



December 19, 2024

RE: Response to correspondence from MassDOT regarding review of the Pioneer Valley Planning MPO Title VI Program (as sub-recipient of FHWA and FTA funding)

Tiffany Garcia
Senior Title VI Specialist
Office of Diversity and Civil Rights
Massachusetts Department of Transportation
(617) 455-9824 | tgarcia2@mbta.com | Tiffany.R.Garcia@dot.state.ma.us

Dear Ms. Garcia,

The Pioneer Valley Metropolitan Planning Organization (PVMPO) has reviewed the Office of Diversity and Civil Rights comments (August 1, 2024) regarding its Title VI program. Based on this correspondence, the PVMPO is responding to the comments and submitting its annual report for 2024 (see attached).

The MPO is providing the following documentation and references on these revisions to the PVMPO Title VI Program in 2024:

- 1) Title VI Complaint Procedures: Similar to the Title VI Notice to the Public and Title VI Complaint Form, the Title VI Complaint Procedures should also be available in languages other than English on PVPC's website. For example, please refer to MassDOT's Discrimination Complaint webpage, where forms and procedures are provided in multiple languages.

PVPC Response: The PVMPO's [Title VI website](#) and program content have been revised and updated to include Title VI Compliant Procedures in languages other than English. PVPC utilized the services of the [Edwin C. Gentzler Translation Center](#) at the University of Massachusetts (Amherst) for assistance with this task.

- 2) LEP Four-Factor Analysis and Language Access Plan (LAP): With future updates, PVMPO should address the following comments in its four-factor analysis and LAP.

Factor 2: PVPC should collect and report data to show the current frequency of contact with LEP populations. Methods for collecting this data may include surveying front-line staff, tracking requests for language assistance, reviewing website analytics, etc.

PVPC Response: PVPC implements a language request tracking procedure and surveyed frontline staff to gather information on the frequency and type of languages encountered. In 2024, the PVMPO surveyed Senior Administrative Assistants (frontline staff), and documented languages encountered. A copy of the survey is available on the PVMPO website.

In 2024 the PVMPO staff has begun working on using website analytics to identify language preferences. Currently our efforts have not yielded satisfactory results, however recently we have secured advanced website services to assist staff in working on this effort and creating a more robust analysis methodology. We would welcome feedback on the experiences of other MPOs or MassDOT to capitalize on the opportunity to use website information to prioritize resources around language preferences.

- Factor 4: PVPC should perform an analysis of the current cost of providing language assistance services and determine whether funding has been sufficient for addressing the needs of LEP populations.

PVPC Response: In 2024 PVPC monitored the costs for language translations and for posting meeting notices and agendas in Spanish newspapers. As we expand EJ efforts that engage a wider audience in planning projects, we anticipate a greater need for translation services and will continue to monitor the need for language resources.

- Language Access Plan:

o PVPC should include a training program that details the frequency of staff training on working with LEP populations, and tools available to staff for providing language services.

PVPC Response: PVPC seeks out opportunities for individualized staff training on Title VI. In 2024 PVPC's Principal Planner Carl Jackson attended the USDOT Civil Rights Training Summit: "Revitalizing Civil Rights for the 21st Century" in Washington, DC (April 10-12th). The conference training covered important topics including the new DBE rule, using Title VI to advance Environmental Justice, program updates from Title VI and ADA practitioners, and updates from modal leadership at DOT. PVPC accrued \$860.67 in direct travel expenses related to the training.

In 2024, six staff members completed “Healing Racism” training. The Healing Racism Institute of Pioneer Valley provides an in-person two-day training that covers the impact of racism. All PVPC staff complete this training. The institute’s website: <https://www.healingracismpv.org/>

In 2024, PVPC registered for the National Transit Institute’s in-person course (January 27-28, 2025) on Environmental Justice at the U.S. DOT Volpe Conference Center in Cambridge, MA. This two-day course provides a comprehensive review of Environmental Justice requirements for federal transit projects, and how these requirements affect transportation decision-making. The course includes a summary of the evolution of Environmental Justice requirements, a discussion of the definition of Environmental Justice, the application of Environmental Justice in different contexts and project scales, and a look ahead to what Environmental Justice may entail for the future.

Participants will learn how to integrate Environmental Justice considerations throughout the project life cycle including planning, project development, National Environmental Policy Act (NEPA) environmental review processes, design, construction, and operation. Through a combination of lectures, case studies, scenarios, and class activities, participants explore the evolving expectations around Environmental Justice, and the relationship of Environmental Justice to advancing more equitable transportation outcomes. Class materials and discussions will focus on examples of best practices and lessons learned using real project examples and experiences.

Course Objectives

- Define Environmental Justice requirements.
- Assess when and how Environmental Justice requirements apply.
- Evaluate the types of impacts and benefits
- Identify approaches in the project life cycle for considering EJ.
- Meaningfully engaging the public in the assessment of EJ considerations.

Note: FTA has rescheduled this training for January 27-28, 2025

PVPC is an active member of the Government Alliance on Race and Equity (GARE). PVPC’s GARE membership provides staff access to a peer network of racial equity practitioners working in local, regional, and state government in over 400+ member jurisdictions. GARE staff curate events and peer-to-peer learning opportunities. The GARE Online Community, and exclusive GARE member tools and resources like the GARE Learning Center, and Racial Equity Insight have been great resources.

