

February 14, 2020

RE: Pioneer Valley MPO Annual Reporting of Title VI Activities

Derek Krevat Regional Planning Coordinator Pioneer Valley Metropolitan Planning Organization Liaison MassDOT Office of Transportation Planning 10 Park Plaza, Suite #4150, Boston, MA 02116

Dear Mr. Krevat:

The Pioneer Valley Planning Commission (as staff to the PVMPO) is providing this update on the MPO's Title VI activities as a sub-recipient of MassDOT receiving transportation related federal financial assistance. In response to correspondence dated October 18, 2019, the PVPC transportation planning staff is providing documentation of this work to satisfy the MPO's Title VI annual reporting requirements for this cycle.

This annual report and the responses to these recommendations are not meant to be inclusive of every Title VI activity undertaken by PVPC staff on behalf of the MPO. Should you have any questions, please contact, Gary Roux Transportation Program Manager at <u>gmroux@PVPC.ORG</u> or 413-781-6045 (ext. 308)

Sincerely,

Gary N Principal Flatme

Attachments: Pioneer Valley MPO 2020 Annual Report on Title VI Recommended Actions Distribution of UPWP Tasks by Community

cc: Kimberly Robinson Gregory Sobczynski Dana Roscoe Benjamin Muller Jeffrey McCollough

Pioneer Valley MPO 2020 Annual Report on Title VI Recommended Actions

(As per October 18, 2019 correspondence)

Comments/Recommendations:

I. <u>Notice</u>

Recommendation I-1: Please review the contact person and contact details on your organization's Notice of Nondiscrimination Rights, and update if necessary. Please also ensure the Notice of Nondiscrimination Rights is available at each initial point of contact between the public and your organization (*e.g.*, in your organization's physical offices in an easy-to-access location, on your organization's website(s), or in planning documents).

Response: The contact person and contact information were checked and updated where needed.

II. Language Access

Recommendation II-1: Please consider the current utilization of non-English materials on your organization's website by the public. Should your organization have data available, consider the utilization of non-English materials by language compared to identified Limited English Proficiency (LEP) populations in your service area, making note of any anticipated needs to 1) provide translations into new languages or 2) provide targeted outreach to linguistic communities notifying them of the availability of materials. Should no information be available, identify the barriers to the collection of data concerning utilization of online resources by LEP individuals and steps your organization is taking towards collecting this information.

Response: The web site for the MPO was recently revised to include translation tools for all LEP languages. All meeting notices and agendas for MPO related activities include a notice regarding the availability of language translations. In the past PVPC has received requests for digital versions of all materials in advance of public meetings in order to allow the content to be viewed on a personal device (during the meeting). PVPC has not received a non-English request for information over the phone or in person.

The MPO currently strives to accomplish the following:

- Translate our most vital documents and make a concerted attempt to translate any of these documents into other languages upon request.
- Provide flyers, meeting notices, and other announcements in the languages spoken in the affected area.
- Offer to translate meeting materials upon request.
- Post notices in non-English community newspapers when appropriate.

- Incorporate Google Translate in our website which may be used to translate site materials into multiple languages.
- Provide interpreters, upon request, at public meetings.
- Translated our transit map into Spanish.
- Provide information about projects that impact a neighborhood or that may have a significant impact in the languages spoken in the area.
- Translate consent forms, and letters containing information regarding participation in a program when needed.

At this time, we do not feel the need to make additional translations. We continue to monitor changes in languages spoken in the Region and routinely ask communities or organizations that we are working with if there are language needs that we may not be aware of. In 2019, a new system wide survey was implemented with a goal of learning more about the languages that might be spoken in the Region. As part of this effort MPO staff has been monitoring and evaluating language information.

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Pioneer Valley MPO Vital Documents Translation Schedule	Spanish	Portuguese	Creole	Russian	Polish	Chinese	Vietnamese	French	Other Slavic
Notice to Beneficiaries (Notice of Civil Rights)	V	Ŋ	V	N	V	V			V
Title VI Complaint Procedures	\mathbf{N}	\mathbf{V}	\checkmark	$\mathbf{\nabla}$	\checkmark	\checkmark	\mathbf{N}	\mathbf{N}	\mathbf{N}
Complaint Form	\checkmark	\checkmark	$\overline{\mathbf{A}}$	\checkmark	\checkmark	$\overline{\mathbf{A}}$	\checkmark	\checkmark	\checkmark
Consent Form	\checkmark	\checkmark	\checkmark	$\overline{\mathbf{A}}$	$\overline{\mathbf{A}}$	\checkmark	\checkmark	\checkmark	$\mathbf{\nabla}$
Statement advising of the availability of free language assistance services for LEP individuals in materials routinely disseminated to the public		Ø	Ø	Ø	V	Ø			
Notices of proposed public hearings regarding proposed transportation plans and programs.	Ŋ					Ø	Ŋ	Ŋ	Ŋ

