Pioneer Valley Metropolitan Planning Organization

Title VI Triennial Program

Catalyst for Regional Progress
PVPC

Prepared by
The Pioneer Valley
Planning Commission

June 18, 2014

Pioneer Valley Metropolitan Planning Organization
Endorsement Sheet

FY 2014 TITLE VI Program

Through consensus at its June 18, 2014 posted meeting, the Pioneer Valley Metropolitan Planning Organization (PVMPO) voted unanimously on to endorse the *PVMPO FY 2014 TITLE VIProgram* in compliance with FTA Circular C4702.1B

_____

Richard A. Davey, Chair

DATED _____

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I. Overview

Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance." To fulfill this basic civil rights mandate, each federal agency which provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing applicable rules, regulations, or requirements.

This document explains the Pioneer Valley Metropolitan Planning Organization (PVMPO) Title VI Program. The Pioneer Valley Metropolitan Planning Organization (PVMPO) is a cooperative body of ten signatories designated by the Governor to act as a forum for ensuring a Continuing, Cooperative and Comprehensive (often referred to as the "3C") decision making of transportation investments within the region. The 3C framework followed by the PVMPO promotes the involvement by all levels of government, stakeholders and general public through a proactive public participation process.

This program, conducted in cooperation with the Massachusetts Department of Transportation (MassDOT), assures that Title VI requirements are fully met and that the PVMPO is compliant with federal guidelines and is responsive to the needs of Title VI beneficiaries. The PVMPO is committed and responsible for all civic rights compliance, including the federal Affirmative Action and Equal Employment Opportunity, the Americans with Disabilities Act and the Disadvantage Business Enterprise Programs, and state nondiscrimination provisions such as the Massachusetts Public Accommodation Law. The PVMPO Title VI Nondiscrimination Policy Statement is included with this program update (Appendix A).

For the purpose of this document, the PVMPO will reference specific guidance from the US Department of Transportation (U.S. DOT), the Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA). The document is outlined based on the issued guidelines from parent agencies. In addition to this, the PVMPO followed the recommendations provided by MassDOT's Office of Diversity and Civil Rights, which is the agency responsible for overseeing the PVMPO Title VI compliance.

II. General Requirements

[USDOT 49 CFR Part 21; FHWA 23 §CFR 200; FTA C4702.1B Chapter III]

A. Title VI Assurances

In accordance with 49 CFR Section 21.7(a), the PVPC signed the FTA Civil Rights Assurance and U.S. DOT Assurance statements are uploaded to the FTA's Transportation Electronic Award Management (TEAM) system (Appendix M). The PVMPO signed FHWA's assurances on January 15, 2013 (Appendix L) and updated these on June 18, 2014 .

B. Title VI Program Approval

The PVMPO FY2014 Title VI Program was submitted to the PVMPO for review on June 4, 2014 and approved on its meeting on June 18, 2014. A signed approval of the PVMPO FY2014 Title VI Program endorsement is presented at the beginning of this document.
On August 12, 2013 PVPC received a written determination from the Federal Transit Authority (FTA) that all Title VI requirements have been met (Appendix G). The next update to the Title VI program is due April 1, 2015.

C. Title VI Notice

The PVMPO employs a range of methods for promoting awareness of its processes and interest in Title VI concerns. The Title VI Notice is posted in all PVMPO's outreach media types, such as: legal notices, press releases, meeting notices, in emails and in the PVPC's website, among other locations and documents.

A list of the documents where the Title VI Notice is posted follows:

1. Press releases – used to invite the public to participate in workshops and meetings hosted by the PVMPO, and they are distributed to all major and most local newspapers in the region, as well as community organizations.
2. Legal notices – mostly used to announce public review of the PVMPO certification documents or their amendments and are placed in the Springfield Republican with translations to Spanish when appropriate. PVPC also publishes in Republican's El Pueblo Latino.
3. Major documents and publications are made available at major libraries in the region.
4. E-mail LISTSERV – a tool used to contact individuals about upcoming events, meetings, workshops and seminars and includes municipal officials, legislators, local and regional community and transportation activists, and interested citizens. The email listserv has is continually being updated and expanded as new community partners are identified.

5. PVPC's website (www.pvpc.org) -The Title VI notice is posted on all the website's pages and a link to a Title VI Policy specific webpage is also available. The website is used to post upcoming meetings, agendas, and meeting minutes, and promotes the website at all public discussions. The website includes access to all documents produced by the PVMPO, as well as links to other agencies, maps, local municipalities and data.
6. PVMPO draft documents – are circulated for public review. The final documents also include the Title VI notice.
7. PVTA provides Title VI notification to its bus riders through with posted notices (in English and Spanish) on all PVTA busses, and at public hearings/workshops, and in public notices.

The MPO uses the language recommended by MassDOT whenever appropriate. The language is specifically designed for flyers, newspapers, and email.

1. Flyer language: "This meeting is accessible to people with disabilities and those with limited English proficiency. Accessibility accommodations and language services will be provided free of charge, upon request, as available. Such services include documents in alternate formats, translated documents, assistive listening devices, and interpreters (including American Sign Language). For more information or to request reasonable accommodation and/or language services please contact NAME by DATE at EMAIL ADDRESS or PHONE NUMBER."
2. Newspaper language: "This meeting is accessible to people with disabilities and those with limited English proficiency. To request accessibility accommodations and/or language services please contact NAME by DATE at EMAIL ADDRESS or PHONE NUMBER."
3. Email language: "This meeting is accessible to people with disabilities and those with limited English proficiency. Accessibility accommodations and language services will be provided free of charge, upon request, as available. Such services include documents in alternate formats, translated documents, assistive listening devices, and interpreters (including American Sign Language). For more information or to request reasonable accommodations and/or language services please contact NAME by DATE at EMAIL ADDRESS or PHONE NUMBER. Please ask to speak with someone about the PROJECT NAME."

   (Second section, below the instructions to unsubscribe) "Title VI Notice of Nondiscrimination: PVMPO complies with Title VI of the Civil Rights Act of 1964 and related federal and state statutes and regulations. It is the policy of PVMPO to ensure that no person or group of persons shall on the grounds of Title VI protected categories, including race, color, national origin, or under additional federal and state protected categories including sex, age, disability, sexual orientation, gender identity or expression, religion, creed, ancestry, veteran's status (including Vietnam-era veterans), or background, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity administered by PVMPO. To request additional information about this commitment, or to file a complaint under Title VI or a related nondiscrimination provision, please contact PVPC's Title VI Specialist, 60 Congress Street Springfield, MA 01104-3419 413-781-6045 Fax: 413-732-2593 TTY/TDD: 413-781-7168

Website: http://www.pvpc.org.

In addition to this, Title VI Notice to Beneficiaries has been translated to other languages other than English with the support of MassDOT Office of Diversity and Civil Rights (ODCR). These notices are also available online, included in all PVMPO translated public documents and published in media other than English. A copy of the PVMPO's Title VI policy statement and notice is included in Appendix A of this document.

D. Title VI Complaints

As of today, the PVMPO does not have any active complaint, investigation or lawsuit against it that allege discrimination on the basis of race, color, and/or national origin since the time of the last submission. However, should an investigation, complaint, or lawsuit be filed against the PVMPO alleging such discrimination, the PVMPO has developed procedures to investigate and track Title VI complaints in coordination with MassDOT ODCR in compliance with the requirements established in 49 CFR Section 21.9(b).

An individual can request information related to the Title VI complaint procedures at our primary offices during regular business hours. Also, the procedures and related documents are readily available for download at the Pioneer Valley Regional Planning Commission's website (www.pvpc.org). The documents explain the procedures on how to file a Title VI complaint and are available in Microsoft Word and in Portable Document Format, or PDF. See Appendix B for a copy of the PVMPO Title VI Tracking Sheet, Appendix C for the PVMPO Title VI Complaint Procedures, and Appendix D for Complaint Forms.

MassDOT ODCR is working on the standardization of the complaint forms and procedures among its sub-recipients. The PVMPO is waiting for guidance on this matter. Once this step is complete, the PVMPO will have both the complaint form and the procedures available in other languages other than English.

III. Public Involvement and LEP

[42 USC 2000d et seq.; 49 CFR Part 21; Executive Order 12898; FHWA 23 §CFR 200; FTA C4702.1B
Chapter III, Section 4(a)(4), Section 8]

Public involvement overarches all phases of project development. From early stages of need assessment, the planning phase and programming of projects and final implementation. MassDOT also includes project development guidance in the 2006 Project Development and Design Guide and in subsequent policy and design directives. This chapter presents the public involvement techniques the PVMPO uses throughout the project cycle that addresses Title VI requirements. The complete PV Public Participation Plan is available online at www.PVPC.org.

A. Minority Representation in the PVMPO

A Memorandum of Understanding (MOU) was signed by the PVMPO members agreeing to work together in undertaking the comprehensive, continuing, and cooperative transportation planning process (3C process), required by the United States Department of Transportation under the provisions of section 134 of Title 23 of the United States Code, as amended, and those of Section 8 of Title 49 of the Federal Transit Act, as amended. The PVMPO membership consists of ten State, Regional, City and Sub-regional officials or their designees. In 2014 members of the MPO were asked to participate in a voluntary survey of race/ethnicity, age and income. A copy of the survey is included in Appendix P. This survey will also be extended to other venues and representative groups such as the Joint Transportation Committee.

Composition of the MPO:

The voting members of the Pioneer Valley Metropolitan Planning Organization consist of the following officials or their designee or alternate:

- the Secretary of the Executive Office of Transportation
- the Administrator of the Massachusetts Highway Department
- the Chairman of the Pioneer Valley Planning Commission
- the Chairman of the Pioneer Valley Transit Authority Advisory Board
- the Mayors of two of the three (3) urban core cities Holyoke, Chicopee or Springfield.
- the Mayor or a Selectman of one of the following four (4) cities and towns outside of the three core cities: Agawam, Southwick, Westfield, West Springfield.
- the Mayor or a Selectman of one of the following five (5) cities and towns: Amherst, Easthampton, Hadley, Northampton, South Hadley.

- a Selectman of one of the following fourteen (14) suburban and rural towns:

Belchertown, Brimfield, East Longmeadow, Granby, Hampden, Holland, Longmeadow, Ludlow, Monson, Palmer, Pelham, Wales, Ware, Wilbraham

- a Selectman of one of the following seventeen (17) suburban and rural towns:

Blandford	Chester	Chesterfield
Cummington	Goshen	Granville
Hatfield	Huntington	Middlefield
Montgomery	Plainfield	Russell
Southampton	Tolland	Westhampton
Williamsburg	Worthington	

In order to facilitate the implementation of the 3C process and to expand involvement in the PVMPO functions, the Pioneer Valley Joint Transportation Committee was established by the MPO. The Advisory Committee provides a forum for broad public participation, technical and citizen input in the transportation planning process. It brings together public agencies, elected and appointed officials, transportation providers, environmental interests, technical experts, specialists, business persons and citizens concerned with transportation plans and programs.

The Advisory Committee membership consists of a broad and balanced spectrum of providers and users of any form of transportation. Any individual is welcome to participate in any open meetings of the Advisory Committee as a non-voting participant.

The JTC formed under provisions out-lined in the Memorandum of Understanding, is the prime policy advisory body regarding transportation planning issues to the Pioneer Valley Metropolitan Planning Organization (MPO). As such, the JTC is composed of the following:

1. One representative and one alternate from each of the 43 communities comprising of the Pioneer Valley Regional Planning district (Voting Members).
2. Staff representatives of the Pioneer Valley Planning Commission (Ex-Officio*).
3. A representative of the MassDOT Highway Division for District One and District Two as appointed by the Administrator of the Highway Division. (one Vote collectively)
4. A representative of MassDOT as appointed by the Secretary of Transportation (Ex-Officio*).
5. Representatives of the other appropriate state agencies as invited by the Secretary of Transportation (Ex-Officio*).
6. A representative of public and private institutions, consumer groups and associations appointed by either the PVPC or by the Administrator of the MASSDOT HIGHWAY DIVISION acting in consultation with the other signatories (Voting Member).
7. A representative of the Pioneer Valley Transit Authority (PVTA) (Voting Member).
8. A representative of Federal Highway Administration (FHWA) (Ex-Officio*)
9. Airport Representative (Voting Member)
10. Motor coach industry represented by Peter Pan (Voting Member)

11. Rail Freight industry represented by the Pioneer Valley Rail Road (Voting Member)
12. University of Massachusetts (Voting Member)
13. A representative designated by the Massachusetts Bicycle Coalition (MassBike), Pioneer Valley Chapter (Voting Member)

* Ex-Officio members or representatives do not have voting status

B. Public Participation Plan

The Moving Ahead for Progress in the 21st Century Act (MAP-21), signed in July 2012, is the current transportation enabling legislation that emphasizes the importance of public involvement in the transportation planning process that was included in the Safe, Accountable, Flexible, and Efficient Transportation Equity Act: a Legacy for Users (SAFETEA-LU) of 2005, the Transportation Equity Act for the Twenty-first Century (TEA-21) of 1998 and the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991. In addition, current regulation highlights the need to develop MPO public participation plans "in consultation with all interested parties." (MAP-21 Section 1201 *§* 134 (i)(6)(B)(i)).

The PVMPO Public Participation Plan (PPP) is attached as Appendix E. The PPP was developed with input from a broad cross section of community stakeholders. Input on ways to improve outreach, communication, and feedback on transportation planning issues continues to be and ongoing evolving process as the PVMPO continues to reach out to nontraditional partners and works to design methods to reach a diverse and changing population. The PVMPO's Public Involvement Statement summarizes the goals of the plan:

" The Pioneer Valley Metropolitan Planning Organization (PVMPO) has a proactive public involvement process that provides complete information, timely public notice, and full public access to PVMPO activities at all key stages in the decision making process. The PVMPO involves the public early in the planning process, and actively seeks out the involvement of communities most affected by particular plans or projects. The Region's transportation plans and programs are developed in a manner that assures that the public, and affected communities in particular, are consulted and afforded ample opportunity to participate in the development of such plans. "

The PPP is the PVMPO's plan for outreach in identifying needs, planning and project development. Through the Joint Transportation Advisory Committee, the PVMPO proactively monitors techniques in order to implement any necessary refinements that may be needed. The PPP has been amended several times in order to incorporate new initiatives and reinforce existing outreach activities.

In 2014 PVPC coordinated additional assistance from the MassDOT ODCR with regard to the redesign of the new web site. ODRC provided draft accessible IT contract language for the web site development. The language is still in draft form and

is not yet being used in MassDOT contracts, but it can provided a guidance to the IT accessibility standards.

Following MassDOT's guidance, the PVMPO will review its PPP to reflect the new protocols and strategies included in MassDOT's Public Participation Plan which at the date of the completion of this document, was still in its public comment phase. A list of meetings held by the PVMPO as requested by MassDOT is included in Appendix F.

C. Identification of Needs

The PVMPO has historically made a concerted effort to involve the region's disabled, elderly, low-income and minority populations. The PVPC has actively collaborated with a wide range of organizations in partnerships to identify and address local and regional transportation, public health and safety issues. The PVMPO engages a broad cross section of the community through these collaborations. Ongoing efforts such as the Plan for Progress, Sustainable Knowledge Corridor Project, Regional Transportation Plan, Welfare to Work Program and Regional Comprehensive Land Use Plan have created relationships with open lines of communication.
The PVMPO makes a concerted effort to involve and address the needs of individuals or neighborhoods with Limited English Proficiency. The PVMPO routinely conducts outreach with language barrier in mind.

Following the guidelines of MAP-21, PVMPO organizes the public participation to allow for consultation with organizations representing low income and minority populations and coordinated the transportation outreach into the meetings and schedules of these stakeholders. PVPC is actively involved in creating programs and projects that directly addressed local needs. The issues and concerns identified are incorporated into projects, programs and specific tasks through the Unified Planning Work Program, Transportation Improvement Program and the Regional Transportation Plan. Some these efforts, organizations and stakeholders consulted include:

a. The PVMPO (through PVPC) is also represented on the **Pioneer Valley Food Security Advisory Committee** (Click here for the Pioneer Valley Food Security Plan). Other members of the Steering Committee include:
Western Mass. Enterprise Fund; Easthampton City Planner; Gardening the Community; Communities Involved in Sustaining Agriculture (CISA); Partners for a Healthier Community;
Springfield Food Policy Council; Department of Elder Affairs ; United Way Pioneer Valley ; Wintermoon Organic Farm ; City of Springfield, Planning Department ; Holyoke Food and Fitness Policy Council; MLK Jr Family Services; Nuestras Raíces; Massachusetts Public Health Association; City of Holyoke Planning and Economic Development; Food Bank of WMA; Holyoke Food and Fitness Policy Council; Mass Workforce Alliance; Concerned Citizen's of Mason Square Farmer's Market; Springfield Food Policy Council ; Office of Public Health Practice and Outreach UMass-Amherst;

PVGrows; Conservation Works LLC.

b. The PVMPO (through PVPC) has had strong coordination in the creation of the **Pioneer Valley Housing Plan**. During the creation of the plan is was very clear that transportation plays a substantial role in "place building" and determining life outcomes. Good schools, a healthy and safe environment, access to financially stable employment are the essential factors needed to succeed, thrive and excel in society. To quote a section of the plan; "In the Pioneer Valley too many families are stuck in isolated and economically segregated areas—both rural and urban—that lack access to quality jobs, schools, affordable housing, transportation, and cultural and physical amenities. There is a regional need to transform these areas in the Pioneer Valley into communities of opportunity to reduce social disparities and allow all residents to thrive." The Pioneer Valley Housing Plan can be viewed online (Pioneer Valley Housing Plan.)

The Advisory Committee for the Pioneer Valley Housing Plan included: Office of Planning, Belchertown; Hilltown CDC; Office of Community Development, Easthampton; Massachusetts Fair Housing Center; Home Builders & Remodelers Assoc. of Western MA; Valley Community Development Corporation; Department of Housing and Community Development; Young Women's Christian Association; Office of Community Development, Chicopee; Fair Housing Program, Hap, Inc.; Amherst Housing Authority; Hilltown Community Development Corporation; Holyoke Housing Authority; Concerned Citizens of Springfield; Housing Director, City of Springfield; Holyoke Planning Dept.; Homeless Housing Coordinator, Mental Health Association, Inc.; Southwick Office of Planning; Springfield Neighborhood Housing Services Inc.; Dietz & Company; West Springfield Office of Planning.

c. **Live Well Springfield**. Live Well Springfield Movement is led by a coalition of over 20 local organizations that works in collaboration with, and complementary to, the work already underway with the statewide Mass in Motion campaign led locally through the City of Springfield Department of Health and Human Services. The current work includes the Go Fresh Mobile Farmer's Market, developing plans for a full line grocery store in Mason Square, rowing and biking programs on the Connecticut River at North Riverfront Park, and the development of a comprehensive plan for a more walkable/bikeable Springfield.

- 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
- DevelopSpringfield 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 Planning Commission
- Pioneer Valley Riverfront Club
- Springfield Housing Authority
- Springfield Partners for Community Action
- Springfield Vietnamese American Civic Association, Inc.
- University of Massachusetts Amherst
- Vietnamese Health Project/ Mercy Medical Center

d. **Springfield Partners for a Healthier Community**. The mission of this broad partnership is to identify and implement policy and environmental changes to prevent and reduce obesity and early deaths from heart disease, stroke and diabetes in the Greater Springfield area. The Coalition assists in statewide efforts to make the "healthy behavior the easy behavior" in school, worksite, healthcare and community settings. The coalition's efforts target the reduction of risk factors related to chronic diseases mentioned above, which are affecting the residents of Springfield. In partnership with the Brightwood Health Center, Springfield Partners, Baystate Medical Center, Springfield Dept. of Health and Human Services, Springfield Planning Department and Parks Department; PVPC successfully secured a grant from the Centers for Disease Control and Prevention (CDC) for a Community Transformation Grant.

e. Working in Springfield's McKnight and Bay Neighborhoods to assess the potential for improving opportunities for physical activity that would address health concerns through improvements to the built environment. Working with the Springfield Planning Office, neighborhood residents, and the **McKnight Neighborhood Council**, PVPC created a scope of work for a feasibility study for a multi-use trail and greenway.

f. PVPC participated in the **Springfield Built Environment Group**. With a significant populations at risk for heart disease and stroke, Springfield faces significant health challenges. The Springfield Built Environment Group helped bring attention to the Springfield Riverwalk and Bikeway and much needed improvements and maintenance for the facility. The effort resulted in the a Governor's Legacy Park grant in the amount of $1.3 million in state and matching funds, implementation of a

maintenance program, and repairs to an elevator for this inner city bikeway. This effort supports MassDOT mode shift goals of tripling biking, walking and transit use and addresses GreenDOT specific strategies for sustainable transportation in addition to other associated goals (better air quality, healthier communities, etc.).

g. In April of 2014 the Pioneer Valley Transit Authority (PVTA) held nine public meetings across the region to solicit comments on a proposed service recommendations. The PVTA's proposed service recommendations include new cross-town routes, improved hours of services, increased frequencies, and streamlined routes. Under the proposed system changes, some routes will be eliminated and bus stops on other routes will be removed. The report on recommendations from the Comprehensive Service Analysis is available online (PVPTA Comprehensive Service Analysis). Public meetings to review the proposed changes took place on the following dates and locations:

- April 2nd, Palmer Public Library, Palmer
- April 3rd, Mason Square Library, Springfield
- April 7th, East Longmeadow Senior Center, East Longmeadow
- April 8th, South Hadley Town Hall, 116 Main St, South Hadley
- April 8th, Chicopee Public Library, Chicopee
- April 9th, Agawam Senior Center, Agawam
- April 9th, Northampton Council Chambers, Northampton
- April 10th, Wilbraham Town Hall, Wilbraham
- April 14th, Amherst Town Hall, 4 Boltwood Ave, Amherst

PVTA Public Meeting in Northampton MA on April 10, 2014

The PVMPO continues to work with our partners to identify the needs of minority groups in the past, has been through its outreach process for the development of the Regional Transportation Plan (RTP). The RTP will be in 2015 and the PVMPO will develop a regional outreach strategy.

Of particular importance has been the training in cultural diversity the PVMPO staff has been involved in, in order to tailor outreach strategies to the region's cultural variances. Recent training opportunities have include:

- Dec 6, 2013; Undoing Racism Training at PVPC in Springfield conducted by the People's Institute in Springfield MA. The training included a historical and institutional analysis of racism; understanding the structure of oppression; defining and sharing culture; leadership development; principles of accountability and networking; and developing a common language, definition and analysis for examining racism in the U.S.
- August 22, 2013; Full day Cultural Competency Training at PVPC in Springfield, MA conducted by the People's Institute. The People's Institute is a national multiracial network of anti-racist organizers and educators dedicated to building a movement for justice by ending racism and other forms of institutional oppression.
- February 19, 2014; Workshop on Cultural Sensitivity at PVPC in Springfield, MA
- May 5, of 2014; PVPC with Live Well Springfield Partners co-sponsored a presentation by Dr. David Williams at the Naismith Basketball Hall of Fame regarding Race and Health Disparities (Click here to see a link to Dr. Williams presentation). Dr. Williams is the Florence Sprague Norman and Laura Smart Norman Professor of Public Health and Professor of African and African American Studies at Harvard University and has done extensive work examining inequality. Dr. William's research provides strong direction for improving health and reducing racial disparities Pioneer Valley Communities.

D. Limited English Proficiency

The PVMPO makes a special effort to seek out and consider the needs of individuals or neighborhoods with Limited English Proficiency. The PVMPO engages persons with LEP with regard to region wide planning activities such as the adoption of the Regional Transportation Plan, Unified Planning Work Program, transit studies, or an updated TIP. The PVMPO outreach to Spanish speaking residents is a routine undertaking. Meeting notices are available upon request in Spanish, with an opportunity to request translator services highlighted in the notice. Important reports are summarized and translated into Spanish upon request. With regard to special activities focused on a specific neighborhood or corridor, maps depicting the distribution of non-English speaking persons will be consulted at the beginning of any such project to determine what, if any, special outreach in any language other than English should be undertaken. If it is determined that a special outreach is warranted,

PVMPO consults with neighborhood groups such as ethnic and religious associations to determine the best method for reaching and involving those non-English speaking residents.

Executive Order 13166, issued in 2000, expanded the impact of the 1964 Civil Rights Act and responded to the concern that persons with limited English proficiency deserve equal participation in the transportation planning process. In accordance with the Executive Order, the U.S. DOT issued the *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons*, which is modeled after the U.S. Department of Justice's general LEP policy guidance document. As described in the guidance, DOT recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

PVPC developed an LEP plan that was reviewed and approved by FTA in 2013 (Appendix G). The PVMPO utilizes the four-factor analysis to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to transportation planning information within the region. The four-factor analysis is based on FTA guidance as published in April 13, 2007 entitled *"Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers."* A copy of the PVMPO LEP plan is included as Appendix H.

PVMPO's prior experience with LEP individuals is extensive. The region includes communities with diverse ethnicities, including many people for whom English is not their native language. It has been helpful in recent instances where PVMPO staff has shared cultural backgrounds with ethnic groups in the region. To expand on the strengths of diversity in our staff, PVPC conducted a language literacy assessment in 2014. A database of staff and the languages spoken was compiled.

The PVMPO is engaged with a wide range of community based organizations that serve LEP persons through participation in meetings of organizations and agencies that deal with LEP issues and through public outreach activities. PVMPO staff participates on an ongoing basis in the meetings and activities of the community and municipal organizations as highlighted in the "Identification of Needs" section "C." Other regularly scheduled coordination efforts include:

- Pioneer Valley Joint Transportation Committee Meetings
- Pioneer Valley Planning Commission Meetings
- Pioneer Valley JTC Bicycle and Pedestrian Advisory Committee
- Mass In Motion Meetings
- Connecticut Riverwalk and Bikeway Task Force Meetings

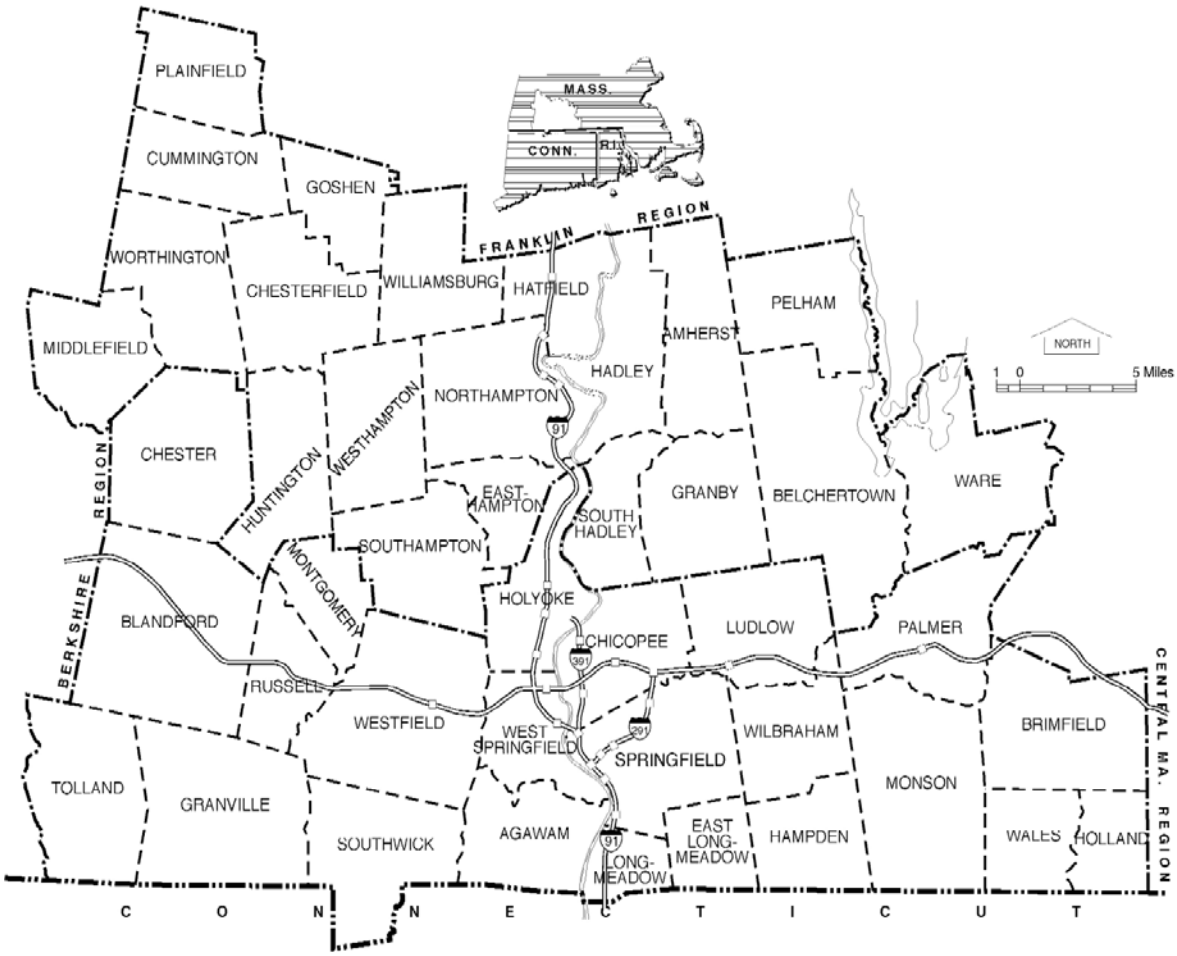
IV. Demographic Profile

[FTA C4702.1B Chapter VI, Section 2(a)(2)]

The PVPC region is composed of the 43 municipalities of Hampden and Hampshire Counties shown Figure 1. The estimated population of this region in 2010 was 621,570. The region measures 1,179 square miles and includes a mix of urban, suburban and rural communities. The majority of the PVPC region is within the Springfield, Massachusetts Metropolitan Statistical Area (MSA). For the purpose of Title VI demographic impact analysis the MPOI uses the definition of "minority" and "low-income" geographic areas that was approved by FHWA for the PVMPO. The full method and application is described in the PVMPO Regional Transportation Plan 2011. The PVMPO region is comprised by 43 municipalities show below in Figure 1.