In 2024 the PVMPO launched Vulnerable Road User Study in Springfield. Designed to address rising injuries and fatalities of pedestrians, bicyclists, and

other vulnerable populations, PVPC included EJ-related initiatives from the Public Participation Plan to expand outreach. Staff dedicated resources to attend community meetings used the MassDOT Engage tool to identify language challenges and contacted community members to find the best times and places to reach the intended audience in an impactful way. Outreach included community groups connected to the neighborhood such as WalkBike Springfield, Safe Routes to School, Walk Boston, MassBike, South End Neighborhood Council, Springfield DPW, Parks Department, and the Springfield Mass-in-Motion coordinator. In addition to a walk audit, PVPC staff employed visual aids to improve communication of complex traffic concepts, including traffic cameras, visual rendering, and drone video. Meeting notices/agendas included offers to provide language translation.

In November 2024, three staff members (Principal Planner Carl Jackson, Deputy Director Ken Comia, and Data Analyst Jacob Tilsch) attended Southern New England APA Conference (SNEAPA) and participated in a conference session where municipal and regional governments shared ideas on how to create a welcoming, and inclusive workplace.

Speakers included:

Esther Rose-Wilen City of New Haven, City Plan Department
Abdul-Razak Zachariah, City of Boston - Planning Department
Stephanie Camp, AICP, South Central Region Council of Governments
Andrew Thomas, AICP, MRP, South Central RCOG
Alexander Castro, City of New Haven - City Plan Department

- 3) Subrecipient Monitoring Procedures: It is MassDOT's understanding that PVPC does not currently have active subrecipients. However, it is still recommended that the MPO have subrecipient monitoring procedures in place if this changes. Having these monitoring procedures is a requirement under Title VI and is something that MassDOT and our federal partners may confirm during compliance monitoring activities. Future updates to the program should include these procedures, and ODCR is happy to provide examples upon request.

PVPC Response: Subrecipient Monitoring Procedures have been included and this information is available on the [website](#). ODCR is correct that the PVMPO currently does not have active subrecipients.

- 4) Board/Organization Head Approval: PVPC has not submitted Title VI Plan approval documentation. To meet this requirement, PVPC should submit a letter signed by the Executive Director, demonstrating awareness and approval of the program.

PVPC Response: Approval of the Title VI Program by the MPO Governing Board has been uploaded to the [PVMPO website](#) and documented as an appendix item in the 2024 Annual Report to MassDOT (see attached). PVPC has also included the signed FTA assurances for 2024.

- 5) Title VI Coordinator Confirmation of Compliance with Title VI: Future updates of the program should include further details on how the Title VI Coordinator confirms compliance with Title VI throughout PVPC's transportation planning activities. This may include conducting/reviewing equity analyses, meeting with staff to discuss project impacts on underserved communities, sharing strategies for inclusive outreach, etc.

PVPC Response: The distribution of federal and state funding by the municipality is highlighted in the TIP documentation as shown in this link: [2024-2028 TIP by Municipality](#)

The PVMPO staff also monitors and evaluates the distribution of state and federal funding through the region's Transportation Improvement Program. This analysis shown in the included table is part of the annual TIP update. A map for this TIP data is also available through the following link: [PVPC Transportation Improvement Projects \(arcgis.com\)](#).

In 2024 the [Unified Planning Work Program](#) (UPWP) included an analysis of the distribution of planning tasks by community. This allows the staff to seek out involvement from communities that may not have actively participated in the MPO's planning initiatives in the past.

In 2024 PVPC staff started work on a new initiative to ensure that every planning project would follow a scoping process that would review opportunities for expanded public engagement and a more comprehensive approach to addressing equity. While this initiative is in the preliminary stage we have introduced staff to the [REJ-Plus](#) data and to the revised [MassDOT Engage](#) tool. The goal is to have these discussions early in the development and scoping process for planning studies.

- 6) With the goal of streamlining how Title VI information is shared and received, ODCR has recently developed SHARE (Subrecipient Hub and Resource Exchange), a SharePoint page designed to provide MPOs with the most up-to-date Title VI information, templates, data tools, etc. Additionally, the page has a built-in discussion board that allows MPOs to pose and answer questions, providing an avenue for the sharing of best practices and problem-solving. Access to the site can be requested by completing the SHARE Access Request Form.

PVPC Response: PVPC staff would like to acknowledge the new [MassDOT Title VI SharePoint](#) resource. The SharePoint site helped staff in seeking documentation for the PVMPO's 2024 Annual Report and staff submitted suggestions to the discussion board. The SharePoint data resources identify neighborhood characteristic in planning projects, including the Screening Tool for Equity Analysis of Project (STEAP), Climate and Economic Justice Screening Tool, and the USDOT Equitable Transportation Community (ETC) Explorer. These are a welcome addition, and we hope the resource affords more opportunities for sharing resources among MPO/RPAs in the future. (note: in 2024 PVPC staff posted to the MassDOT Title VI SharePoint Discussion forum)

The PVPC MPO will continue to work with our federal and state partners to advance Title VI initiatives. If you have any questions or need clarification, please contact me.

Sincerely,

Gary M. Roux
Principal Planner/ Transportation Manager

cc: Kimberly Robinson, PVPC
Chris Klem, MassDOT
Dana Roscoe, PVPC

Attachment: Pioneer Valley Metropolitan Planning Organization's 2024 Title VI Annual Report to MassDOT as a subrecipient.