Spanish or Spanish Creole	67,249	57.2%	57.2%
Polish	6,990	5.9%	63.1%
French (incl. Patois, Cajun)	6,388	5.4%	68.6%
Russian	5,646	4.8%	73.4%
Portuguese or Portuguese Creole	5,014	4.3%	77.6%
Chinese	2,810	2.4%	80.0%
Vietnamese	2,653	2.3%	82.3%
African languages	2,342	2.0%	84.3%
Italian	2,122	1.8%	86.1%
Other Slavic languages	1,720	1.5%	87.5%
Other Asian languages	1,441	1.2%	88.8%
German	1,421	1.2%	90.0%
Mon-Khmer, Cambodian	1,267	1.1%	91.1%
Arabic	1,122	1.0%	92.0%
Other Indo-European	967	0.8%	92.8%
Korean	952	0.8%	93.6%
Other Indic	736	0.6%	94.3%
Greek	728	0.6%	94.9%
Japanese	682	0.6%	95.5%
Hindi	677	0.6%	96.0%
Thai	665	0.6%	96.6%
French Creole	608	0.5%	97.1%
Urdu	579	0.5%	97.6%
Serbo-Croatian	536	0.5%	98.1%
Tagalog	484	0.4%	98.5%
Other West Germanic	348	0.3%	98.8%
Persian	308	0.3%	99.0%
Hebrew	219	0.2%	99.2%
Other Pacific Island	167	0.1%	99.4%
Scandinavian	153	0.1%	99.5%
Gujarati	146	0.1%	99.6%
Laotian	99	0.1%	99.7%
Hungarian	96	0.1%	99.8%
Armenian	93	0.1%	99.9%
Other and unspecified	65	0.1%	99.9%
Yiddish	52	0.0%	100.0%
Other Native North American	23	0.0%	100.0%
Hmong	17	0.0%	100.0%
Navajo	0	0.0%	100.0%
Total other than English at Home	117,585	100%	100.0%

4. Recommendations from the Limited English Proficient (LEP) Plan

The PVPC staff will continue to implement recommendations identified through analysis and the public participation process with the assistance of the Joint Transportation Committee, the MPO and the Pioneer Valley Transit Administration. PVPC intends to take actions necessary to assure that the all

affected communities are included in the decision making process and that the information needed to make decisions is available. As the process develops, practices being tested today may be institutionalized as policy depending on their success.

Examples include:

- Review and update the measures of effectiveness on a regular basis, incorporating new spending on projects listed in the TIP.
- Expand public participation efforts related to the RTP and TIP to include local presentations at special group meetings, neighborhood council meetings, and community activities.
- Adopt MassDOT recommendations related to the PVMPO Public Participation Plan.

5. Ongoing Evaluation of Title VI and EJ Planning Efforts

To assess success in achieving the goals an action item evaluation was developed. This list will be used as an ongoing review of the effectiveness of policies and practices related to EJ and Title VI.

- Has a demographic profile of the metropolitan planning area been developed that identifies low-income and minority populations? Has this data been updated to reflect revised census data?
- Have PVTA and PVPC responded to requests for new and expanded transit service when requested? Has the region sought funds to offer these services?
- Have Title VI reporting requirements been supplemented with a report to the MPO?
- Does the planning process use demographic information to examine the benefits and burdens of the transportation investments included in the plan and TIP?
- Does the planning process have an analytical process in place for assessing the regional benefits and burdens of transportation system investments for different socio-economic groups?
- To what extent has PVPC made proactive efforts to engage and involve representatives of minority and low-income groups through public involvement programs? Does the public involvement process have a strategy for engaging minority and low-income populations in transportation decision making?
- What issues were raised, how are their concerns documented, and how do they reflect on the performance of the planning process?
- What mechanisms are in place to ensure that issues and concerns raised by low-income and minority populations are appropriately considered in the decision making process?

- What corrective action should be put into the process regarding existing requirements and prepare it for future regulatory requirements?

G. TITLE VI AND EJ SELF CERTIFICATION

The Pioneer Valley MPO has conducted an analysis of the Pioneer Valley Regional Transportation Plan with regard to Title VI and EJ conformity. The purpose of the analysis is to evaluate the impacts of the transportation planning process on minority and low-income populations. The analysis evaluates efforts to identify minority and low-income populations, develop public participation inclusive of these populations, and to identify imbalances that impact these populations. The procedures and assumptions used in this analysis follow FHWA guidance, are consistent with the procedures used by MPOs in Massachusetts, and are consistent with Title VI of the 1964 Civil Rights Act, National Environmental Policy Act, Section 109(h) of Title 23, DOT Title VI Regulations, DOT and CEQ NEPA Regulations, Section 1202 of TEA-21, DOT and CEQ NEPA Regulations, Section 1203 of TEA-21, DOT Planning Regulations, Executive Order 12898, USDOT Order 5610.2, and FHWA Order 6640.23.

Accordingly, PVPC has found the Pioneer Valley Regional Transportation Plan to be in conformance with Title VI of the Civil Rights Act of 1964, and requirements of Executive Order 12898 (Environmental Justice). Specifically, the following conditions are met:

1. Conditions Related to Public Involvement

PVPC has identified a strategy for engaging minority and low-income populations in transportation decision making and to reduce participation barriers for these populations. Efforts have been undertaken to improve performance, especially with regard to low-income and minority populations and organizations representing low-income and minority populations. (In 2015 the PVPC will be modifying the Public Participation Process to further incorporate Title VI guidance from the Massachusetts Office of Diversity and Civil Rights.)

2. Conditions Related to Equity Assessment

The Pioneer Valley planning process has an analytical process in place for assessing the regional benefits and burdens of transportation system investments for different socio-economic groups. A data collection process is used to assess the benefit and impact distributions of the investments and specific strategies are identified for responding to imbalances.

3. Title VI and EJ Conclusions

PVPC addresses environmental justice and social equity issues as part of its transportation planning process. PVPC identifies goals to enhance the existing public participation process, methodology to identify low income and minority populations, and provides measures of effectiveness to evaluate transportation deficiencies, benefits, and burdens. The PVPC will continue to improve its public participation and planning process to ensure that it is conducted in accordance with Title VI of the Civil Right Act of 1964, FHWA/FTA guidance on LEP and requirements of Executive order 12898 (Environmental Justice) to give full and fair consideration to minority and low income residents in the region. The region's outreach and efforts to engage the public in meaningful discussion around transportation issues has made great strides and will continue to be a priority of the MPO.