Figure 1

43 Communities Comprising the Pioneer Valley Region



1. Minority Populations

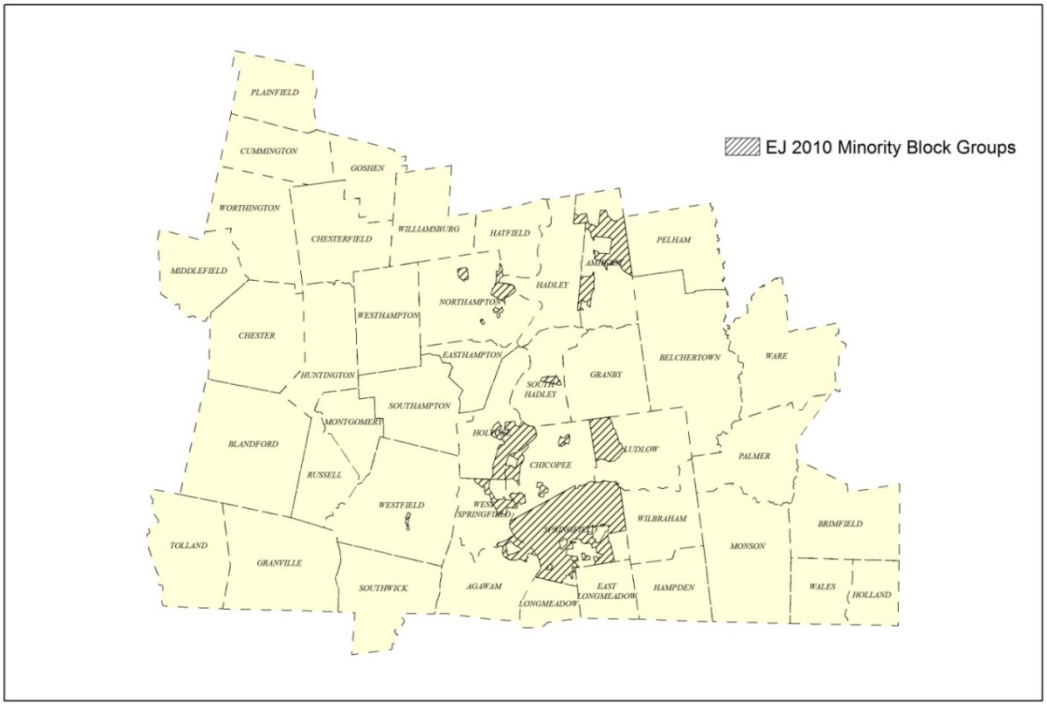
The PVMPO method defines "minority" as "the population that is not identified by the census as White-Non-Hispanic" in the 2010 US Census. The racial or ethnic groups included are:

- 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.

Of the PVMPO region's 621,570 residents (US Census 2010), 23.48 percent meet this definition of minority. When this analysis was applied to the census block groups in the region, the finding was that there are 163 block groups with a minority population greater than the regional average (23.48). Summary results are shown in Figure 2.

Figure 2

Census Block Groups with Minority Populations Exceeding Regional Average of 23.48%
Source: ACS 2006-10 (2010 based Census geography using Transportation macro)



The PVMPO method defines a “low income” areas as one with a proportion of people 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%. This analysis was also applied at the census block group geographic level and is shown in Figure 3.

For the purpose of Title VI demographic impact analysis data was applied at the census block group geographic level and shown in Figure 3.

Figure 3
Census Block Groups with a Poverty Rate Exceeding the Regional Average of 15.47%
Source: ACS 2006-10 (2010 based Census)

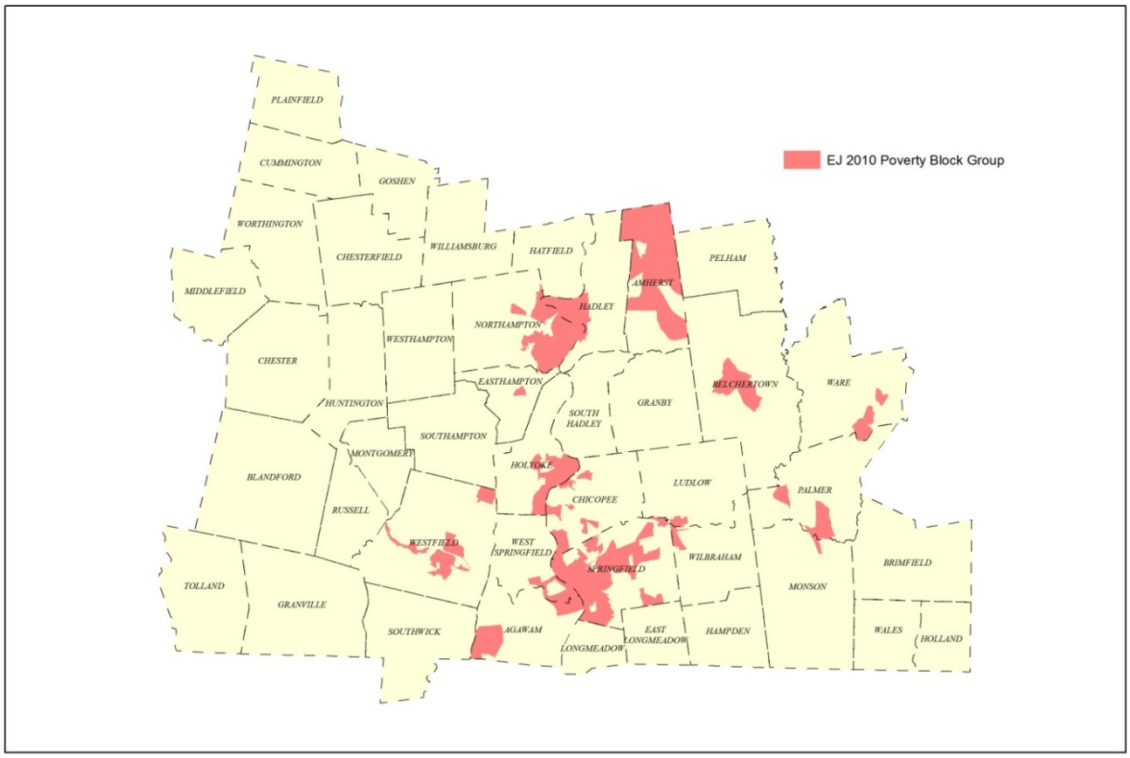


Table 1 - Pioneer Valley Population by Race

Race	Population	Percent
White alone	494,830	79.61%
Black or African American alone	45,569	7.33%
American Indian and Alaska Native alone	2,199	0.35%
Asian alone	16,303	2.62%
Native Hawaiian and Other Pacific Islander alone	286	0.05%
Some other race alone	45,201	7.27%
Two or more races	17,182	2.76%
Total	621,570	100.00%

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

Race	Population	Percent
Not Hispanic or Latino:	517,339	100.00%
White alone	450,095	87.00%
Black or African American alone	39,239	7.58%
American Indian and Alaska Native alone	959	0.19%
Asian alone	16,060	3.10%
Native Hawaiian and Other Pacific Islander alone	155	0.03%
Some other race alone	931	0.18%
Two or more races	9,900	1.91%

Table 3 - Pioneer Valley Hispanic or Latino Population Breakdown

Race	Population	Percent
Hispanic or Latino:	104,231	100.00%
White alone	44,735	42.92%
Black or African American alone	6,330	6.07%
American Indian and Alaska Native alone	1240	1.19%
Asian alone	243	0.23%
Native Hawaiian and Other Pacific Islander alone	131	0.13%
Some other race alone	44,270	42.47%
Two or more races	7,282	6.99%

Source: U.S. Census Bureau, Decennial Census 2010 (not ACS 2006-10)

The PVMPO's Environmental Justice population for minorities is defined by using census block group data "in which the percentage of minorities is greater than the percentage of minorities in the entire region," as agreed upon by the PVMPO's Joint Transportation Committee in January of 2003.

2. Low-income Populations

PVMPO relies on a definition of "low income" based on the federal definitions of "poverty." Annual household income levels associated with this federal definition are shown below.

Table III-A-2-1 Low-income Definitions

Household Size	Federal Poverty Level
1 person	$8,500
2 persons	$10,800
3 persons	$13,290
4 persons	$17,000
5 persons	$20,000

The PVMPO method defines a "low income" area as one with a proportion of people living at or below this federally defined poverty level that exceeds the proportion of people in poverty in the region as a whole, which is 15.4%. This analysis was also applied at the census block group geographic level and is shown in Figure 3.

V. Planning and Project Selection Process

[FTA C4702.1B Chapter VI, Section 2(a)(3)]

The PVMPO is responsible for endorsing official transportation policy and the development of regional planning documents, including a long-range Regional Transportation Plan (often referred to as an RTP), Transportation Improvement Program (TIP), Unified Planning Work Program (UPWP), Congestion Management Program (CMP), and developing a broad Public Outreach Program. All these planning activities require early involvement of local legislators, chief local officials, stakeholders, citizens and other interested parties with full consideration of the principles of Title VI and also Environmental Justice.

The PVMPO relies on a three-step process to assess the benefits and burdens of transportation system investments for low-income populations and minority populations.
These steps include:

1. Identification of transportation investments programmed through the Transportation Improvement Program (TIP) and Regional Transportation Plan (RTP).
2. Scoring and prioritization of programmed TIP projects.
3. Analysis of programmed TIP project locations in relation to census block groups (defined as by the percentage of low-income and/or minority residents that exceed the regional average) to determine the relative distributional equity of programmed transportation investments.

The prioritization process uses a "Transportation Evaluation Criteria" (TEC) set forth by MassDOT predecessor organizations and is utilized in the development of the TIP project listings. Potential regional target-funded projects are evaluated when considered for programming. The results of the evaluation, along with other critical benchmark data concerning project status and readiness, are used to assist in the selection of TIP target projects for review and eventual approval by the PVMPO. This is a continuing, cooperative process among the RPAs, RTAs, MassDOT and its Highway Division

district offices. At this time the PVMPO is considering revisions to the TIP scoring process.

During each TIP cycle the MPO staff conducts an analysis of the distribution of projects and funding to determine the project's impacts on minority and low-income population. A map of this analysis is included in Appendix I and available online (PVMPO TIP Project Map for Title VI 2014-2017) .

Continued to Appendix

Appendix A
TITLE VI NONDISCRIMINATION POLICY STATEMENT

The Pioneer Valley Metropolitan Planning Organization (PVMPO) assures that no person shall, on the basis of race, color, national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance, as required by Title VI of the Civil Rights Act of 1964, as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, and national origin. Related Nondiscrimination Authorities add the protected categories of sex, 23 U.S.C. 324; age, 42 U.S.C. 6101; disability, 29 U.S.C. 790; and income, federal Executive Order 12898. Further, PVMPO will make every effort to ensure nondiscrimination in all of its programs and activities, whether they are federally funded or not, and that services and benefits are fairly distributed to all people. PVMPO also upholds the Massachusetts Public Accommodation Law, M.G.L. c 272 §§92a, 98, 98a, and the Governor's Executive Order 526, section 4 which provide that access to programs, services and benefits be provided without regard to religion, creed, sexual orientation, gender identity or expression, veteran's status and/or ancestry, along with the bases previously referenced. In addition, PVMPO will facilitate meaningful participation in the transportation planning process in a nondiscriminatory manner.

To obtain additional information on PVMPO nondiscrimination obligations, or to request a copy of the Department's Title VI program, or copies of the program in an alternative format (in accordance with Americans with Disabilities Act and Limited English Proficiency regulations), contact:

Title VI Specialist
Pioneer Valley Planning Commission
60 Congress Street
Springfield, MA 01104-3419
413-781-6045
Fax: 413-732-2593 TTY/TDD: 413-781-7168
Website: http://www.pvpc.org

PVPC offers a variety of resources/services in languages other than English, free of charge. Services include but are not limited to the following: oral interpreters, written language services, and translations of vital documents.

To file a complaint of alleged violation of nondiscrimination obligations, complaint forms and further information may be obtained from PVPC by calling 43-781-6045 or 413-781-7168 (TTY), or via our website at http://www.pvpc.org. Any such complaint should be in writing, although staff is able to assist individuals who cannot provide a written complaint, and complaints must be filed within one hundred eighty (180) days following the date of the alleged discriminatory occurrence.

Caso esta informação seja necessária em outro idioma, favor contar o Especialista em Título VI do PVPC pelo fone 413-781-6045.

Si necesita información en otro lenguaje, favor contactar al especialista de PVPC del Título VI al 413-781-6045.

Appendix B

TITLE VI Notice of Nondiscrimination Rights and Protections to Beneficiaries

Federal "Title VI/Nondiscrimination" Protections

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

State Nondiscrimination Protections

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

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

Title VI Specialist
Pioneer Valley Planning Commission
60 Congress Street
Springfield, MA 01104-3419
413-781-6045
Fax: 413-732-2593 TTY/TDD: 413-781-7168
Website: http://www.pvpc.org

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

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

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

Appendix C - Record Title VI Investigations, Complaints and Lawsuits

PVPC maintains the following list for all complaints, lawsuits, and investigations alleging discrimination on the basis of race, color, or national origin. The list includes the date of when the investigation, lawsuit, or complaint was file, a summary of the allegation(s); status of the investigation, lawsuit or complaint; actions taken by the sub recipient in response to the investigation, lawsuit, or complaint, and a summary of all civil rights compliance review activities conducted over the past three years.

Table A. List of complaints, lawsuits, and investigations alleging discrimination on the basis of race, color, or national origin (updated June 18, 2014)

Date Filed	Summary of Allegations	Status of Investigation	Actions taken by the PV MPO

Notification of Protection Under Title VI

In compliance with 49 CFR Section 21.9 (d), the Pioneer Valley Metropolitan Planning Organization (PVMPO) posts information for the public regarding the PVMPO's Title VI obligations and protections against discrimination afforded to the public by Title VI:

Title VI Public Notice

The Pioneer Valley Metropolitan Planning Organization (PVMPO) fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The PVMPO operates without regard to race, color, national origin, creed, income, gender, age, and disability. Any person who believes him/herself or any specific class of persons, to be subjected to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the MPO. Complete complaint procedures are available on the PVPC web site at http://www.pvpc.org/resources/transport/mpo/mpo-titleVI-complaint.pdf
By contacting PVPC at the address listed below. PVMPO meetings are conducted in accessible locations, and materials can be provided in accessible formats and in languages other than English. If you would like accessibility or language accommodation, please contact the MPO at 413-781-6045 (voice), 413-732- 2593 (fax), 413-781-6045 (TTY) or gmroux**@pvpc.org** (e-mail) or by mail at Pioneer Valley MPO Attention Gary Roux, 60 Congress Street, Springfield, MA 01104-3419 .

Civil Rights Compliance

Certifications of the Pioneer Valley MPO Planning Process including Civil Rights compliance is available here:
http://www.pvpc.org/resources/transport/mpo/3C%20Certification%20including%20Title%20VI%20March%202%202011.pdf

Appendix D – Title VI Complaint Procedure

PIONEER VALLEY METROPOLITAN PLANNING ORGANIZATION (PVMPO)
TITLE VI DISCRIMINATION COMPLAINT PROCEDURE

(Revised 3/13/2013 per FTA language)

Title VI of the Civil Rights Act of 1964 and its amendments prohibit discrimination on the basis of race, color, or national origin in programs and activities that receive federal financial assistance. Two Presidential Executive Orders and related statutes further define populations that are protected under the umbrella of Title VI: Executive Order 12898, which is concerned with environmental justice (EJ) for minority and low-income persons; and Executive Order 13166, which is concerned with providing equal access to services and benefits for those individuals with limited English proficiency (LEP).

The purposes of Title VI include preventing the denial, reduction or delay of federally supported benefits to minority and low-income persons; ensuring full and fair public participation in the transportation planning processes of metropolitan planning organizations (MPOs); and ensuring that the policies and programs of MPOs do not have disproportionately adverse effects on minority and low-income persons.

Therefore, to comply with 49 CFR Section 21.9(b), the Pioneer Valley Metropolitan Planning Organization (PVMPO) maintains the following procedure to receive, review, resolve and track complaints related to Title VI.

1. How to Submit a Complaint

Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, by the Pioneer Valley Metropolitan Planning Organization (PVMPO) in its role of planning and programming federal funds may submit a written complaint. Complaints may be submitted for discrimination on the basis of race, color, national origin or language. Any such complaint shall be submitted no later than 180 days after the date the person believes the discrimination occurred. Written complaints shall include a copy of the official complaint form (see appendix J) and be submitted to:

Massachusetts Secretary of Transportation, Chair
Pioneer Valley Metropolitan Planning Organization
c/o Title VI Specialist /Coordinator
Pioneer Valley Planning Commission
60 Congress Street
Springfield MA 01104

All complaints shall be in writing using the complaint form (see appendix J) and shall set forth as completely as possible the relevant facts and circumstances surrounding the alleged discrimination. Language translations of the complaint form other than those available on the PVPC website will be made available upon request. The following information shall be included:

- Name, address, and phone number of the complainant.
- A statement of the complainant, including:
  - The basis of the alleged discrimination (race, color, national origin, or language).
  - A detailed description of the alleged discriminatory act(s).
  - What in the nature of the alleged act(s) led the complainant to feel that discrimination was involved.

    - The date(s) on which the alleged discriminatory act(s) occurred.
    - The name(s) of individual(s) alleged to have participated in the act(s).
- The names of all other agencies or organizations where the complaint is also being filed (if applicable).
- The signature of the complainant and date submitted.

2. Review of Complaints
Upon receipt of the complaint, the PVMPO chair shall direct the PVMPO staff executive director to review it. The PVMPO staff executive director shall provide written acknowledgment of receipt to the complainant within ten (10) business days.

The review may include the gathering of additional information from the complainant and/or the alleged discriminating party or parties.

Upon completion of the review, the PVMPO staff executive director shall submit one of two letters to the complainant; a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision she/he has 60 days after the date of the letter or the LOF to do so.

If more time is required for the review, the PVMPO staff executive director shall notify the complainant and PVMPO chair of the anticipated additional time needed.

3. Resolution of Complaints
The PVMPO staff executive director shall submit the report of findings to the members of the PVMPO for discussion and action. A copy of the report shall also to be provided to the complainant. The PVMPO shall issue a written response to the complainant describing any action taken. The response shall be issued no later than sixty (60) calendar days after the date on which the complaint was received. If more time is required for action, the PVMPO shall notify the complainant of the anticipated additional time needed.

4. Concurrent Complaints and Appeal
The procedures described above do not in any way abridge the right of the complainant to file concurrent complaints with other state or federal agencies and/or to seek private counsel. The procedures above are part of an administrative resolution process that does not include punitive damages or compensatory remuneration. The complainant has the right to appeal the PVMPO's response by submitting the complaint to the Federal Transit Administration. Notice of this right shall be included in the PVMPO's written response to the complainant. Any person may file a compliant directly with the Federal Transit Agency at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington DC 20590.

5. Complaint Tracking
The PVMPO will maintain a log of Title VI complaints received. This log will be available for public review at the offices of the Pioneer Valley Planning Commission, 60 Congress Street, Springfield MA 01104, during business hours.

Revised March 13, 2013
Pioneer Valley Metropolitan Planning Organization

APPENDIX E

TITLE VI COMPLAINT FORM

Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, by the Pioneer Valley Metropolitan Planning Organization (PVMPO) in its role of planning and programming federal funds may submit a written complaint. This form is available on the PVPC web site and language translations are available upon request.

Section I:				
Name:				
Address:				
Telephone (Home):		Telephone (Work):		
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	

Section II:		
Are you filing this complaint on your own behalf?	Yes*	No
*If you answered "yes" to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party: _____		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	Yes	No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

[ ] Race [ ] Color [ ] National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

_____

_____

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No

Section V
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? [ ] Yes [ ] No If yes, check all that apply: [ ] Federal Agency: _____ [ ] Federal Court _____ [ ] State Agency _____ [ ] State Court _____ [ ] Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
Section VI
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Consent/Release Form for Discrimination Complaints

Name: _____

Address: _____

City/Town: _____ State: _____ Zip: _____

As a complainant, I understand that the MPO may need to disclose my name during the course of the complaint review process to persons other than those conducting the review, in order for the review to be thorough. I am also aware of the obligation of the MPO to honor requests under the Freedom of Information Act: I understand that it may be necessary for the MPO to disclose information, including personally identifying details, which it has gathered as part of the investigation of my complaint. In addition, I understand that as a complainant I am protected by MPO policies and practices from intimidation or retaliation in response to my having taken action or participated in action to secure rights protected by nondiscrimination statutes and regulations that are enforced by the MPO.

Please check one:

□ I GIVE CONSENT and authorization to the MPO to reveal, insofar as required for an effective investigation, my identity to persons at the organization identified by me in my formal complaint. I also authorize the MPO to discuss, receive, and review materials and information about me with appropriate administrators or witnesses for the purpose of investigating this complaint. In doing so, I have read and understand the information at the beginning of this form. I also understand that the information received will be used for authorized civil rights compliance activities only. I further understand that I am not required to sign this release, and do so voluntarily.

□ I DENY CONSENT and authorization to the MPO to reveal, in the course of its investigation of my discrimination complaint, my identity to persons at the organization identified by me in my formal complaint, other than those who will be conducting the investigation. I also deny consent to the MPO to disclose any information contained in this complaint to any witnesses I have mentioned in the complaint. In doing so, I understand that I am not authorizing the MPO to discuss, receive, and review materials and information about me from the same. In doing so, I have read and understand the information at the beginning of this form. I also understand that my decision to deny consent may impede the investigation of my complaint and may result in an unsuccessful resolution of my case.

Signature and date required below

_____ _____

Signature Date

Please submit this form in person at the address below, or mail this form to:

Massachusetts Secretary of Transportation, Chair
Pioneer Valley Metropolitan Planning Organization
c/o PVPC Title VI Coordinator
Pioneer Valley Planning Commission
60 Congress Street
Springfield MA 01104

ПРИЛОЖЕНИЕ F

РАЗДЕЛ VI ФОРМА ДЛЯ ЖАЛОБЫ

Любой человек, который считает, что он или она, или какая-либо конкретная категория лиц была подвергнут дискриминации, которая запрещена разделом VI Закона о гражданских правах 1964 года, их добавлений и относящихся к ним уставам, от Pioneer Valley Metropolitan Planning Organization (PVMPO) в своей роли планирования и программированич федеральных средств может подать письменную жалобу. Эта форма доступна на веб-сайте PVPC и перевод на другие языки предоставляется по запросу

Раздел I:				
Имя:				
Адрес:				
Домашний Телефон:		Рабочий Телефон:		
Адрес Электронной почты:				
Необходимость Вспомогательного Формата?	Большой Шрифт		Аудио Кассета	
	TDD		Другие	

Раздел II:		
Подаете ли вы эту жалобу от своего имени?	Да*	Нет
*Если вы ответели «да» на этот вопрос, перейдите к разделу III.		
Если нет, пожалуйста, укажите имя и отношение к человеку, за которого вы жалуетесь:		
Пожалуйста, объясните, почему вы подали жалобу за третье лицо: _____		
Пожалуйста, подтвердите, что вы получили разрешение от потерпевшей стороны, если вы подаете от имени третьего лица.	Подтверждаю	**Нет**

Раздел III:

Я считаю что я испытал(а) дискриминацию на основании (отметьте все, что подходит):

[ ] Расы [ ] Цвета Кожи [ ] Национального Происхождения

Дата Проявления Дискриминации (Месяц, День, Год): _____

Объясните, как можно четче, что произошло и почему вы считаете, что подверглись дискриминации. Опишите все лица, которые были вовлечены. Включите имя и контактную информацию о лице (лицах), которое проявило дискриминацию против вас (если они известны), а также имена и контактные данные свидетелей. Если требуется больше места, пожалуйста, воспользуйтесь обратной стороной этой формы._____

_____

Раздел IV		
Подавали ли вы раннее жалобу VI Раздела на это агенство?	Да	Нет
Раздел V		
Подавали ли вы эту жалобу в какую либо Федеральное, Штатное или местное агенство, или Федеральный или Штатный суд? [ ] Да [ ] Нет Если да, заполните всё что подходит: [ ] Федеральное Агенство: _____ [ ] Федеральный Суд _____ [ ] Агенство Штата _____ [ ] Суд Штата _____ [ ] Местное Агенство_____		
Пожалуйста предоставьте информацию о контактном лице в агентстве / суде, куда была подана жалоба.		
Имя:		
Звание:		
Агенство:		
Адрес:		
Номер Телефона:		
Раздел VI		
Название агенства против которого подается жалоба:		
Контакное лицо:		
Звание:		
Номер Телефона:		

Вы можете приложить любые письменные материалы или другую информацию, которая, как вы считаете, имеет отношение к вашей жалобе.

Разрешение/Релиз форма для жалоб на дискриминацию

Имя: _____

Адрес: _____

Город: _____ Штат: _____ Почтовый Индекс: _____

Как заявитель, я понимаю, что MPO может понадобиться раскрыть мое имя в ходе процесса рассмотрения жалобы другим лицам кроме тех, которые проводят рассмотрение дела, для того, чтобы рассмотрение было тщательным. Я также знаю, обязательства MPO рассматривать запросы по Закону о свободе информации: я понимаю, что это может быть необходимо для MPO раскрыть информацию, включая личные детали, которые MPO собрала в рамках расследования моей жалобы. Кроме

того, я понимаю, что в качестве истца я защищен MPO правилами и практикой, от запугивания или мести в ответ на мое участии в принятии мер или участвии в обеспечении прав, защищеных недискриминационными уставами и правилами MPO.

Пожалуйста, отметьте одно:

□ Я ДАЮ СОГЛАСИЕ и разрешение MPO для расскрытия, насколько это необходимо для эффективного расследования, моей личности лицам той организации, определенной в моей официальной жалобе. Я также разрешаю MPO обсуждать, получать и рассматривать материалы и информацию обо мне с соответствующими администраторами или свидетелями с целью расследования этой жалобы. Я прочитал(а) и понимаю информацию в начале этой формы. Я также понимаю, что полученная информация будет использована только для соблюдения узаконенных гражданских прав. Я также понимаю, что я не обязан подписать этот релиз, и делаю это добровольно

□ Я НЕ ДАЮ СОГЛАСИЯ и разрешения MPO для расскрытия, в ходе своего расследования моей жалобы о дискриминации, моей личности лицам в организации, определенной в моей официальной жалобе, кроме тех, кто будет проводить расследование. Я также не даю согласия MPO для раскрытия любой информации, содержашейся в этой жалобе кому-либо из свидетелей, которых я упоминал(а) в жалобе. При этом я понимаю, что я не разрешаю MPO обсуждать, получать и рассматривать материалы и информацию обо мне. Я прочитал(а) и понимаю информацию в начале этой формы. Я также понимаю, что мое решение не давать этого согласия может помешать расследванию моей жалобы, и может привести к неудачному решению моего дела.

