

**Connecticut
Department of Transportation
2011
FTA Title VI Program**

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Section I
Title VI Overview and Title VI
Mandate

CONNECTICUT DEPARTMENT OF TRANSPORTATION

I. Transit Overview and Title VI Mandate

The information contained in this report is the Connecticut Department of Transportation's (Department) Title VI Plan for October 1, 2011 to April 1 2014. The Title VI Plan has been prepared in compliance with requirements set forth in U.S. Department of Transportation Federal Transit Administration (FTA) Circular 4702.1A of May 13, 2007, "Title VI, and Title VI-Dependent Guidelines for Federal Transit Administration recipients."

The mission of the Bureau of Public Transportation at the Department is for the development, maintenance, and operation of a safe and efficient system of motor carrier and rail facilities for the movement of people and goods, such as bus transit, rail operations, and ridesharing programs.

The Department supports a variety of alternatives to driving alone, including express and local buses, two rail lines, a statewide vanpool system and other services to reduce traffic congestion and improve mobility in Connecticut and throughout the region.

Commuter Rail

The commuter rail network in Connecticut includes the New Haven Line (NHL) and Shore Line East (SLE) services. The NHL is a commuter rail service, owned by Connecticut, which operates between New Haven, Connecticut, and Grand Central Terminal in New York City. In 1985, the Department entered into a three-party service agreement with the New York Metropolitan Transportation Authority (MTA) and Metro-North Railroad (MNR) that provides for operation of NHL service by MNR. The service agreement, referred to as the Amended and Restated Service Agreement (ARSA), also details the cost-sharing arrangement between the Department and MTA MNR.

The NHL is primarily a four-track main line railroad and includes the Main Line and three branch lines. The Main Line includes 73 linear miles between New Haven, Connecticut and Grand Central Terminal, New York (47 of the miles are in Connecticut between New Haven and Greenwich). The 19 Main Line stations in Connecticut include New Haven – State Street, New Haven - Union Station, Milford, Stratford, Bridgeport, Fairfield, Southport, Green's Farms, Westport, East Norwalk, South Norwalk, Rowayton, Darien, Noroton Heights, Stamford, Old Greenwich, Riverside, Cos Cob, and Greenwich. The entire Main Line has an overhead catenary system that provides the primary source of power for over 90 percent of the trains that operate in the daily service.

The Waterbury Branch Line includes 27 miles between Waterbury and Devon (Milford). The six stations on the line include Waterbury, Naugatuck, Beacon Falls, Seymour, Ansonia, and Derby/Shelton. Connecting service is at Bridgeport Station. The Danbury Branch Line includes 24 miles between Danbury and Norwalk. The seven stations on the line include Danbury, Bethel, Redding, Branchville, Cannondale, Wilton, and Merritt 7. Connecting service is at Stamford Station. The New Canaan Branch Line includes 8 miles between New

Canaan and Stamford. The four stations on the line include New Canaan, Talmadge Hill, Springdale, and Glenbrook. The New Canaan Branch is the only electrified branch line. Connecting service is at Stamford Station.

The NHL service in 2010 (Main Line and branch lines) consisted of 289 weekday trains, 178 Saturday trains, and 148 Sunday and holiday trains with the majority of the ridership heading to Stamford or further west into New York City. There were 37,323,761 annual passenger trips¹ and 24,828,201 Connecticut interstate and intrastate passenger trips². In 2010, the total passenger miles were 1,195,080,324 and Connecticut interstate and intrastate passenger miles were 977,233,188.

The Department owns the main line track from the New York state border to New Haven, the branch line tracks, maintenance facilities, most stations, and over 60 percent of the equipment. Equipment in service on the NHL as of September 2011 consists of 367 Multiple-Unit Electric Cars (213 Connecticut owned), 40 push-pull coaches, 10 Cab control cars, and 10 locomotives. The infrastructure includes station buildings, platforms, tracks, communications, and the railroad's power system (substations, catenary, and signalization). Rail yards and equipment maintenance facilities are located in New Haven, East Bridgeport, Stamford, and Danbury and a warehouse is located in Springdale. Under the ARSA, MNR maintains the right-of-way, maintenance facilities, and the equipment. The Department uses FTA assistance to upgrade the right-of-way, build and rehabilitate the maintenance facilities, and purchase the equipment.

Shore Line East (SLE) is a commuter rail service between New London and New Haven that is owned by Connecticut and operated by Amtrak under a service agreement with the Department. The SLE service in 2010 consisted of 26 daily weekday trains (16 between Old Saybrook and New Haven and 10 between New London and New Haven) and 4 through service trains to Bridgeport and Stamford on the NHL. Since April 2008, SLE multi-ride ticket holders have been able to ride on six Amtrak trains between New Haven and New London. The Department began special SLE weekend service in 2007 and since July 2008, has operated weekend and holiday service consisting of 16 trains on Saturdays, Sundays, and holidays. In 2010, SLE service totaled 585,218 annual passenger trips and 12,559,194 passenger miles.

Amtrak owns the right-of-way on the 50 miles of the Northeast Corridor (NEC) between New London and New Haven. The stations on SLE include New Haven – Union Station, New Haven - State Street, Branford, Guilford, Madison, Clinton, Westbrook, Old Saybrook, and New London. The Department also owns or leases parking at most of the stations.

The Department owns the equipment that is provided for the service and Amtrak provides the train crews and performs all associated maintenance and mechanical functions. Equipment in service on SLE as of September 2011 consists of 23 push-pull coaches, 10 Cab control cars, and 14 diesel locomotives. The Department's contract with Amtrak provides for the maintenance of equipment by Amtrak in a Department-funded car and

¹ This figure includes New York passenger trips.

² This figure only includes Connecticut passenger trips.

diesel shop. With FTA assistance, the Department has constructed new stations at Branford, Guilford, Madison, and Clinton and plans to construct a new station at Westbrook.

Bus Service

Urban Transit Services

The State-owned bus services are labeled as Connecticut Transit (CTTransit) and consist of eight operating divisions operated under contract by four separate entities. In all divisions, the bus fleets are State-owned and the services are subject to State control, with oversight provided by the Office of Transit and Ridesharing (OTR) within the Bureau of Public Transportation.

The Hartford Division consists of 30 fixed routes, four limited stop “flyers” and 12 express commuter routes consisting of 237 buses and serving 27 towns, and managed by HNS Management Inc. under contract to the Department. The rolling stock, garage, and office facilities are State-owned as are all permanent fixtures within. The division also includes 9 express bus routes operated by four private companies under contract to the Department.

In State Fiscal Year 2008, the division provided 546,469 hours of service, covering 7,233,127 miles and providing 13,828,693 passenger trips.

Complementary ADA paratransit services for the Hartford system are performed by the Greater Hartford Transit District under contract to the Department.

The New Haven Division consists of 17 fixed bus routes and 2 shuttles. Consisting of 110 buses and serving 19 towns, the division is managed by HNS Management Inc. under contract to the Department. In State Fiscal Year 2008, the division provided 316,019 hours of service, covering 3,566,461 miles and providing 8,598,344 passenger trips. The rolling stock, garage, and office facilities are State-owned as are all permanent fixtures within. Complementary ADA paratransit services for the New Haven system are performed by the Greater New Haven Transit District under contract to the Department.

The Stamford Division consists of 14 local bus routes, 4 rail shuttles and one express commuter route. Consisting of 54 buses and serving 4 Connecticut towns, the division is managed by HNS Management Inc. under contract to the Department. In State Fiscal Year 2008, the division provided 123,300 hours of service, covering 1,337,029 miles and providing 3,142,743 passenger trips. The rolling stock, garage, and office facilities are State-owned as are all permanent fixtures within. Complementary ADA paratransit services for the Stamford system are performed by the Norwalk Transit District under contract to the Department.

The Waterbury Division consists of 22 fixed routes as well as Access to Jobs and several industrial tripper routes. Consisting of 36 buses and serving 5 towns, both fixed route and complementary ADA paratransit operations are performed by North-East Transportation Company of Waterbury under contract to the Department. In State Fiscal Year 2008, the division provided 68,606 hours of service covering 899,380 miles and providing 1,391,994 passenger trips. The garage and office facilities are leased by Northeast. The rolling stock and most operating assets within the maintenance and storage facility are owned by the Department.

The New Britain Division consists of 11 fixed routes, plus one route jointly operated by the Hartford and New Britain divisions. The New Britain division services are operated by two private operating companies, New Britain Transportation Company and DATTCO, Inc., under contract to the Department. A combined total of 20 buses are utilized in serving 4 towns. Complementary ADA paratransit service for the New Britain system is provided by the Central Connecticut Regional Planning Agency under contract to the Department. In State Fiscal Year 2008, the division provided 50,077 hours of service, covering 774,797 miles and providing 722,988 passenger trips. The facilities are privately owned by the respective companies. The rolling stock is owned by the State.

The Meriden Division consists of 3 fixed routes and is operated contract by North-East Transportation Company under contract to the Department, utilizing 3 buses. In State Fiscal Year 2008, the division provided 9,888 hours of service, covering 158,700 miles and providing 164,452 passenger trips. The complementary ADA paratransit service is also provided by North-East, with both services utilizing the leased facilities in Waterbury.

The Bristol Division consists of one fixed route, and is operated by New Britain Transportation Co. under contract to the Department utilizing one bus. In State Fiscal Year 2008, the division provided 5,485 hours of service, covering 72,941 miles and providing 39,280 passenger trips. The complementary ADA paratransit service for the system is provided by Central Connecticut Regional Planning Agency under contract to the Department.

The Wallingford Division consists of one route, operated by North-East Transportation Co., under contract to the Department. North-East also operates the complementary ADA paratransit service for the division. The route utilizes one bus, and in State Fiscal Year 2008, the division provided 2,223 hours of service covering 40,664 miles and providing 15,420 passenger trips. In SFY 2011, using NFP funds, a new service was implemented between Waterbury and the Wallingford Gaylord Rehabilitation Center.

Rural Transit Services

The OTR oversees the funding and operations of five subrecipient Rural Transit Districts under the Section 5311 Program.

Estuary Transit District (ETD) provides Shoreline Shuttle service, Riverside Shuttle service and Transit-on-Call service. Shoreline Shuttle service began in 1996 and runs along Route 1 between the towns of Madison and Old Saybrook connecting with the CTTransit "S" route for continued service into New Haven. Riverside Shuttle service provided since 2005 along Route 154 from Chester to Old Saybrook connects with the Shoreline Shuttle service. Both services are off route and meet ADA requirements. The District has provides Transit-on-Call service through the nine towns of Chester, Clinton, Deep River, Essex, Killingworth, Lyme, Old Lyme, Old Saybrook, and Westbrook. Since the last update in 2009, the District has added out-of-district services to New London funded with State funds (Governor's Service Initiative) and Middletown, funded by New Freedom..

Middletown Transit District (MTD) provides rural transit service (Route 'F') from Middletown to Portland and East Hampton, Route 'G' from Middletown to Durham and

ADA services to the towns of Middletown, Durham, Middlefield, Portland and East Hampton. In addition, MTD currently runs two Job Access and Reverse Commute (JARC) program routes serving the cities of Middletown, Meriden, and Cromwell.

Northeastern Connecticut Transit District (NECTD) was established in 1979 and serves the towns of Brooklyn, Killingly, Putnam, and Thompson with deviated fixed route service. Dial-a-Ride service is provided to the towns of Eastford, Woodstock, and Pomfret. NECTD contracts with the Northeastern Connecticut Council of Governments (NECCOG) for administration, operation oversight, and dispatching services.

Northwestern Connecticut Transit District (NWCTD) was formed in 1987 and provides services to a sixteen-town region. The Candystriper is a Local Bus service (Deviated Flexible Route service) available weekdays in Torrington, Winsted, and Litchfield, and is operated by Nason Partners under contract with Northwestern Connecticut Transit District. The Rural Transit Dial-A-Ride service is a curb-to-curb paratransit service provided by NWCTD and is available to people in the sixteen towns throughout Northwest Connecticut. NWCTD provides transportation funded with JARC program funds since 1999.

Windham Region Transit District (WRTD) was formed in 1979; it operates two rural fixed route bus services, a demand response service and ADA service. The Storrs/Willimantic bus route operates along Route 195 to link Mansfield/Storrs with Windham/Willimantic. The Willimantic 'City Bus' route serves east/west Willimantic and southern Mansfield. JARC funds subsidize service enhancements to the Storrs/Willimantic bus route since 2001.

Title VI Mandate

The Department will effectuate and ensure full compliance with the provisions of Title VI of the Civil Rights Act of 1964, as amended (referred to as Title VI), 49 CFR Part 21, and 23 CFR Part 200, and related statutes and regulations in all Department programs and activities. Specifically Title VI provides that "no person in the United States shall, on the ground of race, color, national origin, sex, age, or disability 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" from the United States Department of Transportation.

In addition, the MTA, specifically MNR, submits a Title VI report to the FTA, which includes the NHL service in Connecticut. The Department reviews the contents of MTA MNR's portion of the Title VI program that reports on the NHL service in Connecticut and monitors their activities in Connecticut. The Department references MTA MNR's Title VI Triennial Submissions throughout this document.

II. General Requirements

The Department's 2009 Title VI Submission meets all the requirements of FTA Circular 4702.1A as it relates to the General Reporting Requirements.

a. Assessment of Compliance

The Department has provided an assessment of compliance that includes a summary of the equity finding of each section of the Department's 2008 Title VI submission. If an inequity has been identified, the analysis includes either a corrective action or a reason why the inequity is justifiable. (Please see Section II)

b. Certifications and Assurances

The Department incorporates the FTA Civil Rights Assurance in the Annual Certifications and Assurances submitted at the beginning of each Federal Fiscal Year to FTA through the Transportation Electronic Award and Management (TEAM) system. The Department annually executes contracts with its subrecipients that contain the appropriate nondiscrimination assurance. The Commissioner's Certification is contained in Section III.

c. Complaints and Lawsuits

The Department has developed procedures for investigating and tracking Title VI complaints filed against the Department. The procedures for filing a complaint are available to the public upon request. The Department will maintain a list of any Title VI investigations, complaints, or lawsuits filed with the agency.

During this reporting period, there were no known investigations, complaints, or lawsuits naming the Department that allege discrimination based on race, color, or national origin with respect to service or other transit benefits.

MNR also maintains a list of Title VI investigations, complaints, or lawsuits that include the NHL service. This information is contained in their most recent Title VI Program Submission.

The Department's copy of procedures for tracking, investigating, and filing a Title VI complaint is contained in Section IV.

d. Notifying Beneficiaries of Protection under Title VI

A Title VI Policy Statement has been developed that provides a description of the procedures that members of the public can follow in order to request additional information on the Department's nondiscrimination obligations. The Department notifies beneficiaries of their rights under Title VI and the procedures the public may follow to file a discrimination complaint on the Department's website www.ct.gov/dot under Civil Rights and Accessibility. The Title VI protections are also posted on bulletin boards throughout the agency and will be posted in public transportation areas.

The Department is currently conducting a follow-up to the 2009 Title VI review of subrecipients/grantees. The notice was sent to FTA subrecipients on August 23, 2011. This packet included a Title VI Information Packet was developed to inform subrecipients/grantees of the Department's obligations under Title VI and their responsibilities as a subrecipient/grantee.

All subrecipients are required to post their Title VI policies and complaint process on their websites. Subrecipients will also be directed and required to document their efforts to ensure LEP persons have the ability to participate in their programs and activities. The Department's policy and process for filing a Title VI complaint is contained on the Shore Line East website www.shorelineeast.com/riding_sle/faq/faq_gen.php#7. MTA MNR notifies beneficiaries of their rights under Title VI on their website <http://www.mta.info/nyct/rules/titlevi.htm>. Additional Title VI notifications procedures are

reported in MNR's Title VI Program Submission. A link to the policies of the Department can be found on the front page of the CTTransit website at www.CTTransit.com.