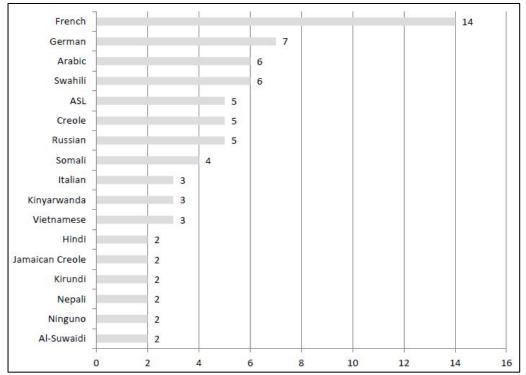
Current Pioneer Valley MPO LEP Languages

<u>*TBD = Translations on a case by case basis or to the extent that resources allow.</u>

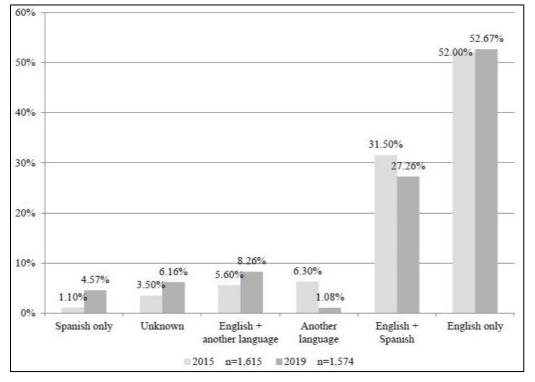
Total Population	# of	% of Total
	People	Population
Spanish	26994	4.51%
Other Indo-European Languages	4963	0.83%
Russian, Polish, or other Slavic languages	4449	0.74%
Chinese (incl. Mandarin, Cantonese)	2047	0.34%
Other Asian and Pacific Island languages	1499	0.25%
French, Haitian, or Cajun	1133	0.19%
Vietnamese	1033	0.17%
Arabic	552	0.09%
Korean	552	0.09%
Other and unspecified languages	542	0.09%
German or other West Germanic languages	151	0.03%
Tagalog (incl. Filipino)	107	0.02%

Speaks English Less than Very Well ACS 2013-17

Distribution of "Other Languages Spoke at Home" (Transit Survey 2019)



NOTE: This data is preliminary and has not been released to the public



Distribution of trips surveyed by languages spoken at home (Transit Survey 2019)

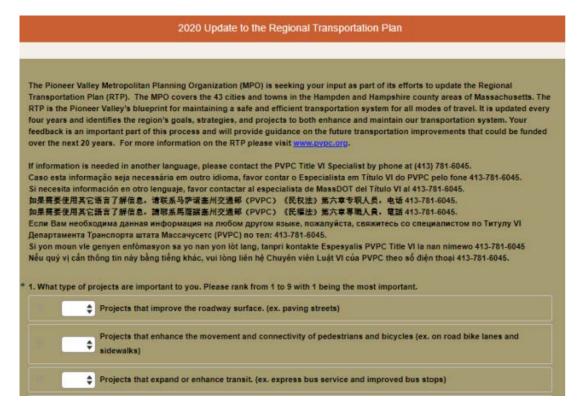
Note: This data is preliminary and has not been released to the public.

Recommendation II-2: Please discuss the use of languages other than English during the outreach process for your organization's most recent Regional Transportation Plan (RTP). Identify which strategies were utilized, and gauge the effectiveness of various strategies by quality and/or quantity of communications.

Response: MPO staff used an online "Survey Monkey" tool in an effort to reach a broader and more diverse audience. In the past an effort was made to use all the LEP languages in the survey. During this survey only English and Spanish were used. Despite this effort to enlist a larger response from "non-English-speakers" the survey failed to receive a single response in Spanish.

There are several ways in which this survey could be more effective at reaching non-English speakers. We could have linked the survey language from English to Spanish. Also, after reflecting on this shortcoming of the survey, it became apparent that a new distribution method for surveys is needed and that in the future the MPO should contact individual organizations with non-English speakers and have surveys distributed directly instead of forwarded from PVPC. A copy of the survey is included in the <u>RTP</u> <u>Appendix</u>.