Подпись и дата необходимы ниже

_____ _____

Подпись Дата

Пожалуйста представьте эту форму лично по указанному ниже адресу или отправьие по почте:

Massachusetts Secretary of Transportation, Chair
Pioneer Valley Metropolitan Planning Organization
c/o PVPC Title VI Coordinator
Pioneer Valley Planning Commission
60 Congress Street
Springfield MA 01104

Appendix G
Pioneer Valley REGION
TRANSPORTATION PLANNING PROGRAM
Public Participation Plan

As adopted June 22, 2010
(Previously Endorsed June 19, 2007)
(Title VI Complaint Procedure Revised September 17, 2009)
(Comment Period Changes Revised June 22, 2010)

Prepared by the
Pioneer Valley Planning Commission

For the Pioneer Valley
Metropolitan Planning Organization,
Massachusetts

Pioneer Valley MPO Members

Name	**Title**
Jeffrey B. Mullen	Chief Executive Officer, Massachusetts Department of Transportation (MassDOT)
Luisa Paiewonsky	Administrator, Highway Division , MassDOT
Richard Butler	Chairman of the Pioneer Valley Planning Commission Executive Committee
Mary MacInnes	Representing the Chairman of the Pioneer Valley Transit Authority Advisory Board
Domenic J. Sarno	Mayor of Springfield
Mayor Michael Bissonnette	Mayor of Chicopee
Mayor Edward Gibson	Mayor of West Springfield
Mayor Mary Clare Higgins	Mayor of Northampton
James Barry	Belchertown Board of Selectmen
Marcus Boyle	Hatfield Board of Selectmen
Alternates	
Mayor Elaine A. Pluta	Mayor of Holyoke
Vacant	Urban Area Outside Core Cities
Gerald Devine	Hadley Board of Selectmen
Enrico Villamoino	East Longmeadow Board of Selectmen
Vacant	Western Tier

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Public Participation Plan for the Pioneer Valley Transportation Planning Program

What is the Public Participation Plan?
The Public Participation Plan (PPP) established the process for public involvement in and awareness of the activities of the Pioneer Valley Metropolitan Planning Organization. The Pioneer Valley Metropolitan Planning Organization (PVMPO) is a regional body made up of nine voting members that meet five to ten times annually. The Pioneer Valley Metropolitan Planning Region includes the forty three cities and towns in and around the lower Connecticut River Valley in western Massachusetts. The PVMPO and their staff work to establish priorities for the funding of transportation studies, projects and programs related to the region's bridge and roadway network, public transit, rail, bicycle and pedestrian needs, and aviation related projects and programs.

The PVMPO's **Public Involvement Statement** summarizes the goals of this plan:

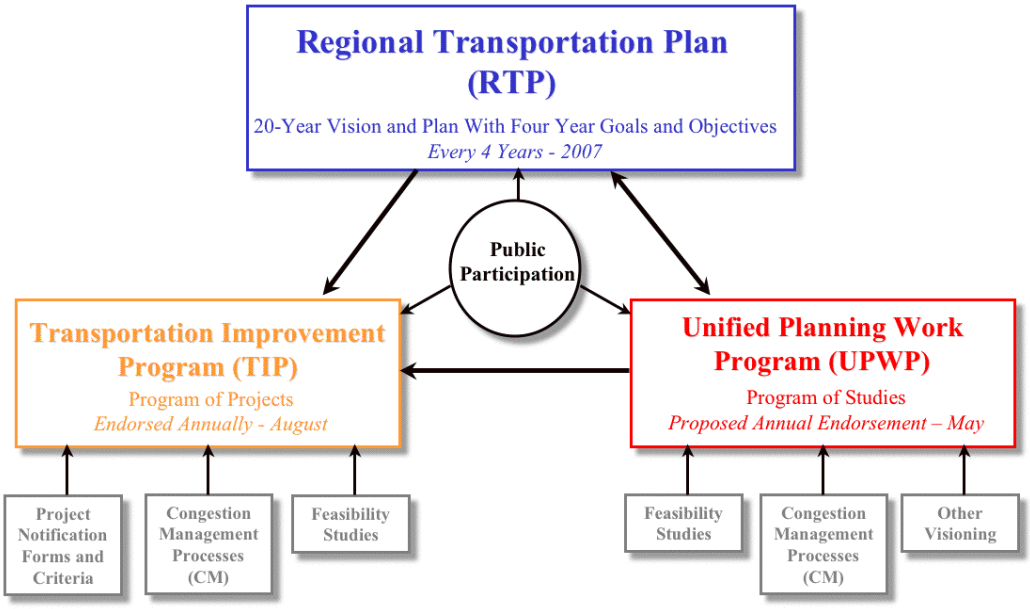
The Pioneer Valley Metropolitan Planning Organization (PVMPO) has a proactive public involvement process that provides complete information, timely public notice, and full public access to PVMPO activities at all key stages in the decision making process. The PVMPO involves the public early in the planning process, and actively seeks out the involvement of communities most affected by particular plans or projects. The Region's transportation plans and programs are developed in a manner that assures that the public, and affected communities in particular, are consulted and afforded ample opportunity to participate in the development of such plans.

1. **ACTIVITIES SUBJECT TO PUBLIC PARTICIPATION.** PVMPO shall provide early and continuing public involvement opportunities throughout the transportation planning and programming process. Transportation

   A. Planning Activities. Special emphasis shall be given to engaging the public in planning studies that form the basis for later programming decisions. Planning activities include corridor studies and special regional studies, environmental assessment studies, and development of the Pioneer Valley Regional Transportation Plan. These activities offer the public the earliest opportunity to participate in the development of project proposals that might eventually be programmed for funding. Thus, PVMPO shall involve the affected community through methods such as local advisory committees, public information meetings, consultation with stakeholders, and newsletters.

   B. Programming Activities. Opportunities for the public to participate shall also be provided through the project selection, programming, and project development phases. These activities include the selection of projects, and the adoption or amendment of Transportation Improvement Program (TIP). PVMPO shall make an effort to involve the affected community through methods such as consultation with representatives to the Joint Transportation Committee, local advisory committees, public information meetings, consultation with stakeholders, and newsletters.

Relationship of PVMPO Transportation Plans and Programs



2. **DEFINITION OF PUBLIC & STAKEHOLDERS.** PVMPO shall make an effort to inform and engage both the general public and stakeholders as appropriate.

   A. General Program. As part of its general planning and programming process, PVMPO will try to involve as broad a cross-section of the population and the region as possible. However, we recognize the there are certain segments of the population and certain organizations that either have a special interest in transportation or that we have a special obligation to reach out to. In this regard, we will try to involve the following: citizens, member municipalities, affected public agencies, public and private providers of transportation, providers of freight transportation services, representatives of users of public transportation, users of pedestrian walkways and bicycle transportation facilities, representatives of persons with disabilities, senior citizens, and other parties who have expressed an interest in the process.

   B. Pioneer Valley Regional Transportation Plan or Transportation Improvement Plan. When developing a new or making a major modification to an existing Pioneer Valley Regional Transportation Plan, or Transportation Improvement Plan the PVMPO will consult "as appropriate" with state and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation. This consultation will help PVMPO achieve its related goal of promoting consistency between planned transportation improvements and state and local planned growth and economic development patterns.

   C. Special Studies. For special studies and corridor studies that PVMPO conducts, it shall make an effort to identify and involve persons and groups that might be affected by potential changes to the particular transportation service or facility under review, in addition to those engaged through the general planning process. Examples include neighborhoods associations, residents and businesses within the study area.

D. Consultation and Discussion with Special Groups – Environmental Justice (EJ). PVMPO shall also make a special effort to seek out and consider the needs of groups or communities traditionally not well served by existing transportation systems. These include, but are not limited to low-income households and minority households. To assure adequate participation of these groups, PVMPO will be proactive in seeking representation from low-income or minority individuals, or representative low-income or minority groups and consult and discuss the PVMPO's transportation planning programs and products.

It is sometimes necessary to conduct an outreach effort to EJ communities, beyond that which is normally expended. At a minimum, PVMPO shall identify groups that it needs to involve, add them to the appropriate mailing lists, and define methods for engaging them in relevant programs or projects. This requirement for special outreach efforts shall apply to both sections A and B above.

PVMPO efforts in this regard shall be consistent with the Environmental Justice Executive Order (EO 12898) dated February 11, 1994, and other related guidance from the Federal Highway Administration and Federal Transit Administration. This effort will also be consistent with the Environmental Justice Action Items identified in the Regional Transportation Plan (endorsed by the PVMPO February, 2007) The Environmental Justice recommendations of the RTP have been incorporated into this public participation plan and are included in Appendix A. Appendix A has been updated with this Public Participation Plan to reflect accomplishments in PVMPO's outreach to environmental justice communities.

E. Outreach to Special Groups – Persons with Limited English Proficiency (LEP). PVMPO shall also make a special effort to seek out and consider the needs of individuals or communities with Limited English Proficiency. [1]

The PVMPO will engage persons with LEP with regard to regionwide planning activities such as the adoption of the Regional Transportation Plan, Unified Planning Work Program, transit studies, or an updated TIP, the PVMPO will make outreach to Spanish-speaking residents a more routine undertaking. Meeting notices will be available upon request in Spanish, with an opportunity to request translator services highlighted in the notice. Important reports will be summarized and translated into Spanish upon request.

With regard to special activities focused on a specific neighborhood or corridor, maps depicting the distribution of non-English speaking persons will be consulted at the beginning of any such project to determine what, if any, special outreach in any language other than English should be undertaken. If it is determined that a special outreach is warranted, PVMPO will consult with neighborhood groups such as ethnic and religious associations to determine the best method for reaching and involving those non-English speaking residents.

PVMPO efforts in this regard shall be consistent with the signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" dated August 11, 2000, and other related guidance from the Federal Highway Administration and Federal Transit Administration.

[1] Federal regulations define Persons with Limited English Proficiency as individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit in federally funded programs and activities

3. **ADEQUATE TIME FOR PUBLIC COMMENT.** PVMPO shall allow reasonable time for public review and comment at key decision points. These include, but are not limited to, action on the Pioneer Valley Regional Transportation Plan, Unified Planning Work Program and the Transportation Improvement Program (TIP). Minimum notification periods shall be as follows:

   Amendments to PVMPO's Public Participation Plan – 45 days
   Adoption of the TIP & major TIP amendments – 30 days *
   Adoption of the UPWP & major UPWP amendments – 30 days
   Adoption of Pioneer Valley Regional Transportation Plan & major amendment – 30 days
   Joint Transportation Committee, JTC Subcommittee, PVMPO meetings – 7 days

   * While a minimum public comment period of 30 days has been established for the TIP, and major TIP amendments, the MPO may, at their discretion, vote to abbreviate the public comment period under what they (the MPO) consider to be extraordinary circumstances. Under no circumstances will this period be less than 15 days. All comments received during the abbreviated comment period will be taken into consideration by the MPO before making a recommendation.

   The MPO may extend the public participation period and provide an additional opportunity for comment when the revised document differs substantially from the version that was made available to the public or when public comment raises new material issues which interested parties could not have reasonably foreseen. Under these circumstances the PVMPO has the sole discretion to determine justification for an extension. When the action to extend public comment on the TIP is approved, the MPO will re-advertised a public notice on the proposed TIP amendments and schedule an additional public meeting followed by an additional abbreviated 15 day comment period. Adjustments, defined as minor alterations to major documents, are not considered amendments and will not be re-advertised.

4. **METHODS OF NOTIFYING THE PUBLIC.** PVMPO shall use appropriate methods to notify the public of its activities and of opportunities for public involvement. Determination of which methods to use must be done for each individual planning project or study. However, the minimum requirements are listed below.

   A. Schedule of Meetings. For committees with regularly scheduled meetings (Joint Transportation Committee) the annual schedule of meetings shall be filed with each town clerk's office at the beginning of the calendar year.

   B. Meeting Notices. A notice of each committee or subcommittee meeting shall be filed with every town clerk's office. The notice shall include a statement, in Spanish, that translator services may be requested in advance. For studies or committees that involve only a few towns, the notice shall be filed only in the town halls of the affected communities. If a predetermination is made that the study or committee may affect a significant non-English speaking population, the meeting notice will include a statement, in that language, that translator services may be requested in advance.

   C. Public Comment. Every meeting conducted by PVMPO will include on the agenda an opportunity for public comment as part of the "other business" agenda item.

   D. Mailing Lists. PVMPO shall maintain mailing lists for each committee or study. Notices of meetings shall be sent to all persons on the mailing list. Anyone may request that his or her name be added to a particular mailing list, by indicating the

appropriate list and providing a regular mail address.

E. PVMPO Website. PVMPO shall maintain a calendar of meetings and activities on its website. The website shall also include copies of appropriate reports and plans that individuals can read online or download to their own computer. Draft documents will be made available on the PVMPO website in advance of any decision to be made by the PVMPO. The pvpc.org web has been designed to comply with accessibility standards. MPO notices and transportation documents will be posted in an HTML format and meet the accessibility standards of the World Wide Web W3C Consortium (WWW.W3.org) and be compatible with text reading software. Most images on the site are accompanied by a brief alt-text tag that identifies the image or its function. Hyperlinks are written so that they make sense when read out of context and tables include a summary that provides information about table's contents.

F. Legal Notices in Newspapers. Anytime PVMPO initiates a formal public comment period, notice of the opportunity to comment shall be posted in a legal ad in the area's major daily newspaper; and other local, minority, or alternative language newspapers as appropriate.

G. Interested Parties. PVMPO shall mail meeting notices to persons who have expressed a special interest in PVMPO's overall transportation program, or specific studies. PVMPO shall add persons who have expressed such an interest to the appropriate PVMPO mailing list.

H. Additional Methods. PVMPO shall give consideration to alternative methods of involving the public appropriate to the project. Such methods may include, but are not limited to newsletters, advertising in minority and alternative language newspapers, distributing information through public libraries and community groups (especially those serving EJ and LEP communities, the elderly and persons with disabilities), presentations at Chamber of Commerce meetings, Rotary Club meetings, pubic surveys, attendance at public functions, using local government cable access stations, using open house format meetings, involving focus groups for specially selected topics, preparing press releases, and holding events at public locations. Libraries for distribution may include the following locations:

West Springfield Public Library
200 Park Street
West Springfield, MA 01089

Emily Williston Memorial Library
9 Park Street
Easthampton, MA 01027

Agawam Public Library
Reference Desk
750 Cooper Street
Agawam, MA 01001

Jones Library
Reference Desk
43 Amity Street
Amherst, MA 01002

Porter Memorial Library
Reference Desk
Main Street
Blandford, MA 01008

Chicopee Main Library
Reference Desk
Market Square
Chicopee, MA 01013

Holyoke Public Library
Reference Desk
335 Maple Street
Holyoke, MA 01040

Monson Free Library
Reference Desk
2 High Street
Monson, MA 01057

Plainfield Library
Reference Desk
Main Street
Plainfield, MA 01070

Library Department
Reference Desk
Main Street
Ware, MA 01082

Hubbard Memorial Library
Reference Desk
24 Center Street
Ludlow, MA 01056

Forbes Library
Reference Desk
West Street
Northampton, MA 01060

Springfield Library and Museums
Reference Desk
220 State Street
Springfield, MA 01103

Westfield Athenaeum Library
Reference Desk
6 Elm Street
Westfield, MA

South Hadley Public Library
Bardwell Street
South Hadley, MA 01075

5. **MEETING LOCATIONS.** All meetings will be scheduled at convenient and accessible times and places. Regularly scheduled meetings of the Joint Transportation Committee and PVMPO are normally held during normal business hours at the Pioneer Valley Planning Commission, 60 Congress Street, Springfield, MA (a handicap and transit accessible building). Sufficient notice will be given to the public and interested citizens when occasional modifications to this schedule are necessary. Scheduling of public information meetings held for special planning studies, both time and place, will be determined based on the suggestions of appropriate stakeholders.

6. **VISUALIZATION.** In an effort to better describe each plan or program under consideration by the citizens and interested groups, PVMPO will employ appropriate visualization techniques. These techniques will often include handouts, maps and graphics on presentation boards, and/or electronic presentations (such as PowerPoint.) When available and appropriate, PVMPO may also use visualization software, transportation models, and animation.

7. **DOCUMENTATION OF PUBLIC COMMENT & RESPONSE.** PVMPO shall document public comments received during the course of a study or an amendment of the Pioneer Valley Regional Transportation Plan, UPWP, or TIP. PVMPO shall also document how it responded to public comments.

   A. Comments Received. Documentation of comments may be accomplished in a manner appropriate to the project and the nature of the comments. Documentation may consist of meeting minutes, a file of letters, or a special memo that summarizes the comments. A written summary is preferred at key points in the decision-making process: when members of the relevant study committee must decide to narrow the range of alternatives, select a preferred alternative, or make a decision of similar nature. The written summary of comments made at public information meetings

shall be given to the committee members prior to any committee action.

B. Response to Comments. PVMPO shall provide a descriptive summary of how it responded to significant public comments during the development of a plan or document such as the TIP. The summary may be produced as a separate report or included as a short section in the final plan or document.

8. ADOPTION OF A "FINAL" TRANSPORTATION PLAN. The following describes the minimum public involvement program required during the review of a draft Pioneer Valley Regional Transportation Plan, or a draft of a major amendment to the Plan. These steps must be taken before PVMPO acts to adopt the draft document as the final Plan.

A. Legal Notice. A legal notice, summarizing opportunities for commenting on the draft Transportation Plan or draft major amendment, shall be printed in the Springfield Republican and other local newspapers as appropriate, in English and in Spanish. The legal notice will appear a minimum of 30 days in advance of the PVMPO's action to endorse the document and shall include a statement that translator services may be requested in advance. The notice shall also be submitted to the offices of every town clerk in the Region.

B. World Wide Web. The draft Transportation Plan itself (or draft major amendment) and the legal notice, or a more lengthy notice if appropriate, will be made available on the PVMPO website a minimum of 30 days in advance of the final decision by the PVMPO. The final Plan will also be posted to the PVMPO website as soon as possible after the plan's endorsement, and made available there at least until an updated or new Plan is adopted.

C. Comment Period and Public Meeting. PVMPO shall allow a minimum of 30 days for public comments and shall hold a public information meeting prior to completion of the 30-day public comment period. Opportunity for public comment on the plan shall also be provided at every Joint Transportation Committee and PVMPO meeting during the comment period.

The MPO may extend the public participation period and provide an additional opportunity for comment when the revised document differs substantially from the version that was made available to the public or when public comment raises new material issues which interested parties could not have reasonably foreseen. Under these circumstances the PVMPO has the sole discretion to determine justification for an extension. When the action to extend public comment on the RTP is approved, the MPO will re-advertised a public notice on the proposed RTP changes and schedule an additional public meeting followed by an additional abbreviated 15 day comment period. Adjustments, defined as minor alterations to the document, are not considered amendments and will not be re-advertised.

D. Summary & Disposition of Comments. A summary of significant comments and the disposition of the comments shall be provided in the final document.

9. ADOPTION OF A TRANSPORATION IMPROVEMENT PROGRAM (TIP) The following describes the minimum public involvement program required during the review of a draft Pioneer Valley TIP or the draft of a major amendment to this document. These steps must be taken before PVMPO acts to adopt a draft document as the final or the official endorsed document.

A. Legal Notice. A legal notice, summarizing opportunities for commenting on the draft TIP or draft major amendment, shall be printed in the Springfield Republican and other local newspapers as appropriate, in English and in Spanish. The notice shall include a statement that translator services may be requested in advance. The notice shall also be posted in the offices of every town clerk in the Region.

B. World Wide Web. The draft TIP (or draft major TIP amendment) and the legal notice, or a more lengthy notice if appropriate, will be made available on the PVMPO website a minimum of 30 days*. The final TIP and UPWP will also be posted to the PVMPO website as soon as possible after its adoption, and a current version made available there at least until a new TIP is adopted.

C. Comment Period and Public Meeting. PVMPO shall allow a minimum of 30 days* for public comments and shall hold a public information meeting during the public comment period. Opportunity for public comment on the TIP shall also be provided at every Joint Transportation Committee and PVMPO meeting during the comment period.

D. Summary & Disposition of Comments. A summary of significant comments and the disposition of the comments shall be provided in the final document.

* While a minimum public comment period of 30 days has been established for the TIP, and major TIP amendments, the MPO may, at their discretion, vote to abbreviate the public comment period under what they (the MPO) consider to be extraordinary circumstances. Under no circumstances will this period be less than 15 days. All comments received during the abbreviated comment period will be taken into consideration by the MPO before making a recommendation.

The MPO may extend the public participation period and provide an additional opportunity for comment when the revised document differs substantially from the version that was made available to the public or when public comment raises new material issues which interested parties could not have reasonably foreseen. Under these circumstances the PVMPO has the sole discretion to determine justification for an extension. When the action to extend public comment on the TIP is approved, the MPO will re-advertised a public notice on the proposed TIP amendments and schedule an additional public meeting followed by an additional abbreviated 15 day comment period. Adjustments, defined as minor alterations to major documents, are not considered amendments and will not be re-advertised.

Development of the Transportation Improvement Program (TIP) is a requirement of the Metropolitan Transportation Planning Process as described in the Metropolitan Planning Final Rule 23 CFR 450 section 324. This regulation developed by the Federal Department of Transportation defines the Transportation Improvement Program as:

"A staged, multiyear, intermodal program of transportation projects which is consistent with the metropolitan transportation plan."

The Pioneer Valley TIP is a four-year schedule of projects identified by year and location complete with funding source and cost. The TIP is developed annually and is available for amendment and adjustment at any time. Each program year of the TIP coincides with the Federal Fiscal Year calendar, October 1 through September 30. All TIPs and amendments are consistent with the goals and objectives of the Regional Transportation Plan for the Pioneer Valley Region.

The voting members of the Pioneer Valley Metropolitan Planning Organization consist of the

following officials or their designee or alternate:

- the Secretary of the Mass DOT
- the Administrator of the Mass DOT Highway Division
- the Chairman of the Pioneer Valley Planning Commission
- the Chairman of the Pioneer Valley Transit Authority Advisory Board
- the Mayors of two of the following three (3) urban core cities within the Pioneer Valley region:

Holyoke	Chicopee	Springfield

- the Mayor or a Selectman of one of the following four (4) cities and towns outside of the three core cities within the Pioneer Valley region:

Agawam	Southwick	Westfield
West Springfield		

- the Mayor or a Selectman of one of the following five (5) cities and towns within the Pioneer Valley region:

Amherst	Easthampton	Hadley
Northampton	South Hadley	

- a Selectman of one of the following fourteen (14) suburban and rural towns within the Pioneer Valley region:

Belchertown	Brimfield	East Longmeadow
Granby	Hampden	Holland
Longmeadow	Ludlow	Monson
Palmer	Pelham	Wales
Ware	Wilbraham	

- a Selectman of one of the following seventeen (17) suburban and rural towns within the Pioneer Valley duly elected as prescribed under the provisions of this MOU document:

Blandford	Chester	Chesterfield
Cummington	Goshen	Granville
Hatfield	Huntington	Middlefield
Montgomery	Plainfield	Russell
Southampton	Tolland	Westhampton
Williamsburg	Worthington	

In addition, the Joint Transportation Committee (JTC) Chairman, and one representative each from the Federal Highway Administration (FHWA)**,** the Federal Transit Administration (FTA), the Chair of the Infrastructure Committee of the Western Massachusetts Economic Development Council (EDC)**,** the five (5) alternate community MPO representatives, and one

representative each from both the MassDOT Highway Division District One and District Two Offices shall be considered ex-officio, non-voting members of the Pioneer Valley MPO. Alternate members shall be additional chief elected officials from each of the above-cited categories of communities and he/she shall be eligible to attend, participate and vote at MPO meetings in the event that the primary member cannot attend.

As the lead planning agency for the MPO, the PVPC accepts the responsibility for developing the TIP and UPWP in a cooperative process with other members of the MPO and the general public. The final TIP and UPWP is voted on for endorsement at a formal meeting of the MPO. The endorsed TIP project listing is included in the State Transportation Improvement Program verbatim and requires endorsement by the Secretary of Transportation and Public Works.

The MPO relies on a transportation advisory committee (JTC) to carry out the cooperative process during TIP development. The Joint Transportation Committee (JTC) is a group of community appointed officials, MPO member representatives, public and private transportation providers, citizens, and special interest groups and agencies. The JTC establishes and recommends to the MPO procedures for submitting, prioritizing and selecting projects for the TIP. PVPC staff provides the technical support to conduct the TIP development activities for the JTC.

Below is a general outline of steps taken during the TIP development process.

1. Project proponents (communities, MPO members, agencies) submit projects through the process outlined in Chapter 2 of the Massachusetts Project Development & Design Guidebook (2006)
2. Projects are prioritized based on an evaluation criteria by MPO staff, JTC representatives, and MassDOT Highway Division District staff, and MassDOT staff at a posted meeting open to all.
3. The State (thru MassDOT) provides funding targets for the Pioneer Valley Region.
4. JTC reviews and recommends project priorities on the TIP to the MPO
5. Draft TIP project listings are prepared by the MPO staff are distributed for review and comment to MPO members
6. MPO meets to make final decisions on the composition of the TIP and to recommend the Draft TIP for general public release for no less than a 30 day review period
7. Final Draft TIP is distributed for review, consultation and comment in accordance with the adopted Public Participation Plan
8. Public meetings and news releases are conducted to promote public involvement and consultation.
9. Comments are compiled and addressed where appropriate
10. Final TIP developed for the JTC's consideration and their recommendation to MPO
11. MPO meets to vote on endorsement of the TIP
12. Endorsed Regional TIPs are compiled by MASSDOT to create the State TIP (STIP)
13. Secretary of MASSDOT endorses the STIP (on behalf of the Governor) and submits the STIP to federal agencies for review and approval
14. Federally approved STIP is ready for state implementation (project advertisement)

15. Amendments and adjustments to the TIP are made on an as needed basis with the additional public review and input for formal amendments only.

Project Priority Criteria and Selection. The MASSDOT developed a process and set of criteria to evaluate and prioritize the region's TIP projects which was modified and endorsed by the MPO. All projects included in the TIP are evaluated and assigned a priority value or rating. This process is used as a management tool to identify projects of regional priority and program them accordingly in the TIP based on their level of design readiness.

Program **Amendment**s to the TIP. For the purposes of project selection and programming, amendment to the TIP can be conducted at any time. Amendments require formal MPO action. An amendment to the TIP is defined any change that differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not reasonably have foreseen from the public involvement efforts.

The public involvement requirements for amendments shall be satisfied by following the standard 30 day procedure* for MPO and JTC Committee meetings. So long as the proposed amendment is listed on the respective Joint Transportation Committee and PVMPO agendas, and those agendas have been sent to the town clerks and respective committee mailing lists and posted on the PVMPO website seven days in advance of the meeting the public involvement requirements for the amendment shall be satisfied.

* While a minimum public comment period of 30 days has been established for the TIP, and major TIP amendments, the MPO may, at their discretion, vote to abbreviate the public comment period under what they (the MPO) consider to be extraordinary circumstances. Under no circumstances will this period be less than 15 days. All comments received during the abbreviated comment period will be taken into consideration by the MPO before making a recommendation.

Program **Adjustments** to the TIP. Program adjustments can be conducted without formal MPO action. Minor adjustments may include such actions as moving projects between Year 1 and Year 2, and minor fluctuations in project description, costs and funding source. This action can be accomplished through an agreed upon administrative action.

Annual Listing of Projects. An annual listing of projects, including investments in pedestrian walkways and bicycle transportation facilities, for which Federal funds have been obligated in the preceding year shall be made available on the PVMPO website. The listing is developed by the Massachusetts Executive Office of Transportation and will be consistent with the categories identified in the TIP.

9. PUBLIC INFORMATION REQUIREMENTS FOR THE UNIFIED PLANNING WORK PROGRAM (UPWP) The following describes the minimum public involvement program required during the review of a draft Pioneer Valley UPWP. These steps must be taken before PVMPO acts to adopt a draft document as the final or official endorsed document.

A. Legal Notice. A legal notice, summarizing opportunities for commenting on the draft TIP or draft major amendment, shall be printed in the Springfield Republican and other local newspapers as appropriate, in English and in Spanish. The notice shall include a statement that translator services may be requested in advance. The notice shall also be posted in the offices of every town clerk in the Region.

B. World Wide Web. The draft UPWP will be made available on the PVMPO website a

minimum of 30 days in advance of the final decision by the PVMPO. The final TIP and UPWP will also be posted to the PVMPO website as soon as possible after its adoption, and a current version made available there at least until a new TIP and UPWP are adopted.

C. Comment Period and Public Meeting. PVMPO shall allow a minimum of 30 days for public comments and shall hold a public information meeting during the public comment period. Opportunity for public comment on the UPWP shall also be provided at every Joint Transportation Committee and PVMPO meeting during the comment period.

D. Summary & Disposition of Comments. A summary of significant comments and the disposition of the comments shall be provided in the final document.