A copy of the Department's policy to notify beneficiaries of their protection under Title VI is contained in Section VI.

e. Promoting Public Participation (Information Dissemination)

The Department and its contractors have undertaken public outreach and involvement activities to ensure that minority and Limited English Proficiency (LEP) persons had meaningful access to programs, services, and information. The Department has a policy that adheres to Title VI requirements. The Department provides numerous opportunities for the public to be involved in the identification of impacts of proposed transportation decisions.

English is the predominant language in Connecticut with Spanish being the second most frequently spoken language. The Department makes efforts to notify the English and non-English speaking public about transportation services and other programs. MNR also provides Spanish language translations when appropriate and reports on these activities in their Title VI Triennial Program Submissions.

The Department has developed a *Public Involvement Guidance Manual* that includes TIPS for reaching out to low-income, minority, and LEP populations as outlined in the Circular. The public review and comment period is pending on this draft document. The draft document is available upon request from the Department.

The Department has also developed *Pubic Involvement Procedures* that establish a proactive public involvement process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement of the public in developing plans and transportation improvement programs. This includes communities affected by Title VI, Executive Order 12898 (Environmental Justice), and individuals with Limited English proficiency. The draft document is available upon request from the Department.

The Connecticut General Assembly has established three advisory committees to provide input on transportation services, programs, and services. Information on the advisory committees is contained in Section V.

The description of the steps the Department and its contractors have taken to promote public participation and examples of the information that is disseminated are contained in Section V.

f. Pending Applications for Financial Assistance

The listing of pending applications for financial assistance is contained in Section VII.

g. Analysis of Construction Projects

Detailed evaluations for these projects are contained in Section VIII.

III. Program Specific Requirements for Recipients Serving Large Urbanized Areas

The Department's 2011 Title VI Submission meets all the requirements of FTA Circular 4702.1A as it relates to Program Specific Requirements for Recipients Serving Large Urbanized Areas.

a. Bus System-Wide Service Standards and Policies

The Department has developed system-wide bus service standards and policies that address key characteristics of service level and service quality for the state-owned CTTransit bus system. These standards and the policies are presented in the CTTransit Service Guidelines, June 2009 Report that is contained in Section IX.

b. Rail System-Wide Service Standards and Policies

The Department has developed system-wide rail service standards and policies that are contained in Section X.

c. Evaluation of Service and Fare Changes

The Department evaluates system-wide service and fare changes and proposed improvements at the planning and programmatic stages to determine whether those changes have a discriminatory impact.

An analysis of the impacts of any significant service and fare changes is performed in compliance with Title VI requirements in Section XI.

d. Demographic and Service Profile Maps and Charts

The Department has prepared Minority, Limited English Proficiency (LEP) and Poverty demographic maps and charts using the latest available data from the decennial census and 2005 American Community Survey. The base mapping by census tract and associated data charts were compiled using the Department's Geographic Information System (GIS) using statewide, bus and rail service areas aggregates.

The rail service area for MNR, NHL, SLE, and Amtrak were defined as a 2.5-mile radius around each rail station.

The bus service area was defined as a ¼-mile band along each bus route, a 2.5 mile buffer around each express bus stop for CTTransit and the area contained by the towns served by the rural transit districts.

Additionally mapping supporting the 5310 and 5316 (Job Access) programs were produced with low income/poverty and minority concerns. (See Section XII)

e. Monitoring Transit Service

The Department monitors the transit services throughout the service areas to compare the level of service provided to minority areas with service provided in other areas. The Department has developed a new level of service and quality of service monitoring process.

The Department is proposing a monitoring methodology that combines “quality of service” and customer survey analyses, as outlined in the FTA Circular. Methodologies vary by mode. The process begins with a comparison of the quality of service and then considers the equity service policies/standards and practices associated with the distribution of amenities, vehicles and security.

If differences exist in any of these factors along the trips to any of the destinations analyzed, the Department will determine whether the differences are significant. If significant disparities in one or more quality of service indicators are confirmed, the Department will determine why the disparity exists and take corrective action to correct the disparity.

Please see Section XIII for the proposed new monitoring methodology.

IV. Program Specific Requirements for State Departments of Transportation

The Department’s 2011 Title VI Submission meets all the requirements of FTA Circular 4702.1A as it relates to Program Specific Requirements for State Departments of Transportation.

1. Statewide Transportation Planning

The Department’s statewide planning process complies with Title VI. A copy of the procedures is contained in Section XIV.

2. Program Administration, Monitoring of Subrecipients, and Assistance to Subrecipients

The Department notifies subrecipients of federal funds for the 5307, 5310, 5311, 5316 and 5317 programs on the requirement to comply with Title VI. The brochure and Title VI policy statement are sent to all subrecipients. The Department then utilizes the Compliance Assessment document to monitor subrecipients.

The Department is currently conducting a follow-up to the 2009 Title VI review of subrecipients. The notice along with the assessment survey was sent to FTA subrecipients/grantees on August 23, 2011, and must be submitted to the Department by September 26, 2011. (See Section XV)

Section II

Assessment of Compliance

ASSESSMENT OF COMPLIANCE

The following is a summary of findings for each key section of the Department's Title VI submission.

Analysis of Construction Projects (Capital Program)

Copies of the following Environmental Assessment (EA) documents are included the "Analysis of Construction Projects" (Section VIII):

- New Haven Rail Maintenance Facility Improvements EA (State Project No. 301-0088)
- Norwich Intermodal Transportation Center EA (State Project No. 103-245) – EA was initially approved in 2007; a reevaluation was submitted and approved in 2008.

Draft documents are currently being prepared for the following Projects:

- Orange Railroad Station EA (State Project No. 106-120)
- New Haven-Hartford-Springfield Rail EA (State Project No. 170-2296)
- Danbury Branch Improvement Program Environmental Impact Statement (State Project No. 302-008)

Monitoring System-Wide Service Standards

Transit:

The Department Title VI Coordinator and the Public Transportation Title VI Liaison Officer will work with CT Transit to ensure that their service standards and guidelines do not create an adverse impact. A "Level of Service" survey will be conducted in the fall of 2011, and a report of findings will be completed and submitted to FTA by October 31, 2011. If the review shows that prior decisions have resulted in disparate impacts, the Department will develop corrective measures to address and mitigate any impacts.

Rails:

Monitoring Service and Fare Changes

Notice to Beneficiaries

The Department is currently conducting a follow-up to the 2009 Title VI review of subrecipients. The notice was sent to FTA subrecipients on August 23, 2011.

In 2010 the Department conducted Title VI training specifically targeted to subrecipients. This training covered their responsibilities under Title VI, the required assurances they are required to make, and the Title VI complaint process. The training was well received and will be offered again in the future.

Update to Title VI MPO Review

The Department has included the report of findings relative to the 2011 Title VI Process Review of MPOs. The review team which consists of personnel from the Bureau of

will follow the enhanced analysis, with particular attention being paid to major service changes.

Notice to Beneficiaries

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Update to Title VI MPO Review

The Department has included the report of findings relative to the 2011 Title VI Process Review of MPOs. The review team which consists of personnel from the Bureau of Policy and Planning and the Department's Title VI Coordinator will be meeting with the MPOs in the first quarter of 2012 to discuss the review findings, and to discuss corrective actions that must be implemented. This review was a follow-up to the review performed in 2004.

After reviewing the responses to the review, there appear to be some areas that are repetitive areas noncompliance; MPOs that do not have a Title VI complaint process or procedure; MPOs administering the Title VI program using Title VII guidance; MPOs that have not developed a LEP plan; MPOs only identifying larger LEP populations for consideration; and MPOs not having a process in place to monitor for program disparities or to determine if processes and procedures that may cause an adverse impact.

Other Information Required by FTA

Connecticut Department of Transportation Title VI Corrective Action Plan:

In March of 2011 the Department submitted a Corrective Action Plan to FTA to address deficiencies identified in the 2007 and 2010 Triennial and State Management Reviews; the FTA 2008 Title VI Review; and the 2009 Title VI submission. The Department has addressed the areas of concern as part of this document.

Section III
Certifications & Assurances

Section III
Certifications and Assurances
and
Title VI Policy Statement

APPENDIX B - FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS

1. **No Government Obligation to Third Parties** The STATE, the SECOND PARTY and its contractor/subcontractors in connection with the Work, acknowledge and agree that, notwithstanding any concurrence by the Federal Government in or approval of the solicitation or award of the underlying contract, absent the express written consent by the Federal Government, the Federal Government is not a party to this Agreement and shall not be subject to any obligations or liabilities to the STATE, the SECOND PARTY or its contractor/subcontractors, or any other party (whether or not a party to the Agreement) pertaining to any matter resulting from the underlying Agreement.

The SECOND PARTY agrees to include the above Article in each contract/subcontract financed in whole or in part with Federal assistance provided by FTA. It is further agreed that the Article shall not be modified, except to identify the contractor/subcontractor who will be subject to its provisions.

2. **Program Fraud and False or Fraudulent Statements and Related Acts**

a. The SECOND PARTY acknowledges that the provisions of the Program Fraud Civil Remedies Act of 1986, as amended, 31 U.S.C. §§ 3801 et seq. and U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR Part 31, apply to its actions pertaining to this Project. Upon execution of the underlying Agreement, the SECOND PARTY certifies or affirms the truthfulness and accuracy of any Statements it has made, it makes, it may make, or causes to be made, pertaining to the underlying Agreement or the FTA assisted project for which this Agreement work is being performed. In addition to other penalties that may be applicable, the SECOND PARTY further acknowledges that if it makes, or causes to be made, a false, fictitious, or fraudulent claim, statements, submission, or certification, the Federal Government reserves the right to impose the penalties of the Program Fraud Civil Remedies Act of 1986 on the SECOND PARTY to the extent the Federal Government deems appropriate.

b. If applicable, the SECOND PARTY also acknowledges that if it makes, or causes to be made, a false, fictitious, or fraudulent claim, statement, submission, or certification to the Federal Government under an agreement connected with a project that is financed in whole or in part with Federal assistance originally awarded by FTA under the authority of 49 U.S.C. § 5307, the Government reserves the right to impose the penalties of 18 U.S.C. § 1001 and 49 U.S.C. § 5307(n)(1) on the SECOND PARTY, to the extent the Federal Government deems appropriate.

c. If applicable, the SECOND PARTY agrees to include these two sections in each subcontract financed in whole or in part with Federal assistance provided by FTA. It is further agreed that the sections shall not be modified, except to identify the contractor/subcontractors who will be subject to the provisions.

3. **Access to Records and Reports** If applicable, the SECOND PARTY agrees to provide the STATE, the FTA Administrator or his authorized representatives, including any PMO Contractor, access to the SECOND PARTY's records and construction sites pertaining to a major capital project, defined at 49 U.S.C.5302(a)1, which is receiving federal financial assistance through the programs described at 49 U.S.C. 5307, 5309, 5311, 5316 or 5317. By definition, a major capital project excludes contracts of less than the simplified acquisition threshold currently set at \$100,000.

The SECOND PARTY shall make available records related to the Agreement to the STATE, the Secretary of Transportation, and the Comptroller General or any authorized officer or employee of any of them for the purposes of conducting an audit and inspection.

APPENDIX B - FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS

The SECOND PARTY agrees to permit any of the foregoing parties to reproduce by any means whatsoever or to copy excerpts and transcriptions as reasonably needed.

The SECOND PARTY agrees to maintain all books, records, accounts and reports required under this Agreement for a period of not less than three (3) years after the date of termination or expiration of this Agreement, except in the event of litigation or settlement of claims arising from the performance of this Agreement, in which case the SECOND PARTY agrees to maintain same until the STATE, the FTA Administrator, the Comptroller General, or any of their duly authorized representatives, have disposed of all such litigation, appeals, claims or exceptions related thereto. Reference 49 CFR 18.39(i)(11).

4. **Federal Changes** If applicable, the SECOND PARTY agrees to comply, at all times, with all applicable FTA regulations, policies, procedures and directives, including without limitation those listed directly or by reference in the Master Agreement between the STATE and FTA, as they may be amended or promulgated from time to time until such time as all work described in the Scope of Services under this Agreement, is completed. The SECOND PARTY's failure to so comply shall constitute a material breach of this agreement.
5. **Civil Rights Requirements** As a condition to receiving federal financial assistance under the Agreement, if any, the SECOND PARTY shall comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d - 2000d-7), all requirements imposed by the regulations of the United States Department of Transportation (49 CFR Part 21) issued in implementation thereof, and the **Title VI Contractor Assurances** attached hereto, all of which are hereby made a part of this Agreement.
6. **Special Provisions Disadvantaged Business Enterprises** The SECOND PARTY hereby acknowledges and agrees to comply with "**Agreements With Goals Special Provisions Disadvantaged Business Enterprises as Subcontractors and Material Suppliers or Manufacturers For Federal Funded Projects**" dated October 16, 2000, attached hereto and hereby made a part of this Agreement.
7. **Incorporation of Federal Transit Administration (FTA) Terms** The preceding provisions include, in part, certain Standard Terms and Conditions required by U.S. DOT, whether or not expressly set forth in the preceding terms and conditions. All contractual provisions required by U. S. DOT, as set forth in FTA Circular 4220.1F are hereby incorporated by reference. Anything to the contrary herein notwithstanding, all FTA mandated terms shall be deemed to control in the event of a conflict with other provisions contained in this Agreement. The contractor/subcontractors shall not perform any act, fail to perform any act, or refuse to comply with any of the STATE's requests which would cause the STATE to be in violation of the FTA terms and conditions.
8. **Suspension or Debarment** That suspended or debarred Contractors, consulting engineers, suppliers, materialmen, lessors or other vendors may not submit proposals for a STATE contract or subcontract during the period of suspension or debarment regardless of their anticipated status at the time of contract award or commencement of work.
 - a. The signature on the Agreement by the SECOND PARTY shall constitute certification that to the best of its knowledge and belief the SECOND PARTY or any person associated therewith in the capacity of owner, partner, director, officer, principal investigator, project director, manager, auditor or any position involving the administration of Federal or STATE funds:

APPENDIX B - FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS

- 1) Is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by Federal department or agency; and
- 2) Has not, within the prescribed statutory time period preceding this Agreement, been convicted of or had a civil judgment rendered against him/her for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction, violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false Statements, or receiving stolen property; and
- 3) Is not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State or local) with commission of any offenses enumerated in paragraph a. 2) of this certification; and
- 4) Has not within a five-year period preceding this Agreement, had one or more public transactions (Federal, State or local) terminated for cause or default.

b. Where the SECOND PARTY is unable to certify to any of the statements in this certification, the SECOND PARTY shall attach an explanation to this Agreement.

The SECOND PARTY agrees to insure that the following certification be included in each subcontract Agreement to which it is a party, and further, to require said certification to be included in any subcontracts, sub-subcontracts and purchase orders:

- 1) The prospective subcontractors, sub-subcontractors participants certifies, by submission of its/their proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency; and
- 2) Where the prospective subcontractors, sub-subcontractors participants are unable to certify to any of the statements in this certification, such prospective participants shall attach an explanation to this proposal.

9. **Buy America Requirements** If applicable, the SECOND PARTY shall include a notice of the "Buy America" provision in its equipment and construction contracts/subcontracts valued greater than One Hundred Thousand Dollars (\$100,000). These contracts/subcontracts must also include a "Buy America" certificate as set forth in Title 49, Part 661, revised October 1, 1998, the provisions of which are hereby incorporated herein by reference.