2020 RTP Online Survey with Offer for Translations



III. Equity Analyses

Recommendation III-1: Please discuss any specific changes made to the most recent RTP equity analyses due to improved attention to Title VI analysis efforts since the previous RTP cycle. Please also identify any notable shortcomings in these analyses.

Response: Title VI analysis in the 2020 RTP includes enhanced transit analysis of the distribution of service (Chapter 4) and new graphics for improved legibility and clarity.

Past and proposed funding allocations for TIP projects were calculated for defined low income and minority populations. PVPC completed an inventory of projects included on the RTP and mapped these projects. GIS tools were used to determine the amount of transportation funds (including bridge projects) allocated to each population group and also compared these values to regional average allocations using census block group data.

The shortcoming of this analysis is that PVPC needs to find ways expand the analysis and include other Title VI protected classes. These vulnerable populations might include those at high risk for asthma or other factors that contribute to health disparities. There may be opportunities to look a trending risk assessment for populations in the future and ways to predict with greater certainty how a demographic might change in the 20 year time frame for a project on the RTP.

For reference, the RTP analysis is presented in <u>Tables 4-1 and 4-2 of the RTP in Chapter 4</u>.

Recommendation III-2: While Title VI and Environmental Justice considerations have some overlap, there are considerable differences in the applicability, measurement, and use of Title VI and Environmental Justice analyses. Please discuss how your organization's equity analyses distinguish these areas of analysis. If necessary, make proposals for improving the distinction between these analyses for the upcoming certification document cycle.

Response: Several changes were incorporated into the RTP to take into consideration the differences in Title VI an Environmental Justice analysis. The RTP chapter titles were changed to acknowledge the distinct differences between the two. Separate analysis was included for EJ and Title VI populations while information on "elder" and "disabilities" was enhanced.

IV. Equity Impacts on MPO Activities

Recommendation IV-1: Please discuss how identified planning needs (*e.g.* from RTPs, previous studies, or municipal/outside agency requests) are selected and prioritized for both standalone and programmatic Unified Planning Work Program (UPWP) tasks and subtasks. If there is a codified process, your organization is welcome to simply link to or provide that documentation. In either instance, identify Title VI implications of the current selection and prioritization processes and strategies for mitigating disparate impacts.

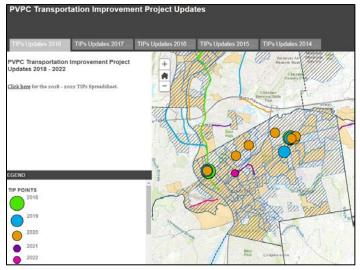
Response: The MPO identifies planning tasks for the UPWP through the review of the RTP, previous studies, working with the Joint Transportation Committee, our Federal and State partners, and from municipal requests.

In 2019, PVPC conducted an equity assessment of transportation planning tasks completed as part of previous UPWP efforts. UPWP tasks are an important barometer as they provide assistance to Towns that might not have the resources to complete the task, and also because a planning study generated through a UPWP task can result in recommendations that prepare a project for future development. For this assessment, work plans from the previous eleven years were reviewed to tasks that were completed for each of the 43 communities in the PVPC region. Tasks included data collection, planning studies, local technical assistance requests, and regional activities such as the update to the TIP or CMP. In total, nearly 970 tasks were identified over the five year period. While the total number of projects for each community is often a function of the size of the community, at least one task was completed for each community over the five year period. This information is summarized in the in Table 4-10 (see attachment) from the RTP.

In 2019, PVPC conducted an equity analysis of transit service for a new bud route referred to as "<u>The Loop</u>" that provides service to downtown Springfield, MA. Service and fare equity analysis is frequently used to prioritize changes in the transit service.

PVPC conducts an <u>annual review of TIP projects</u> to assess the distribution of funded projects in low income and minority neighborhoods. This process is identified in the current TIP.

TIP Project Distribution Analysis



V. <u>Public Engagement</u>

Recommendation V-1: Please discuss the use of strategies to engage with minority and low-income populations during the outreach process for your organization's most recent RTP. Gauge the effectiveness of various strategies by quality and/or quantity of communication, and consider identifying potential amendments to your organization's Public Participation Plan if necessary.

Response: In the development of the RTP, a concerted effort was made to engage the public through the distribution of meeting notices and posting in local news media. A detailed summary of this outreach in included in <u>Chapter 3 of the RTP</u>.