10. PUBLIC INFORMATION REQUIREMENTS FOR SECTION 5307 GRANTS. The public involvement process adopted by PVMPO for its TIP shall also serve to satisfy the public involvement requirements of the Pioneer Valley Transit Authority (PVTA) as applicant for regular Section 5307 (FTA Transit Capital) funds. This applies to the PVTA's annual purchase of replacement vehicles for programs and other major capital purchases. This does not apply to non-routine capital projects that require an environmental assessment or environmental impact statement. For major projects the PVTA shall conduct its own separate public involvement process.

11. ACCESS TO TECHNICAL INFORMATION. PVMPO shall provide reasonable public access to technical and policy information used in the development of the Pioneer Valley Regional Transportation Plan, the Transportation Improvement Program (TIP), and related studies, plans, and programs

12. REASSESSMENT OF PUBLIC PARTICIPATION PROGRAM. PVMPO shall conduct a review of the effectiveness of the public participation process once every two years to ensure that the process provides full and open access to all. This task will include a review of public participation efforts undertaken, assessing both what worked and what might be improved, and recommendations for future efforts, if appropriate.

A. Appendix A

Environmental Justice and Title VI Certification

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 an addressing as appropriate, disproportionately high an 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.

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:

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.

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 to routinely evaluate this strategy for its effectiveness at reducing barriers for these populations.

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.

Minority Populations

Minority persons comprise 21.9 percent of the region's population as a whole. The racial or ethnic groups used in the 2002 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, 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."** Of the region's 608,479 residents, 132,982 fall within this definition of minority. (A breakdown of these populations included in Tables 8-1 – 8-3.)

Table 8-1 - 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 alone	390	0.06%
Some other race alone	42,650	7.01%
Two or more races	13,343	2.19%
Total:	608479	100.00%

Table 8-2 - 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	1009	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 8-3 - 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%

After reviewing three different scenarios, the Environmental Justice target population for minorities was defined by using census block group data: “in which the percentage of minorities is greater than the percentage of minorities in the entire region (21.9 percent).” Other definitions that were explored included: "Any census block group with a minority population greater than 10% above the average for the entire region (any above 31.9%)" and "any census block group with greater than 50% minority population."

Maps of each of these definitions for minority populations in the region were mapped and further evaluated. The data was reviewed at meetings of the Joint Transportation Committee. The "over 50% minority" definition was determined not to be inclusive of minority student populations and areas of strong minority influence. The "10 percent above the regional average" minority definition was more inclusive but fell short of other goal of creating an analysis that would be clear to explain to the public at large as and clear to decision makers using the data for assessment. The "above the regional average" definition was unique in that outlying block groups were included without creating a large geographic area that would rendered subsequent assessments inadequate. The Pioneer Valley Planning

Commission's Joint Transportation Committee formally voted on and approved the "greater that average" definition in January of 2003.

Identification of Low Income Populations

In defining "low income" target populations, PVPC examined six different thresholds used in by similar MPOs. While the term "minority" is clearly defined under the US Census. The term "Low income" is not defined. The definition of "low income" for the purpose is referenced through official federal definitions as "poverty."

Table 1-1 - Low-Income Definitions

Household Size	Federal Poverty Level
1 person	$8,500
2 persons	$10,800
3 persons	$13,290
4 persons	$17,000
5 persons	$20,000

The six "low income" definitions include for evaluation included in the Pioneer Valley Region included a broad range of classifications. Each was mapped and reviewed for accuracy and presented to the Joint Transportation Committee for recommendations. The six definitions include:

1. Any census block group where the poverty rate is 10% or more higher than that of the region (above 23.5%)

2. Any census block group where more than half the population lives below the poverty line.

3. Any census block group where the percentage of persons below 150% of the poverty line is more than for the region as a whole (21.3%).

4. Any census block group where the percent of persons below 150% of the poverty line is more than 10% over the average for the region as a whole (above 31.3%).

5. Any census block group where more that half the population lives below 150% of the poverty line**.**

6. Any census block group where the poverty rate is higher than that of the region (13.5%).

The last definition (#6) provided the best representation of the region. The six definitions were mapped and evaluated based the distribution of the target population and the inclusion of low-income neighborhoods. Of the six only #4 and #6 include low income neighborhoods outside of the region's urban core. To keep the definition of "low income" easy to explain and understand definition #6 was selected by the JTC:

Low-income block group = any block group in which the poverty rate (percent of persons living below the Federal poverty line) is higher than that of the region as a whole (13.5%).

The definition is inclusive of 57,217 people living in 162 block groups and represents 73.7% of the low-income population. The 162 included block groups comprise 36% of the region's total (450). The geography of the low-income population includes the larger urban centers as well as smaller neighborhoods in Westfield and Ware.

Consultation and Active Solicitation of Public Participation

Strategy: *Make a concerted effort to engage and involve representatives of minority and low-income groups to hear their views regarding performance of the transportation planning process.*

The Environmental Justice program was developed around a public participation 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. Following the guidelines of SAFETEA-LU, 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. The Transportation Consultation Stakeholders to date include:

Springfield Education Institutions
Representative from the Massachusetts Career Development Institute (MCDI), Springfield Technical Community College and American International College participated in a transportation stakeholder's assessment of the needs and issues of their students and faculty. The issues included the need for transit service that would allow recent graduates with access to jobs, on-campus parking issues, neighborhood access to transit and issues related to childcare and trip chaining. The group came up with several short term recommendations and agreed to meet again in the future.

The Springfield Health Coalition
The mission of the Springfield Health Coalition is to identify and implement policy and environmental changes to prevent and reduce obesity and early deaths from heart disease, stroke and diabetes in the Greater Springfield area. The Coalition assists in statewide efforts to make the "healthy behavior the easy behavior" in school, worksite, healthcare and community settings. The coalition's efforts target the reduction of risk factors related to chronic diseases mentioned above, which are affecting the residents of Springfield. The Pioneer Valley Planning Commission completed a user survey of the Springfield Riverwalk that identified obstacles and barriers to using the facility.

The Springfield Walks/ Mason Square Partners; Springfield Walks is a collaborative project including Rails-to-Trails Conservancy, Massachusetts Department of Public Health, City of Springfield, Pioneer Valley Planning Commission, Springfield Health Coalition and neighborhood organizations such as the Mason Square Neighborhood Health Center. More than one half of Massachusetts residents are overweight and nearly one in five are obese. Heart disease and stroke are the leading causes of death in Springfield. These alarming statistics led to the formation of Springfield Walks, an initiative to work with community leaders to encourage a more active lifestyle. Walking can significantly reduce the risk of heart disease and stroke. Springfield Walks has been working with residents and organizations on ways to make Mason Square a safe and easy place for walking. The Pioneer Valley Planning Commission's Unified Planning Work Program facilitated this effort with

assistance in public outreach to Mason Square residents, review and comments on the State Street reconstruction project, data collection and mapping of cycling routes, presentation materials for public forums, mapping for the State Street Art Walk and ongoing assistance with funding for related activities.

Target Hunger
Target Hunger is a community organizing project of The Food Bank and two dozen community partners in the Mason Square area of Springfield, with the goal of implementing new solutions to the problem of hunger, which affects 9% of local residents, and create a sustainable model of community food security. Transportation has been identified as a major obstacle in accessing healthy food.

Holyoke Food and Fitness Collaborative
This partnership of organizations is working toward a Kellogg Grant that would incorporate a variety of transportation projects as they relate to public health and safety. Nuestras Raíces, a leader in the Collaborative, is a grass-roots organization that promotes economic, human and community development in Holyoke, Massachusetts through projects relating to food and agriculture

Consultation and Public Participation Action Items for Environmental Justice and Title VI

The specific action items to be completed under this task include the following:

1. The PVPC will continue 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.

2. Continue to expand public participation efforts related to the RTP and TIP to include local presentations at special group meetings, neighborhood council meetings and community activities.

3. Maintain a central file to document on-going public outreach efforts to minority and low-come populations. This effort will assist in documenting future activity.

4. Develop a protocol for responding to issues and concerns regarding Title VI.

5. Coordinate a presentation to MPO members regarding Title VI and Environmental Justice.

6. Coordinate efforts on Title VI and Environmental Justice between PVPC, FRCOG and CRCOG.

7. Revise the PVPC 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.

Previous work:

In 2002 staff attended training workshops sponsored by FHWA and obtained copies of EJ plans from MPOs of similar size. FHWA's Environmental Justice staff gave a presentation of the EJ program to the Joint Transportation Committee and videotaped a show for web broadcasting on the PVPC's local cable access show "REGION." In the months that followed, PVPC developed a draft scope of work pulling "best practices" from each of the programs reviewed. The Joint Transportation Committee approved the scope of work and reviewed many of the products. PVPC staff presented an overview of transportation planning to the Pioneer Valley Plan for Progress, Urban Investment Strategy Team and followed up on inquiries from local communities on transportation issues and needs in their communities. Demographic data on EJ target populations was used to schedule public outreach efforts in minority and low-income neighborhoods. Public hearings for the Regional Transportation Plans were held in Springfield, Westfield, Amherst, Northampton, Chesterfield, and Ware. With the exception of Chesterfield (a rural community) each RTP public hearing was held in an EJ community.

Equity Assessment Measures

Strategies: Four equity assessment strategies were developed under this task.

Identify the distribution of transportation investments in the region. Evaluate past and proposed funding allocations for TIP/RTP projects for minority neighborhoods vs. non-minority neighborhoods.

Quantify the frequency of transit service for low-income and minority populations. PVPC will evaluate the level of service (LOS) for transit routes in minority and low-income neighborhoods and compare these to regional averages.

Identify and evaluate the availability of bus shelters for transit routes in minority and low-income neighborhoods and compare these to regional average (including shelter availability)

Travel times to major service centers. PVPC will use the regional transportation model to forecast travel times to hospitals, colleges and universities from minority and low-income populations and compare these travel times to regional averages.

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 past spending and also assist decision-makers in achieving an equitable balance of funding in future years.

Certification:

The Pioneer Valley MPO has conducted an analysis of the 2007 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 and 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, 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:

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.

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.

Appendix B

PIONEER VALLEY METROPOLITAN PLANNING ORGANIZATION (PVMPO)
TITLE VI DISCRIMINATION COMPLAINT PROCEDURE

As previously endorsed: September 17, 2009

Title VI of the Civil Rights Act of 1964 and its amendments prohibit discrimination on the basis of race, color, or national origin in programs and activities that receive federal financial assistance. Two Presidential Executive Orders and related statutes further define populations that are protected under the umbrella of Title VI: Executive Order 12898, which is concerned with environmental justice (EJ) for minority and low-income persons; and Executive Order 13166, which is concerned with providing equal access to services and benefits for those individuals with limited English proficiency (LEP).

The purposes of Title VI include preventing the denial, reduction or delay of federally supported benefits to minority and low-income persons; ensuring full and fair public participation in the transportation planning processes of metropolitan planning organizations (MPOs); and ensuring that the policies and programs of MPOs do not have disproportionately adverse effects on minority and low-income persons.

Therefore, to comply with 49 CFR Section 21.9(b), the Pioneer Valley Metropolitan Planning Organization (PVMPO) maintains the following procedure to receive, review, resolve and track complaints related to Title VI.

1. How to Submit a Complaint

Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, by the Pioneer Valley Metropolitan Planning Organization (PVMPO) in its role of planning and programming federal funds may submit a written complaint. Complaints may be submitted for discrimination on the basis of race, color, national origin or language. Any such complaint shall be submitted no later than 180 days after the date the person believes the discrimination occurred. Written complaints shall be submitted to:

Massachusetts Secretary of Transportation, Chair
Pioneer Valley Metropolitan Planning Organization
c/o Pioneer Valley Planning Commission
60 Congress Street
Springfield MA 01104

Complaints shall be in writing and shall set forth as completely as possible the relevant facts and circumstances surrounding the alleged discrimination. The following information shall be included:

- Name, address, and phone number of the complainant.
- A statement of the complainant, including:
  - The basis of the alleged discrimination (race, color, national origin, or language).
  - A detailed description of the alleged discriminatory act(s).
  - What in the nature of the alleged act(s) led the complainant to feel that discrimination was involved.
  - The date(s) on which the alleged discriminatory act(s) occurred.
  - The name(s) of individual(s) alleged to have participated in the act(s).
- The names of all other agencies or organizations where the complaint is also being filed (if applicable).

- The signature of the complainant and date submitted.

2. Review of Complaints
Upon receipt of the complaint, the PVMPO chair shall direct the PVMPO staff executive director to review it. The PVMPO staff executive director shall provide written acknowledgment of receipt to the complainant within ten (10) business days.

The review may include the gathering of additional information from the complainant and/or the alleged discriminating party or parties.

Upon completion of the review, the PVMPO staff executive director shall submit a report of findings to the members of the PVMPO. If the complaint is found to have merit, the report of the PVMPO staff executive director shall also include proposed resolutions and/or recommended actions, such as:

- Forwarding the complaint to a responsible implementing agency.
- Identifying remedial actions that are available to offer redress.
- Identifying possible improvements to the PVMPO's Title VI processes.

If more time is required for the review, the PVMPO staff executive director shall notify the complainant and PVMPO chair of the anticipated additional time needed.

3. Resolution of Complaints
The PVMPO staff executive director shall submit the report of findings to the members of the PVMPO for discussion and action. A copy of the report shall also to be provided to the complainant. The PVMPO shall issue a written response to the complainant describing any action taken. The response shall be issued no later than sixty (60) calendar days after the date on which the complaint was received. If more time is required for action, the PVMPO shall notify the complainant of the anticipated additional time needed.

4. Concurrent Complaints and Appeal
The procedures described above do not in any way abridge the right of the complainant to file concurrent complaints with other state or federal agencies and/or to seek private counsel. The procedures above are part of an administrative resolution process that does not include punitive damages or compensatory remuneration. The complainant has the right to appeal the PVMPO's response by submitting the complaint to the Federal Transit Administration, as described in FTA Circular 4702.1A (http://www.fta.dot.gov/laws/circulars/publications_4123.html). Notice of this right shall be included in the PVMPO's written response to the complainant.

5. Complaint Tracking
The PVMPO will maintain a log of Title VI complaints received. This log will be available for public review at the offices of the Pioneer Valley Planning Commission, 60 Congress Street, Springfield MA 01104, during business hours.

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Appendix C

DRAFT BYLAWS of the PIONEER VALLEY JOINT TRANSPORTATION COMMITTEE

(Ratified on)

1.1 The Role of the Joint Transportation Committee

The Pioneer Valley Joint Transportation Committee (JTC) is the region's transportation advisory group for the Pioneer Valley Metropolitan Planning Organization (MPO). The JTC was established by the 3-C (Comprehensive, and Continuing, Cooperative) Memorandum of Understanding (MOU), which emphasizes a comprehensive, cooperative and continuing process for transportation planning and programming. The committee is designed to assist the MPO in incorporating citizen participation in transportation decisions which provides a mechanism for federal, state, and local input into the regional transportation planning process. Each member community is asked to appoint two representatives (a representative and an alternate) to the committee. The Pioneer Valley MPO also requests that other transportation organizations in the region appoint a representative to the JTC.

The JTC meets monthly on the second Wednesday of the month, all meetings are open to the public and interested parties are encouraged to attend. Meetings are posted on the PVPC website at www.pvpc.org . MPO staff will have an opportunity to comment on individual transportation plans, expectations, and concerns and incorporate them into the regional planning process. The planning program and the various functional elements of the planning process are developed cooperatively with the committee and ultimately reviewed by the committee prior to action by MPO. The JTC is responsible for coordination of all regional transportation related plans and programs in cooperation with PVPC staff.

1.2 Responsibilities of the Pioneer Valley JTC:

The JTC is responsible for making recommendations to the MPO or other entities involved in transportation planning for the region. Each item requiring MPO action is initially referred to the JTC for review and recommendation. The chairperson of the JTC is responsible for transmittal of the JTC recommendation to the 3-C signatories. Dissenting views are reported along with the majority viewpoint. JTC responsibilities are as follows:

- Convene public meetings and hearings to develop, review, and advise the MPO on transportation related items.
- Maintain a diverse interaction from public and private representatives while also providing a forum for discussing transportation matters on a regular basis.
- Review and advise the MPO on the Pioneer Valley Regional Transportation Plan (RTP), Transportation Improvement Program (TIP), and Unified Planning Work Program (UPWP).
- Maintain and update basic policies governing the conduct of the 3-C planning process.
- Ensure that the 3-C process is open and broadly participatory.
- Resolve issues and controversies related to the implementation of the 3-C process through consensus building.
- Recommend planning priorities.
- Recommend multimodal transportation project priorities.
- Recommend the implementation of specific programs to the legally established agency.
- Disseminate important legislation to local elected officials and key decision-makers through various community meetings.
- Represent and vocalize the region's issues and concerns at MPO meetings.
- Provide comments for improving the public participation process to better meet the needs of the region.
- Educate the committee regarding the Metropolitan Transportation Planning Process by discussing different topics at each JTC meeting with an open forum for questions and answers

1.3 Composition of the JTC

The JTC formed under provisions out-lined in the Memorandum of Understanding, is the prime policy advisory body regarding transportation planning issues to the Pioneer Valley Metropolitan Planning Organization (MPO). As such, the JTC is composed of the following:

1. One representative and one alternate from each of the 43 communities comprising of the Pioneer Valley Regional Planning district (Voting Members).
2. Staff representatives of the Pioneer Valley Planning Commission (Ex-Officio*).
3. A representative of the MassDOT Highway Division for District One and District Two as appointed by the Administrator of the Highway Division. (one Vote collectively)
4. A representative of MassDOT as appointed by the Secretary of Transportation (Ex-Officio*).
5. Representatives of the other appropriate state agencies as invited by the Secretary of Transportation (Ex-Officio*).
6. A representative of public and private institutions, consumer groups and associations appointed by either the PVPC or by the Administrator of the MASSDOT HIGHWAY DIVISION acting in consultation with the other signatories (Voting Member).
7. A representative of the Pioneer Valley Transit Authority (PVTA) (Voting Member).
8. A representative of Federal Highway Administration (FHWA) (Ex-Officio*)
9. Airport Representative (Voting Member)
10. Motor coach industry represented by Peter Pan (Voting Member)
11. Rail Freight industry represented by the Pioneer Valley Rail Road (Voting Member)
12. University of Massachusetts (Voting Member)
13. A representative designated by the Massachusetts Bicycle Coalition (MassBike), Pioneer Valley Chapter (Voting Member)

    * Ex-Officio members or representatives do not have voting status

1.4 Appointment and Term of Members

1. Voting Community Representatives of the JTC will be appointed by the Chief Elected Official of each community. Designated voting representatives of organizations listed under article 6 of section 1.3 of these Bylaws, will be appointed by the appropriate authority from each organization.
2. Voting members of organizations listed in section 1.3 articles 6, 7,8,9,10,11, and 12 will be appointed by that organization to a term determined by the above mentioned organization
3. The term of each voting community representative will be two years, at which point the PVPC will contact the Chief Elected Official of each Community and will request a written response stating whether that Community will have a new representative or the same representative will continue to serve. The Chief Elected Official may change representatives at anytime via written request.
4. The JTC is required to appoint one voting member to be Chairperson of the JTC. The Committee shall appoint a Chairperson every two years. The Committee may also appoint a Vice Chairperson under the same terms as the Chairperson.

1.5 Subcommittees

To assist the JTC with its actions and responsibilities, subcommittees within the JTC are established on an as-needed basis. These subcommittees meet to discuss specific topics of interest and each provides advice to the larger group. With MPO Staff assistance, these groups study problems and provide information for JTC decision making. These subcommittees are primarily composed of JTC members but may include non-JTC members whose interest and skills will benefit the committee. Current subcommittees include:

- TIP Subcommittee
- Bicycle/Pedestrian Subcommittee.

1.6 JTC Meetings

Meetings are held monthly at the PVPC on the second Wednesday of every month.. All notices shall be written and mailed to all members of the JTC no less than (7) days prior to the day designated for the meeting which is the subject of the notice in accordance with Chapter 397 of the General Laws of Massachusetts (The open Meeting Law).

1. Quorum shall consist of 11 voting community members of the JTC. A lack of a quorum shall not prevent the members of any regularly scheduled meeting from coming to order, making motions, discussing informational agenda items or discussing or passing a motion to continue said meeting at a later date in accordance with Chapter 40B, Section 4, of the General Laws of Massachusetts.
2. Majority vote shall be tallied based upon the majority of JTC members present and voting so long as a quorum for the meeting has been successfully achieved and continues to exist. Each voting representative is entitled to one vote per voting topic, all votes are equal. There will be no proxies.
3. Alternate Community members may attend and contribute to all meetings, but do not have voting powers if the primary member for said Community is present, each community is allowed one vote per voting topic.
4. All procedural questions of the JTC not specifically addressed by these Bylaws shall be resolved in accordance with Robert's Rules of Order (as revised), provided that the rules contained therein are not inconsistent with the Bylaws or special rules of the JTC
5. Ex-Officio members will have equal non voting rights on the JTC.
6. Agendas for regularly scheduled JTC meetings may be changed by the Chair up to 48 hours before the time of the meeting. Public officials may have items placed on the agenda up to Nine (9) days before the meeting.

1.7 Public Participation

The MPO public participation policies will be followed by the JTC

1.8 Ratification of the Bylaws

Ratification of the Bylaws will be by the endorsement of this draft document by the MPO at the August 1, 2006 meeting.

1.9 Amendments of the Bylaws

These Bylaws may be amended by a two-thirds vote of the JTC present and voting at a duly convened meeting so long as the text of the proposed amendment appears in the notice of the meeting and was presented to the Committee at its previous meeting
Amendments to these Bylaws can only be made by a two thirds voting member vote.

1.10 Meeting Cancellation Policy

The PVPC and the Chair of the JTC have the right to cancel a meeting up until two hours prior to the start of said meeting. In the case that a meeting is cancelled all agenda items will be handled at the next scheduled JTC meeting.

Appendix D **(Note, the MOU referenced here is in the process of revision as of 3/31/2010 and will be updated in 2010)**

Memorandum of Understanding
September 2, 1998 amended on March 18, 2004 and August 1, 2006
MEMORANDUM OF UNDERSTANDING RELATING TO THE
COMPREHENSIVE, CONTINUING, COOPERATIVE TRANSPORTATION
PLANNING AND PROGRAMMING PROCESS AND THE METROPOLITAN PLANNING ORGANIZATION
By and Between the
MASSACHUSETTS EXECUTIVE OFFICE OF TRANSPORTATION
MASSACHUSETTS HIGHWAY DEPARTMENT
PIONEER VALLEY PLANNING COMMISSION
PIONEER VALLEY TRANSIT AUTHORITY

WHEREAS, the Massachusetts Department of Transportation (MassDOT) has the statutory responsibility, under Chapter 6A of the Massachusetts General Laws, to conduct comprehensive planning for and to coordinate the activities and programs of the state transportation agencies; and,

WHEREAS, the Massachusetts Department of Transportation (MassDOT) Highway Division has the statutory responsibility under Chapter 16 of the Massachusetts General Laws for the construction, maintenance and operation of the state roads and bridges and serves as the principal source of transportation planning in the Commonwealth and is responsible for the continual preparation of comprehensive and coordinated transportation plans and programs; and,

WHEREAS, the Pioneer Valley Planning Commission (PVPC) is recognized by the MPO as the officially designated regional planning agency for the Pioneer Valley region and as such has statutory responsibility for comprehensive planning, including transportation planning, as provided for under the provisions of Chapter 40B of the Massachusetts General Laws and, in addition, is comprised of local planning board members and/or designees of the chief elected officials of each of its 43 member local governments; and,

WHEREAS, the Advisory Board of the Pioneer Valley Transit Authority (PVTA) is composed of the chief elected official or designee of 24 cities and towns that have joined to form and manage a regional transit authority under the provisions of Chapter 161B of the Massachusetts General Laws. PVTA has the statutory responsibility for providing mass transportation on an exclusive basis in the area constituting the authority, to provide mass transportation service under contract in areas outside the authority, and to prepare a program for public mass transportation which includes long and short range planning elements together with implementation schedules for mass transportation improvements; and,

WHEREAS, the Massachusetts Department of Transportation (MassDOT), Massachusetts Highway Department (now the MassDOT Highway Division, the PVTA and the PVPC on April 12, 1976 signed a Memorandum of Understanding (MOU) agreeing to work together in undertaking the comprehensive, continuing, and cooperative transportation planning process (3C process), required by the United States Department of Transportation under the provisions of Section 134 of Title 23 of the United States Code, as amended, and those of Section 8 of Title 49 of the Federal Transit Act, as amended, and creating the Joint Transportation Committee; and

WHEREAS, the Governor of the Commonwealth, in response to the provisions of the Safe Accountable Flexible Efficient Transportation Equity Act: Legacy for Users (SAFETEA-LU) signed into law on August 10, 2005 and rules and regulations related thereto, and in view of the responsibility for the transportation planning and programming process of the four parties to this agreement, hereinafter referred to as the MPO, previously designated representatives from these parties to be the Metropolitan Planning Organization (MPO) for the Pioneer Valley region; and

WHEREAS, Section 450.108 of Title 23 of the Code of Federal Regulations provides that, to the extent possible, there be one agreement containing the understanding required by this section with respect to cooperatively carrying out transportation planning and programming among the MPO, State and publicly owned operators of mass transportation services; and,

WHEREAS, the members of the MPO recognize that transportation planning and programming must be conducted as an integral part of and consistent with the comprehensive planning and development process, and that the process must involve the fullest possible participation by state agencies, local governments, private institutions, other appropriate groups and the general public; and

WHEREAS, there is a shared interest and desire on the part of the four signatories to this MOU to expand the membership of the MPO in order to enhance the participation and perspective of the variety of the local governments comprising the Pioneer Valley region.

NOW, THEREFORE, the members of the MPO hereto jointly agree as follows:

The voting members of the Pioneer Valley Metropolitan Planning Organization shall, upon execution of this revised and updated MOU document, consist of the following officials or their designee or alternate:

- the Secretary of the Executive Office of Transportation
- the Administrator of the Massachusetts Highway Department
- the Chairman of the Pioneer Valley Planning Commission
- the Chairman of the Pioneer Valley Transit Authority Advisory Board
- the Mayor**s** of two of the following three (3) urban core cities within the Pioneer Valley region duly elected as prescribed under the provisions of this MOU document:

  Holyoke Chicopee Springfield

- the Mayor or a Selectman of one of the following four (4) cities and towns outside of the three core cities within the Pioneer Valley region duly elected as prescribed under the provisions of this MOU document:

  Agawam Southwick Westfield
  West Springfield

- the Mayor or a Selectman of one of the following five (5) cities and towns within the Pioneer Valley region duly elected as prescribed under the provisions of this MOU document:

  Amherst Easthampton Hadley
  Northampton South Hadley

- a Selectman of one of the following fourteen (14) suburban and rural towns within the Pioneer Valley region duly elected as prescribed under the provisions of this MOU document:

  Belchertown Brimfield East Longmeadow
  Granby Hampden Holland
  Longmeadow Ludlow Monson
  Palmer Pelham Wales
  Ware Wilbraham

- a Selectman of one of the following seventeen (17) suburban and rural towns within the Pioneer Valley duly

elected as prescribed under the provisions of this MOU document:

Blandford	Chester	Chesterfield
Cummington	Goshen	Granville
Hatfield	Huntington	Middlefield
Montgomery	Plainfield	Russell
Southampton	Tolland	Westhampton
Williamsburg	Worthington	

In addition, the Joint Transportation Committee (JTC) Chairman, and one representative each from the Federal Highway Administration (FHWA)**,** the Federal Transit Administration (FTA), the Chair of the Infrastructure Committee of the Western Massachusetts Economic Development Council (EDC**),** the five (5) alternate community MPO representatives, and one representative each from both the Massachusetts Highway Department District One and District Two Offices shall be considered ex-officio, non-voting members of the Pioneer Valley MPO. Alternate members shall be additional chief elected officials from each of the above-cited categories of communities and he/she shall be eligible to attend, participate and vote at MPO meetings in the event that the primary member cannot attend.

I. Nomination and Election Process for the Six Locally Elected MPO Members

The above-cited community officials shall be elected to the MPO by the Pioneer Valley Planning Commission at a full Commission meeting. The electoral process shall be conducted using a regional caucus approach for each of the five local officials. PVPC will host meetings in each MPO tier to identify and recommend local officials interested in participating on the MPO. The term of office for each community representative to the Pioneer Valley MPO shall be for two years. At the first election, two Selectmen shall be elected for a one-year term, and two for a full two-year term. In the event that a current MPO member from one of the local tiers chooses not to run for reelection or is not reelected to office, the alternate member shall automatically assume the duties of the member. The PVPC will seek to fill any vacant alternate MPO member slot(s) through a search process carried out in consultation with the Joint Transportation Committee (JTC) and ultimately confirmed by an affirmative vote of the Commission. Once the Commission has successfully completed the election process, the proposed new municipal MPO member or members will be brought before the MPO for acceptance by an affirmative vote of a majority of its members.