The SECOND PARTY shall obtain and submit to the STATE copies of all signed Buy America certifications, including Buy America certifications that may be required of its contractor/subcontractors if the dollar thresholds established by FTA are exceeded.

10. **Lobbying** Second Parties who apply or bid for an award of \$100,000 or more shall file the certification required by 49 CFR Part 20, "**Certification Regarding Lobbying**" attached hereto. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member

APPENDIX B - FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS

of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier shall also disclose the name of any registrant under the Lobbying Disclosure Act of 1995 who has made lobbying contacts on its behalf with non-Federal funds with respect to that Federal contract, grant or award covered by 31 U.S.C. 1352. Such disclosures are forwarded from tier to tier up to the recipient.

11. **Clean Air Requirements** If applicable, the SECOND PARTY agrees to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act, as amended, 42 U.S.C. §§ 7401 et seq. The SECOND PARTY agrees to report each violation to the STATE and understands and agrees the STATE will, in turn, report each violation as required to assure notification to the FTA and the appropriate EPA Regional Office.

The SECOND PARTY also agrees to include these requirements in each contract/subcontract exceeding \$100,000 financed in whole or in part with federal assistance provided by FTA.

12. **Clean Water Requirements** If applicable, the SECOND PARTY agrees to comply with all applicable standards, orders or regulations issued pursuant to the Federal Water Pollution Control Act, as amended, 33 U.S.C. 1251 et seq. The SECOND PARTY agrees to report each violation to the STATE and understands and agrees that the STATE will, in turn, report each violation as required to assure notification to the FTA and the appropriate EPA Regional Office.

The SECOND PARTY also agrees to include these requirements in each contract/subcontract exceeding \$100,000 financed in whole or in part with federal assistance provided by FTA.

13. **Contract Work Hours and Safety Standards Act**

(a) When applicable, the SECOND PARTY agrees to include provision in contracts with its contractor/subcontractors in carrying out the Work, which may require or involve the employment of laborers or mechanics, which shall not require nor permit any such laborer or mechanic in any workweek in which he or she is employed on such Work to work in excess of forty (40) hours in such workweek, unless such laborer or mechanic receives compensation at a rate not less than one and one-half times the basic rate of pay for all hours worked in excess of forty (40) hours in such workweek.

(b) In the event of any violation of the section set forth in paragraph (a) of this Article, any contractor/subcontractors responsible therefore shall be liable for the unpaid wages. In addition, contractor/subcontractors shall be liable to the United States for liquidated damages. Such liquidated damages shall be computed with respect to each individual laborer or mechanic, including watchmen and guards, employed in violation of the section set forth in paragraph (a) of this Article, in the sum of Ten Dollars (\$10.00) for each calendar day on which such individual was required or permitted to work in excess of the standard workweek of forty (40) hours without payment of the overtime wages required by the section set forth in paragraph (a) of this Article.

(c) The STATE upon its own action or upon written request of an authorized representative of the Department of Labor shall cause the SECOND PARTY to withhold or cause to be withheld, from any moneys payable by the SECOND PARTY on account of work performed for it by contractor/subcontractors under any such contract/agreement or any other Federal Contract/Agreement or any Federal contract with the same prime contractor, or any other federally-assisted contract subject to the Contract Work Hours and Safety Standards Act, which is held by the same prime contractor, such

APPENDIX B - FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS

sums as may be determined to be necessary to satisfy any liabilities of such contractor or subcontractor for unpaid wages and liquidated damages as provided in the section set forth in paragraph (b) of this Article.

(d) The SECOND PARTYs contractor/subcontractors shall insert in any contract/subcontract the sections set forth in paragraphs (a) and (b) of this Article and also a section requiring the contractor/subcontractors to include these sections in any lower tier contracts/subcontracts. The prime contractor shall be responsible for compliance by any subcontractor or lower tier subcontractor with the sections set forth in paragraphs (a) through (d) of this Article.

14. Transit Employee Protective Provisions

(1) The SECOND PARTY agrees to comply with applicable transit employee protective requirements as follows:

(a) General Transit Employee Protective Requirements To the extent that transit operations are involved, the SECOND PARTY agrees to carry out the transit operations work on the underlying Agreement in compliance with terms and conditions determined by the U.S. Secretary of Labor to be fair and equitable to protect the interests of employees employed under this Agreement and to meet the employee protective requirements of 49 U.S.C. A 5333(b), and U.S. DOL guidelines at 29 CFR Part 215, and any amendments thereto. These terms and conditions are identified in the letter of certification from the U.S. DOL to FTA applicable to the FTA Recipient's project from which Federal assistance is provided to support work on the underlying Agreement. The SECOND PARTY agrees to carry out that work in compliance with the conditions stated in that U.S. DOL letter. The requirements of this subsection (1), however, do not apply to any Agreement financed with Federal assistance provided by FTA either for projects for elderly individuals and individuals with disabilities authorized by 49 U.S.C. § 5310(a)(2), or for projects for nonurbanized areas authorized by 49 U.S.C. § 5311. Alternate provisions for those projects are set forth in subsections (b) and (c) of this section.

(b) Transit Employee Protective Requirements for Projects Authorized by 49 U.S.C. § 5310(a)(2) for Elderly Individuals and Individuals with Disabilities If the Agreement involves transit operations financed in whole or in part with Federal assistance authorized by 49 U.S.C. § 5310(a)(2), and if the U.S. Secretary of Transportation has determined or determines in the future that the employee protective requirements of 49 U.S.C. § 5333(b) are necessary or appropriate for the STATE and the public body subrecipient for which work is performed on the underlying Agreement, the SECOND PARTY agrees to carry out the Project in compliance with the terms and conditions determined by the U.S. Secretary of Labor to meet the requirements of 49 U.S.C. § 5333(b), U.S. DOL guidelines at 29 CFR Part 215, and any amendments thereto. These terms and conditions are identified in the U.S. DOL's letter of certification to FTA, the date of which is set forth Grant Agreement or Cooperative Agreement with the STATE. The SECOND PARTY agrees to perform transit operations in connection with the underlying Agreement in compliance with the conditions stated in that U.S. DOL letter.

(c) Transit Employee Protective Requirements for Projects Authorized by 49 U.S.C. § 5311 in Nonurbanized Areas If the Agreement involves transit operations financed in whole or in part with Federal assistance authorized by 49 U.S.C. § 5311, the SECOND PARTY agrees to comply with the terms and conditions of the Special Warranty for the Nonurbanized Area Program agreed to by the

APPENDIX B - FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS

U.S. Secretaries of Transportation and Labor, dated May 31, 1979, and the procedures implemented by U.S. DOL or any revision thereto.

(2) The SECOND PARTY also agrees to include the any applicable requirements in each subcontract involving transit operations financed in whole or in part with Federal assistance provided by FTA.

15. **Charter Bus Requirements** If applicable, the SECOND PARTY agrees to comply with 49 U.S.C. 5323(d) and 49 CFR Part 604, which provides that recipients and subrecipients of FTA assistance are prohibited from providing charter service using federally funded equipment or facilities if there is at least one private charter operator willing and able to provide the service, except under one of the exceptions at 49 CFR 604.9. Any charter service provided under one of the exceptions must be "incidental," i.e., it must not interfere with or detract from the provision of mass transportation.
16. **School Bus Requirements** If applicable, pursuant to 49 U.S.C. 5323(f) and 49 CFR Part 605, the SECOND PARTY may not engage in school bus operations exclusively for the transportation of students and school personnel in competition with private school bus operators unless qualified under specified exemptions. When operating exclusive school bus service under an allowable exemption, the SECOND PARTY may not use federally funded equipment, vehicles, or facilities.
17. **Drug and Alcohol Testing** As required by FTA regulations, "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations," at 49 CFR Part 655, subpart I, the SECOND PARTY certifies that it has established and implemented an anti-drug and alcohol misuse program, and has complied with or will comply with all applicable requirements of FTA regulations, "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations," at 49 CFR Part 655.
18. **Energy Conservation** If applicable, the SECOND PARTY and its contractor/subcontractors in connection with the Work will comply with, the mandatory standards and policies relating to energy efficiency which are contained in the State Energy conservation plan issued in compliance with the Energy Policy and Conservation Act, as amended, 42 U.S.C. 6321 et. seq.
19. **Recycled Products** The SECOND PARTY agrees to comply with all the requirements of Section 6002 of the Resource Conservation and Recovery Act (RCRA), as amended (42 U.S.C. 6962), including but not limited to the regulatory provisions of 40 CFR Part 247, and Executive Order 12873, as they apply to the procurement of the items designated in Subpart B of 40 CFR Part 247.
20. **Americans with Disabilities Act (ADA)** This Article applies to those Second Parties which are responsible for compliance with the terms of the Americans with Disabilities Act of 1990 (Act), Public Law 101-336. During the term of the Agreement the SECOND PARTY represents that it is familiar with the terms of this Act and that it is in compliance with the Act. Failure of the SECOND PARTY to satisfy this standard as the same applies to performance under this Agreement, either now or during the term of the Agreement as it may be amended, will render the Agreement voidable at the option of the STATE upon notice to the SECOND PARTY. The SECOND PARTY warrants that it will hold the STATE harmless and indemnify the STATE from any liability which may be imposed upon the STATE as a result of any failure of the SECOND PARTY to be in compliance with this Act, as the same applies to performance under this Agreement.

The SECOND PARTY agrees to comply with 49 U.S.C. § 5301(d), which states that the Federal policy that elderly individuals and individuals with disabilities have the same right as other individuals to use public

APPENDIX B - FEDERAL TRANSIT ADMINISTRATION (FTA) REQUIREMENTS

transportation services and facilities, and that special efforts shall be made in planning and designing those services and facilities to implement transportation accessibility rights for elderly individuals with disabilities.

21. **Privacy Act** If applicable, the SECOND PARTY agrees to comply with, and assures the compliance of its employees with, the information restrictions and other applicable requirements of the Privacy Act of 1974, 5 U.S.C. § 522a. Among other things, the SECOND PARTY agrees to obtain the express consent of the Federal Government before the SECOND PARTY or its employees operate a system of records on behalf of the Federal Government. The SECOND PARTY understands that the requirements of the Privacy Act, including the civil and criminal penalties for violation of that Act, apply to those individuals involved, and that failure to comply with the terms of the Privacy Act may result in termination of the underlying Agreement.

The SECOND PARTY also agrees to include these requirements in each contract/subcontract to administer any system of records on behalf of the Federal Government financed in whole or in part with Federal assistance provided by FTA.

22. **Grant Management Guidelines for Grantees and Third Party Contracting Guidelines** If applicable, the SECOND PARTY agrees that its contractor and subcontractors in connection with the Work will be governed by the rules and regulations of the Federal Transit Administration's "Grant Management Guidelines for Grantees - Circular 5010.1D" dated November 1, 2008. FTA Circular 5010.1D further refers to the Federal Transit Administration's "Third Party Contracting Guidelines", Circular 4220.1F" dated November 1, 2008, Rev. April 14, 2009.
23. **Code of Federal Regulations** If applicable, the SECOND PARTY shall ensure that all parties are in compliance with the audit requirements set forth in Title 48, Section 31 of the Code of Federal Regulations (CFR) and Title 23, Section 172 CFR, as revised, with retaining consultants.
24. **Preaward and Post Delivery Requirements** If applicable, the SECOND PARTY agrees to comply with the requirements of 49 U.S.C. § 5323(m) and FTA regulations, "Pre-Award and Post-Delivery Audits of Rolling Stock Purchases," 49 CFR Part 663 and any amendments thereto.
25. **Bus Testing Requirements** If applicable, the SECOND PARTY agrees to comply with the requirements of 49 U.S.C. § 5318(e) and FTA regulations, "Bus Testing," 49 CFR Part 665, and any amendments to those regulations that may be promulgated.

FEDERAL FISCAL YEAR 2011 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE
(Required of all Applicants for FTA assistance and all FTA Grantees with an active capital or formula project)

AFFIRMATION OF APPLICANT

Name of Applicant: Connecticut Department of Transportation

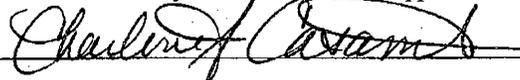
Name and Relationship of Authorized Representative: Charlene A. Casamento, Bureau Chief

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 directives, and comply with the certifications and assurances as indicated on the foregoing page applicable to each application it makes to the Federal Transit Administration (FTA) in Federal Fiscal Year 2011.

FTA intends that the certifications and assurances the Applicant selects on the other side of this document, as representative of the certifications and assurances in this document, should apply, as provided, to each project for which the Applicant seeks now, or may later, seek FTA assistance during Federal Fiscal Year 2011.

The Applicant affirms the truthfulness and accuracy of the certifications and assurances it has made in the statements submitted herein 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 in 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 correct.

Signature  Date: 11/12/10

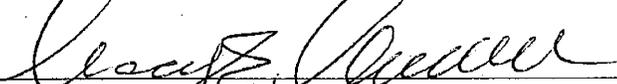
Name Charlene A. Casamento
Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Connecticut Department of Transportation

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 the project.

Signature  Date: 11/12/10

Name Nancy Arnold, Assistant Attorney General
Attorney for Applicant

Each Applicant for FTA financial assistance 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.

**FEDERAL FISCAL YEAR 2011 CERTIFICATIONS AND ASSURANCES FOR
FEDERAL TRANSIT ADMINISTRATION ASSISTANCE PROGRAMS**

(Signature page alternative to providing Certifications and Assurances in TEAM-Web)

Name of Applicant: Connecticut Department of Transportation

The Applicant agrees to comply with applicable provisions of Categories 01 – 24. X
OR

The Applicant agrees to comply with applicable provisions of the Categories it has selected:

<u>Category</u>	<u>Description</u>	
01.	Assurances Required For Each Applicant.	_____
02.	Lobbying.	_____
03.	Procurement Compliance.	_____
04.	Protections for Private Providers of Public Transportation.	_____
05.	Public Hearing.	_____
06.	Acquisition of Rolling Stock for Use in Revenue Service.	_____
07.	Acquisition of Capital Assets by Lease.	_____
08.	Bus Testing.	_____
09.	Charter Service Agreement.	_____
10.	School Transportation Agreement.	_____
11.	Demand Responsive Service.	_____
12.	Alcohol Misuse and Prohibited Drug Use.	_____
13.	Interest and Other Financing Costs.	_____
14.	Intelligent Transportation Systems.	_____
15.	Urbanized Area Formula Program.	_____
16.	Clean Fuels Grant Program.	_____
17.	Elderly Individuals and Individuals with Disabilities Formula Program and Pilot Program.	_____
18.	Nonurbanized Area Formula Program for States.	_____
19.	Job Access and Reverse Commute Program.	_____
20.	New Freedom Program.	_____
21.	Paul S. Sarbanes Transit in Parks Program.	_____
22.	Tribal Transit Program.	_____
23.	TIFIA Projects	_____
24.	Deposits of Federal Financial Assistance to a State Infrastructure Banks.	_____



CONNECTICUT DEPARTMENT OF TRANSPORTATION

POLICY STATEMENT

POLICY NO. EX.O.-27
August 23, 2011

SUBJECT: Title VI

The Connecticut Department of Transportation (Department) will effectuate the provisions of Title VI of the Civil Rights Act of 1964, as amended (42 USC Section 2000d), 49 CFR Part 21, and 23 CFR Part 200, FTA Circular 4702.1.A and other nondiscrimination directives. The Department prohibits discrimination on the basis of sex, age and disability and will make every effort to ensure that no person shall, on the ground 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 from the United States Department of Transportation. The Airport and Airway Improvement Act of 1982 (49 U.S.C. § 47123) added "sex" and "creed" as protected status in all Federal Aviation Administration activities. The Department further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. The Department has developed a Title VI discrimination complaint process that is compliant with the Title VI requirements.