The Draft Regional Transportation Plan for the Pioneer Valley (RTP) underwent a public review and comment period consistent with the Pioneer Valley Region Public Participation Process. Early in the development of the RTP a series of focus groups were convened to assist in the development of the draft document. Focus groups consisted of a core group of representatives that were invited to participate in a discussion on the development of the vision statement, goals, needs, and strategies included in the RTP. Comments received as part of the focus groups were used to assist in the development of the problem statements included in the RTP.

There were a total of four focus groups on the RTP:

- November 14, 2018 Bicycle and Pedestrian
- November 14, 2018 Infrastructure
- December 4, 2018 Transit
- December 6, 2014 Environment, Sustainability and Climate Change

To begin each focus group, staff <u>developed a short video</u> describing regional

transportation from the viewpoint of the average citizen. This video helped to set the tone for discussion by identifying the regional transportation needs and priorities of a select group of residents. Comments received as part of the focus groups were used to develop a draft vision, goals, needs, strategies and problem statements. This draft version was distributed to the JTC, MPO, and through the PVPC website in January 2019, to continue to solicit comments. The video was successful in engaging individuals in the discussion of complex transportation issues. The video was also an effective icebreaker in starting a dialog around issues of personal significance.





A series of RTP informational products were developed to begin outreach efforts and education on the RTP process. All of the products were made available on the dedicated webpage, and through social media for the RTP update. The RTP article also appeared in PVPC's quarterly newsletter.

RTP products include:

- RTP Webpage <u>http://www.pvpc.org/projects/2020-regional-transportation-plan-update</u>
- RTP Article <u>http://www.pvpc.org/content/lot-can-happen-four-years</u>
- RTP FAQ -

http://www.pvpc.org/sites/default/files/RTP%20Frequently%20Asked%20Questions.pdf

- RTP Brochure
- RTP Survey

Summary of RTP Outreach Events

Date	Event
Monthly	Pioneer Valley Joint Transportation Committee Meetings
Monthly	Pioneer Valley Metropolitan Planning Organization Meetings
February 12, 2019	West Springfield Rotary Club
February 13, 2019	Transportation Evaluation Criteria Scoring
February 21, 2019	Pioneer Valley Commissioner Meeting
March 20, 2019	Western Massachusetts Historical Commission Coalition
May 20, 2019	Greater Holyoke Chamber of Commerce Meeting
June 4, 2019	Hilltown CDC, Climate Change Listening Session
June 6, 2019	MassDOT CIP Public Meeting at Springfield Public Library
June 20, 2019	Greater Westfield Chamber of Commerce Board Meeting

In 2019, PVPC staff participated in a "<u>Grow with Google</u>" corporate event designed to offer training, tools, and resources to help individuals learn skills and advance career and/or business initiatives. At the event PVPC offered information to participants about the regional transportation planning process and fielded inquiries regarding the 2020 RTP update.

The MPO staff continually seeks new methods to engage populations in the planning process. Some neighborhoods in Pioneer Valley Region have a high influx of immigrant populations from a wide range of nationalities. We strive to engage, inform, and involve everyone in the decision making process. PVPC's guiding principles in for public engagement as defined in the MPO's public participation plan include: promoting respect; proactively providing opportunities for involvement; offering authentic and meaningful participation; providing a clear and predictable process; fostering diversity and inclusiveness; being responsive to participants; record and respond to public comment; and self-evaluation and modification. In the development of the 2020 RTP many of these goals were achieved to a high degree. There are opportunities for improvement. We should give further consideration to the evaluation of the effectiveness of public engagement after a task has been completed.

Recommendation V-2: Please continue to work with MassDOT's Office of Diversity and Civil Rights (ODCR) on updates to the Community Contacts database on the MassDOT Engage platform.

Response: The Community Contacts database has been updated to include recent additions to the MPO's distribution/contact database.

Recommendation V-2: Please consider the utilization of virtual public involvement (VPI) strategies for engaging Title VI populations in your organization's region. Which VPI strategies are currently used? How are currently utilized strategies engaging Title VI populations, and how could they be improved? Which additional strategies are of interest to Title VI populations in your organization's region?

Response: The MPO continues to explore new planning and public outreach tools designed to enhance public engagement and improve the planning process. In 2019, PVPC used <u>aerial drone footage</u> to help the public better understand the benefits and operation of the use of "roundabouts" in intersection design.