II. Voting

Votes of the Pioneer Valley MPO, including all those affecting regional certification documents (e.g. the Transportation Improvement Program [TIP], the Regional Transportation Plan [RTP], the Unified Planning Work Program [UPWP], Air Quality Conformity Determinations, compliance with the Americans With Disabilities Act [ADA]), shall be by a simple majority of those MPO members present and voting, provided that one of the state agencies shall be included in the majority vote and at least five (5) members or designee/alternates are present.

III. MPO Chair and Vice-Chair

The Chair of the MPO shall be the Secretary of MassDOT. The Vice-Chair of the MPO shall be either the Chair of the PVPC or the Chair of the PVTA Advisory Board and will be elected for a term of two years by a majority vote of the regional agency and local community members of the MPO. The Vice-Chair is empowered to call a meeting of the MPO with the support of at least three (3) other Pioneer Valley MPO members.

IV. The Objectives of the 3C Process

A. The 3C process is a comprehensive, continuing and cooperative transportation planning and programming process resulting in transportation plans and programs consistent with the comprehensive planning objectives of the

Pioneer Valley region.

B. The 3C process is comprehensive, including the effective integration of the various stages and levels of transportation planning and programming for the entire Pioneer Valley region and examining all modes so as to assure a balanced planning and programming effort. There is a simultaneous analysis of various related non-transportation elements, such as land-use, housing, economics, environmental resources and population, in order to assure consistency within an integrated and comprehensive planning and programming process.

C. The 3C process is continuing, affirming the necessity to plan for both the short- or long-range future, emphasizing the iterative character of the progression from systems planning to project planning and programming and implementation and the necessity for re-evaluating data and plans on a periodic basis.

D. The 3C process is cooperative, requiring effective coordination among public officials at all levels of government, and inviting the wide participation of all parties, public or private, at all stages of the transportation planning process. A key objective of the process is to resolve transportation issues by providing a forum for the resolution of concerns and disputes. At the same time, the process is not intended to operate, and cannot operate, to dilute the ultimate authority or responsibility of those state, regional or local public officials or agencies who, pursuant to statute or under contract, develop, review and/or implement transportation plans, programs and projects.

V. Functions of a Transportation Planning Advisory Group

In order to accomplish the objectives of the 3C process, the Pioneer Valley MPO has established a special committee known as the Joint Transportation Committee, to serve as the Transportation Policy Advisory Group for the Pioneer Valley region, in accordance with earlier agreements. The primary functions of the Joint Transportation Committee are:

A. To advise the MPO on matters of policy affecting the conduct of the 3C transportation planning and programming process for the Pioneer Valley region.

B. To advise the MPO on such regional transportation documents as may from time to time be required by state or federal laws and regulations.

C. To provide maximum participation in the transportation planning and programming process by providing a forum to bring the MPO together with other public agencies, elected and appointed officials of cities and towns, and citizens concerned with the transportation planning and programming process; thereby facilitating, wherever possible, the consistency of transportation plans and programs for the Pioneer Valley region with the policies, priorities, and plans of affected state and regional agencies, local communities, private groups and individuals within the Pioneer Valley region. The MPO shall annually determine the membership on the Joint Transportation Committee in a manner that will provide for a widely representative viewpoint and ensure a balanced consideration of transportation issues. Consistent with the provisions of this Memorandum of Understanding, the Joint Transportation Committee shall adopt bylaws and other procedures as may be necessary to govern its operation.

D. To nominate the six (6) local chief elected officials and alternates, recommended to serve as Pioneer Valley MPO members, which will be followed by an election conducted by the Pioneer Valley Planning Commission. Alternates are encouraged to regularly attend Pioneer Valley MPO meetings as ex-officio members in addition to the six (6) primary community MPO members

VI. Functions of the Metropolitan Planning Organization

A. The MPO shall jointly develop, review and annually endorse as appropriate a Planning Work Program which includes a Unified Planning Work Program; a Transportation Plan; a Transportation Improvement Program, as well as such transportation plans and programs as may from time to time be required by federal and state laws and regulations.

B. The MPO shall be the forum for cooperative transportation decision-making in the Pioneer Valley region.

C. In the resolution of basic regional transportation policy, the MPO shall seek and consider the advice of all interested parties.

VII. Operation of the MPO (this section will be revised as in 2010 as part of a revised Memorandum of Understanding for the MPO)

A. The MPO shall meet in the Pioneer Valley region at least once per year.

B. The Secretary of the Massachusetts Executive Office of Transportation, or his/her designee, shall chair the MPO. A Vice-Chairman of the MPO shall be elected for a term of two years from one of the two regional agency chairs (either PVPC or PVTA) who serve on the MPO. The Vice-Chairman shall be elected by the regional and local community representatives to the Pioneer Valley MPO.

C. Either the Chairman or Vice-Chairman can conduct meetings of the MPO.

VII. Responsibilities of Each Signatory

A. The MassDOT will be responsible for organizing and conducting MPO meetings, including maintaining records, reporting major statewide and inter-regional policies and issues as they develop and generally provide leadership for the MPO.

B. The Massachusetts Highway Department, through the Office of Planning will be responsible for making appropriate planning funds available to the PVPC by contract to assist in the implementation of the required planning work program as defined in the approved Unified Planning Work Program **(**UPWP) the Office of Planning will also provide the necessary data, technical support and staff support required to assist in fulfilling the transportation planning needs of the Pioneer Valley region and the Commonwealth.

C. The PVPC shall be responsible for comprehensive regional planning and shall be the lead-planning agency for the Pioneer Valley region and it's MPO. The PVPC shall maintain qualified transportation planning staff, subject to the availability of funds, and shall be principally responsible for the maintenance of the transportation planning process and for the support and operation of the Joint Transportation Committee and the MPO.

D. The PVTA, in addition to its statutory responsibility of providing mass transportation, will assist in obtaining and ensuring input and participation in multimodal transportation planning from local elected officials and the general public. The PVTA will actively participate in the 3C transportation planning and programming process and will represent regional concerns relative to public transportation problems and needs.

E. Each community representative to the MPO shall be responsible for articulating a local government perspective of regional transportation problems and needs for the category of community (i.e. urban core cities, urban centers, suburban towns, or rural towns) for which he/she is elected to represent on the Pioneer Valley MPO.

IX. Effect of the Memorandum

This Memorandum of Understanding grows out of and supersedes the Memorandum of September 2, 1998, and shall become effective upon the date of a majority of the signatures from the MPO members including the Secretary of MASSDOT, the Administrator of Massachusetts Highway Department, the Chairman of PVPC, the Chairman of the PVTA and the four existing community MPO members. -In addition, this signatory sheet-shall become a part of the final updated MOU document. The signatories shall review the contents of this Memorandum every three years at a minimum, and make appropriate changes as may be necessary and are agreed upon by a majority of the MPO members.

X. Concerning Municipal Recognition of this Agreement

The undersigned Signatories to this Memorandum acknowledge the MPO must maintain continuing recognition from the Pioneer Valley region's cities and towns of the purposes, objectives, and functions of the transportation planning and programming process, as well as the mechanisms required to implement this agreement. To help achieve this continuing recognition, the MOU shall be reviewed and reaffirmed once every three years by the members of the Pioneer Valley MPO, with the advice of the JTC. During each review, the document shall be circulated among all mayors, boards of selectmen, and city and town managers in the Pioneer Valley region for their review and comment.

Appendix E

LEGAL NOTICE

2010 Update to the Pioneer Valley Metropolitan Planning Organization's Public Participation Plan

In accordance with the requirements of the Pioneer Valley Region's Metropolitan Planning Organization (MPO), the Pioneer Valley Planning Commission (PVPC) is holding a public review period for the following document:

> The Pioneer Valley Metropolitan Planning Organization's Public Participation Plan (PPP) outlines the public participation process for transportation planning in the Pioneer Valley (Hampshire and Hampden County). The document describes the public review process for transportation planning plans and programs for the region including the Regional Transportation Plan, the Transportation Improvement Program, the Unified Planning Work Program and other transportation studies. The PPP works in concert with regional goals and objectives and the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). The Pioneer Valley PPP plays a role in building a consensus for the future of transportation projects and policies in the region.

Two meetings to solicit public comments on the Draft Public Participation have been scheduled at the following times and locations:

- Wednesday, January 13, 2010 – 10:15 a.m. Pioneer Valley Planning Commission, 60 Congress Street, Springfield, MA 01104
- Wednesday, February 10, 2010 – 10:15 a.m. Pioneer Valley Planning Commission, 60 Congress Street, Springfield, MA 01104

Copies of the Draft PPP are available for public review on-line from PVPC's web page at www.pvpc.org. Hard copies of the document are also available by contacting PVPC directly. Written comments on the plan are encouraged and will be accepted beginning January 6, 2010 and ending February 26, 2010. Interpretive services for the public meetings are available with 72 hour advance notification. Comments may be submitted in person at the public meetings, or in writing to the Pioneer Valley Planning Commission, 60 Congress Street, Springfield, MA 01104, attention: Gary Roux (email: gmroux@pvpc.org).

City and Town Clerks: Please post this notice on the official bulletin board until March 1, 2010 and file in your office pursuant to Massachusetts General Laws, Chapter 39, Section 23, A-C

AVISO LEGAL

Actualización 2010 del Pioneer Valley Metropolitan Planning Organization's Public Participation Plan

(Plan de Participación Pública)

De acuerdo con los requisitos del Pioneer Valley Region's Metropolitan Planning Organization (MPO), el Pioneer Valley Planning Commission (PVPC) está llevando a cabo una revisión pública del siguiente documento:

> El Pioneer Valley Metropolitan Planning Organization's Public Participation Plan (PPP) contornea el proceso de la participación pública en el planificación de transportación en el Pioneer Valley (los condados de Hampshire y Hampden). El documento describe el proceso de revisión pública de los planes y los programas de planificación de transporte para la región incluyendo el Regional Trasportation Plan (plan regional del transporte), el Transportation Improvement Program (programa de mejora del transporte), the Unified Planning Work Program (programa de trabajo para planificación unificada) y otros estudios del transporte. El PPP trabaja en concierto con metas y objetivos regionales y con el acto *Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users* (SAFETEA-LU). El Pioneer Valley PPP desempeña un papel muy importante en la construcción de un consenso sobre el futuro de los proyectos y las polizas del transporte en la región.

Habrán dos reuniones para solicitar comentarios públicos sobre el documento. Las reuniones están planificadas para los siguientes dias:

- Miércoles, 13 de enero del 2010, a las 10:15 de la mañana en las oficinas del Pioneer Valley Planning Commission, 60 Congress Street, Springfield, MA 01104

- Miércoles, 10 de febrero del 2010, a las 10:15 de la mañana en las oficinas del Pioneer Valley Planning Commission, 60 Congress Stree, Springfield, MA 01104

Las copias del documento PPP están disponibles para la revisión pública en la página web del Pioneer Valley Planning Commission, www.pvpc.org. Copias del documento en papel también están disponibles; comuniquese con las oficinas del Pioneer Valley Planning Commision para pedir una copia. Los comentarios escritos sobre el documento PPP serán aceptados empezando Enero 6 del 2010 y terminando Febrero 26 del 2010. Los servicios de interpretación estarán disponibles durante las reuniones públicas con 72 horas de solicitud adelantada. Comentarios también se puede someter en persona en las reuniones públicas, o por escrito a el Pioneer Valley Planning Commission, 60 Congress Street, Springfield, MA 01104, attención: Gary Roux (email: gmroux@pvpc.org).

City and Town Clerks: Please post this notice on the official bulletin board until March 1, 2010 and file in your office pursuant to Massachusetts General Laws, Chapter 39, Section 23, A-C

Appendix F

Opportunities for Public Comment – 2010 Schedule

Public outreach efforts related to the 2010 update of the Public Participation Plan are described below. If additional comments are received prior to the expected adoption of the Plan on XXX 2010, those comments will be addressed and documented in the Final Plan.

January 6, 2010:	PVPC MPO meeting, special presentation on the PPP, opportunity for public comment, Pioneer Valley MPO opens Public comment period (minimum 45 days) contingent on incorporation of MASSDOT comments. PVPC 60 Congress Street, Springfield, MA Posting of Draft PPP on PVPC web site
January 7, 2010:	Mailing of Draft PPP to Joint Transportation Committee Notice to Town Clerks
January 8, 2010:	Legal notice: Hampshire Gazette (English) Legal notice: Springfield Republican (English & Spanish) Notice to Town Clerks Notice to extensive special mailing list including environmental and EJ News release to other media
January 13, 2010:	Pioneer Valley Joint Transportation Committee Meeting; special presentation & opportunity for public comment 10:15 a.m., 2nd Floor, PVPC. 60 Congress Street, Springfield, MA Notice to Town Clerks.
~~February 10, 2010~~:	~~Meeting Notice; Pioneer Valley Joint Transportation Committee and opportunity for public comment on the PPP. 10:15 a.m., 2nd Floor, PVPC. 60 Congress Street, Springfield, MA~~ ~~Notice to Town Clerks~~. (Meeting Cancelled due to inclement weather)
March 10, 2010:	Meeting Notice; Pioneer Valley Joint Transportation Committee and opportunity for public comment on the PPP. 10:15 a.m., 2nd Floor, PVPC. 60 Congress Street, Springfield, MA Notice to Town Clerks.
June 22, 2010:	PVPC MPO meeting, presentation on the PPP and opportunity for public comment. MPO approves conditional endorsement of the PPP pending incorporation of MPO comments and consideration for any comments prior to the end of the public participation process. PVPC, 2nd Floor, 60 Congress Street, Springfield, MA
June 22, 2010:	Public participation period for the PVMPO Public Participation Plan Ends

In accordance with Federal requirements for a minimum a 45-day period for public comments prior

to the adoption or amendment of a public participation plan. The time period from the first notice of opportunities to comment **(January 6, 2010)** on this update of the PVMPO Public Participation Plan until consideration for adoption by the PVMPO on **(June 22, 2010)** was 166 days.
The draft document and a notice of opportunities to comment on the draft Plan was posted to the PVMPO website following endorsement for public comment by the Pioneer Valley MPO on June 22, 2010. A legal notice, officially opening the public comment period, was published in the Springfield Republican and Hampshire Gazette (in both English and Spanish) on January 8, 2010. On January 6 a notice of the opportunities for comment was mailed to the town clerks in the Region; and was either emailed or mailed to more than 120 persons involved in various transportation planning subcommittees at PVMPO, including bike/ped, transit, environmental justice, freight, and human services transportation and other interested parties.

PVPC staff gave a public presentation on the draft document at the January 13 and February 10, 2010 meeting of the Joint Transportation Committee meeting. A similar presentation was given at the January 6, 2010 and June 22, 2010 of the PVMPO. Comments were received and incorporated into the document.

Public comments could also be made at the other MPO meetings.

Comments and Disposition

A summary of the comments received and our disposition of those comments is provided in the following table:

Comment by	Comment	Disposition	Date received
Michael Chong Planning and Environment Program Manager Federal Highway Administration	It is not clear if the PPP states that an additional opportunity for public comment is provided if the TIP or RTP differs significantly from the version that was made available for public comment by the MPO and raises new material issues which interested parties could not have reasonably have foreseen from the public involvement efforts. For example, a public notice for an amendment (or new document) states that there are 5 projects to be added to the TIP, and during the comment period, the total changes to the mix of projects is actually 20 projects. Is there an additional opportunity for public input?	Revisions have been incorporated to allow the public participation period to be extended	2/25/2010
Michael Chong Planning and Environment Program Manager Federal Highway Administration	Appendix D, MOU The text includes both MassDOT and EOT, and you might wait until the MPO reworks the MOU to define the role of all the parties involved in the planning process. You could include a statement that the section will be updated after MPO updates the MOU etc.	A statement has been added to acknowledge the upcoming changes to the MPO. References to EOT have been left as they were pending the updated MOU.	2/25/2010

End of Comment for recent changes to the Public Participation Plan

Endorsement and Adoption

The PVJTC recommended the draft Public Participation Plan to the PVMPO for endorsement. The PVMPO for endorsed the revised Pubic Participation Plan on June 22, 2010
(insert copy of endorsement sheet on the next page)

PIONEER VALLEY MPO ENDORSEMENT SHEET

The signatures below signify that all members of the Pioneer Valley Region's Metropolitan Planning Organization, or their designees, have met on June 22, 2010 and discussed the following item for endorsement: The Public Participation Plan for the Pioneer Valley MPO.

Massachusetts Department of Transportation (MassDOT)
I, Secretary and CEO of the Massachusetts Department of Transportation, hereby
☒ Endorse ☐ Do Not Endorse the above referenced item.

for 22 Jun 10
Jeffrey Mullan Date
Secretary, CEO-MassDOT

Massachusetts Department of Transportation (MassDOT)
I, Administrator of the Massachusetts Department of Transportation Highway Division, hereby
☒ Endorse ☐ Do Not Endorse the above referenced item.

06/22/10
Luisa Paiewonsky Date
Administrator-MassDOT

Pioneer Valley Planning Commission (PVPC)
I, Chair of the Pioneer Valley Planning Commission, hereby
☐ Endorse ☐ Do Not Endorse the above referenced item.

6/22/10
Richard Butler Date
Chair - PVPC

Pioneer Valley Transit Authority (PVTA)
I, Administrator of the Pioneer Valley Transit Authority, hereby
☐ Endorse ☐ Do Not Endorse the above referenced item.

6/22/10
Mary MacInnes Date
Administrator - PVTA

City of Springfield
I, Mayor of the City of Springfield, hereby
❑ Endorse ❑ Do Not Endorse the above referenced item.

Domenic Sarno — Date
Mayor-Springfield

City of Chicopee
I, Mayor of the City of Chicopee, hereby
❑ Endorse ❑ Do Not Endorse the above referenced item.

Michael Bissonnette — Date
Mayor-Chicopee

City of Northampton
I, Mayor of the City of Northampton, hereby
☒ Endorse ❑ Do Not Endorse the above referenced item.

Mary Clare Higgins — 6/23/10 Date
Mayor-Northampton

Town of West Springfield
I, Mayor of the Town of West Springfield, hereby
❑ Endorse ❑ Do Not Endorse the above referenced item.

Edward Gibson — June 22 2010 Date
Mayor-West Springfield

Town of Belchertown
I, Board of Selectmen member of the Town of Belchertown, hereby
❑ Endorse ❑ Do Not Endorse the above referenced item.

James Barry — Date
Selectman-Belchertown

Town of Hatfield
I, Board of Selectmen member of the Town of Hatfield, hereby
☑ Endorse ❑ Do Not Endorse the above referenced item.

Marcus Boyle — 22 JUN 10 Date
Chair, Selectman-Hatfield

Appendix H

Public Meetings held for various PVMPO Outreach Efforts

PVMPO Meetings

FY12

- May 10, 2012
- June 19, 2012

FY13

- October 18, 2012
- November 8, 2012
- May 1, 2013
- May 29, 2013
- July 9, 2013
- August 21, 2013
- September 5, 2013

FY14

- January 15, 2014
- February 27, 2014
- April 29, 2014
- June 18, 2014

Public Meetings for TIP (both for New TIP Releases and TIP Amendments)

- August, 17, 2011 – FY 12-15 Draft TIP Public Meeting
- March 28, 2012 – FY 12-15 Amendment #1
- May 23, 2012 – FY 13-16 Draft TIP Public Meeting
- August 8, 2012 – FY 12-15 Amendment #2
- November 7, 2012 – FY 13-16 Amendment #1
- January 9, 2013 – FY 13-16 Amendment #2
- May 1, 2013 – FY 13-16 Amendment #3
- May 22, 2013 – FY 12-15 Draft TIP Public Meeting
- August 28, 2013 – FY 13-16 Amendment #4
- March 26, 2014 – FY 14-17 Amendment #1

PVMPO Member Election Meetings Consultation Meetings

- October 12, 2011 –
- October 13, 2011 –
- September 20, 2012 –
- September 26, 2012 –

PVMPO Joint Transportation Advisory Committee Meetings

FY 12	FY 13	FY 14
• 11/09/11	• 10/10/12	• 10/9/13
• 1/11/12	• 11/14/12	• 11/13/13
• 2/8/12	• 12/12/12	• 12/11/13
• 3/14/12	• 2/13/13	• 1/8/14
• 4/11/12	• 4/10/13	• 2/12/14
• 5/9/12	• 5/8/13	• 3/12/14
• 6/13/12	• 6/12/13	• 4/9/14
• 9/12/12	• 9/11/13	• 5/14/14
		• 6/11/14

Pioneer Valley JTC Bicycle and Pedestrian Advisory Committee

FY 12	FY 13	FY 14
• 11/09/11	• 10/10/12	• 10/9/13
• 1/11/12	• 11/14/12	• 11/13/13
• 2/8/12	• 12/12/12	• 12/11/13
• 3/14/12	• 2/13/13	• 1/8/14
• 4/11/12	• 4/10/13	• 2/12/14
• 5/9/12	• 5/8/13	• 3/12/14
• 6/13/12	• 6/12/13	• 4/9/14
• 9/12/12	• 9/11/13	• 6/11/14

U.S. Department
of Transportation
**Federal Transit
Administration**

REGION I

55 Broadway, Suite 920
Cambridge, MA 02142

August 8, 2013

Timothy Brennan
Executive Director
Pioneer Valley Planning Commission
60 Congress Street
Springfield, MA 01104-3419

Re: Title VI Program Concurrence – Recipient ID#1363

Dear Mr. Brennan:

This letter is to confirm that we received the Pioneer Valley Planning Commission (PVPC) Title VI program on August 8, 2013. A Title VI Program submission is required pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration's (FTA) Circular 4702.1A, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective May 13, 2007.

Upon reviewing your program, we have determined that it meets the requirements set out in the FTA's Title VI Circular, 4702.1A. Please plan to submit a Title VI program using the updated FTA Circular 4703.1B by the next program due date of April 1, 2015, by attaching it to your Recipient Profile in FTA's TEAM-Web. Please delete any version of the program in TEAM that this submission is replacing. Your Title VI program will expire 60 days after the due date, on May 31, 2015. If we have not received all required information by the time your Title VI program expires, the Pioneer Valley Planning Commission may experience delays in processing grants or draw-down restrictions.

Thank you for your ongoing cooperation in meeting all of the FTA civil rights program requirements. A copy of this letter has been attached to your Recipient Profile in TEAM for your reference.

Should you need assistance or if you have any questions regarding the comments above, please do not hesitate to contact me directly at (617) 494-2397 or at Margaret.Griffin@dot.gov.

Sincerely,

Margaret Griffin
Regional Civil Rights Officer

cc: Mary Beth Mello, FTA
Sean Sullivan, FTA
Monica McCallum, Regional Division Chief, FTA Civil Rights
TEAM Recipient Profile #1363

PIONEER VALLEY PLANNING COMMISSION

LIMITED ENGLISH PROFICIENCY (LEP) PROGRAM AND IMPLEMENTATION PLAN

Updated March 13, 2013

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CONTENTS

Figures and Charts

Accessible Formats

This document is available in accessible formats upon request. Paper copies of this document and additional information about accessible formats may be obtained by contacting:

Pioneer Valley Planning Commission
60 Congress Street, Springfield MA 01104
(413) 781-6045
www.pvpc.org

1.0 INTRODUCTION

This Limited English Proficient (LEP) Plan has been developed by the Pioneer Valley Planning Commission (PVPC) in consultation with the FTA publication of April 13, 2007, "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers."

This plan is a living document; it is continually reviewed, updated and improved by PVPC staff to help better meet the needs of the residents of the Pioneer Valley Metropolitan Planning Organization (PVMPO) region.

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:

- **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq**., and its implementing regulations, which state that no person shall be subject to discrimination on the basis of race, color, or national origin under any program or activity that receives federal assistance.

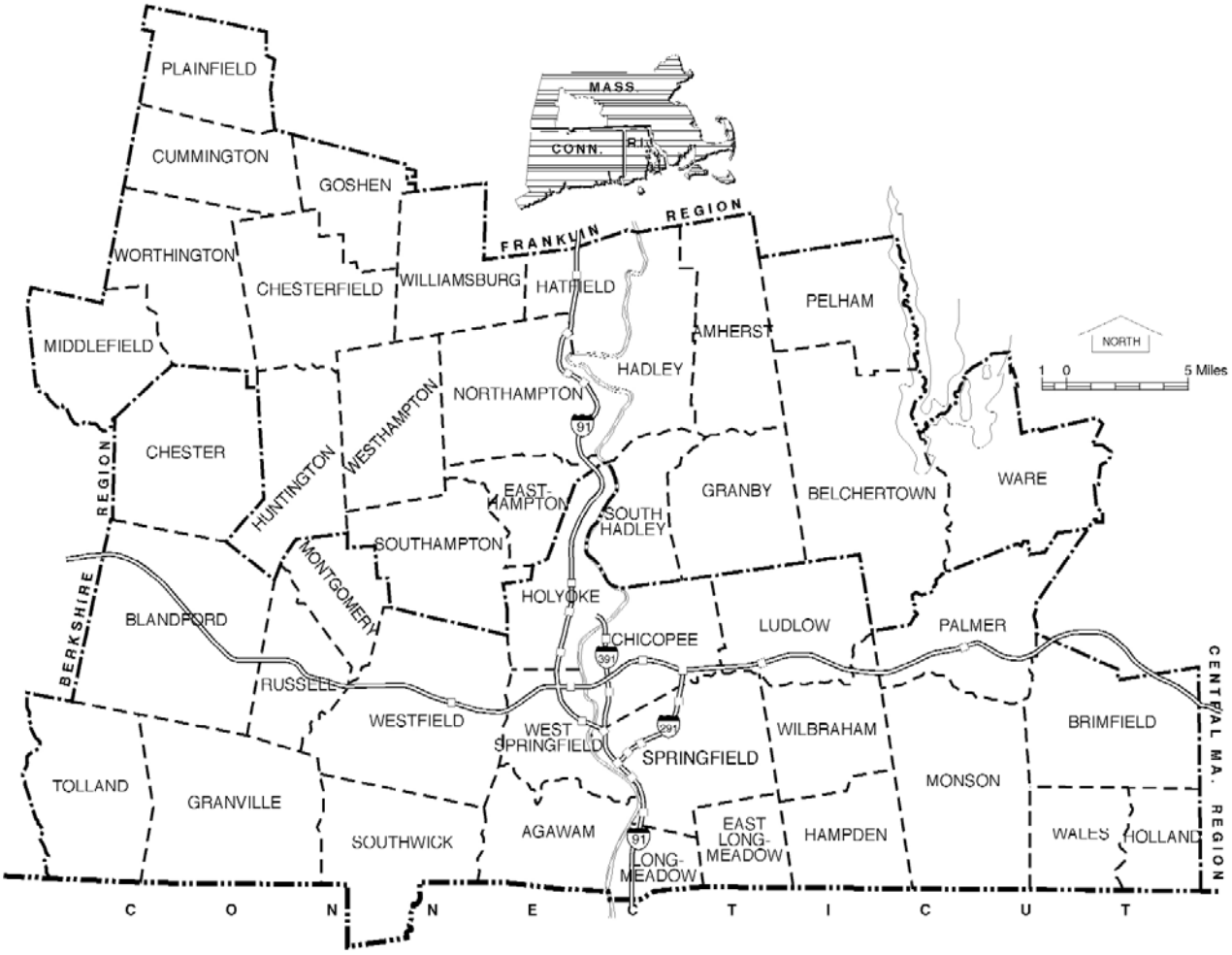
- **Executive Order 13166** "Improving Access to Services for Persons with Limited English Proficiency" of August 16, 2000, which directs that Federal agencies subject to the requirements of Title VI publish guidance for their recipients clarifying LEP obligations. Executive Order 13166 directs that all guidance documents be consistent with the compliance standards and framework detailed in the U.S. Department of Justice's Policy Guidance "Enforcement of Title VI of the Civil Rights Act of 1964—National Origin Discrimination Against Persons With Limited English Proficiency." This guidance advises that different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies, programs and operations of entities that receive funds from the federal government, which includes the PVMPO.

These federal regulations and guidance define persons with Limited English Proficiency as individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit in federally funded programs and activities.

This plan is being made available to people and organizations for which LEP may be a common consideration, including social service, non-profit, and law enforcement agencies. This plan is available in electronic PDF format on the PVPC website at www.pvpc.org. Paper copies of this LEP Plan will be provided to the community based organizations that have been consulted during the development of this plan, as well as the members of the Pioneer Valley Metropolitan Planning Organization (PVMPO), the Joint Transportation Committee of the PVMPO, the

Massachusetts Department of Transportation, Federal Highway Administration, the Federal Transit Administration, the Pioneer Valley Transit Authority, and any other person or agency requesting a copy.