Special emphasis areas include the following programs:

Construction/Maintenance
Design
Planning and Research
Contract/Agreement Processing, Prequalification, and Award
Rights of Way
Environmental Planning
Education and Training
Transit and Ridesharing
Rails

The Commissioner, as Chief Executive Officer of the Department, has the overall responsibility for carrying out the Department's commitment to the Title VI Program. The Title VI Program is a Department wide initiative, and all managers, supervisors, and employees share the responsibility of ensuring compliance.

The Title VI Program implementation responsibilities have been delegated to the Department's Bureau Chiefs. The Bureau Chiefs will designate Title VI Liaisons who will be responsible for the day-to-day collection, analysis, and reporting of Title VI related data. The Title VI Liaisons will conduct compliance and program reviews to ensure that the Department is adhering to the procedures outlined in the Department's Title VI Implementation Plan.

Section IV

Complaints and Lawsuits

COMPLAINTS AND LAWSUITS

Tracking and Investigating Title VI Complaints

All Title VI complaints will be filed in accordance with the following Title VI Complaint Procedures:

Any person alleging to be aggrieved by a discriminatory practice may in person or through a legal representative, obtain a Title VI Complaint Reporting Form, and file the completed form with the Title VI Coordinator or Bureau Head within 180 days following the date of the alleged discriminatory action or the date when the person(s) became aware of the alleged discriminatory action. The Title VI Coordinator or Bureau Head may complete the Complaint Reporting Form and attach the Complainant's letter.

All complaints will be referred to the Department's Title VI Coordinator. The Title VI Coordinator will review the complaint and inform the appropriate program area designee. Complaints must be in writing, signed by the Complainant or a representative, and include the Complainant's name, address, and telephone number, or other means by which the Complainant may be contacted. Complaints shall explain as fully as possible the facts and circumstances surrounding the alleged discriminatory action, and identify the individual(s) and/or organization(s) responsible for the alleged discriminatory action. In cases where the Complainant will be assisted in converting an oral complaint into a written complaint, the Complainant is required to sign the written complaint. Signed allegations of discrimination received by facsimile or e-mail will be acknowledged and processed. Complaints received by telephone will be put in writing and provided to the complainant for confirmation, revision, and signature before processing.

The Title VI designee or the individual receiving the written complaint will review the complaint to ensure that the required information is provided, the complaint is timely, and is within the appropriate jurisdiction. The complaint will be accepted unless it is withdrawn, is not filed within the allowed time period, or the Complainant fails to provide required information after a written request for omitted/ additional information.

Issues that do not involve discrimination or are not based upon a protected basis will not be directed to the appropriate entity. Individuals will not be discouraged from filing a written complaint.

Complaints Filed Against the Department

Written complaints filed with the Department in which the Department is named as the Respondent will be forwarded to the appropriate USDOT agency for processing. The allegation(s) will be analyzed by the USDOT agency and the Complainant will be notified of the status of the complaint. The Title VI Coordinator may conduct an independent evaluation regarding affected Department policy and may direct that actions are taken within the Department to address any policy deficiencies.

Complaints Filed Against a Sub-recipient

Written complaints filed with the Department in which a Department sub-recipient (i.e., contractor, subcontractor, consultant, sub-consultant, or other sub-recipient) is named as the Respondent will be analyzed and investigated by the Title VI Coordinator. The Department will notify a Respondent named in a complaint by mail and the Respondent will be contacted for an interview. The complaint

investigation will be completed within forty (40) days of the date of receipt of the complaint.

The Title VI Coordinator will prepare an investigative report (IR) after conducting the investigation and forward a copy of the complaint and the IR to the FTA Civil Rights Specialist, within sixty (60) days of the date of receipt of the complaint.

A complaint log will be maintained for all complaints filed with and investigated by the Department. The Investigator will advise the Complainant of his/her rights under Title VI, Title VIII, and related statutes.

Investigation Process

The Investigation Process includes the following:

- Investigative Plan
- Request for Information
- Conducting Interviews
- On-Site Visit
- Obtaining Evidence
- Analyzing Data
- Writing the Investigative Report

Investigative Plan

The Investigative Plan is an internal document for use by the Investigator and their supervisor that will define the issues of the complaint. The following elements are contained in an Investigative Plan:

- 1) Complainant(s) Name and Address/Attorney For Complainant with Name and Address
- 2) Respondent(s) Name and Address/Attorney For Respondent with Name and Address
- 3) Applicable Law (i.e., Title VI, Title VIII, Compliance Review Under Regulations)
- 4) Basis
- 5) Issue(s)
- 6) Background
- 7) Name of Person(s) to be Interviewed, including Questions for the Complainant, Respondent and Witness(es)
- 8) Evidence to be Obtained During the Investigation

Request for Information

The Request for Information is provided to the Respondent to facilitate the obtaining of evidence pertinent to the investigation and is provided to the Respondent prior to conducting an interview.

Conducting Interviews

Interviews are conducted of witnesses who can provide information that will either support or refute complaints.

COMPLAINANT – The Investigator contacts the Complainant to ensure that the Complainant's allegation(s) are understood. It is recommended that the Investigator interview the Complainant prior to preparing the Investigative Plan. If

this is not possible, changes are made as appropriate to the Investigative Plan based upon information provided by the Complainant.

RESPONDENT – Respondents are interviewed to provide an opportunity to respond to the allegations raised by the Complainant as well as to provide the Investigator the opportunity to understand the Respondent's operation or policies that Complainant cites in the complaint. The Respondent is informed of their right to submit a formal position statement addressing the Complainant's allegations. Question the Respondent regarding possible settlement opportunities.

WITNESSES – The Complainant or Respondent may request that additional persons be interviewed. Persons will only be interviewed who have information relevant to the allegations raised in the complaint of discrimination.

On-Site Visit

An On-Site visit will be conducted when:

- Contact with the Complainant and the Respondent in person may yield information and clarification that might not otherwise be obtained;
- It is necessary to review the physical environment;
- More effective communication can be established with representatives and witnesses of the Complainant and Respondent; and
- Documentation can only be examined on-site for reasons of convenience, cost, format, or volume.

Obtaining Evidence

Evidence is requested that contain some or all of the following:

- Policies and procedures regarding the practice that Complainant has alleged;
- All documents relating to Respondent's dealing with Complainant in the situation described in the complaint;
- Documents which exhibit how others, not in the Complainant's group, were treated under similar circumstances;
- Respondent's reason(s) for the action taken; and
- A formal position statement from Respondent addressing Complainant's allegations.

The Types of Evidence includes the following:

- **CIRCUMSTANTIAL EVIDENCE** – Includes facts from which may be inferred intent or discriminatory motive and proves intent by using objectively observable data;
- **COMPARATIVE EVIDENCE** – A comparison between similarly situated individuals;
- **DIRECT EVIDENCE** – Related to the Respondent's motive, it is defined as any statement or action by an official of the Respondent that indicates a bias against members of a particular group;
- **DOCUMENTARY EVIDENCE** – Written material, which is generated during the course of normal business activity;
- **STATISTICAL EVIDENCE** – Statistics, facts, or data of a numerical type, which are assembled, classified, and tabulated so as to present significant information about a given subject; and

- TESTIMONIAL EVIDENCE – Evidence that is provided orally.

Analyzing Data

Data will be analyzed to determine whether a violation of applicable laws, regulations, or policies has occurred.

Writing the Investigative Report

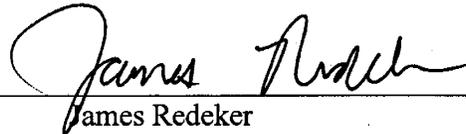
The Investigative Report (IR) will contain the following sections:

- Complainant(s) Name and Address
- Respondent(s) Name and Address
- Applicable Law
- Basis
- Issues
- Findings for each issue with a corresponding conclusion for each issue
- Recommended Decision
- Recommendations (If Applicable)

The Office of Contract Compliance is responsible for the Department's Title VI Program activities, including coordinating procedures, overseeing implementation, and monitoring and reporting progress. The Manager of the Office of Contract Compliance has been designated as the Department's Title VI Coordinator, and can be reached at (860) 594-2169. The Office of Contract Compliance is located at 2800 Berlin Turnpike, Newington, CT 06131.

As Commissioner of this Department, I am personally committed to the effective implementation of the Department's Title VI Program. It is expected that all agency personnel will fully cooperate with the Title VI Coordinator in the implementation of the procedures outlined in the Title VI Implementation Plan.

(This Policy Statement supersedes Policy Statement No. EX.O.-27 dated September 22, 2008).

A handwritten signature in cursive script, reading "James Redeker", is written over a horizontal line.

James Redeker
Acting Commissioner

AUTHORITIES

- Title VI of the Civil Rights Act of 1964, as amended (42 USC 2000d to 2000d-4);
- Federal Transit Laws, as amended (FTA C 4702.1A) – This Circular delineates the Federal Transit Administration’s (FTA) Title VI requirements;
- Title VIII of the Civil Rights Act of 1968, as amended (42 USC 3601-3619) – This Act is known as the *Fair Housing Act* and Title VIII of this Act prohibits discrimination with respect to the sale or renting of housing;
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC 4601-4655) – This Act is known as the Uniform Act and provides for the uniform and equitable treatment of persons displaced from their homes, businesses, or farms by Federal and federally assisted programs and establishes uniform and equitable land acquisition policies for Federal and federally assisted programs;
- Section 504 of the Rehabilitation Act of 1973, as amended (29 USC 794) – *No otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance* (cite taken from 49 CFR 27.1);
- 23 USC 109(h) – Requires the promulgation of guidelines intended to ensure that *possible adverse economic, social, and environmental effects relating to any proposed project on any Federal-aid system have been fully considered in developing such project, and that the final decision on the project are made in the best overall public interest....*;
- 23 USC 324 – Prohibits discrimination on the basis of sex;
- 23 CFR 200 – This part delineates the Federal Highway Administration’s (FHWA) Title VI regulation;
- 23 CFR 450 & 49 CFR 613 – “Planning Assistance and Standards” (October 28, 1993, unless otherwise noted);
- 23 CFR 771 – Joint FTA/FHWA regulation: “Environmental Impact and Related Procedures” (August 28, 1987);
- 28 CFR 42, Subpart F (Department of Justice regulation) – “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted);
- 49 CFR 21 – “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964, as amended” (June 18, 1970, unless otherwise noted);
- DOT Order 5610.2 – “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations” (EJ) (April 15, 1997);
- DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (LEP) (December 14, 2005).

YOUR RIGHTS AS UNDER

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964, as amended, ensures that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability 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.

PROTECTIONS INCLUDE BUT ARE NOT LIMITED TO: PUBLIC WAITING AREAS, PASSENGER HOLDING AREAS, SERVICE, QUALITY OF SERVICE, ROUTING, SCHEDULING, SNACK BARS, GIFT SHOPS, TICKET COUNTERS, BAGGAGE HANDLERS, CAR RENTAL AGENCIES, TAXIS, RESTAURANT FACILITIES, RESTROOMS, AND PASSENGER GROUND TRANSPORTATION.

Any person who believes that he or she, has been subjected to discrimination prohibited under Title VI of the Civil Rights Act of 1964, as amended, may file a complaint. For more information on Title VI, please visit the Connecticut Department of Transportation website at www.ct.gov/dot under Civil Rights and Accessibility.

Complaints can be filed with either of the following:

Title VI Program Coordinator
East Building, 5th Floor TCR

1200 New Jersey Avenue, SE
Washington, DC 20590

or

Debra Goss, Title VI Coordinator
Connecticut Department of
Transportation

Division of Contract Compliance
PO Box 317546
Newington, CT 06131-7546

**Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06131**

Report of Title VI Complaints

In compliance with 49 CFR Section 21.9(b) and the FTA C 4702.1A the Connecticut Department of Transportation maintains a record of Title VI investigations, complaints and lawsuits naming the Department and/or a subrecipient/grantee. This list includes the date of the investigation, lawsuit or complaint; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and the actions taken by the Department or subrecipient/grantee.

Date Complaint Received: August 30, 2010

Summary: On August 30, 2010, the Department received a Title VI complaint alleging discrimination on the basis of race. The complainant, who is an African American female, alleges that the bus driver, a white male, denied her a bus transfer. She alleges that about 20 minutes later the same bus driver gave a Caucasian lady a transfer without an argument. The complainant stated she observed an African American woman and a child passenger being told to sit in the back of the bus. The complainant filed complaints of discrimination with the Department, CTTransit and the Commission on Human Rights and Opportunities (CHRO).

Action Taken: The Title VI Coordinator contacted CTTransit about the complaint. CTTransit notified the Department that they were in the process of investigating the complaint and would provide the investigative report. The Title VI Coordinator arranged a meeting with CT Transit to discuss the complaint investigation. The meeting was held on April 21, 2011 at the CT Transit Headquarters in Hartford, CT. Debra Goss, Title VI Coordinator, and Irma Reyes, Title VI Associate Coordinator conducted an interview with CT Transit, Kimberlee Morton, Assistant General Manager, and David Lee, General Manager to discuss their investigative report regarding the complaint.

The CHRO complaint is currently open and has been scheduled for a public hearing. Department's legal staff is currently working with CHRO. We will be working with CTTransit to insure that decisions that are being made in interpreting their policies and procedures do not cause a discriminatory impact whether intentionally or unintentionally.

Date Complaint Received: June 14, 2011

Summary: On June 17, 2011 the Department received a complaint utilizing the Title VI complaint form on the Department's website. The complainant stated in her complaint that her pick-up arrangements were being discontinued by the Greater Hartford Transit District (GHTD). The complainant indicated that revoking her previous reasonable accommodation is punitive under the circumstances, especially upon submitting her safety concerns and protesting the previous no show policy when rides were being threatened with letters of suspension for medical circumstances out of their control.

Action Taken: Irma Reyes, Associate Title VI Coordinator submitted a letter to the Greater Hartford Transit District on June 23, 2011, providing them with the details of the initial complaint and requesting a reply to her concerns. On June, 23, 2011, the Office of Contract Compliance received a copy of a response letter from the Greater Hartford Transit District that was submitted to the complainant. The GHTD responded they have extended the accommodation to continue to ring the doorbell in the front of the complainant's apartment building, wait for the complainant to respond to the door bell and drive around the back of the building and get the vehicle to provide the complainant with standard door-to-door assistance. This arrangement will continue until a date to be determined. When the new Interactive Voice Response (IVR) software system is deployed they will offer the complainant this notification system as a replacement to the unique accommodation currently in effect. The complainant later rescinded her complaint and no further action is required.

Date Complaint Received: December 17, 2010

Summary: The complainant submitted a complaint form to the Office of Contract Compliance regarding allegedly being discriminated against during a two year period by the CT Transit Human Resources Department. The complainant alleges that he has been holding a CDL and passenger endorsement for nearly ten years and he has applied for a Bus Driver position "too many times". He stated that he has seen people without a CDL and even with no experience get the job. Additionally, he alleged that he went for an interview on 11/27/10 "but the lady may have wanted some cash" and knows that "she hired people who never worked as a driver and never had a commercial license". Furthermore, the complainant alleges that the "lady told him that 100 or more people applied for this job and that some would pay money for this job".