Aerial Drone Video of Amherst Roundabout Operation (2019)

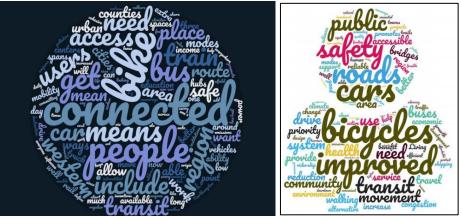
In 2019, PVPC also implement the use of <u>remote video recording</u> in traffic safety studies. As a pilot project the technology cameras were installed at 5 midblock crosswalk location to record and monitor pedestrian and vehicle operations. The data provided from cameras allowed for a more thorough study of the crosswalk and better communicated the safety issues associated with the crosswalk locations.



Crosswalk Assessment using Countcam-2 used with Camlytics

To enhance comprehension and consensus building, PVPC employed the used of "word clouds." This graphic tool was effective at engaging participants in a meaningful discussion in establishing regional transportation priorities without relying on a high degree of literacy.

Visualization Word Clouds



VI. <u>Complaints</u>

Recommendation VI-1: Please review the location and availability of complaint forms at primary points of contact between the public and your organization (*e.g.*, in your organization's physical offices in an easy-to-access location and on your organization's website(s). Are complaint forms easy-to-find and available in relevant languages? Are descriptions of complaint processes also available at these locations and in relevant languages?

Response: Title VI Complaint form is posted and available in all LEP languages on the PV MPO web site. Complaint forms are also available from the receptionist at the information desk at PVPC offices on Congress Street in Springfield, MA. A notice of availability of the MPO's Title VI complaint process is posted in all LEP languages in the PVPC Large Conference Room (2nd floor). All meeting notices include translated offers for assistance.

Posting of Notice of Complaint Process in PVPC Large Conference Room



Attachment: Distribution of UPWP Task by Community

Community Agawam Amherst Belchertown	2010 2 4	2011 2	2012	2013	2014	2015	2016	2017	2018	2019*	2020*	Total
Amherst Belchertown	4		2	4								
Belchertown	-		-	1	3	1	3	5	5			24
		2	4	4	1	1	1	2	2			21
	1	3	1		1	3	2	2	2			15
Blandford	1	1		1		1					1	5
Brimfield		2	3	2	1			1	3	1		13
Chester	1	2	1	1	1			3	1			10
Chesterfield	1						1		1			3
Chicopee	4	1	3	3	3	3	1	2	3	1		24
Cummington	1		1		1		1	1	2	1		8
East Longmeadow	2	2		1	1	1	1	3	3	1		15
Easthampton	3	3	2	1	3	1	1	5	4			23
Goshen	1	1	1		1	1	1	1	2	1		10
Granby		2		3				1			1	7
Granville		1	1	1	1		1		3	1		9
Hadley	1	3	4	2	1	2	1	2	2		1	19
Hampden	1		2		1		1	1	1		1	8
Hatfield				1			1					2
Holland	1	1				1	2	1	2			8
Holyoke	3	5	6	3	3	3	6	6	4	1		40
Huntington	1	1	1	2	1		1		1			8
Longmeadow	3		1	4	2	1	4	2	1	1		19
Ludlow	7	1			2		1	2				13
Middlefield		1										1
Monson	1	1		1				1	1		1	6
Montgomery			1	2	1			1				5
Northampton	7	6	5	7	3	4	5	6	6			49
Palmer	1					3	3	2	2			11
Pelham	1	1		1				1				4
Plainfield	1	1	1	1	1				1	1		7
Region Wide	38	29	33	34	28	30	26	24	26	25	25	318
Russell	1	1	1	1		1						5
South Hadley	3	1	2	4	3	2	1	4	2			22
Southampton	1	1	2	1		1	2	1	1			10
Southwick	6	2	1	2	3	1	2	3	1		1	22
Springfield	8	12	10	6	6	10	14	11	8	3		88
Tolland			1	1	1		1	1	2			7
Wales			1	1			1	2	2			7
Ware	5	2	1	2	2	3	2	2	1		1	21
West Springfield	4	3	2	2	1	1	3	9	2			27
Westfield	1	1	3	3	1		2	5	6			22
Westhampton	2			1	1			1				5
Wilbraham	1		1	1	1		2	1	4			11
Williamsburg	1		3	1	1	1	2	1	2			12
Worthington	1						1	1	2	1		6
Grand Total	121	95	101	102	80	76	97	117	110	38	32	970

Table 4-10 – Distribution of UPWP Task by Community by Year

END