Figure 1.1 : Pioneer Valley Metropolitan Planning Organization Region



2.0 PVMPO REGION LEP POPULATION ANALYSIS

This section presents an analysis of LEP residents of the PVMPO region. This analysis is modeled on the four-factor analysis of an individualized assessment described in the FTA guidance publication of April 13, 2007 entitled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers." Though the four-factor analysis is intended primarily for use by transit agencies, its application to the PVMPO is also helpful in assessing the needs of LEP persons in the metropolitan transportation planning process.

The PVMPO region includes communities with diverse ethnicities, including many people for whom English is not their native language. The representatives and residents of these communities who participate in the metropolitan planning organization (MPO) process are the most regular and significant channels through which PVPC has developed and maintains awareness of the concerns of LEP persons.

The following factors were considered to help gauge the level and extent of language assistance measures required to sufficiently ensure meaningful participation in the MPO process:

- Factor 1: Proportion, numbers and distribution of LEP persons in the PVMPO region
- Factor 2: Frequency of contact with LEP persons
- Factor 3: Nature and importance of metropolitan transportation planning to LEP persons
- Factor 4: Resources available to PVMPO and cost

2.1 Factor 1: Proportion, Numbers and Distribution of LEP Persons

The U.S. Census Bureau reports a range of 4 classifications of how well people speak English. The classifications are 'very well,' 'well,' 'not well,' and 'not at all.' Consistent with federal guidance, the PVMPO LEP Plan considers people who are reported by the Census to speak English 'not well' or 'not at all' as Limited English Proficient persons.

2.1.1 Service Area Geographic Boundaries

The PVMPO region consists of the 43 Massachusetts municipalities listed below on Table 2.1 and displayed in Figure 1.1 on the previous page.

Table 2.1 Communities in the Pioneer Valley Region

Agawam	Easthampton	Ludlow	Southwick
Amherst	Goshen	Middlefield	Springfield
Belchertown	Granby	Monson	Tolland
Blandford	Granville	Montgomery	Wales
Brimfield	Hadley	Northampton	Ware
Chester	Hampden	Palmer	West Springfield
Chesterfield	Hatfield	Pelham	Westfield
Chicopee	Holland	Plainfield	Westhampton
Cummington	Holyoke	Russell	Wilbraham
East Longmeadow	Huntington	South Hadley	Williamsburg
	Longmeadow	Southampton	Worthington

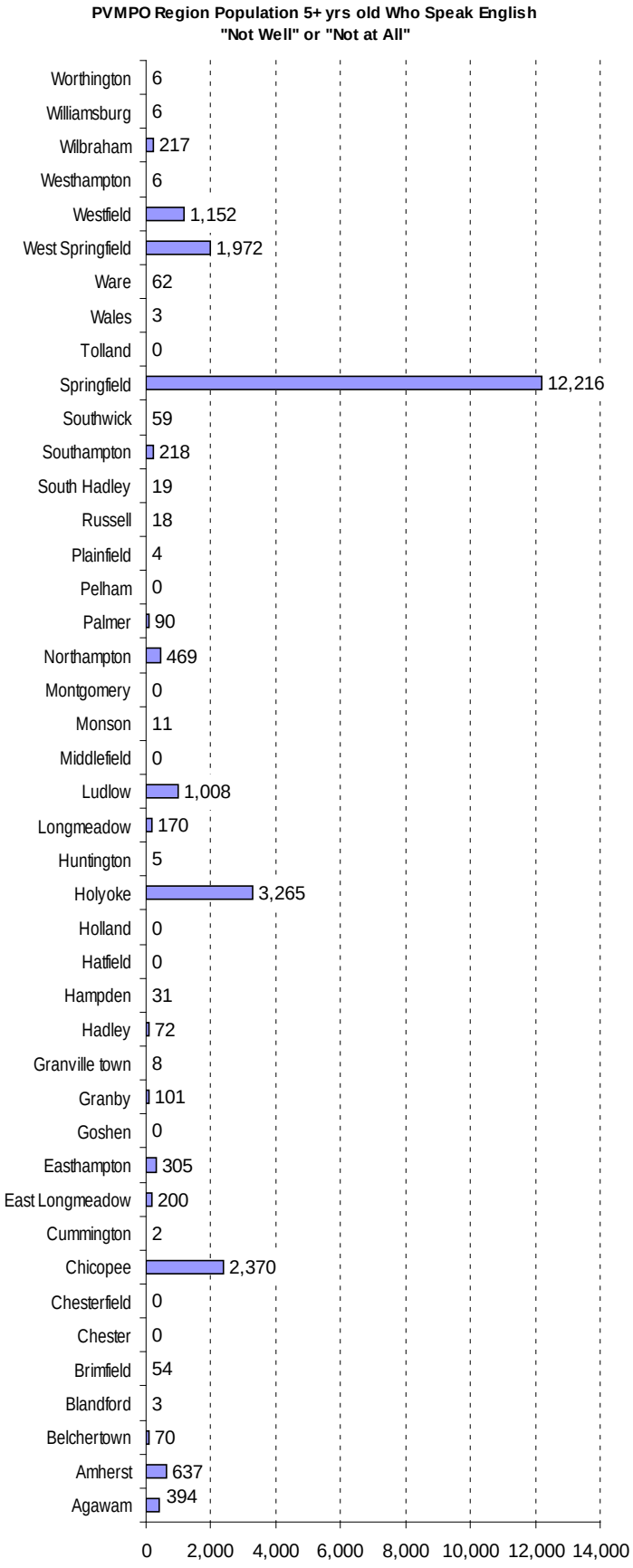
2.1.2 Analysis of Language-related U.S. Census Data

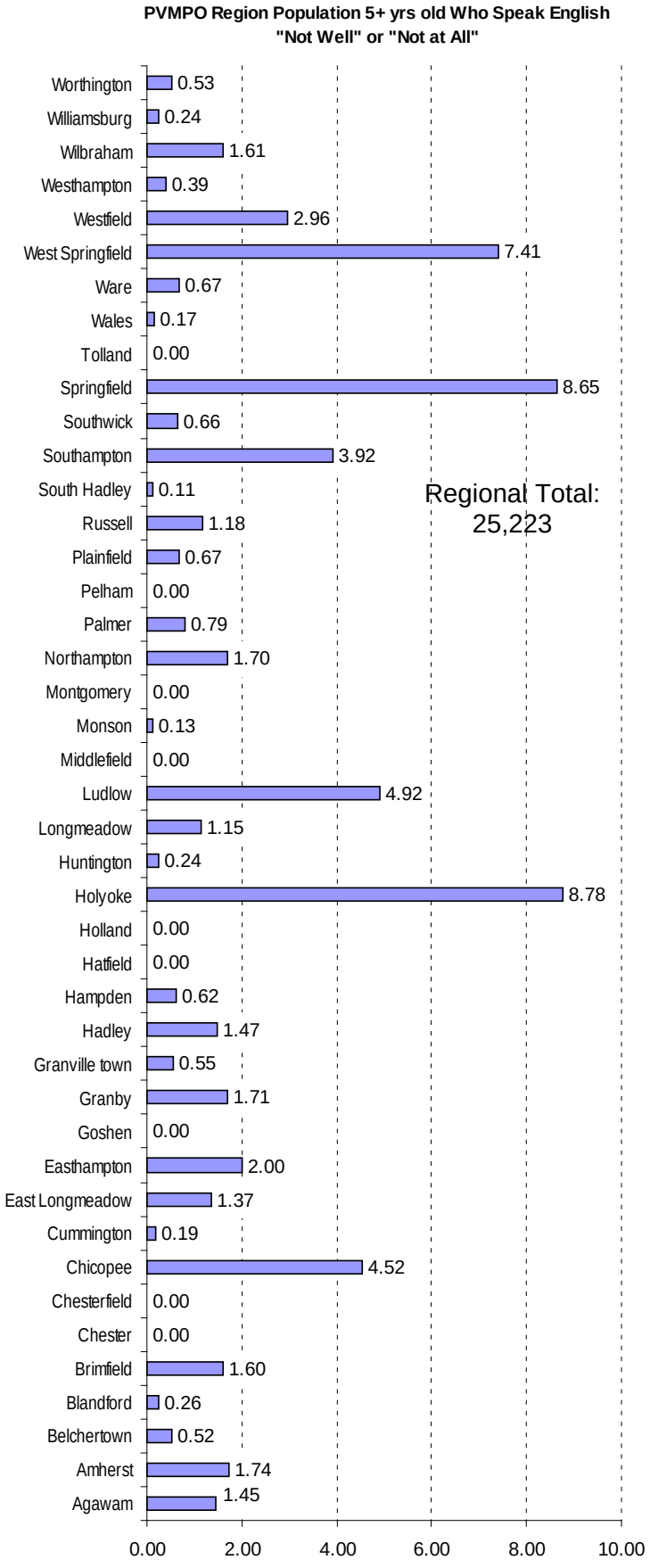
This section presents analysis of demographic data related to the ability to speak English from the 2010 U.S. Census and the 2006-2010 American Community Survey (ACS). Table 2.2 shows the wide range of languages other than English spoken at home in the Pioneer Valley and speaks to the cultural diversity of the region.

Table 2.2
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%

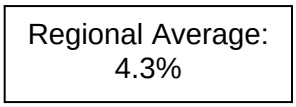
Figure-2.2 shows that the number of LEP persons in the region is 25,223. The five highest number of LEP residents are in the communities of Chicopee, Holyoke, Springfield, West Springfield and Westfield. Analysis of Census ACS 2006-2010 demographic data for the PVMPO communities in Figure-2 shows that Ludlow, proportion of residents US the PVMPO region who 43 considered LEP is 4.3. presented data available at this time the PVPC region exceeds within person thresholds for all may be LEP language groups Based on harbor provisions in the 3.0). 1,000 eligible (See save section





Source: US ACS Census 2006-10 "Population 5 years and Over by Language Spoken at Home and Ability to Speak English"

Figure 2.2



Source: ACS 2006-10 "Population 5 years and Over by Language Spoken at Home and Ability to Speak English"

The most recent data for English proficiency is from the 2006-2010 American Community Survey five-year estimates. ACS only two reporting categories: 1) "Speaks English Very Well" and 2) "Speaks English Not Very Well." The ACS estimate for Hampshire and Hampden County 2006-2010 is that 25,223 people over the age of 5, or approximately 4.3 of the County's 585,684 residents over that age, speak English "less than very well." The region speaks with a diversity of languages other than English however the majority of people surveyed for who English was not their first language are also able to speak English "very well."

2.1.3 Involvement of Community Organizations and Committees

The PVMPO is engaged with community based organizations that serve LEP persons in two general ways: 1) participating in meetings of organizations and agencies that deal with LEP issues; and 2) the public involvement process.

The staff of the PVMPO participates on an ongoing basis in the meetings and activities of the following community and municipal organizations that address in part the needs of LEP persons:

- Directors of Councils on Aging in PVMPO communities.
- Human service organizations.
- Emergency management agencies and staff of PVMPO member communities.
- Homeland Security Councils of Hampden and Hampshire Counties.

PVMPO staff also participates regularly in meetings and activities of municipal and volunteer committees in PVMPO member communities, including those of the City of Northampton Public Transportation Committee. PVMPO staff also conducts outreach to the Town Amherst Public Transportation Committee. Both committees address issues of concern to LEP residents of the region.

PVMPO continues to work with other transportation agencies, including the Pioneer Valley Transit Authority, Massachusetts Highway Department, Massachusetts Office of Community and Economic Development and others to identify other community based organizations not traditionally involved in service of LEP persons. Table 1 (next page) lists the organizations, meeting dates with PVMPO and transportation concerns identified during outreach performed for the most recent update of the PVMPO Title VI plan to MassDOT.

Table 1
Recent LEP Outreach Activities

Winter 2011

- Populations of non-native English speakers were identified using Census data during the updating of LEP information for the PVTA Non-transit User Study, PVPC Coordinated Human Services Plan, and LEP Programs.
- Provided a Spanish translation on YouTube for the bikes on bus instructional video.

Spring 2011

- Coordination of with Springfield North End Community Organizations on a "Fun on the Riverwalk" to foster healthy lifestyle choice and encourage community use of the Springfield Riverwalk and Bikeway in a neighborhood with significant number of Spanish speakers.
- Meeting with Russian bus operators to develop outreach ideas for engaging native Russian speakers.
- Locations where significant numbers of Russian speakers live identified.

Summer 2011

- Produced and posted Russian-language bus rider information sheet plus five different "how to ride" sheets in Russian for bus stops near buildings or in neighborhoods where Russian speakers live.
- Introduced "Pioneer Valley Try Transit Week" to broaden transit's appeal and remove cultural barriers and stereotypes.
- Began working with Springfield Public Housing (Saab Court) and Lutheran Social Services in West Springfield on outreach through English as a Second Language (ESL) classes with Russian, Spanish, Somali, Burmese and Chinese native speakers.

Fall 2011

- Engaged a total of 58 non-English speakers through a series of LEP events that included classroom and bus onboard trainings. Schedules and maps were provided at all events. Poster-sized plots schedules and route maps were produced and left at LSS and Saab Court for ongoing use and reference:

  Oct. 6: Russian native speakers (10) – LSS, West Springfield with bus

  Oct. 6: Russian native speakers (none attended) – Saab Court, Springfield

  Oct. 20: Spanish native speakers (10) – LSS, West Springfield

  Oct. 20: Russian native speakers (12) – LSS, West Springfield

  Oct. 20: Burmese native speakers (8) – LSS, West Springfield

  Oct. 20: Somali native speakers (12) – LSS, West Springfield

  Oct. 20: Chinese native speakers (6) – LSS, West Springfield

- Met with the Director of Environmental Programs for Nuestras Raices in Holyoke to discuss transportation issues for after school youth programs. Nuestras Raices Nuestras Raíces currently manages 8 community gardens and two youth gardens, and plans to expand the network of gardens each year. Student transportation for students remains an issue.

Common Questions/Concerns Heard From Non-English Speakers

- Non English speaking residents are not always fully engaged in project design and development. Traditional methods of outreach may not always be effective.
- Many reported difficulty when boarding the bus the first time. Non-English speakers said they were unable to understand the cost of the fare when they initially boarded. Some Somali participants put in large denominations (i.e. $5, $10, $20) bus fare and thought the bus could produce change; they said that in their country, they pay when they board and receive change based on where they get off of the bus.
- Transfer policy and purchase are a source of confusion to non-English speakers. Participants said it was difficult to understand the transfer time limit description.
- Non-English speakers expressed interest in traveling to Holyoke Mall and other major shopping destinations. Staff described how to travel to the Mall via the P20.
- It is difficult for customers to estimate travel times and bus arrival times when there are long intervals between time points (i.e., R1- between Westfield Center and SBT).
- Onboard safety concerns were expressed by customers. Staff pointed out the security cameras and described safety policies.
- Staff addressed participant's questions regarding route frequency differences. Participants were confused as to why certain Springfield PVTA routes leave every half hour while the R-10 only runs every hour.

Key Points/Lessons Learned

- Many of the growing health concerns in Springfield's North End neighborhoods identified by the Brightwood Health Center and Springfield Partners for Healthier Communities are influenced by the build environment. It is imperative that transportation projects and infrastructure constructed in this community fully incorporate the "Complete Streets" guidance adopted in the Massachusetts Highway Design Guide and that community engagement during the design phase of project development recognize cultural and language barriers that may be unique to Springfield's North End neighborhoods. Sidewalks, bike lanes, inviting streetscapes that provide opportunities for positive social interaction are critical to creating healthy vibrant neighborhoods. Traditional "English only" outreach during project planning may fall short of achieving these goals.
- Support from Lutheran Social Services was critical to the success of this effort. LSS provided translators for Burmese, Chinese, Somali and Russian.
- Outstanding internal support from Z. Valentin for Spanish translation and P. Chege for Somali translation.
- Bus ride very important for success of these events.
- Outstanding participation/translation by bus operators D. Kishko and P. Chege was critical.

Next Steps

- Recommend continuing with similar evening outreach events for Russian, Somali, Spanish, Chinese and Burmese at LSS ESL classes at 6-month intervals (when there is evening light).

- PVPC will continue to coordinate work closely with Baystate's Brightwood Health Center, Springfield Partners for Healthier Communities and the Springfield Planning Department to identify language barriers and address issues as they relate to the planning, design and construction of transportation projects.
- Recommend developing and focusing efforts in the next 6 months on outreach to Spanish speakers through ESL classes at other social service agencies.
- Expand "Try Transit Week" marketing and promotion efforts. Work to create new social norms for the public's perception of transit by engaging civic and community leaders.
- Indentify transportation issues for
- Future organizations/agencies identified for new LEP outreach:
  - ✓ Holyoke Community College ESL classes at Holyoke Transportation Center
  - ✓ Valley Opportunity Council in Holyoke
  - ✓ Catholic Charities ESL classes in Springfield
  - ✓ Jewish Family Service of Western Massachusetts.

2.2 Factor 2: Frequency of Contact with LEP Persons

PVMPO members and staff are in contact with organizations and individuals representing the concerns of LEP persons on a daily basis. The contacts include:

- Planning support to the PVTA, which serves a large number of LEP persons daily.
- Coordination of public involvement and community outreach activities for the PVMPO and PVTA, such as bus rider forums, para-transit rider meetings, public hearings and meetings with community groups.
- Coordination and cooperation with community based organizations. (Appendix J)
- Coordination with social service organizations.

2.3 Factor 3: Nature and Importance of PVMPO Transportation Planning and Service to LEP Community

PVMPO is committed to making the metropolitan transportation planning process as accessible as possible to all people who live within the region. This outreach to LEP persons is important because PVMPO staff also provides comprehensive planning, surveying and public involvement services the Pioneer Valley Transit Authority, which provides fixed route and para-transit service to 24 of the most populous PVMPO communities. Significantly, LEP persons may be more dependent on transit service than English speakers in the region. Any denial, delay or reduction in access to the public transit services provided because of language-related barriers is unacceptable. The PVMPO staff publishes notices of significant planning efforts in Spanish newspaper that are distributed free of charge and conducts regular surveys of transit customers in the region.

2.4 Factor 4: Resources Available

The PVMPO programs the transportation projects that utilize federal and state sources of operating assistance for transit, as well as and capital assistance for transportation and transit projects. Support for LEP outreach and related services are integrated with the planning and development of these projects.

Going forward, the PVMPO will continue to identify LEP concerns and seek appropriate additional funding and strategies for integration with programmed transportation projects in the region that may be available and appropriate for LEP programs and services.

3.0 SAFE HARBOR STIPULATION FOR WRITTEN TRANSLATIONS

Federal law provides a "safe harbor" stipulation so that recipients and sub-recipients of federal funds can ensure with greater certainty that they comply with their obligations to provide written translations in languages other than English. A safe harbor means that if a recipient or sub-recipient provides written translations in certain circumstances, such action will be considered strong evidence of compliance with the recipient's or sub-recipient's written-translation obligations under Title VI.

The failure to provide written translations does not mean there is noncompliance, but rather provides a guide for recipients and sub-recipients that would like greater certainty of compliance than can be provided by a fact-intensive analysis.

For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not required. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, could be acceptable or preferable under such circumstances.

Strong evidence of compliance with a recipient's or sub-recipient's written-translation obligations under safe harbor includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered.

This safe harbor provision applies to the translation of written documents only. It does not affect the Title VI requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and reasonable.

In the PVMPO region all eligible LEP language groups exceed the "1,000 or greater" population threshold for which written translations of vital documents can be provided (see table 3.1). Using the Safe Harbor standard, PVPC is committed to provide written translations of all key documents to residents of our 43 communities.

4.0 IMPLEMENTATION PLAN FOR LANGUAGE ASSISTANCE

This section describes PVMPO's current and future plans for providing language assistance to LEP persons in the region.

4.1 Identifying LEP Persons Who Need Language Assistance

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.

4.2 Providing Language Assistance

This section describes the current and future services that the PVMPO provides for enhancing the access of its system to LEP persons.

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:

- Partnerships with PVTA and community organizations to develop a list of language translation volunteers who are available for public meetings. This option could be used where advanced notice is provided that translator services are needed. This option may also help increase the number of languages for which translation services are available.
- Development of written translation and oral interpreter service providers database. This would improve the speed and convenience with which written documents can be translated for the public, and reduce 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 2010 decennial census and/or indications of increases in LEP population.
- Identification of community based organizations that are not being contacted through existing outreach.

4.3 Providing Notice to LEP Persons

USDOT LEP guidance states: "Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons can understand."

PVMPO provides this notification through the following:

1. Meeting notices in print and on the PVMPO website that include instructions on how to request language assistance (with advance notice).
2. The statement in outreach documents that language services are available from the agency.
3. Working with community-based organizations and other stakeholders to inform LEP individual of the recipient's services, including the availability of language assistance services.
4. Including notices in local newspapers in languages other than English. (Local Spanish news media is traditionally used by the MPO)

Future notification services are expected to include:

- An inventory of existing public service announcements and community outreach opportunities.
- Improved incorporation of notices of language assistance availability in existing outreach.
- Targeted community outreach to LEP persons, especially via the community based organizations that may serve and represent them.

4.4 Monitoring and Updating This LEP Plan

PVMPO will continue to monitor and update this LEP Plan. Related activities will likely include:

- Establishing and implementing a process to obtain feedback from LEP persons, directly, as well as community members and agencies.
- Conducting internal monitoring and random spot checks of LEP services.
- Refining and improving the LEP Plan described above consistent with feedback received.
- Considering new language assistance needs when expanding service.
- Regularly updating the plan (annual basis) or when significant new language-related demographic data becomes available.

END

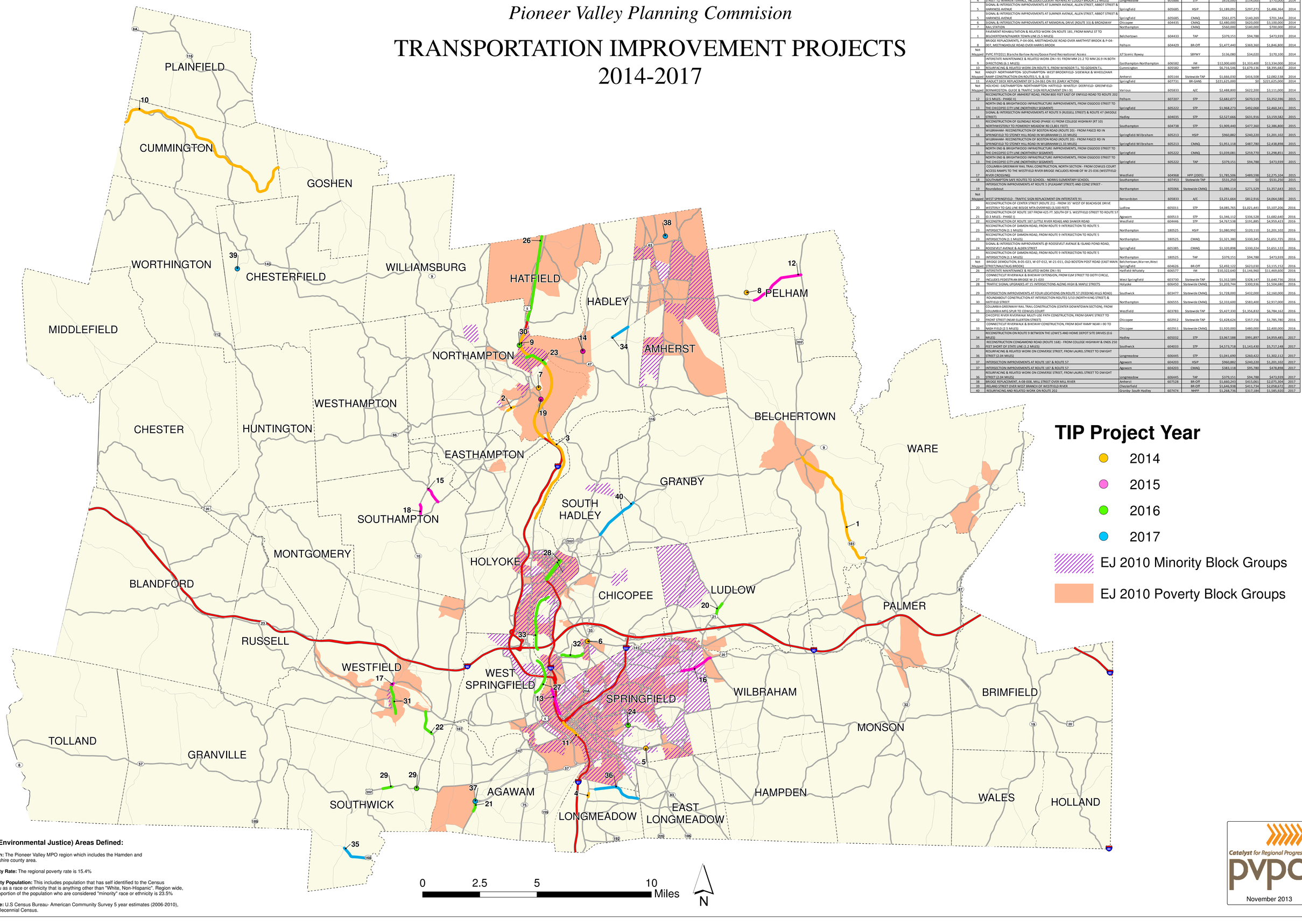
Appendix K

Pioneer Valley Planning Commision

TRANSPORTATION IMPROVEMENT PROJECTS 2014-2017

FFY 2014 to 2017 Transportation Improvement Program (TIP)