Action Taken: Upon reviewing the complaint it was determined that this complaint did not have a basis under Title VI. A letter was sent to CT Transit informing them of the complaint. The complaint was concurrently sent to Diane Donato, Director of Equal Employment Opportunity and Diversity. Ms. Donato is the Department's Title VII Coordinator.

LAWSUITS

The Connecticut Department of Transportation is not aware of any Title VI related lawsuits filed during this period.

Section V
Promoting Public Participation

Limited-English Proficiency
Implementation Plan

Environmental Justice

PROMOTING PUBLIC PARTICIPATION (INFORMATION DISSEMINATION) AND LIMITED-ENGLISH-PROFICIENCY IMPLEMENTATION PLAN

ConnDOT conducts a variety of public outreach and involvement activities that provide opportunities for the public, including low-income, minority, and LEP populations, to be involved in the transportation planning and monitoring processes.

Transportation Advisory Committees

ConnDOT works closely with two advisory committees, whose members are appointed jointly by the Governor and General Assembly and include individuals with disabilities. The meetings are public and are advertised at a minimum through the existing outreach channels that include multi-lingual posting and targeted outreach.

The ***Connecticut Public Transportation Commission*** provides “advice on the planning, development and maintenance of adequate rail, bus and motor carrier facilities and rail, bus and other public transportation services including the adequacy of such services for elderly and disabled users in the state and any other matters affecting the quality of public transportation facilities and services in the state.” (Sec. 13b-11a, C.G.S.) The Commission holds monthly daytime meetings as well as six to eight evening public hearings around the state to collect input from the public.

The ***Connecticut Rail Commuter Council*** “acts as a consumer liaison between riders and ConnDOT, Metro-North, and Shore Line East railroads and advises the legislature regarding commuter issues.” (Sec. 13b-212b, C.G.S.)

Address: 55 DuBois St., Darien 06820. FAX, (203) 655-4752. Website:
www.trainweb.org/ct. E-mail: Trains@camcomm.com.

Office of Rail

The Office of Rail contracts with MNR for the New Haven Line and a regional transportation demand management agency for SLE to provide outreach, marketing, and other involvement activities for the rail services.

ConnDOT complies with the federal government’s Limited English Proficiency (LEP) requirement through communications in English and Spanish when appropriate. Several different types of mechanisms are used to communicate with customers to ensure LEP, low-income, and minority persons have meaningful access to services, especially if a change directly impacts a Title VI area or population.

The methods to communicate with customers vary and are generally done to provide notification of changes to the service. Public input and participation is solicited with respect to service and fare changes through such things as public hearings and forums, market research, and focus groups.

The following is a summary of public outreach and involvement activities.

Internet Websites: MNR and SLE websites contain information on the printed schedule such as timetables, fares, bus connections, station information/directions, service policies, frequently asked questions, and links to other connecting service provider websites. Both the MNR and SLE offer machine translation to Spanish and a wide variety of other languages using Google Translate.

- SLE - <http://www.shorelineeast.com/>
- MNR - <http://www.mta.nyc.ny.us/mnr/index.html>

Brochures/Flyers: MNR and SLE utilize brochures and flyers that are distributed widely at various locations such as train seats, ticket offices, Take One holders, libraries, town halls, realtors' offices, Convention and Visitors' Centers, etc. These publications are mostly promotional in nature. SLE's "Ride & Relax" is a basic SLE introduction brochure to the service. MNR continues to publicize *WebTicket* in the promotional materials. This online service allows customers to purchase tickets in advance with a credit card that aims to reduce on-board ticket purchases. MNR has also distributed a Winter Weather Travel Guide brochure and an Emergency Evacuation Instructions pamphlet.

ConnDOT and its contractor periodically review updating/revising the website and brochure(s) to more effectively communicate information to its customers. Demand for products in languages other than English is periodically evaluated based on customer surveys and in compliance with Title VI. In last year's SLE customer satisfaction survey, ConnDOT did not receive any affirmative responses to the Limited English Proficiency/Spanish language request question.

Email Notification System: SLE has an email notification service that is used to disseminate information in a timely manner to customers about schedule changes, service disruptions that will significantly affect riders for longer than a period of a couple days, major incidents or construction projects, and as a reminder for upcoming holiday schedule changes.

Seat Notices: MNR and SLE utilize seat notices that are used to disseminate information to customers as quickly as possible. They are generally placed on the train seats and are used after an unplanned event has occurred or several days in advance of a planned event. Seat notices are used for other notification purposes.

Station Posters: Station posters are often used for a planned service change on the MNR and SLE services. The posters serve to notify the frequent and occasional passenger who may not see a seat notice. Posters vary in size and quality depending on the duration.

Publications: MNR produces publications that are placed on train seats and the Take One racks. These publications advise customers of changes in service and on railroad operations and policies. MNR publishes a monthly newsletter called Mileposts for frequent/daily customers. It is distributed/available the second Thursday of each month.

SLE uses "webletters" that are distributed to an email list maintained by the TDM contractor, and to anyone who joins the list by clicking on the "Subscribe" button on www.ShoreLineEast.com. The content and distribution date is usually focused on holiday schedule changes or significant service adjustments.

Customer service: A phone number with a live operator during service hours is provided for questions about the SLE service. After hours, calls are forwarded to voicemail for follow-up the next business day. A Spanish language voicemail option is available from the general customer service menu and direct transfer to a Spanish-speaking individual at CTTransit during business hours.

Advertising: Television advertisements have been developed and are airing frequently on local cable stations, print ads are running in local newspapers (including the local Spanish language paper La Voz), a statewide and a small regional magazine ad is in production, and web banner ads are being produced for local newspaper websites (including www.lavozhispanact.com) and geo-targeted national sites such as Weatherbug and Yahoo.

News Releases: News releases are developed for the MNR and SLE services. These releases are another way to provide information to the customers and are distributed to print and electronic media throughout the service territory. The SLE news releases are distributed as ConnDOT news releases. These releases are drafted by the operations unit, finalized, and distributed from the Office of Communications within the Commissioner's office. Included in the MNR news release distribution list are such media outlets as The Amsterdam News, El Diario and Noticias del Mundo (print publications) as well as The Spanish Cable Network, WNJU (Ch. 47), WXTZ (Ch. 41) (broadcast). All materials refer customers to MNR's Travel Information Center for additional information, which has a multi-language translation through an outside language line telephone service. Teleprinter service for the hearing impaired is available at ConnDOT and at MNR.

Office of Transit and Rideshare

ConnDOT also conducts a variety of public outreach and involvement activities that provide opportunities for the public to be involved in transit service planning. These opportunities are made available to low-income, minority, and LEP populations.

Each major CTTransit operating division has a formal service review process with a standing committee composed of key CTTransit and Department staff who review and analyze proposals for new, revised or discontinued services at least three times a year in each division. Proposed new services may come from many sources including employees, customers and the general public. Public outreach meetings are held in each major operating division. These outreach meetings are held in different communities of the service area and are well attended by staff and the interested riding and general public.

In addition, ConnDOT has other processes that provide additional opportunities for public input. An ADA Advisory Committee was formed in each CTTransit service area to represent the needs and interests of customers of the complementary ADA Paratransit services. These Committees are facilitated by ConnDOT's ADA Paratransit subcontractors. ConnDOT also facilitates a regional planning effort

under the SAFETEA-LU mandates for the FTA Section 5310 (Transportation for Elderly Persons and People with Disabilities), 5316 (Job Access and Reverse Commute) and 5317 (New Freedom) programs for a Locally-Developed Coordinated Public Transit Human Services Transportation Plan. ConnDOT formed five regional planning collaboratives composed of planning agencies, transit agencies, human service agencies, departments of state government, business groups, advocacy groups and private citizens to develop the plans that are required in order to apply for funding under the applicable federal programs.

Basic dissemination of public transit information is done using some of the tools described in the following section.

1. Information Services

The task of making public transit more attractive as an alternative mode of travel in CTTransit's service areas requires that high-quality information about how to use the service be readily available to present and potential riders. The "user information standard" is established as "the provision of high quality information which is easy to obtain, easy to understand, attractive and containing full information for present and potential riders."

a) Telephone Customer Service Center

An information system is maintained in the Customer Service Center at each CTTransit division to answer all inquiries in a competent and courteous manner. Adequate answering capacity is provided so that callers seldom get a busy signal and hold time is kept to a minimum.

The staffing of the Customer Service Centers varies by Division and by budget constraints. However, the goal is for the centers to be staffed every day that service is scheduled and with a suitable number of personnel to handle calls satisfactorily. Hours of operation will correspond to the core of the service day and are publicized to customers on buses, timetables and the web site.

All information regarding routes or schedules, including new schedules, route changes, detours, bus breakdowns and other pertinent general information, is transmitted to the Customer Service Center in a timely fashion. It is the policy of CTTransit to provide information in Spanish and by special TTY/TDD equipment to people who have a hearing or speech impairment.

b) Customer Service & Sales Outlet

CTTransit operates Customer Service/Sales Outlets in downtown Hartford at State House Square, in downtown New Haven on the New Haven Green, and in Stamford at the Stamford Transportation Center. Each outlet is centrally located in the downtown area and is staffed by a Customer Service Sales Specialist who assists riders with route and schedule information, as well as selling bus passes and tickets.

Fare media are also available for purchase by mail and on-line at CTTransit's web site: <http://www.CTTransit.com>, and at select retailers including Stop and Shop Supermarkets.

c) Internet Service

CTTransit's website provides current and potential customers with information about

the bus system, including route maps and schedules, fare information, information on upcoming and recent service changes, and links to connecting service providers. There is an English-language version of the website at <http://www.cttransit.com/>. The Spanish-language version can also be accessed at any time from any page of the English-language version.

CTTransit has provided schedule and routing data to reputable third-party trip planning organizations such as TRIPS123 and Google Transit. In addition, CTTransit has now completed an upgrade to the TRAPEZE scheduling system that permits trip planning to be done on-line or by an information agent working with the on-line trip planner. This project is being funded by Connect-Ability, an organization providing services to people with disabilities entering the workforce.

d) Schedules, System Maps, Brochures

All CTTransit bus schedules are printed in a standard format which includes a route map, intermediate timepoints, clear identification of major destinations or traffic generators, fare zone information (for express service), transfer information, effective date, How-to-Ride-the-Bus instructions, and special information for disabled passengers. The schedules are sized to fit in a coat pocket or purse and the system map schedule holder pocket. Schedules are distributed free of charge as follows:

- (1) On buses in specially provided holders.
- (2) Stocked by major employers with schedule racks.
- (3) At the Customer Service/Sales Outlets.
- (4) Mailed free, upon request.
- (5) Provided by the Connecticut Department of Transportation.

Multi-color system maps showing the location of each CTTransit area of operation are available, free of charge, to the public and updated as required. These maps should be easy to read and contain general route, schedule, fare, transfer, points-of-interest and How-to-Ride information.

Other public information brochures are provided as appropriate. Passenger Advisory seat notices and the "Riders' Digest" schedule and route adjustment pamphlets are distributed on the buses to inform riders of changes, detours or special attractions. Special notice signs located on the driver courtesy panel also are provided for informational purposes.

Electronic destination signs that conform to ADA regulations are provided at the front of the coach above the windshield supplemented by a side sign adjacent to the front entrance door. A route letter/number sign is provided on the rear of the bus. The front and side signs display the route letter/number at all times. When practical to do so, the route name should also display at all times and only the bottom line of the sign will scroll multiple messages. Front dashboard auxiliary plastic signs may be required on occasion for new routes or special services. Use of these extra signs should be minimized.

e) Advertising and Promotion

Extensive promotional efforts are made to reach the general public to encourage them to utilize the services offered. Media used include radio, newspapers, bus boards, direct mail, display posters, schoolbook covers and any other innovative

techniques that would appear to reach the desired targeted market. All new transit services receive special promotions. Spanish language media are used for announcing public meetings, service changes and as advertising outlets.

LIMITED-ENGLISH-PROFICIENCY IMPLEMENTATION PLAN

Overview

On August 11, 2000, President Clinton issued Executive Order 13166, entitled "*Improving Access to Services for Persons With Limited English Proficiency*" (LEP). The Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), and the Federal Aviation Administration (FAA) were instructed to ensure that all FHWA/FTA/FAA funding recipients provide meaningful access to their LEP applicants and beneficiaries.

As a recipient of Federal funding the Connecticut Department of Transportation (ConnDOT) takes reasonable steps to ensure meaningful access to all federal-aid programs and activities to LEP persons. To comply with Title VI of the Civil Rights Act of 1964, as amended, ConnDOT adheres to acceptable compliance standards ensuring reasonable access to all federal-aid Programs and activities by LEP persons and thereby preventing discrimination based on national origin. Coverage extends to all ConnDOT programs and activities.

This section of the Title VI Plan describes the minimum steps that ConnDOT will take to ensure meaningful access by LEP persons to federal-aid Programs and activities.

Included are a series of LEP maps that have been used to identify people with LEP characteristics for purposes of developing communications and outreach in accordance with Title VI requirements.

Examples of populations likely to include LEP persons who are served or encountered by ConnDOT and should be considered when planning language services include, but are not limited to:

- Public transportation passengers.
- Persons living in areas affected or potentially affected by transportation projects.
- Business owners who apply to participate in the Disadvantaged Business Enterprise Program.

Four-Factor Analysis

An assessment of the number or proportion of LEP individuals eligible to be served or encountered by CTTransit and the frequency of encounters with CTTransit is an important first step, because the Language Assistance Plan should be developed to meet the specific need.

The Four Factor Analysis involves four steps:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee
2. The frequency with which LEP individuals come in contact with the program
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives
4. The resources available to the recipient and costs

Factor 1: Number and Proportion of LEP Persons in the CTTransit Service Areas

DOT Guidance: *“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.*

The ACS data shows that the area covered by CTTransit services includes 81,086 persons who speak English less than “well” or “very well,” representing 4.3 percent of the area's population. Using the ACS data, the top 5 languages spoken by LEP persons in the areas served by CTTransit include the Spanish, French, Portuguese, Polish and Vietnamese languages. The maps for LEP indicate the census tracts where more than 5% of the population falls into the “less than well or very well” category.

Factor 2: Frequency of Contact by LEP Persons with CTTransit Services

DOT Guidance: *“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.*

CTTransit is currently collecting data from its riders on their level of English proficiency using a bus rider survey. In the meantime, for purposes of this assessment, the following data sources were used to estimate the frequency of encounters by LEP persons with CTTransit services. These sources are:

- Website Translations for CTTransit and SLE
- Survey of Front Line Employees

Website Data Translations – Website Alternative Language Use - January 1, 2011-March 31, 2011. CTTransit provides a Spanish version of its website. CTTransit also offers Google Translate on its main website and all of the websites of its subrecipients. MNR and SLE websites offer machine translations into Spanish and a number of other languages using Google Translate.

The major transit websites have Google Analytics (GA) installed so that Google Translate interactions can be tracked. For the two major websites under the direct control of ConnDOT the analysis showed:

www.cttransit.com

The primary language used based on Google Analytics (GA) was English at 98.33%. The next most used language was Spanish at 0.53% of all website visits. Other languages fell at a level of 0.25% or below of all website visits. These levels did not reach our threshold level for additional analysis which is established at 1% of all website visits for the quarter.

www.shorelineeast.com

The primary used language based on GA was English at 98.78%. The next most used language was French at 0.20%, and other languages fell at a level of 0.14% or below. These levels did not reach our threshold level for additional analysis which is established at 1% of all website visits for the quarter.

Other Service Websites - ConnDOT notified all rural operators and other private public transit contractors delivering transit services that they were to install add Google Analytics on their sites and report the results quarterly.