Key	Project Description	City/Town	Project ID	Funding	Fed. Funds	Non Fed. Founds	Total Cost	FFY Year
1	PAVEMENT REHABILITATION & RELATED WORK ON ROUTE 181, FROM MAPLE ST TO BELCHERTOWN/PALMER TOWN LINE (5.5 MILES)	Belchertown	604433	STP	$6,972,346	$1,743,086	$8,715,432	2014
2	RESURFACING AND RELATED WORK ON ROUTE 10, FROM MM 24.8 NORTHERLY TO MM 25.1 AT EARLE STREET	Northampton	606665	STP	$120,000	$30,000	$150,000	2014
3	RESURFACING & RELATED WORK ON ROUTE 5, MM 16.014 IN HOLYOKE TO MM 20.427 IN EASTHAMPTON (4.43 MILES)	Easthampton-Holyoke	605891	STP	$2,045,597	$511,399	$2,556,996	2014
4	RESURFACING & RELATED WORK ON ROUTE 5 (LONGMEADOW STREET), FROM EDGEWOOD STREET TO WARREN TERRACE, INCLUDES CULVERT REPAIRS AT COOLEY BROOK (2 MILES)	Longmeadow	605886	STP	$616,000	$154,000	$770,000	2014
5	SIGNAL & INTERSECTION IMPROVEMENTS AT SUMNER AVENUE, ALLEN STREET, ABBOT STREET & HARKNESS AVENUE	Springfield	605685	HSIP	$1,189,091	$297,273	$1,486,364	2014
5	SIGNAL & INTERSECTION IMPROVEMENTS AT SUMNER AVENUE, ALLEN STREET, ABBOT STREET & HARKNESS AVENUE	Springfield	605685	CMAQ	$561,075	$140,269	$701,344	2014
6	SIGNAL & INTERSECTION IMPROVEMENTS AT MEMORIAL DRIVE (ROUTE 33) & BROADWAY	Chicopee	604435	CMAQ	$2,480,000	$620,000	$3,100,000	2014
7	RAIL STATION	Northampton		CMAQ	$560,000	$140,000	$700,000	2014
1	PAVEMENT REHABILITATION & RELATED WORK ON ROUTE 181, FROM MAPLE ST TO BELCHERTOWN/PALMER TOWN LINE (5.5 MILES)	Belchertown	604433	TAP	$379,151	$94,788	$473,939	2014
9	BRIDGE REPLACEMENTS, P-04-006, MEETINGHOUSE ROAD OVER AMETHYST BROOK & P-04-007, MEETINGHOUSE ROAD OVER HARRIS BROOK	Pelham	604429	BR-Off	$1,477,440	$369,360	$1,846,800	2014
Not Mapped	PVPC FFY2011 Blanche Barlow Acres/Goose Pond Recreational Access	ALT Scenic Byway		SBYWY	$136,080	$34,020	$170,100	2014
9	INTERSTATE MAINTENANCE & RELATED WORK ON I-91 FROM MM 21.2 TO MM 26.9 IN BOTH DIRECTIONS (6.1 MILES)	Easthampton-Northampton	606582	IM	$12,000,600	$1,333,400	$13,334,000	2014
10	RESURFACING & RELATED WORK ON ROUTE 9, FROM WINDSOR T.L. TO GOSHEN T.L.	Cummington	605582	NHPP	$6,716,546	$1,679,136	$8,395,682	2014
Not Mapped	HADLEY- NORTHAMPTON- SOUTHAMPTON- WEST BROOKFIELD- SIDEWALK & WHEELCHAIR RAMP CONSTRUCTION ON ROUTES 5, 9, & 10	Amherst	605144	Statewide TAP	$1,666,030	$416,508	$2,082,538	2014
11	VIADUCT DECK REPLACEMENT OF S.24-061 ON I91 (EARLY ACTION)	Springfield	607731	BR-GANS	$221,625,000	$0	$221,625,000	2014
Not Mapped	HOLYOKE- EASTHAMPTON- NORTHAMPTON- HATFIELD- WHATELY- DEERFIELD- GREENFIELD- BERNARDSTON- GUIDE & TRAFFIC SIGN REPLACEMENT ON I-91	Various	605833	A/C	$2,488,800	$622,200	$3,111,000	2014
12	RECONSTRUCTION OF AMHERST ROAD, FROM 800 FEET EAST OF ENFIELD ROAD TO ROUTE 202 (2.5 MILES - PHASE II)	Pelham	607207	STP	$2,682,077	$670,519	$3,352,596	2015
13	NORTH END & BRIGHTWOOD INFRASTRUCTURE IMPROVEMENTS, FROM OSGOOD STREET TO THE CHICOPEE CITY LINE (NORTHERLY SEGMENT)	Springfield	605222	STP	$1,968,273	$492,068	$2,460,341	2015
14	SIGNAL & INTERSECTION IMPROVEMENTS AT ROUTE 9 (RUSSELL STREET) & ROUTE 47 (MIDDLE STREET)	Hadley	604035	STP	$2,527,666	$633,916	$3,159,582	2015
15	RECONSTRUCTION OF GLENDALE ROAD (PHASE II) FROM COLLEGE HIGHWAY (RT 10) NORTHWESTERLY TO POMEROY MEADOW RD (1,801 FEET)	Southampton	604738	STP	$1,909,440	$477,360	$2,386,800	2015
16	WILBRAHAM- RECONSTRUCTION OF BOSTON ROAD (ROUTE 20) - FROM PASCO RD IN SPRINGFIELD TO STONEY HILL ROAD IN WILBRAHAM (1.33 MILES)	Springfield-Wilbraham	605213	HSIP	$960,882	$240,220	$1,201,102	2015
16	WILBRAHAM- RECONSTRUCTION OF BOSTON ROAD (ROUTE 20) - FROM PASCO RD IN SPRINGFIELD TO STONEY HILL ROAD IN WILBRAHAM (1.33 MILES)	Springfield-Wilbraham	605213	CMAQ	$1,951,118	$487,780	$2,438,898	2015
13	NORTH END & BRIGHTWOOD INFRASTRUCTURE IMPROVEMENTS, FROM OSGOOD STREET TO THE CHICOPEE CITY LINE (NORTHERLY SEGMENT)	Springfield	605222	CMAQ	$1,039,081	$259,770	$1,298,851	2015
13	NORTH END & BRIGHTWOOD INFRASTRUCTURE IMPROVEMENTS, FROM OSGOOD STREET TO THE CHICOPEE CITY LINE (NORTHERLY SEGMENT)	Springfield	605222	TAP	$379,151	$94,788	$473,939	2015
17	COLUMBIA GREENWAY RAIL TRAIL CONSTRUCTION, NORTH SECTION - FROM COWLES COURT ACCESS RAMPS TO THE WESTFIELD RIVER BRIDGE INCLUDES REHAB OF W-25-036 (WESTFIELD RIVER CROSSING)	Westfield	604968	HPP (2005)	$1,785,506	$489,598	$2,275,104	2015
18	SOUTHAMPTON SAFE ROUTES TO SCHOOL - NORRIS ELEMENTARY SCHOOL	Southampton	607451	Statewide TAP	$531,250	$0	$531,250	2015
19	INTERSECTION IMPROVEMENTS AT ROUTE 5 (PLEASANT STREET) AND CONZ STREET - Roundabout	Northampton	605066	Statewide CMAQ	$1,086,114	$271,529	$1,357,643	2015
Not Mapped	WEST SPRINGFIELD - TRAFFIC SIGN REPLACEMENT ON INTERSTATE 91	Bernardston	605833	A/C	$3,251,664	$812,916	$4,064,580	2015
20	RECONSTRUCTION OF CENTER STREET (ROUTE 21) - FROM 35' WEST OF BEACHSIDE DRIVE WESTERLY TO GAS LINE BESIDE MTA OVERPASS (5,500 FEET)	Ludlow	605013	STP	$4,085,765	$1,021,441	$5,107,206	2016
21	RECONSTRUCTION OF ROUTE 187 FROM 425 FT. SOUTH OF S. WESTFIELD STREET TO ROUTE 57 (0.3 MILES - PHASE I)	Agawam	600513	STP	$1,346,112	$336,528	$1,682,640	2016
22	RECONSTRUCTION OF ROUTE 187 (LITTLE RIVER ROAD) AND SHAKER ROAD	Westfield	604446	STP	$4,767,538	$191,885	$4,959,423	2016
23	RECONSTRUCTION OF DAMON ROAD, FROM ROUTE 9 INTERSECTION TO ROUTE 5 INTERSECTION (1.1 MILES)	Northampton	180525	HSIP	$1,080,992	$120,110	$1,201,102	2016
23	RECONSTRUCTION OF DAMON ROAD, FROM ROUTE 9 INTERSECTION TO ROUTE 5 INTERSECTION (1.1 MILES)	Northampton	180525	CMAQ	$1,321,380	$330,345	$1,651,725	2016
24	SIGNAL & INTERSECTION IMPROVEMENTS @ ROOSEVELT AVENUE & ISLAND POND ROAD, ROOSEVELT AVENUE & ALDEN STREET	Springfield	605385	CMAQ	$1,320,898	$330,224	$1,651,122	2016
23	RECONSTRUCTION OF DAMON ROAD, FROM ROUTE 9 INTERSECTION TO ROUTE 5 INTERSECTION (1.1 MILES)	Northampton	180525	TAP	$379,151	$94,788	$473,939	2016
Not Mapped	BRIDGE DEMOLITION, B-05-023, W-07-012, W-21-031, OLD BOSTON POST ROAD (EAST MAIN STREET/WALTAUG BROOK)	Belchertown,Ware,Warren,West Springfield	604626	BR-Off	$2,492,122	$623,030	$3,115,152	2016
26	INTERSTATE MAINTENANCE & RELATED WORK ON I-91	Hatfield-Whately	606577	IM	$10,322,640	$1,146,960	$11,469,600	2016
27	CONNECTICUT RIVERWALK & BIKEWAY EXTENSION, FROM ELM STREET TO DOTY CIRCLE, INCLUDES PEDESTRIAN BRIDGE W-21-020	West Springfield	607730	Statewide TAP	$1,312,589	$328,147	$1,640,736	2016
28	TRAFFIC SIGNAL UPGRADES AT 15 INTERSECTIONS ALONG HIGH & MAPLE STREETS	Holyoke	606450	Statewide CMAQ	$1,203,744	$300,936	$1,504,680	2016
29	INTERSECTION IMPROVEMENTS AT FOUR LOCATIONS ON ROUTE 57 (FEEDING HILLS ROAD)	Southwick	603477	Statewide CMAQ	$1,728,000	$432,000	$2,160,000	2016
30	ROUNDABOUT CONSTRUCTION AT INTERSECTION ROUTES 5/10 (NORTH KING STREET) & HATFIELD STREET	Northampton	606555	Statewide CMAQ	$2,333,600	$583,400	$2,917,000	2016
31	COLUMBIA GREENWAY RAIL TRAIL CONSTRUCTION (CENTER DOWNTOWN SECTION), FROM COLUMBIA MFG SPUR TO COWLES COURT	Westfield	603783	Statewide TAP	$5,427,330	$1,356,832	$6,784,162	2016
32	CHICOPEE RIVER RIVERWALK MULTI-USE PATH CONSTRUCTION, FROM GRAPE STREET TO FRONT STREET (NEAR ELLERTON STREET)	Chicopee	602912	Statewide TAP	$1,428,624	$357,156	$1,785,780	2016
33	CONNECTICUT RIVERWALK & BIKEWAY CONSTRUCTION, FROM BOAT RAMP NEAR I-90 TO NASH FIELD (2.5 MILES)	Chicopee	602911	Statewide CMAQ	$1,920,000	$480,000	$2,400,000	2016
34	RECONSTRUCTION ON ROUTE 9 BETWEEN THE LOWE'S AND HOME DEPOT SITE DRIVES (0.6 MILES)	Hadley	605032	STP	$3,967,588	$991,897	$4,959,485	2017
35	RECONSTRUCTION CONGAMOND ROAD (ROUTE 168) - FROM COLLEGE HIGHWAY & ENDS 250 FEET SHORT OF STATE LINE (1.2 MILES)	Southwick	604033	STP	$4,573,718	$1,143,430	$5,717,148	2017
36	RESURFACING & RELATED WORK ON CONVERSE STREET, FROM LAUREL STREET TO DWIGHT STREET (2.04 MILES)	Longmeadow	606445	STP	$1,041,690	$260,422	$1,302,112	2017
37	INTERSECTION IMPROVEMENTS AT ROUTE 187 & ROUTE 57	Agawam	604203	HSIP	$960,882	$240,220	$1,201,102	2017
37	INTERSECTION IMPROVEMENTS AT ROUTE 187 & ROUTE 57	Agawam	604203	CMAQ	$383,118	$95,780	$478,898	2017
36	RESURFACING & RELATED WORK ON CONVERSE STREET, FROM LAUREL STREET TO DWIGHT STREET (2.04 MILES)	Longmeadow	606445	TAP	$379,151	$94,788	$473,939	2017
38	BRIDGE REPLACEMENT, A-08-008, MILL STREET OVER MILL RIVER	Amherst	607528	BR-Off	$1,660,243	$415,061	$2,075,304	2017
39	IRELAND STREET OVER WEST BRANCH OF WESTFIELD RIVER	Chesterfield		BR-Off	$1,646,938	$411,734	$2,058,672	2017
40	RESURFACING AND RELATED WORK ON ROUTE 202	Granby- South Hadley	607474	NHPP	$1,268,736	$317,184	$1,585,920	2017



TIP Project Year

- 2014
- 2015
- 2016
- 2017
- EJ 2010 Minority Block Groups
- EJ 2010 Poverty Block Groups

EJ (Environmental Justice) Areas Defined:

Region: The Pioneer Valley MPO region which includes the Hamden and Hampshire county area.

Poverty Rate: The regional poverty rate is 15.4%

Minority Population: This includes population that has self identified to the Census Bureau as a race or ethnicity that is anything other than "White, Non-Hispanic". Region wide, the proportion of the population who are considered "minority" race or ethnicity is 23.5%

Source: U.S Census Bureau- American Community Survey 5 year estimates (2006-2010), 2010 Decennial Census.

Catalyst for Regional Progress
pvpc

November 2013

FFY 2013 to 2016 Transportation Improvement Program (TIP)

Key	Project Description	City/Town	Project ID	Funding	Fed. Funds	State Funds	Total Cost	FFY Year
1	Reconstruction of Route 187 (Feeding Hills Road)	Westfield	604442	STP	$4,110,720	$1,027,680	$5,138,400	2013
2	Intersection Improvements at West St./Glendale St./Loudville / Pomeroy Meadow	Easthampton	602486	STP	$2,208,775	$552,194	$2,760,969	2013
3	Amherst Road Reconstruction from Amherst TL to 800 feet east of Enfield Road (1.7 miles) - Phase 1	Pelham	601154	STP	$2,461,870	$615,468	$3,077,338	2013
4	Route 116 (Main Street) Rehabilitation 1.9 Miles	Plainfield	604825	STP	$1,569,600.0	$392,400.0	$1,962,000	2013
5	I-91/Route 5/I-90 Connector Road Improvements	West Springfield	606643	HSIP	$150,262	$16,696	$166,958	2013
6	Chicopee Riverwalk - Design only	Chicopee	602912	CMAQ	$103,453	$25,863	$129,316	2013
7	Park and Ride Lot Construction at the VA Medical Center	Northampton	606375	CMAQ	$640,000	$160,000	$800,000	2013
8	Signal & Intersection Improvements at Homestead Ave @ Lower Westfield Road	Holyoke	606045	CMAQ	$1,082,262	$270,565	$1,352,827	2013
5	I-91/Route 5/I-90 Connector Road Improvements	West Springfield	606643	HSIP	$972,893	$108,099	$1,080,992	2013
9	BRIDGE REPLACEMENT, C-11-020, GEORGE MILLER ROAD OVER THE MIDDLE BRANCH OF THE WESTFIELD RIVER	Chester	604721	BR	$844,338	$211,085	$1,055,423	2013
10	BRIDGE REPLACEMENT ROUTE 112 OVER THE WESTFIELD RIVER & CSX RAILROAD	Huntington	602994	BR	$3,897,600	$974,400	$4,872,000	2013
11	BRIDGE REHABILITATIONEAST STREET OVER THE CHICOPEE RIVER	Ludlow / Wilbraham	605618	BR	$760,000	$190,000	$950,000	2013
12	BRIDGE REHABILITATION, W-27-015, NORTH ROAD OVER ROBERTS MEADOW BROOK	Westhampton	604339	BR	$875,067	$218,767	$1,093,834	2013
13	BRIDGE REHABILITATION, S-24-077, ROUTE I-291 OVER PAGE BOULEVARD	Springfield	606345	BR	$2,500,320	$625,080	$3,125,400	2013
14	*Construct Holyoke Canalwalk and streetscape improve	Holyoke	603263	HPP-4274	$3,505,163	$876,291	$4,381,454	2013
15	Hampshire County Bike Paths (Norwottuck Reconst)- construction	Various	605065	HPP-1773	$3,559,560	$889,890	$4,449,450	2013
16	PVPC FFY2011 Access and Interpretation	CT River Scenic Byway		NSBG	$162,691	$40,673	$203,364	2013
17	PVPC FFY2011 Blanche Barlow Acres/Goose Pond Recreational Access	JLT Scenic Byway		NSBG	$136,080	$34,020	$170,100	2013
18	PVPC FFY 2010 Trails Linkages project for Route 112 and JLT	Rt112/JLT Scenic Byway		NSBG	$54,700	$13,675	$68,375	2013
19	PVTA Signage Project using repurposed earmark funds	PVTA Service Area			$450,000	$0	$450,000	2013
20	Construction of Bikeway Loop connecting CT Riverwalk with Main Street	Agawam	603731	TE	$2,004,817	$501,204	$2,506,021	2013
21	Route 181 Pavement Rehabilitation and Related Work ($11,145,181)	Belchertown	604433	STP	$7,926,560	$1,981,640	$9,908,200	2014
22	Route 187 Little River Road Reconstruction	Westfield	604446	STP	$4,823,040	$1,205,760	$6,028,800	2014
23	CHICOPEE- SIGNAL & INTERSECTION IMPROVEMENTS AT MEMORIAL DRIVE (ROUTE 33) & BROADWAY ($1,580,479 YOE)	Chicopee	604435	STP	$450,002	$112,501	$562,503	2014
23	CHICOPEE- SIGNAL & INTERSECTION IMPROVEMENTS AT MEMORIAL DRIVE (ROUTE 33) & BROADWAY ($1,580,479 YOE)	Chicopee	604435	CMAQ	$814,381	$203,595	$1,017,976	2014
24	SPRINGFIELD- SIGNAL & INTERSECTION IMPROVEMENTS AT SUMNER AVENUE, ALLEN STREET, ABBOT STREET & HARKNESS AVENUE ($2,139,904 YOE)	Springfield	605685	CMAQ	$1,029,607	$114,401	$1,144,008	2014
24	SPRINGFIELD- SIGNAL & INTERSECTION IMPROVEMENTS AT SUMNER AVENUE, ALLEN STREET, ABBOT STREET & HARKNESS AVENUE ($2,139,904 YOE)	Springfield	605685	HSIP	$972,893	$108,099	$1,080,992	2014
25	BRIDGE REPLACEMENTS, P-04-006, MEETINGHOUSE ROAD OVER AMETHYST BROOK & P-04-007, MEETINGHOUSE ROAD OVER HARRIS BROOK	Pelham	604429	BR	$1,747,200	$436,800	$2,184,000	2014
26	Bridge Rehabilitation Route 116 Chicopee/Cabot St. over Conn. River and PVRR	Chicopee/Holyoke	82611	A/C Bridge	$800,000	$200,000	$1,000,000	2014
27	Columbia Greenways Rail Trail Northern Section - from Cowles Court access ramps to the Westfield River bridge, incl. rehab of W-25-036 ($2,187,600)	Westfield	604968	HPP-1656	$1,820,083	$455,021	$2,275,104	2014
28	Interstate Maintenance and Related Work on I-91	Easthampton/Northampton	606582	IM	$10,105,992	$1,122,888	$11,228,880	2014
29	Southampton Safe Routes to School - Norris Elementary	Southampton		SRTS	$572,940	$0	$572,940	2014
30	Springfield Safe Routes to School - Alice Beal School	Springfield		SRTS	$404,560	$0	$404,560	2014

FFY 2013 to 2016 Transportation Improvement Program (TIP)

Key	Project Description	City/Town	Project ID	Funding	Fed. Funds	State Funds	Total Cost	FFY Year
31	Amherst-Northampton-Southampton-West Brookfield, Sidewalk & Wheelchair Ramp Construction on Routes 5, 9 and 10	Amherst-Northampton-Southampton-West Brookfield	605144	TE	$1,280,000	$320,000	$1,600,000	2014
32	Amherst Road Reconstruction from 800 feet east of Enfield Road to Route 202 (2.5 miles) - Phase 2	Pelham	607207	STP	$2,785,234	$696,308	$3,481,542	2015
33	Route 5 Resurfacing from Oxbow Bridge (MM20.4) southerly to end of State Highway at MM 16.0	Easthampton/Holyoke	605891	STP	$2,452,143	$613,036	$3,065,178	2015
34	HADLEY- SIGNAL & INTERSECTION IMPROVEMENTS AT ROUTE 9 (RUSSELL STREET) & ROUTE 47 (MIDDLE STREET ($3,543,593 YOE)	Hadley	604035	STP	$240,494	$60,123.4	$300,617	2015
35	Route 5 (Longmeadow St) Resurfacing and Related Work from Edgewood St to Warren Terrace, including culvert repairs at Cooley Brook	Longmeadow	605886	STP	$524,651	$131,163	$655,814	2015
36	HADLEY- SIGNAL & INTERSECTION IMPROVEMENTS AT ROUTE 9 (RUSSELL STREET) & ROUTE 47 (MIDDLE STREET ($3,543,593 YOE)	Hadley	604035	CMAQ	$1,729,587	$432,397	$2,161,984	2015
36	HADLEY- SIGNAL & INTERSECTION IMPROVEMENTS AT ROUTE 9 (RUSSELL STREET) & ROUTE 47 (MIDDLE STREET ($3,543,593 YOE)	Hadley	604035	HSIP	$972,893	$108,099	$1,080,992	2015
37	Boston Road (Route 20) Reconstruction ($8,683,580)	Springfield/Wilbraham	605213	STP	$6,119,766	$1,529,941	$7,649,707	2016
38	SPRINGFIELD- NORTH END & BRIGHTWOOD INFRASTRUCTURE IMPROVEMENTS, FROM OSGOOD STREET TO THE CHICOPEE CITY LINE (NORTHERLY SEGMENT)	Springfield	605222	STP	$4,291,282.7	$1,072,820.7	$ 5,364,103	2016
37	Boston Road (Route 20) Reconstruction ($8,683,580)	Springfield/Wilbraham	605213	CMAQ	$1,729,587	$432,397	$2,161,984	2016
37	Boston Road (Route 20) Reconstruction ($8,683,580)	Springfield/Wilbraham	605213	HSIP	$972,893	$108,099	$1,080,992	2016
39	BRIDGE REPLACEMENT, H-21-018, LYMAN STREET OVER FIRST LEVEL CANAL	Holyoke	600936	BR	$5,511,520	$1,377,880	$6,889,400	2016
40	BRIDGE REPLACEMENT, S-19-024, VALLEY ROAD OVER MOOSE BROOK	Southampton	603024	BR	$1,211,750	$302,938	$1,514,688	2016
41	Connecticut Riverwalk and Bikeway Extension	West Springfield	603730	SW-CMAQ	$1,263,742	$315,936	$1,579,678	2016
42	Traffic Signal Upgrades at 15 intersections along High and Maple Street	Holyoke	606450	SW-CMAQ	$1,348,193	$337,048	$1,685,241	2016
43	Intersection Improvements at Four locations on Route 57 Feeding Hills Rd	Southwick	603477	SW-CMAQ	$1,935,360	$483,840	$2,419,200	2016
44	Intersection Improvements at Pleasant Street and Conz Street	Northampton	605066	SW-CMAQ	$728,000	$182,000	$910,000	2016
45	Columbia Greenway Rail Trail Construction Center (Downtown) Section from Columbia Mfg Spur to Cowles Court	Westfield	603783	TE	$5,628,341	$1,407,085	$7,035,426	2016
46	CHICOPEE RIVER RIVERWALK MULTI-USE PATH CONSTRUCTION, FROM GRAPE STREET TO FRONT STREET (NEAR ELLERTON STREET)	Chicopee	602912	TE	$1,291,659	$322,915	$1,614,574	2016
47	I-91 Resurfacing & Related Work	Hatfield / Whately	606577	IM	$9,515,520	$2,378,880	$11,894,400	2016

TRANSPORTATION EVALUATION CRITERIA

Community:
Location:
Total Cost:

Highway-funded Roadway Improvement Projects

PROJECT TYPE	TRANSPORTATION CRITERIA				OTHER IMPACT CRITERIA		
	Condition	**Mobility**	**Safety**	**Cost Effectiveness**	**Community Effects and Support**	**Land Use and Economic Development**	**Environmental Effects**
Roadways	Magnitude of pavement condition improvement O	Effect on magnitude and duration of congestion O	Effect on crash rate compared to state average O	Cost per Unit Change in Condition	Residential effects: right-of-way, noise, aesthetics, cut-through traffic, other O	Business effects: right-of-way, access, noise, traffic, parking, freight access other O	Air Quality/Climate effects O
	Magnitude of improvement of other infrastructure elements O	Effect on travel time and connectivity/access O	Effect on bicycle and pedestrian safety O	Cost per Linear Mile	Effect on service to minority or low-income neighborhoods O	Sustainable development effects O	Water quality/supply effects; wetlands effects O
		Effect on other modes using facility O	Effect on transportation security and evacuation routes O	Cost per AADT	Other impacts/benefits to minority or low-income neighborhoods O	Consistent with regional land-use and economic development plans O	Historic and cultural resource effects O
		Effect on regional and local traffic O			Public, local government, legislative, and regional support O	Effect on job creation O	Effect on wildlife habitat and endangered species O
					Effect on development and redevelopment of housing stock O		
	Avg. Score (-3 to +3) O	**Avg. Score (-3 to +3)** O	**Avg. Score (-3 to +3)** O		**Avg. Score (-3 to +3)** O	**Avg. Score (-3 to +3)** O	**Avg. Score (-3 to +3)** O

Total Score (-18 to +18)
O

Appendix N

PIONEER VALLEY MPO ENDORSEMENT SHEET

The signatures below signify that all members of the Pioneer Valley Region's Metropolitan Planning Organization, or their designees, have met on July 9, 2013 and discussed the following item for endorsement:

CERTIFICATION OF THE 3C PLANNING PROCESS

Concurrent with the submittal of the proposed TIP to the FHWA and the FTA, the MPO shall certify that the metropolitan transportation planning process is being carried out in accordance with all applicable requirements including:

1. 23 U.S.C. 134, 49 U.S.C. 5303, and this subpart;

2. In non-attainment and maintenance areas, sections 174 and 176 (c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 (c) and (d)) and 40 CFR part 93;

3. Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR part 21;

4. 49 U.S.C. 5332, prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;

5. Section 1 10 1 (b) of the MAP 21 and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;

6. 23 CFR Part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts

7. The provisions of US DOT and of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) and 49 CFR parts 27, 37, and 38;

8. The Older Americans Act, as amended (42 U.S.C. 6101), prohibiting discrimination on the basis of age in programs or activities receiving Federal financial assistance;

9. Section 324 of title 23 U.S.C. regarding the prohibition of discrimination based on gender; and

10. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and 49 CFR part 27 regarding discrimination against individuals with disabilities.

11. Anti-lobbying restrictions found in 49 USC Part 20. No appropriated funds may be expended by a recipient to influence or attempt to influence an officer or employee of any agency, a Member of Congress, in connection with the awarding of any Federal contract.

Massachusetts Department of Transportation (Mass DOT)
I, Secretary of the Massachusetts Department of Transportation, hereby
☒ Endorse ☐ Do Not Endorse the above referenced item.

Richard Davey — 9 Jul 13 Date
Secretary &CEO Mass DOT

Massachusetts Department of Transportation Highway Division
I, Acting Administrator of the Highway Division of MassDOT, hereby
☑ Endorse ☐ Do Not Endorse the above referenced item.

Frank DePaola — 07/09/13 Date
Highway Administrator, Mass DOT

Pioneer Valley Planning Commission (PVPC)
I, Chair of the Pioneer Valley Planning Commission, hereby
☐ Endorse ☐ Do Not Endorse the above referenced item.

Walter Gunn — 7/9/13 Date
Chair - PVPC

Pioneer Valley Transit Authority (PVTA)
I, Administrator of the Pioneer Valley Transit Authority, hereby
☒ Endorse ☐ Do Not Endorse the above referenced item.

John Musante — 7/9/13 Date
Chair - PVTA

City of Chicopee
I, Mayor of the City of Chicopee, hereby
☒ Endorse ☐ Do Not Endorse the above referenced item.

Michael Bissonnette — 7/8/13 Date

City of Holyoke
I, Mayor of the City of Holyoke, hereby
☐ Endorse ☐ Do Not Endorse the above referenced item.

Alex Morse — Date
Mayor-Holyoke

City of Northampton

I, Mayor of the City of Northampton, hereby
❑ Endorse ❑ Do Not Endorse the above referenced item.

David Narkewicz
Mayor-Northampton

Date

City of Agawam
I, Mayor of the Town of Agawam, hereby
❑ Endorse ❑ Do Not Endorse the above referenced item.

Richard Cohen
Mayor-Agawam

Date

Town of Belchertown
I, Board of Selectmen member of the Town of Belchertown, hereby
☑ Endorse ❑ Do Not Endorse the above referenced item.

George Archible
Selectman-Belchertown

7/9/13
Date

Town of Hatfield
I, Board of Selectmen member of the Town of Hatfield, hereby
❑ Endorse ❑ Do Not Endorse the above referenced item.

Marcus Boyle
Selectman-Hatfield

Date

Appendix O
FTA FISCAL YEAR 2013 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2013 CERTIFICATIONS AND ASSURANCES FOR FEDERAL TRANSIT ADMINISTRATION ASSISTANCE PROGRAMS
(Signature page alternative to providing Certifications and Assurances in TEAM-Web)

Name of Applicant: Pioneer Valley Planning Commission

The Applicant agrees to comply with applicable provisions of Groups 01 – 24. _____
OR
The Applicant agrees to comply with applicable provisions of the Groups it has selected:

Group	Description	
01.	Required Certifications and Assurances for Each Applicant.	☑
02.	Lobbying.	☑
03.	Private Sector Protections.	☑
04.	Procurement and Procurement System.	☑
05.	Rolling Stock Reviews and Bus Testing.	☑
06.	Demand Responsive Service.	☑
07.	Intelligent Transportation Systems.	☑
08.	Interest and Finance Costs and Leasing Costs.	☑
09.	Transit Asset Management and Agency Safety Plans.	☑
10.	Alcohol and Controlled Substances Testing.	☑
11.	Fixed Guideway Capital Investment Program (New Starts, Small Starts, and Core Capacity) and Capital Investment Program in Effect before MAP-21.	☑
12.	State of Good Repair Program.	☑
13.	Fixed Guideway Modernization Grant Program.	☑
14.	Bus/Bus Facilities Programs.	☑
15.	Urbanized Area Formula Programs and Job Access and Reverse Commute (JARC) Program.	☑
16.	Seniors/Elderly/Individuals with Disabilities Programs and New Freedom Program.	☑
17.	Rural/Other Than Urbanized Areas/Appalachian Development/Over-the-Road Bus Accessibility Programs.	☑
18.	Public Transportation on Indian Reservations and "Tribal Transit Programs.	☑
19.	Low or No Emission/Clean Fuels Grant Programs.	☑
20.	Paul S Sarbanes Transit in Parks Program.	☑
21.	State Safety Oversight Program.	☑
22.	Public Transportation Emergency Relief Program.	☑
23.	Expedited Project Delivery Pilot Program.	☑
24.	Infrastructure Finance Programs.	☑

Appendix O
FTA FISCAL YEAR 2013 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2013 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE
(Required of all Applicants for FTA funding and all FTA Grantees with an active Capital or Formula Project)

AFFIRMATION OF APPLICANT

Name of Applicant: Pioneer Valley Planning Commission

Name and Relationship of Authorized Representative: _____

BY SIGNING BELOW, on behalf of the Applicant, I declare that the Applicant has duly authorized me to make these Certifications and Assurances and bind the Applicant's compliance. Thus, the Applicant agrees to comply with all Federal statutes and regulations, and follow applicable Federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its authorized representative makes to the Federal Transit Administration (FTA) in Federal Fiscal Year 2013, irrespective of whether the individual that acted on its Applicant's behalf continues to represent the Applicant.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply, as provided, to each Project for which the Applicant seeks now, or may later seek FTA funding during Federal Fiscal Year 2013.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801 *et seq*., and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. 1001 apply to any certification, assurance, or submission made in connection with a Federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature_____ Date: _____

Name_____
Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): _____

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under State, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on the Applicant.