In all, less than two percent of all visits to CTTransit or SLE websites involve use of language assistance services. Surveys of front-line employees show that LEP interactions are not a significant problem, though it could be assumed that many potentially significant LEP issues are not reported due to the language barrier itself.

Mapping Tools - The new mapping as shown in will also provide ConnDOT with a stronger tool for identifying language "Hot Spot" areas in the service area that have the highest concentrations of LEP persons. Use of that mapping will help generally, but especially with specific projects or service changes to target language assistance services to the particular languages in that area. .

Survey of Front-Line Employees - ConnDOT determined that another way to gauge program enhancements that could improve the customer experience for LEP individuals would be to conduct a survey of front-line employees who interact with the public. A survey was developed and sent to bus and rail operations in the state for distribution to all front-line personnel that interact with the public in various functions of planning or taking a transit trip. This included employees who provide trip planning or other public information functions, bus drivers, rail ticket agents and conductors, dispatchers, etc. The survey was printable and available online. A total of 683 completed surveys were received and enumerated. Some operations were initially underrepresented (New Britain Transportation and Shore Line East). However, follow-up requests were made and the survey deadline was extended for those operations to ensure they were adequately represented in the sample. Metro-North was not included in the survey. Metro-North has an existing Title VI plan that covers all of their operations, including the New Haven Line and Branch Lines in Connecticut.

Completed surveys were entered into an online database. These were analyzed in a statewide grouping, nine geographic bus service region groupings, and a rail grouping.

The survey measured both the frequency of contact with non-English speaking persons and the approximate number non-English speaking persons encountered. The ten languages selected for inclusion on the survey were based on Connecticut census data

Division 2							
Totals	3,566,275	454,696	227,348	20,851	62,553	28%	

*Riders are one-half the ridership to account for round trips.

** LEP population rides at three times the rate of the general population

A similar analysis can be performed for ADA paratransit ridership and rail ridership to determine the extent of use by LEP populations.

Factor 3: Nature and Importance of Transit

DOT Guidance: *“The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual...”*

“...providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.”

Identify Most Critical Services for CTTransit and Rail

While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons on both a daily basis and in the event of emergency or urgent situations.

According to the 2000 Census, nationally, more than eleven percent of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about four percent of English speakers. Recent immigrants to the United States (including those persons who may not be limited English proficient) use public transit at higher rates than native-born adults. Catering to LEP persons may help to increase and retain ridership among CTTransit’s immigrant communities.

In addition, in certain situations the delivery of clear instructions regardless of language is required. For example, emergency evacuation instructions in stations and vehicles should be either non-written/non-verbal or provided in languages that meet the thresholds of LEP. Similarly, it is important to provide information to the public on security awareness or emergency preparedness. If this information is not accessible to people with limited English proficiency, or if language services in these areas are delayed, the consequences to these individuals could be serious.

Factor 4: Available Resources and Costs of Providing Language Assistance Services

DOT Guidance: *"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. (emphasis added). Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.*

... "large entities and those entities serving a significant number or proportion of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance. Such recipients may find it useful to be able to articulate, through documentation or in some other reasonable manner, their process for determining what language services would be limited based on resources or costs."

This last step allows ConnDOT to weigh the demand for language assistance against the agency's current and projected financial and personnel resources. This analysis should help the agency determine if the language services it currently provides are cost effective and should also help agencies plan future investments that will provide the most needed assistance to the greatest number of LEP persons within the limits of agency resources.

Documented Expenditures

While expenditures related to providing language assistance have not necessarily been closely tracked historically, ConnDOT can report on certain expenditures of funds on language-related services by the CTTransit bus operation.

- Initial development costs for the Spanish portion of the web site (launched Feb 2009): \$17000
- Yearly cost for Motion Point to maintain (including per word translation costs for new content) \$7,000
- Translation services (communications materials, signage, surveys, etc) FY 2011 \$1,869
- In FY 2011, interior notices (Spanish) for new buses (all 8 Divisions) \$1150
- In FY 2011, communications materials printed only in Spanish (vs dual language materials) \$5,177

Such expenditures on language assistance activities such as those that follow will be monitored more closely from here on as part of the language assistance plan.

ConnDOT will continue to expend a reasonable portion of the budgetary dollars to meet compliance goals and fulfill the provisions of the language assistance plan.

ConnDOT is committed to assuring that resources are used to reduce the barriers that limit access to its information and services by LEP persons.

In areas where a significant number of LEP individuals are served, ConnDOT will ensure that any resource limitations are well substantiated.

Resources that may reduce the costs needed to provide access to LEP individuals include, but are not limited to:

- Training bilingual staff to act as interpreters and translators.
- Information sharing through industry groups.
- Telephonic and video conferencing interpretation services.
- Translating vital documents posted on Web sites.
- Pooling resources and standardizing documents to reduce translation needs.
- Using qualified translators and interpreters to ensure that documents need not be "fixed" later and that inaccurate interpretation do not cause delay or other costs.
- Centralizing interpreter and translator services to achieve economies of scale.
- Formalized use of qualified community volunteers.

Language Services

There are two main ways to provide language services; oral interpretation either in person or via telephone interpretation services and written translation. Oral interpretation can range from on-site interpreters for critical services to commercially available telephonic interpretation services. Written translation can range from translation of an entire document to translation of a short description of the document.

When it is determined that interpretation is needed and reasonable, it will be provided in a timely manner in order to be effective.

Procedure

ConnDOT will determine which items will be translated; applying the results of the four-factor analysis. ConnDOT will translate vital written materials into the language/s identified as frequently encountered; likely to be affected and eligible to be served. Written materials will include, but not limited to:

- Emergency transportation information.
- Markings, signs, and packaging for hazardous materials and substances.
- Signs in bus and train stations, and in airports.
- Notices of public hearings (i.e. legal notices) regarding ConnDOT's proposed transportation plans, projects, or changes, and reduction, denial, or termination of services or benefits.
- Signs in waiting rooms, reception areas, and other initial points of entry.
- Notices advising LEP persons of free language assistance and language identification cards for staff (i.e. "I speak cards).
- Statements about services available and the right to free language assistance services in appropriate non-English languages, in brochures, booklets, outreach and recruitment information, and other materials routinely disseminated to the public.
- Written tests that do not assess English-language competency, but test competency for a particular license, job, or skill for which knowing English is not required.
- Applications or instructions on how to participate in a recipient's program or activity or to receive recipient benefits or services (i.e. ROW acquisition/relocation brochure).
- Consent forms.

Language Assistance

ConnDOT has a listing of employees that have stated that they are proficient in languages other than English. This resource can be used by ConnDOT to assist LEP persons. ConnDOT also has a listing of firms that provide translation and interpretation services.

Responsibilities

ConnDOT will ensure that LEP persons have meaningful access to all federal-aid Programs and activities. Federal-aid Programs include the following: Planning, Environment, Design, Rights-of-Way (ROW), Construction, and Safety. Federal-aid activities include the following: commuter rail/bus, Rideshare, Air and Port transportation. Concerning federal-aid Programs, whenever ConnDOT holds a public hearing/meeting (whether during Environment or Design), the legal notice regarding the hearing/meeting must indicate that LEP persons requiring documents be printed in an alternate language can contact a ConnDOT representative to communicate this need in a reasonable amount of time prior to the event. Additionally, legal notices must inform LEP persons that a translator will be made available if ConnDOT is notified sufficiently in advance of the hearing/meeting. In the case of ROW agents making individual contacts, if a property owner does not speak English as his/her primary language, the ROW agent will consult the ConnDOT *Language Request List* to coordinate the services of another resource employee who may act as a translator or contract out for translation services (see LEP Interpreters Translators Listing). Regarding federal-aid activities, commuter services (bus, rail, ferry service, airport, etc.), ConnDOT will offer informational documents in alternate languages and provide reasonable accommodation regarding translation services at train stations, airports, etc.

MNR has a policy to provide meaningful access to LEP customers that includes the NHL service area. MNR utilizes print and electronic media sources and language translations. MNR's plan and samples of Spanish language documents issues are contained in the "Promoting Public Participation" section of MNR's most recent Title VI submission.

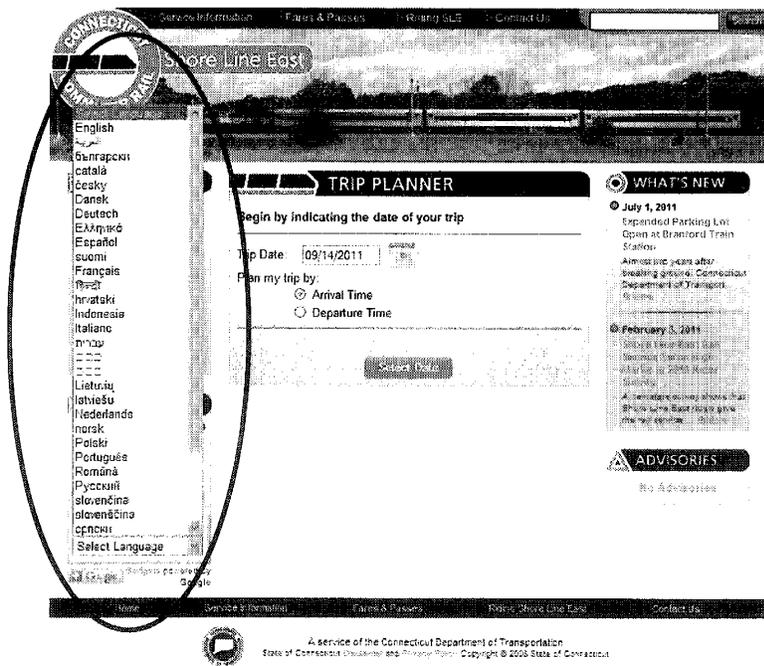
Public Information Materials and Alternative Language Options

The following are examples of alternative language offerings on our websites, and some samples of advertising copy for both on-board and publication purposes.

Screenshot of the Google Translate widget on the Shore Line East website:



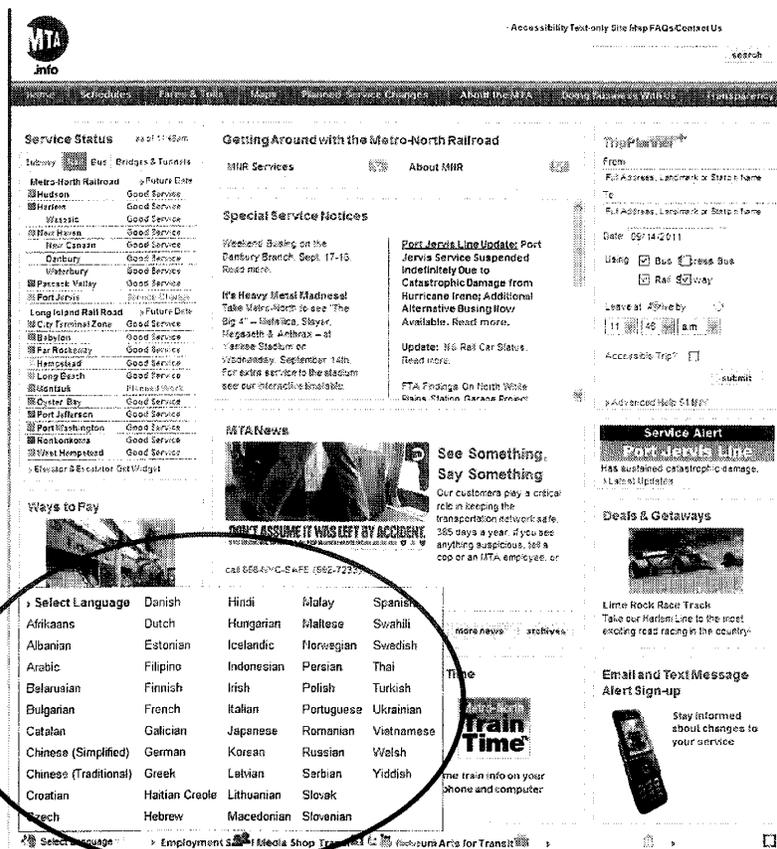
Screenshot of the Google Translate widget expanded:



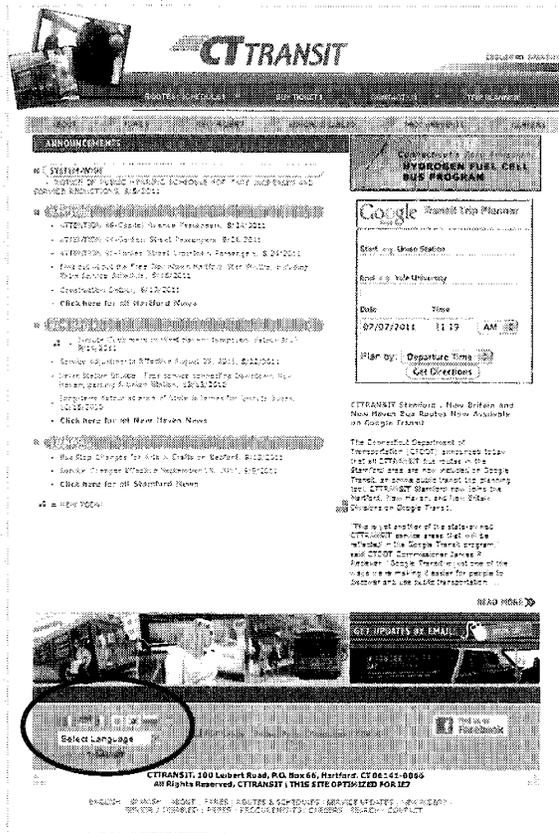
Screenshot of the Google Translate widget on the Metro-North website:



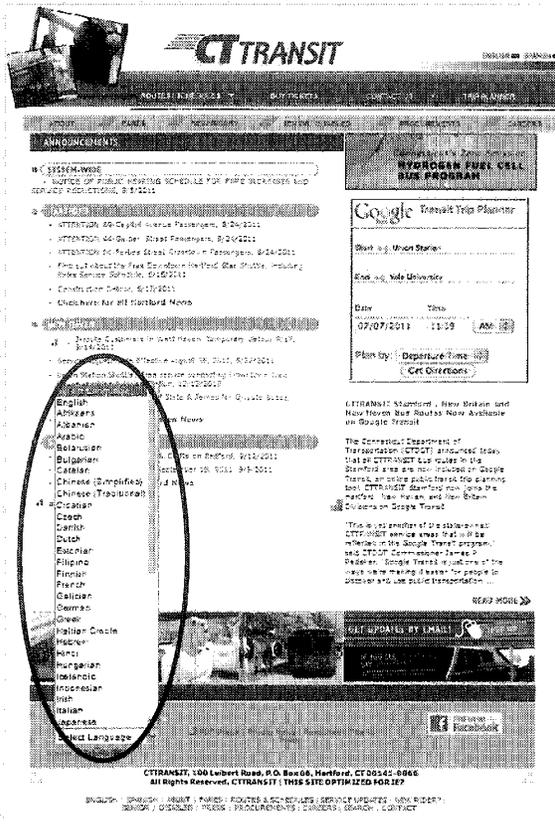
Screenshot of the Google Translate widget expanded:



Screenshot of the Google Translate widget on the CTTRANSIT website:



Screenshot of the Google Translate widget expanded:



Screenshot of the custom translated CTTRANSIT website (toggle circled):

The screenshot shows the CTTRANSIT website interface. At the top left is the CTTRANSIT logo. In the top right corner, there is a language selection dropdown menu, which is circled in red. Below the header, there is a main content area with several sections:

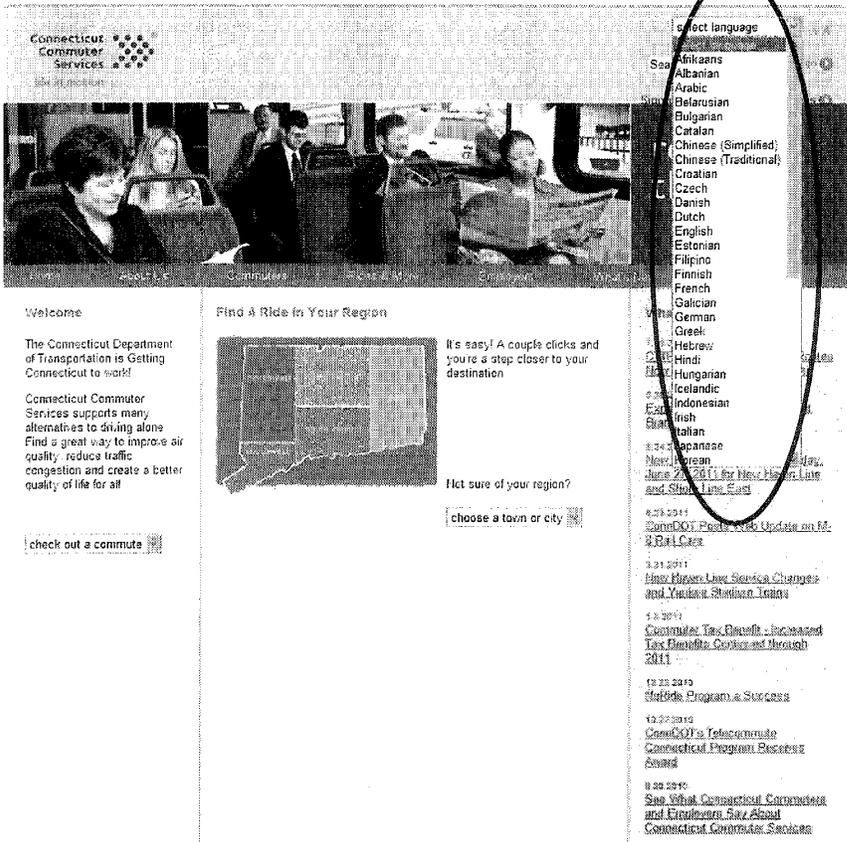
- ANUNCIOS:** A list of news items with titles and dates.
 - CONSEJERIA DE SOOQ EL SISTEMA
 - NOTICIA: Transporte de Flete en el verano 06/24/2011
 - NOTICIA: Pasajeros de CT Transit 06/24/2011
 - NOTICIA: Pasajeros de Faltas Faltas Cuarenta 06/24/2011
 - Comunicación Acerca del Plan de Viajes para el Verano y de Faltas de Viajes en el Verano de 2011 con el verano 06/24/2011
 - Operación de verano 06/24/2011
 - Haga clic aquí para los noticias de Hartford
 - Comunicación Acerca del Plan de Viajes para el Verano y de Faltas de Viajes en el Verano de 2011 con el verano 06/24/2011
 - Operación de verano 06/24/2011
 - Comunicación Acerca del Plan de Viajes para el Verano y de Faltas de Viajes en el Verano de 2011 con el verano 06/24/2011
 - Haga clic aquí para los noticias de New Haven
 - Comunicación Acerca del Plan de Viajes para el Verano y de Faltas de Viajes en el Verano de 2011 con el verano 06/24/2011
 - Operación de verano 06/24/2011
 - Haga clic aquí para los noticias de Stamford
 - NOTICIA 06/24/2011
- PROGRAMA AUTOMOBUS SIN EMISIONES DE VULGOBOND:** A section with a header and a small image.
- Google Traductor de viajes:** A Google Translate widget for travel-related content.
- Los rutas de autobuses de CTTRANSIT en Stamford, New Britain y New Haven ahora están disponibles en Google Transit:** A text block with a small image of a bus.
- NOTICIAS POR C. ELECTO:** A section with a header and a small image.

At the bottom of the page, there is a footer with contact information and social media links.

Screenshot of the Google Translate widget on the CTRIDES website:



Screenshot of the Google Translate widget expanded:



CTTRANSIT Bus Interior Signs

ASSAULTING A BUS OPERATOR IS A FELONY!

Up to 10 years in jail and a \$10,000 fine.

CTTRANSIT will prosecute to the full extent of the law anyone who assaults a bus driver.



Connecticut Public Act No. 09-191, Effective 10/1/2009

AGREDIR A UN OPERADOR DE AUTOBÚS ES UN DELITO!

Hasta 10 años de cárcel y una multa de \$10,000.

CTTRANSIT procesará con todo el peso de la ley a toda persona que agrede a un conductor de autobús.



Connecticut Public Act No. 09-191, Vigencia: 10/1/2009

LOCAL BUS SERVICE FARES EFFECTIVE JANUARY 2, 2005

■ Regular Cash Fare	\$1.25	■ Transfers	FREE
■ Children (Age 4 & under)	FREE	■ 10-Ride Ticket	\$11.25
■ Youth Fare (Age 5-18)		■ All-Day Pass	\$3.25
Cash	\$1.00	■ 3-Day Pass	\$7.50
10-Ride Ticket	\$9.00	■ 5-Day Pass	\$11.25
■ Senior/Disabled Fare		■ 7-Day Pass	\$15.00
Cash	60c	■ 31-Day Pass	\$45.00
10-Ride Ticket	\$5.40		

PASAJES PARA EL SERVICIO LOCAL EFECTIVOS DESDE EL 2 DE ENERO, 2005

■ Pasaje regular en efectivo. \$1.25	■ Transferencias	GRATIS
■ Niños (Hasta los 4 años)	■ Boleto de 10 viajes	\$11.25
■ Jóvenes (5 a 18 años)	■ Pase para todo el día	\$3.25
Efectivo	■ Pase de 3 días	\$7.50
Boleto de 10 viajes	■ Pase de 5 días	\$11.25
■ Anciano/Incapacitado	■ Pase de 7 días	\$15.00
Efectivo	■ Pase de 31 días	\$45.00
Boleto de 10 viajes		

LOCAL BUS SERVICE FARES EFFECTIVE JANUARY 2, 2005

<ul style="list-style-type: none"> ■ Regular Cash Fare \$1.25 ■ Children (Age 3 & under) FREE Maximum three per adult. ■ Youth Fare (Age 3-10) Cash \$1.00 10-Ride Ticket \$9.00 Proof of age may be requested. ■ Transfers FREE Issued upon boarding only. Transfer is good for continuing a one-way trip on a local bus. Doubling back over any part of the original route is prohibited. 	<ul style="list-style-type: none"> ■ Senior/Disabled Fare Cash \$6.00 10-Ride Ticket \$5.40 Medicare card or state-issued reduced fare photo ID must be shown upon boarding. ■ 10-Ride Ticket \$11.25 Multi-ride ticket, no expiration date. ■ All-Day Pass \$3.25 Unlimited local rides for one (1) day. May be purchased on bus. Please tell bus operator you want a pass before depositing money. 	<ul style="list-style-type: none"> ■ 3-Day Pass \$7.50 Unlimited local rides for 3 days from the date of first use. ■ 5-Day Pass \$11.25 Unlimited local rides for 5 days from the date of first use. ■ 7-Day Pass \$15.00 Unlimited local rides for 7 days from the date of first use. ■ 31-Day Pass \$45.00 Unlimited local rides for 31 days from the date of first use.
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PASAJES PARA EL SERVICIO LOCAL EFECTIVOS DESDE EL 2 DE ENERO, 2005

<ul style="list-style-type: none"> ■ Pasaje regular en efectivo \$1.25 ■ Niños (hasta los 3 años) GRATIS Un máximo de tres con cada adulto. ■ Jóvenes (3 a 10 años) Efectivo \$1.00 Boleto de 10 viajes \$9.00 Es posible que se pida comprobar su edad. ■ Transferencias GRATIS Exhibidas solamente al abordar. La transferencia es válida para continuar un viaje de una sola vía en un autobús local. El duplicar de regreso en cualquier parte de la ruta original está prohibido. 	<ul style="list-style-type: none"> ■ Anfitrión discapacitado Efectivo \$6.00 Boleto de 10 viajes \$5.40 La tarjeta de Medicare y la Tarjeta del Pasaje Reducido son válidas por el autobús, se deben mostrar al abordar. ■ Boleto de 10 viajes \$11.25 Boleto de viajes múltiples sin fecha de vencimiento. ■ Pase para todo el día \$3.25 Es posible que se pueda comprar en el autobús. Por favor, dígame al conductor que quiero comprar un pase antes de depositar su dinero. Las tarjetas de los autobuses no tienen un valor en efectivo pero pueden ser cambiadas con efectivo para comprar pases para todo el día. 	<ul style="list-style-type: none"> ■ Pase de 3 días \$7.50 ■ Pase de 5 días \$11.25 ■ Pase de 7 días \$15.00 ■ Pase de 31 días \$45.00 Los pases son válidos para viajes ilimitados comenzando por la fecha en que se abra la primera vez durante el tiempo especificado.
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YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964, as amended, ensures that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability 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.

Protections include but are not limited to public bus stops, service, quality of service, routing, scheduling, and access to services provided at the sales outlets, customer service centers, and administrative facilities.

Any person who believes that he or she has been subjected to discrimination prohibited under Title VI of the Civil Rights Act of 1964, as amended, may file a complaint. For more information on Title VI, please visit the **CTTRANSIT** web site at www.cttransit.com (under Title VI Policy).

Complaints can be filed with the following:

General Manager
CTTRANSIT
100 Leiber Road, PO Box 68
Hartford, CT 06141-0068
Telephone 860-522-8951, x262

Title VI Coordinator
Division of Contract Compliance
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06111

Title VI Program Coordinator
Office of Civil Rights
Federal Transit Administration
East Building, 3rd Floor, TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

SUS DERECHOS EN VIRTUD DEL ARTÍCULO VI DE LA LEY DE DERECHO CIVILES DE 1964

El Artículo VI de la Ley de Derechos Civiles de 1964, según enmendada, garantiza que ninguna persona de Estados Unidos será, en base a su raza, color, origen nacional, sexo, edad o discapacidad, excluida de la participación en, denegada los beneficios de o sometida de otra forma a discriminación bajo cualquier programa o actividad que recibe ayuda financiera federal.

Las protecciones incluyen pero no están limitadas a: paradas de autobuses públicos, servicio, calidad de servicio, rutas, horarios y acceso a servicios provistos en los puntos de venta, centros de servicio al cliente y centros administrativos.

Toda persona que considere que ha estado sometida a discriminación prohibida bajo el Artículo VI de la Ley de Derechos Civiles de 1964, según enmendada, podrá presentar una queja. Para más información sobre el Artículo VI, por favor visite el sitio Web de **CTTRANSIT**, en www.cttransit.com (bajo Política del Artículo VI).

Las quejas podrán presentarse ante cualquiera de los siguientes personal:

General Manager
CTTRANSIT
100 Leiber Road, PO Box 68
Hartford, CT 06141-0068
Teléfono 860-522-8951, x262

Title VI Coordinator
Division of Contract Compliance
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, CT 06111

Title VI Program Coordinator
Office of Civil Rights
Federal Transit Administration
East Building, 3rd Floor, TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

RIDER TIPS

to help us serve you better:

- Arrive at the bus stop five minutes before the scheduled arrival time of the bus;
- Have the exact bus fare, pass or ticket ready before you board the bus;
- Request a transfer from the driver when you board the bus and pay the fare;
- Allow persons using wheelchairs to board first;
- Keep children seated;
- Pull the "stop requested" signal cord at least one block before your stop;
- Use the back door for faster exits;
- Do not cross the street in front of the bus, wait until it has pulled away.

CONSEJOS PARA EL PASAJERO

para ayudarnos a servirle mejor:

- Llegue a la parada del autobús cinco minutos antes de que el autobús llegue a la parada;
- Tenga a mano el pago exacto del pasaje, el pase o el boleto, antes de abordar el autobús;
- Solicite una transferencia del conductor del autobús cuando aborde el mismo, y pague el pasaje;
- Permita que las personas que usan sillas de rueda aborden el autobús primeramente;
- Mantenga sentados a los niños;
- Hale la cuerda para la señal de "parada solicitada" al menos una cuadra antes de su parada;
- Utilice la puerta trasera para salir rápidamente;
- No cruce la calle en frente del autobús, espere hasta que éste salga.

RULES FOR PASSENGERS

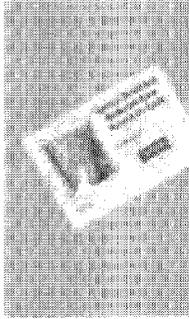
to keep your ride safe and comfortable:

- Do not eat, drink or smoke on board;
- Keep the designated front seats reserved for Senior Citizens and Disabled passengers;
- Do not use foul language or disturb others on the bus;
- Fold strollers/shopping carts before boarding and store them out of the aisle;
- Use earphones to listen to your radio or audio device;
- Keep your cell phone conversations *private* by speaking quietly;
- Keep your head, hands and arms inside of the bus;
- Shirts and shoes must be worn while on the bus;
- Animals, other than service animals, must be in secured containers;
- Place trash in trash cans; Keep seats clean; No feet on the seats;
- Cooperate with your bus operator's instructions.

REGLAS PARA EL PASAJERO

para asegurar que viaje seguro y cómodo, por favor:

- No coma, beba o fume a bordo;
- Mantenga los asientos de enfrente que han sido designados como reservados para los pasajeros ancianos e incapacitados;
- No utilice un lenguaje grosero o moleste a otros en el autobús;
- Doble los cochecitos de niños/carritos de compra antes de que aborde el autobús y manténgalos alejados del pasillo;
- Utilice audífonos para escuchar su radio o aparatos de sonido;
- Cuando utilice el teléfono celular, hable en voz baja, manteniendo así su *privacidad*;
- Mantenga su cabeza, manos y brazos dentro del autobús;
- Mientras se encuentra dentro del autobús, mantenga puestos sus zapatos y camisa;
- Los animales que no sean de servicio, deben mantenerse en contenedores asegurados;
- Ponga la basura en su lugar; mantenga limpio los asientos; no coloque sus pies en los asientos;
- Coopere con las instrucciones del operador de su autobús.



**SENIOR CITIZENS AND PERSONS WITH DISABILITIES RIDE THE BUS FOR HALF FARE
LAS PERSONAS DE EDAD AVANZADA Y AQUELLAS CON INCAPACIDADES
VIAJAN EN EL AUTOBÚS, PAGANDO LA MITAD DEL PASAJE.**

Show the bus operator your Medicare card or state-issued Reduced Fare ID card and pay half the regular fare. Individuals 65 and over or with a qualifying disability are eligible for a Reduced Fare ID card. Contact CYTRANSIT for application.

Muestre al operador del autobús su tarjeta de Medicare o la tarjeta de identificación del Pasaje Reducido emitido por el estado y pague la mitad del pasaje regular. Las personas de 65 años de edad o mayores o con una incapacidad que los haga calificar, son elegibles para recibir una tarjeta de identificación del Pasaje Reducido. Contacte a CYTRANSIT para solicitarla.

PLEASE REMEMBER... POR FAVOR, RECUERDE...



Eating, drinking, and smoking are *not* allowed on the bus.

Keep the bus clean for everyone. *No* feet on the seats.
Please drop any trash in the container at the rear door.

No está permitido comer, beber y fumar en el autobús.

Mantenga limpio el autobús para el disfrute de todos.

No coloque sus pies en los asientos. Por favor, deposite cualquier basura en el envase que se encuentra en la puerta trasera.



thanks. gracias.