I further affirm to the Applicant that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA Project or Projects.

Signature_____ Date: _____

Name_____
Attorney for Applicant

Each Applicant for FTA funding and each FTA Grantee with an active Capital or Formula Project must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its signature in lieu of the Attorney's signature, provided the Applicant has on file this Affirmation, signed by the attorney and dated this Federal fiscal year.

Pioneer Valley Metropolitan Planning Organization

Self-Identification Survey

If you wish to complete this anonymous survey, please answer each of the questions below.

Race/Ethnicity:

□White (not of Hispanic origin)
□ Black (not of Hispanic origin)
□Asian/Pacific Islander
□ Hispanic (any race)
□ American Indian/Native Alaskan
□ I choose not to self-identify.

My native language is English. □ Yes □ No

Do you speak a language other than English when communicating with family members? □ Yes; if "Yes," what language:_____
□ No

Disability:

I consider myself to have a disability. □ Yes □ No

Age:

I am 65 years of age or older. □ Yes □ No

Household Income:

There are ____(N)individuals living in my household.

My household income is: □ $0-24,999 □ $25-51,999 □ $52-71,000
□ Above$71,000

Thank you.

Appendix Q
Title VI Work Plan
Pioneer Valley Planning Commission (PVPC)

1. OVERVIEW

These findings has been developed pursuant to the Massachusetts Department of Transportation (MassDOT) Office of Diversity and Civil Rights' (ODCR) assessment of Pioneer Valley Planning Commission's (PVPC) 2011 and 2012 annual Title VI reports. MassDOT, a direct recipient of federal financial assistance through MassDOT. While the focus of this document is on Title VI, we note the obligation of PVPC to include responsibility for all civil rights compliance, including for federal Affirmative Action and Equal Disadvantaged Business Enterprise programs, and for comparable state level requirements.

The Office of Diversity and Civil Rights (ODCR) is responsible for ensuring that MassDOT fulfills its Title VI and related Commonwealth civil rights obligations through effective management of MassDOT's Title VI/Nondiscrimination Programs. ODCR also ensures that MassDOT meets its obligations and commitments for equal opportunity and affirmative action in employment and contracting and within programs and activities. MassDOT's focus on diversity in its programs is based on the simple premise that its transportation services and workforce should mirror the diverse populations they serve.

Concurrent with MassDOT's own compliance efforts is oversight of subrecipients' Title VI activities. MassDOT has reviewed PVPC's Title VI reports for 2011 and 2012. In this document, MassDOT makes a series of observations and recommendations with regard to PVPC's Title VI activities that are designed to facilitate compliance.

2. AREAS FOR IMPROVEMENT

- Demonstrate commitment to nondiscrimination in organizational documents
- Notify the public of rights under Title VI and related nondiscrimination provisions
- Revise complaint processes and notices to accurately depict federal and state nondiscrimination provisions
- Ensure capacity to transact business with individuals with limited English proficiency
- Ensure adoption and implementation of principles of MassDOT Public Participation Plan, Language Access Plan, and Accessible Public Meeting Policy
- Document Title VI activities, such as outreach and implementation of Public Participation Plan and Language Access protocols
- Engage in training on Title VI principles on public participation and language access

- Target Outreach to entire community and all interested stakeholders

- Incorporate principles of title VI into project selection process/criteria

3. TITLE VI REPORT ASSESSMENT

This section discusses the findings of our assessment.

3.1 Organizational Aspects

- Included in PVPC's by-laws can be a description of the role that nondiscrimination, inclusivity, outreach, and the removal of barriers to participation play in MPO activities. Whether describing the process of selecting new MPO members or stating the guiding objectives of the organization, the commitment to nondiscrimination can be explicitly mentioned.

3.2 Title VI Notice to Beneficiaries

- The presence of a Title VI Notice to Beneficiaries on PVPC's website is a positive achievement. It is further recommended that a Title VI Notice to Beneficiaries is incorporated into Title VI complaint procedures/forms as well as notices of opportunities for public engagement such as public meeting announcements.

- PVPC should document all its methods of disseminating its Notice to Beneficiaries. The annual reporting cycle provides subrecipients with an opportunity to submit documentation to ODCR of the efforts articulated in their Title VI programs. While the focus of annual reporting may vary year-to-year, subrecipients should still take the opportunity to provide supporting documentation of Title VI related activities and initiatives when available. For example, if a Title VI Notice to Beneficiaries is posted within public meeting announcements, inclusion of such documents in annual Title VI reports helps demonstrate PVPC's compliance with nondiscrimination requirements.

- In its Title VI Notice to Beneficiaries, PVPC states "The Pioneer Valley Metropolitan Planning Organization (PVMPO) complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. PVMPO operates without regard to race, color, national origin, creed, income, gender, age, and disability." This statement mischaracterizes the obligations of the MPO and the protected categories.

- It should not be stated that the MPO "Operates without regard to" the protected categories, but rather the MPO conducts its programs, services, and activities in a nondiscriminatory manner.

- It should be noted that FTA recognizes only race, color, and national origin (including limited English proficiency) as Title VI – protected categories. FHWA also recognizes age, gender, and disability in its Title VI/Nondiscrimination programs. State law protections extend nondiscrimination protections to additional categories including ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, veterans status (including Vietnam-era veterans), and background. PVPC can certainly utilize a single public notice, but the Title VI and

related federal nondiscrimination provisions, state nondiscrimination provisions, and other protected categories should be clearly delineated.

- Notifications to beneficiaries of their protection under Title VI should be translated into languages other than English, as need and consistent with the DOT Limited-English Proficiency (LEP) Guidance. Notifications to beneficiaries of their protection under Title VI are considered vital documents, and should make clear that beneficiaries may request a translation of the document and outline the procedure to do so.

- ODCR has developed a Title VI Notice to Beneficiaries that satisfies both FHWA and FTA Title VI Notice requirements. Further, MassDOT has translated the full Notice into the top 10 languages found in the Commonwealth. ODCR recommends that each MPO region adopt this Notice to Beneficiaries and disseminate along with the languages indicated in the Four-Factor Analysis of each region.

3.3 Title VI Complaint Procedures

- The Title VI Discrimination Complaint Procedure described in the annual report accurately mentions race, color, and national origin as Title VI-protected categories. However, the complaint procedure also delineates a non-Title VI protection (language). Title VI does not provide protection on the basis of language alone; Title VI protects people with limited English proficiency, who are defined as "persons for whom English is not their primary language who have a limited ability to read, write, speak, or understand English. Listing language may open the door to complaints which are not necessarily warranted under Title VI (i.e. those with generally low literacy skills). For this reason, language should not be singled out as a basis of discrimination on its own under Title VI. The FTA recognizes only race, color, and national origin (including limited English proficiency) as Title VI-protected categories. FHWA also recognizes age, gender, and disability under separate but related Title VI nondiscrimination provisions. State Law extends nondiscrimination protections to additional categories including ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, veterans status (including Vietnam-era veterans), and background. PVPC may utilize a single complaint procedure for all instances of alleged discrimination, but the Title VI and related federal nondiscrimination provisions, state nondiscrimination provisions, and other protected categories should be clearly delineated.

- PVPC's Title VI Discrimination Complaint Procedure requires that all complaints be submitted in writing. While such a stipulation is appropriate under FTA C 4702. 1A, PVPC's complaint procedures must make clear the availability of assistance to complainants who are unable to produce and submit a written complaint on their own.

- Notices detailing Title VI complaint procedures and Title VI complaint forms should be translated into languages other than English, as needed and consistent with the DOT Limited-English Proficiency (LEP) Guidance. Title VI complaint procedures and Title VI complaint forms are considered vital documents, and PVPC should make clear that beneficiaries may request a translation of the document and outline the procedure to do so, in a statement that is translated into the languages indicated in PVPC's LEP Four Factor Analysis.

- ODCR is working with FHWA and FTA to develop unified complaint procedures that can serve as template procedures for subrecipients, similar to the Notice to Beneficiaries.

- PVPC's procedure for the review and resolution of Title VI complaints does not reflect FHWA requirements. While FTA delegates the authority to recipients and subrecipients to conduct Title VI investigations and issue final determinations, FHWA does not. PVPC's Title VI Complaint Procedure should reflect a "check-in" stage with ODCR immediately following the receipt of a complaint. This will allow ODCR to contact the appropriate federal agency, if needed, in order to make a jurisdictional determination and assign the obligation to conduct an investigation and issue findings.

- PVPC states that its log of Title VI complaints is available for public review at their offices. This should not be the case, as publicizing Title VI complaints may act to deter potential complainants from filing a complaint, even if the log does not contain unique identifying information.

- PVPC should document its methods of disseminating Title VI complaint procedures and forms, and provide ODCR with a copy of its Title VI complaint log. The annual reporting cycle provides subrecipients with an opportunity to submit documentation to ODCR of the efforts articulated in their Title VI programs.

3.4 Language Access

- PVPC's LEP outreach activities are highly commendable. The documentation of each LEP meeting/event help demonstrate PVPC's commitment and attention to better serving LEP individuals within its region. PVPC should continue to attach similar documents to their annual Title VI submissions to MassDOT.

- While PVPC nicely integrates its findings from LEP outreach activities into its Four-Factor Analysis and language implementation plan, it seems that some material analyzed in the first factor may be better considered among the other three factors of the Four-Factor Analysis.

- In factor two of the Four-Factor Analysis, PVPC describes its contact with organizations and individuals representing the concerns of LEP persons. While this is helpful in providing service to LEP persons, the purpose of factor two of the Four-Factor Analysis is to determine the frequency of contact directly between the MPO and LEP persons. PVPC should fulfill this measure by documenting the number of translation requests it receives, the number of translations performed on its website, and the number of LEP individuals which attend MPO meetings and activities. PVPC should attempt to document and quantify interactions with LEP individuals by distributing surveys at meetings which request individuals to indicate the language spoken at home and level of English proficiency.

- PVPC identifies its LEP populations at an aggregate level across languages. The LEP populations within each eligible LEP language group should be identified, not just the sum and percentage of all LEP individuals across languages.

- If CMMPO decides to follow the "Safe-Harbor" approach to demonstrating compliance with language access obligations than while identification of LEP populations at the "community" level has the potential to be a positive undertaking, it is not in keeping with the requirements for determining the Safe Harbor threshold. As stated in the Safe Harbor Provision, the total population of persons eligible to be served or likely to be affected or encountered in the MPO region should be considered. PVPC should comply with the requirements by addressing the LEP populations which meet the Safe Harbor threshold at the region-wide level.

- PVPC should identify its "vital" documents and develop a plan for providing and disseminating them in languages other than English based on findings from the Four-Factor Analysis. PVPC may also want to create abbreviated versions (or abstracts) of larger documents which can then be translated upon request. This would allow PVPC to improve their language access while limiting the time and cost of translation services.

- PVPC should include translation features on its website. It is noted that the accuracy and effectiveness of these translation systems is not complete and should not be relied on as an exclusive means of providing language access to LEP individuals in the region. However, there is still no doubt that the provision of translation features on MPO websites reduces barriers for LEP persons to some extent. Included with the translation feature should be a disclaimer stating the limitations of the feature and directions to request additional language assistance if needed. This disclaimer should be translated into languages other than English, as needed and consistent with the DOT LEP Guidance

- MassDOT commends PVPC on its plan to develop a list of language translation volunteers. Such efforts can augment the organization's ability to effectively respond to LEP needs at a reduced cost to the organization. ODCR recently conducted a survey of MassDOT staff to identify staffers with foreign language capabilities (written and spoken) and to gauge their willingness to provide language services in limited incidental situations. ODCR will make its own survey from available to all MPOs for this purpose, which PVPC may utilize to transform this initiative into an ongoing process.

3.5 Public Participation Plan

- PVPC Should provide documentation of the measures taken to ensure the participation of Title VI-p0rotected classes during all facets of the planning process and monitor the effectiveness of its public involvement process. PVPC should also provide detailed descriptions of how such processes fostered an improved relationship with Title VI-protected populations.

Appendix R

Timothy W. Brennan, Executive Director

Pioneer Valley Planning Commission
DBE Participation Goal FFY2014-2015-2016

Uploaded to TEAM on 7/30/13 for effective date of 10/1/2013

The full text of PVPC's DBE Program, last revised September 20, 2012, can be viewed at the offices of PVPC at 60 Congress Street, Springfield, MA 01104. Please direct your comments to **DRoscoe@PVPC.org or jmccollough@pvpc.org**

Section 26.1, 26.23 Objectives and Policy Statement

The Pioneer Valley Planning Commission (PVPC) has established a Small Business/Disadvantaged Business Enterprise (SB/DBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 26. The PVPC has received Federal financial assistance from the U.S. Department of Transportation, and as a condition of receiving this assistance, the PVPC has signed an assurance that it will comply with 49 CFR Part 26.

It is the policy of the PVPC to ensure that SB/DBEs are defined in part 26, have an equal opportunity to receive and participate in U.S. DOT–assisted contracts. It is also our policy:

1. To ensure nondiscrimination in the award and administration of U.S. DOT-assisted contracts;
2. To create a level playing filed on which SB/DBEs can compete fairly for U.S. DOT-assisted contracts;
3. To ensure that the SB/DBE Program is narrowly tailored in accordance with applicable law;
4. To ensure that only firms that fully meet 49 CFR Part 26 eligibility standards are permitted to participate as SB/DBEs;
5. To help remove barriers to the participation of DBEs in U.S. DOT assisted contracts;
6. To assist the development of firms that can compete successfully in the market place outside the SB/DBE Program.

Timothy W. Brennan is the PVPC's SB/DBE Liaison Officer, responsible for implementing all aspects of the SB/DBE Program. Implementation of the SB/DBE Program is accorded the same priority as compliance with all other legal obligations incurred by PVPC in its financial assistance agreements with the U.S. Department of Transportation.

This policy statement has been disseminated to the Executive Committee of the Pioneer Valley Planning Commission and all of the components of the organization. The PVPC and its project partners have distributed this statement to SB/DBE and non-SB/DBE business communities that perform work for the PVPC on U.S. DOT-assisted contracts through outreach and the PVPC website (www.pvpc.org).

This update to the PVPC Disadvantaged Business Enterprise (DBE) Program Participation Goal is proposed for Federal Fiscal Years 2013-15. The goal has been updated using the two-step method as described in 49 CFR 26.45. It is important to not that PVPC has no active federally funded projects at this time and the DBE participation goal will largely apply to indirect cost expenditures in future years. While PVPC is not adjusting the because of the reduced size of the contracting program, the type of work which we expect to contract has changed dramatically and this impacts the goal (regardless of the level of funding).

This is a three-year DBE goal, as required by the Final Rule effective February 28, 2011 for 49 CFR Part 26 regarding U.S. DOT DBE Program Improvements.

Step 1: Establishment of Available Estimate for Base Goal Figure

The base figure DBE Participation Goal for PVPC and sub recipients was established by the following method:

- Determination of Normal Market Area: The implementation of the agency's work program and the current conditions of the market were key variants that affected the goal methodology and calculation formula. The Pioneer Valley Region consists of an isolated urbanized cluster that stretches along a catchment area that consists of Interstate 91 and the Massachusetts Turnpike and roughly parallels the Connecticut River. This cultural and institutionally defined boundary has historically defined the market area geographically as **Hampshire and Hampden County**. For the purposed of defining the market area the DPE evaluation the market includes these same boundaries.
- The total number of DBE firms available to do business was determined by reviewing the most recent directory of for-profit and non-profit firms certified as DBE businesses in Hampden and Hampshire Counties (the PVPC service area) by the Massachusetts Supplier Diversity Office or SDO (formerly the State Office of Minority and Women Business Assistance, or SOMBWA).
- The total number of business establishments in the region is 20,092 (as of 2011) according to the Massachusetts Executive Office of Labor and Workforce Development:

Geography	Year	Total Establishments (Total employers with Employees)
Hampden County	2011	15,422
Hampshire County	2011	4,670
Pioneer Valley Region	2011	20,092

- The Massachusetts Supplier Diversity Office reported a total of 2600 DBE firms in Massachusetts and 186 registered DBE firms in the Pioneer Valley Region (7% of the statewide total).
- The number of registered DPE firms (186) represents one percentage (**1%**) of the total business establishments (20,092) in the region.

- A total of approximately 47 Massachusetts DBE firms were identified in Hampden and Hampshire Counties (which encompasses the PVPC region) in the SDO-defined industry categories for which funds are, or could possibly be, expended in the FFY2014-16 reporting period on the U.S. DOT projects or funding programs for which PVPC could be a recipient. These number and categories for these projects are listed here:

Massachusetts Supplier Diversity Office Code	# *
AA - ACCOUNTING	3
AE - ARCHITECTS	2
CO - CONSULTANTS	2
CP6 - COMPUTER PROGRAMMING	1
CP7 - COMPUTER TRAINING, SUPPORT SERVICES AND CONSULTING	1
CP9 - INFORMATION TECHNOLOGY	1
EG - ENGINEERS	1
EM - EMPLOYMENT SERVICES (NON-PROFIT)	2
ES - ENGINEERING SUPPORT SERVICES	1
HA - HEALTH CARE SERVICES (NON-PROFIT)	3
MK - MARKETING	12
MK0 - ADVERTISING	3
MK2 - GRAPHIC DESIGN	4
OF2 - OFFICE EQUIPMENT AND SUPPLIES	1
OS - OFFICE SUPPORT SERVICES	2
PG - PHOTOGRAPHY	1
PT - PRINTERS	2
PT1 - PHOTOCOPY SERVICES	1
SU1 - SUPPLIERS OF COMPUTER OR TELECOMMUNICATIONS EQUIPMENT	1
SU2 - SUPPLIERS OF CHEMICAL AND CLEANING PRODUCTS	1
SU4 - SUPPLIERS OF PAPER PRODUCTS	1
TG - TRAINING SERVICES	1
* Number registered in MA SDO Region #2	47

- PVPC then reviewed business directory listings of all firms in these categories in the PVPC region:
    - Greater Springfield (http://memberservices.membee.com/masprcoc4/irmdirectory2.aspx)
    - Hampshire County (http://www.explorenorthampton.com/ and www.amherstarea.com)
    - Holyoke (http://www.holycham.com/directory)

  PVPC determined that a search of these directories was not providing a meaningful representation. Only approximately 3000 of the 20,092 firms had affiliated membership.

- Weighting was used however the small number of firms identified did not accurately reflect the employer base. The total number of firms available for each category was estimated. The **Step One Base Figure is 1.95%.**

Massachusetts Supplier Diversity Office Code	# DBE	# Available	Weight	Adjusted #
AA - ACCOUNTING	3	150	0.04	0.12
AE - ARCHITECTS	2	100	0.01	0.02
CO - CONSULTANTS	2	300	0.04	0.08
CP6 - COMPUTER PROGRAMMING	1	1200	0.04	0.04
CP7 - COMPUTER TRAINING, SUPPORT SERVICES AND CONSULTING	1	300	0.04	0.04
CP9 - INFORMATION TECHNOLOGY	1	100	0.04	0.04
EG - ENGINEERS	1	90	0.12	0.12
EM - EMPLOYMENT SERVICES (NON-PROFIT)	2	50	0.04	0.08
ES - ENGINEERING SUPPORT SERVICES	1	100	0.12	0.12
HA - HEALTH CARE SERVICES (NON-PROFIT)	3	50	0.04	0.12
MK - MARKETING	12	100	0.04	0.48
MK0 - ADVERTISING	3	100	0.01	0.03
MK2 - GRAPHIC DESIGN	4	150	0.04	0.16
OF2 - OFFICE EQUIPMENT AND SUPPLIES	1	15	0.04	0.04
OS - OFFICE SUPPORT SERVICES	2	200	0.04	0.08
PG - PHOTOGRAPHY	1	150	0.04	0.04
PT - PRINTERS	2	70	0.08	0.16
PT1 - PHOTOCOPY SERVICES	1	110	0.04	0.04
SU1 - SUPPLIERS OF COMPUTER OR TELECOMMUNICATIONS EQUIPMENT	1	12	0.08	0.08
SU2 - SUPPLIERS OF CHEMICAL AND CLEANING PRODUCTS	1	300	0.01	0.01
SU4 - SUPPLIERS OF PAPER PRODUCTS	1	120	0.04	0.04
TG - TRAINING SERVICES	1	50	0.01	0.01
* Number registered in MA SDO Region #2	47	3817	1	**1.95**

Step 2: Adjustments and Historical Reference

Back in FFY2007, PVPC adjusted the base figure to a DBE participation goal of **3%** upon review of historical data and anticipated project expenditures in the industrial categories referenced above in Step 1. The 3% goal was retained in FFY2008 and FFY2009.

For FFY2010, actual DBE utilization on U.S. DOT-assisted projects through April 2010 was 1.9%. Therefore, the DBE goal was adjusted from 3.0% to **2.0%** to reflect this actual participation rate. This lower goal was also a reflection of the change in the type of work that this that would be undertaken that year. With these major contracts completed PVPC does not anticipate an expenditure of more than $90,000 per year in FFY 2014, 2015 and 2016. More significantly the expenditures will not involve significant capital improvement projects or vehicle purchases. The nature of the work that federal transportation dollars will be expended on

will change dramatically from what it was in the past. For this reason PVPC does not feel that an adjustment factor can be applied. The restructuring under MAP-21 has changed the type of discretionary transportation funding in PVPC's procurement program. For comparison purposes the Central Massachusetts Regional Planning Commission (CMRPC, a regional planning commission of similar size and population, posted a goal in 2013 of .5% (one half of one percent).

For this FFY2014-16 projection PVPC reviewed the actual DBE utilization for the two prior years:

Project	2012	2013	Prior Years DBE Utilization	Expenditures (2012 thru 2013)	DBE Utilization
I-91 Knowledge Corridor Rail Study and Holyoke Station Feasibility Study	$0	$0	$0	$0	0%
UMass Amherst Transit Building	$0	$0	$0	$0	0%
JARC and New Freedom funding	$64,184	$0	$26,000	$64,184	41%
5303, 5307, 3C indirect expenditures	$30,000	$30,000	$1,000*	$60,000	2%

*Estimated transportation funding expenditures related to office supplies and equipment maintenance, temporary staff, software purchases and computer support. Many of these costs may be bundled as "Admin" under the agency's indirect cost line item as written into the 3C contract.

PVPC DBE Goal for FFY2014-16

The outlook for DOT-funded projects in the region for the FFY2014-16 window includes a transit ridership survey and the purchase of office related equipment, computer maintenance, and supplies. Most of these items are included in the indirect cost budget from 5303 and 3C funding. The total expenditure for each of the three years is estimated to be less than $90,000. As previously mentioned, past projects that have boosted federal transportation dollar expenditures in previous years including the UMass Amherst Transit Building and Knowledge Corridor Passenger Rail Study and Holyoke Station Feasibility Analysis are complete.

Based on the current circumstances PVPC has determined that the DBE Participation Goal should remain at 2% for the FFY2014-16 three-year reporting period.

PVPC retains the expectation that 100% of future DBE participation will be achieved through race-neutral means. This reflects the fact there are currently no active or upcoming federal projects on which to implement race-conscious measures to increase participation. PVPC has found that some MBE and WBE firms have not registered as DBEs with Massachusetts Supplier Diversity Office (SOD). In the past PVPC has actively engaged and encouraged these suppliers to register with the SOD. PVPC will continue to work with contractors to obtain DBE certification and 100% of the goal will be achieved through race-neutral measures.

Consultation

PVPC recognizes the importance of public participation in the establishment of the DBE Goal. The DBE goal will be published and made available for inspection during the normal business hours for a specified timeframe as stated in 49 CFR Part 26. PVPC will publish notification of the goal in The Republican and publish a translated version in El Pueblo Latino, a weekly

Spanish language newspaper based in Springfield, Massachusetts. Further PVPC will notify and solicit input from the Massachusetts Supplier Diversity Office, Massachusetts Alliance for Small Business Contractors, New England Black Chamber Of Commerce Business Center regarding the proposed goal and will document all responses.

Appendix S

Complaint Procedure (Como Quejarse))

Título VI del Acto de Derechos Civiles (Civil Rights Act) de 1964 con sus amendas prohíbe discriminación basada de raza, color, o origen nacional con relación a programas y actividades que reciben dinero del gobierno federal. Dos mandatos ejecutivos presidenciales y otras leyes cuidan de esas poblaciones dentro de Título VI: orden ejecutivo 12898 que protege los derechos de las minorías y los con sueldo bajo; y orden ejecutivo 13166 que cuenta con aceso igual a los servicios y beneficios para ellos que no hablan bien el inglés (LEP).

El propósito de Título VI incluye que no puede negar, reducir, ni demorar los beneficios federales a las minorías y los con sueldo bajo; que todos pueden participar en el proceso de planear el transporte de MPO`s (organizaciones metropólitas de planear) y nadie debe sufrir negativamente.

Por eso, para cumplir con la sección 21.9(b), CFR 49, el Pioneer Valley Metropolitan Planning Organization (PVMPO) tiene lo siguiente para recibir, reparar, resolver, y responder a las quejas relacionadas a Título VI.

1. Como quejarse

   Los que creen que han sufrido discriminación prohibida por Título VI del Acto de Derecho Civil de 1964 y que pertenece a PVMPO y su posición de planear y usar el dinero federal pueden escribir para quejarse. Las cartas necesitan hablar de la discriminación de raza, color, origen nacional o lengua. Se necesita escribir 180 días antes de que ocurrió la discriminación. Favor de escribir a:

   Massachusetts Secretary of Transportation, Chair
   Pioneer Valley Metropolitan Planning Organization
   c/o Pioneer Valley Planning Commission
   60 Congress Street
   Springfield MA 01104

   No se olvide de incluir completamente la información que pertenece al acto que pueda ser discriminación. Incluya:
   Nombre, dirección, y número de teléfono de la persona que se queja.
   La razón para la discriminación (raza, color, origen, o lengua.
   Descripción de lo que ocurrió.
   Por qué piensa que sufrió discriminación?
   Las fechas cuando ocurrió.
   Nombres de cualquier personas asociadas con este acto.
   Nombres de otras agencias que van a recibir este documento.

2. Repaso de las quejas

   Al recibir la carta, un director ejecutivo de PVMPO la repasará. Es necesario responder dentro de 10 días.
   Puede incluir más información de ambos la persona que se queja y él que participó en la discriminación.

Al terminar el repaso, el director de PVMPO compartirá la información con los otros miembros de PVMPO.
Si es una verdadera queja, tiene que dar algunas recomendaciones como:
Mandar la carta a la agencia responsable.
Identificar maneras para mejor el proceso de Título VI de PVMPO.
Si requiere más tiempo para resolver la situación, el director le avisará a todos invueltos.

3. Resolución de las quejas
   El director ejecutivo tiene que mandar la carta y las recomendaciones a los miembros de PVMPO para discurso y acción. El PVMPO contestará dentro de 60 días.
   El PVMPO dirá si requiere más tiempo para resolver la situación.
4. También no hay problema si la persona quiere quejarse a otras agencias federales o del estado. También se puede pedir consejo de otra persona. El PVMPO no paga nada de recompensa. Si las resoluciones no son de acuerdo con él que escribió, puede discutir la decisión con el Federal Transit Administration (favor de mirar la información del FTA circular 4702.1ª http:/www.fta.gov/circulars/publications4123html. El PVMPO incluirá esta información en la respuesta escrita.
5. Mantener la información
   El PVMPO tendrá una lista de las quejas que han recibido. Se puede ver esta información a las oficinas de:
   Pioneer Valley Planning Commission
   60 Congress St.
   Springfield, MA 01104
   durante las horas de operación.