PLEASE REMEMBER... POR FAVOR, RECUERDE...



Keep your personal and cell phone conversations, music and radios *quiet* and *private*.

No loud or profane language.

Mantenga sus conversaciones personales y por teléfono celular, *privadas* y en voz *baja*, su música y la radio con un *volumen bajo*.

No se permite un lenguaje en voz alta o con profanidades.



thanks. gracias.

CTTRANSIT Bilingual Service Change Announcement

INFORMATION ABOUT SCHEDULE CHANGES EFFECTIVE SUNDAY, JUNE 26, 2011 INFORMACIÓN ACERCA DE CAMBIOS DE HORARIO A PARTIR DEL DOMINGO 26 DE JUNIO DE 2011

CTTRANSIT makes schedule changes periodically to improve the overall efficiency of its service. Service adjustments will be made to the following routes, effective June 26, 2011:

C-North Haven
D-Dixwell Avenue
G-Shelton Avenue
J-Kimberly Avenue
J-Whitney Avenue
M-Washington Avenue
M-State Street
O-Route 1/55x Connecticut Post Flyer
S-Madison

C-NORTH HAVEN
Sunday
(NEW SERVICE)
New C4x trips leaving downtown New Haven at 10:45am and 4:45pm and arriving at BI's Plaza at 11:03am and 5:03pm respectively will be added.
New Cx trips leaving BI's Plaza at 2:31pm, 5:07pm, and 8:22pm and arriving in downtown New Haven at 2:53pm, 5:28pm, and 8:43pm respectively will be added.

D-DIXWELL AVENUE
Sunday
(NEW SERVICE)
Additional service between downtown New Haven and the Skiff Street and Dixwell Avenue terminus will be provided during the midday and afternoon hours. Please obtain an updated timetable for more information about these new trips.

G-SHELTON AVENUE
Weekdays/Saturday
(REVISED SERVICE)
Trips will now use Shepard Street instead of Butler Street when leaving the Marlboro Street terminus. The new route will follow Marlboro Street to Shepard Street, proceed right onto Shepard, and right onto Goodrich. The bus stops on Marlboro Street at Butler Street and Butler Street at Goodrich Street will be discontinued. New bus stops will be located at the corner of Marlboro Street and Shepard Street, Shepard Street and Goodrich Street, and Goodrich Street and Butler Street.

J-KIMBERLY AVENUE
Weekdays
(NEW SERVICE)
A new trip leaving Union Station at 6:00am and arriving in downtown New Haven at 6:07pm will be added. This trip will then continue to the J1-Centerville route.

J-WHITNEY AVENUE
Weekdays
(NEW SERVICE)
A new J1 trip leaving downtown New Haven at 6:10am and arriving in Centerville at 6:30am will be added. This trip will originate at Union Station at 6:00am.

M-WASHINGTON AVENUE
Saturday
The entire Saturday schedule will be changed. Some improvements include: 40 minute service to/from the Grata Street terminus and early morning service from the Grata Street terminus arriving in downtown New Haven at 8:23am. Please obtain an updated timetable for more information.

M-STATE STREET
Saturday
The entire Saturday schedule will be changed. Service will now be provided every 40 minutes. Please obtain an updated timetable for more information.

O-ROUTE 1/55x CONNECTICUT POST FLYER
Saturday
(REVISED SERVICE)
Just a reminder that Saturday evening trips no longer travel to Door #6 of the Westfield Connecticut Post. All Saturday evening trips now stop at Door #5 only.

S-MADISON
Weekdays
(REVISED SERVICE)
Not all buses originating in Madison and arriving in downtown New Haven will return to Madison. Some will be traveling to the bus garage or proceeding to another. Please check the destination sign of the 5 bus when you are boarding in downtown New Haven.

CTTRANSIT hace cambios de horario periódicamente para mejorar la eficiencia general de su servicio. Se harán ajustes en los servicios de las siguientes rutas, a partir del 26 de junio de 2011:

C-North Haven
D-Dixwell Avenue
G-Shelton Avenue
J-Kimberly Avenue
J-Whitney Avenue
M-Washington Avenue
M-State Street
O-Ruta 1/55x Connecticut Post Flyer
S-Madison

C-NORTH HAVEN
Domingo
(SERVICIO NUEVO)
Se agregarán nuevos viajes C4x que partirán del centro de New Haven a 10:45am y 4:45pm, y que llegarán a BI's Plaza a 11:03am y 5:03pm respectivamente.
Se agregarán nuevos viajes Cx que partirán de BI's Plaza a 2:31pm, 5:07pm y 8:22pm, y llegarán al centro de New Haven a 2:53pm, 5:28pm y 8:43pm respectivamente.

INFORMACIÓN INFORMATION

D-DIXWELL AVENUE
Domingo
(SERVICIO NUEVO)
Se proveerá un servicio adicional entre el centro de New Haven y la terminal de Skiff Street y Dixwell Avenue durante el mediodía y horas de la tarde. Consiga por favor un horario actualizado para tener más información acerca de estos viajes nuevos.

G-SHELTON AVENUE
Días de semana/Sábado
(SERVICIO REVISADO)
Los viajes usarán Shepard Street en vez de Butler Street al salir de la terminal de Marlboro Street. La ruta nueva seguirá Marlboro Street hasta Shepard Street, proseguirá a la derecha hacia Shepard y a la derecha hacia Goodrich. Las paradas de autobuses de Marlboro Street en Butler Street y de Butler Street en Goodrich Street serán discontinuadas. Se ubicarán paradas de autobuses nuevas en la esquina de Marlboro Street y Shepard Street, Shepard Street y Goodrich Street, y Goodrich Street y Butler Street.

J-KIMBERLY AVENUE
Días de semana
(SERVICIO NUEVO)
Se agregará un nuevo viaje, que partirá de Union Station a 6:00pm y llegará al centro de New Haven a 6:07pm. Este viaje continuará luego a la ruta J1-Centerville.

J-WHITNEY AVENUE
Días de semana
(SERVICIO NUEVO)
Se agregará un nuevo viaje J1, que partirá del centro de New Haven a 6:10pm y llegará a Centerville a 6:30pm. Este viaje se originará en Union Station a 6:00pm.

M-WASHINGTON AVENUE
Sábado
Todo el horario del sábado será modificado. Algunas mejoras incluyen: un servicio de cuarenta minutos al/de la terminal de Grata Street y un servicio temprano a la mañana de la terminal de Grata Street que llegará al centro de New Haven a 8:23am. Consiga por favor un horario actualizado para tener más información.

M-STATE STREET
Saturday
Todo el horario del sábado será modificado. Se brindará un servicio ahora cada 40 minutos. Consiga por favor un horario actualizado para tener más información.

O-ROUTE 1/55x CONNECTICUT POST FLYER
Sábado
Un simple recordatorio de que los viajes de los sábados a la tarde ya no van a la Puerta #6 de Westfield Connecticut Post. Todos los viajes de los sábados a la tarde se detienen ahora en la Puerta #5 solo.

S-MADISON
Días de semana
No todos los autobuses que salen de Madison y llegan al centro de New Haven volverán a Madison. Algunos irán al garaje de autobuses o seguirán a otra ruta. Verifique por favor la señal de destino del autobús 5 cuando lo tome en el área del centro de New Haven.

ACERA DE PRÓXIMOS CAMBIOS EN LAS SIGUIENTES RUTAS:

C - North Haven
D - Dixwell Avenue
G - Shelton Avenue
J - Kimberly Avenue
J - Whitney Avenue
M - Washington Avenue
M - State Street
O - Route 1/55x Connecticut Post Flyer
S - Madison

ABOUT UPCOMING CHANGES TO THE FOLLOWING LOCAL ROUTES:

C - North Haven
D - Dixwell Avenue
G - Shelton Avenue
J - Kimberly Avenue
J - Whitney Avenue
M - Washington Avenue
M - State Street
O - Route 1/55x Connecticut Post Flyer
S - Madison

TRY OUR NEW TRIP PLANNER ONLINE AT www.cttransit.com



Customer Service: (203) 624-0151
www.cttransit.com

Vigencia
26 de junio de 2011

Effective
June 26, 2011



Spanish Shore Line East advertisements:

Shore Line East

paseo divertido

Los trenes se detienen en:

- New London
- Old Saybrook
- Westbrook
- Clinton
- Madison
- Guilford
- Branford
- New Haven- State St
- New Haven- Union Station

servicio diario de trenes a lo largo de la costa

ShoreLineEast.com

Un servicio del Departamento de Transporte de Connecticut 800.ALL.RIDE

Shore Line East

Anunciando nuevo horario Shore Line East de fin de semana a los mejores lugares en Connecticut.

Comienza el 4 de julio. Visite shorelineeast.com o llame 800.255.7433

HORARIO

Dirección Oeste (sólo sáb y dom) / Hora de salida por hora		AM	AM	AM	PM	PM	PM	PM
Hacia New Haven								
Old Saybrook		7:00	8:55	10:55	1:00	3:07	4:55	7:07
Westbrook		7:05	9:00	11:00	1:05			
Clinton		7:10	9:05	11:05	1:10			
Madison		7:15	9:10	11:10	1:15			
Guilford		7:21	9:16	11:16	1:21	3:20	5:08	7:20
Branford		7:29	9:24	11:24				
New Haven - State Street		7:42	9:37	11:37	1:42	3:42	5:30	7:42
New Haven - Union Station		7:45	9:40	11:40	1:45	3:45	5:33	7:45
Dirección Este (sólo sáb y dom) / Hora de salida por hora		AM	AM	PM	PM	PM	PM	PM
A Old Saybrook								
New Haven - Union Station		8:00	10:02	12:02	2:02	4:02	6:04	8:04
New Haven - State Street		8:02	10:04	12:04	2:04	4:05	6:06	8:06
Branford				2:15	4:15	6:17	8:17	10:18
Guilford		8:18	10:20	12:20	2:23	4:23	6:25	8:25
Madison				2:29	4:29	6:31	8:31	10:32
Clinton				2:34	4:34	6:36	8:36	10:37
Westbrook				2:39	4:39	6:41	8:41	10:42
Old Saybrook		8:38	10:40	12:40	2:47	4:47	6:47	8:49

Consulte el horario diario de trenes en shorelineeast.com para obtener información sobre horarios ampliados en altas horas de la noche y servicio a New London.

Un servicio del Departamento de Transporte de Connecticut

Shore Line East Survey, with Spanish Option circled:

SHORE LINE EAST PASSENGER SURVEY



2011

Dear Shore Line East traveler:

Thank you for riding Shore Line East today. To help us find out if your travel experience has been as positive as we would like it to be, please take some time to complete this survey. Passenger input from past on-board surveys has resulted in several changes to our schedules, operations and facilities.

When you have completed the survey, please give it to the representative on your train or place the survey in the box near the exit of the train car. You can also drop off your completed survey on your return trip later today.

Thank you for your time and cooperation. Enjoy the ride.

James P. Redeker
Acting Commissioner,
Connecticut Department of Transportation



Si Ud. prefiriere completar una version de esta encuesta en Espanol, por favor llame a Shore Line East al 1-800-255-7433. Se la haremos llegar a Ud. por correo.

Report of Meeting

Date and Time: May 9, 2011 @ 2:30 PM
Location: Room G328, DOT Headquarters, Newington
Subject: Public Involvement Internal Coordination

Attendees:

John E. Bernick	CTDOT	860-594-3304	john.bernick@ct.gov
Jim Stutz	CTDOT	860-594 -2852	James.stutz@po.state.ct.us
Tom Maziarz	CTDOT	860-594-2001	Thomas.Maziarz@ct.gov
Julianne Chatman	CTDOT	860-594-2085	Julianne.Chatman@ct.gov
Kevin Nursick	CTDOT	860-594-3003	Kevin.Nursick@ct.gov
Debra Goss	CTDOT	860-594-2169	Debra.Goss@ct.gov
Shari Pratt	CTDOT	860-594-2171	Shari.Pratt@ct.gov
Irma Reyes	CTDOT	860-594-2168	Irma.Reyes@ct.gov
Dave Carol	PB		carol@pbworld.com
Joanne Frascella	PB	617-960-4948	Frascella@pbworld.com
Jim Boice	STV	203 383 5134	h.james.bolice@stvinc.com

1. Discussion Topics

- Decision process for project logo/branding
- Plan for addressing Title VI
- Website development
- Newsletter draft and mock-up
- Look Ahead Schedule for PI activities

2. Rebranding/Logo

- CTDOT would like to establish a more formal process for selecting a name for the project.
- CTDOT will provide a framework for considering naming options and recommending a project name and PB will prepare a memo that further details the process.
- The process may include hiring a marketing firm and holding 1-2 meetings with focus groups.
- Branding may include the new CT rail logo or, alternatively, PB would develop a new logo once a project name is selected.

3. Website Development

- The website has been expanded with the following new features:
 - Google Translate for Spanish translation of website pages,
 - Google Analytics to track website usage statistics, such as the number of “hits” to the website and the number of users accessing the Spanish translation,
 - Recent news briefs and project updates,
 - Information Center for project documents, such as the project Fact Sheet, and
 - Comment Sense database to manage comments and responses received via the website. The new database automatically inputs comments, tracks their status, and can be used to generate weekly reports.
- Additional website features are in development including Facebook and Twitter and an Interactive Map. PB is developing a storyboard for an interactive map for the website. Features of the map include:
 - Distance calculator to estimate the travel distance in miles between stations by clicking on an origin and destination station,
 - Regional intermodal transportation system, such as highways, bus routes, and rail connections to establish the project as part of the regional transportation system,
 - Station information, including links to the town’s websites.
- A storyboard for the interactive map will be developed for the next PI Coordination meeting in June. Initially, the interactive map should be viewed as a planning tool and should help to create a “buzz” about the project. As the project advances, the map will be enhanced with station area plans, fares, and schedules for connecting bus and train service.
- The Governor’s press release of May 9th announcing the award of \$30 million in federal funding for the project will be posted to the website.
- PB will provide suggested updates to the NHHS Rail project on CTDOT’s Major Project Update webpage.

4. Title VI requirements for Limited English Proficiency (LEP) populations

- CTDOT Planning and CTDOT Contract Compliance will assist in developing a project specific plan for meeting new state and federal requirements under Title VI for Limited English Proficiency (LEP) populations.
- It was noted that Google Translate provides a literal translation of website material, which may change the intended meaning. PB was asked to consider ways to more accurately translate the content of the entire website, or develop a “mirrored” website in Spanish.
- There are concentrations of Spanish speaking populations in Meriden, Hartford, and Springfield.
- Additional language translations may be required to meet the needs of significant Polish (New Britain) and French Creole (Enfield) populations within the corridor.
- CTDOT Compliance will assist in identifying community groups within LEP populations along the corridor that should be added to the project contact list.
- CTDOT will also provide maps for concentrations of LEP populations.

5. Public Meetings

- The first series of meetings with the individual towns as part of the Environmental Assessment process led by WSA is nearly complete. A second series of meetings will be scheduled in June to discuss concepts with each of the towns.

6. Newsletter

- PB/FHI has developed the newsletter template and draft text for the newsletter.
- The newsletter should note the award of \$30 million in federal funding.
- PB/FHI will prepare a mock-up of the newsletter for CTDOT review this week.
- The newsletter will be distributed by the end of May.
- The next newsletter could feature an article on how the project will contribute to small business development and job creation.

7. Look Ahead Schedule

- **Public Meetings**
 - The next group meeting with the towns and regional planning agencies should be scheduled in August.
- **Media Program**
 - PB should develop the media kit and should advise CTDOT on ideas for 'events' that will both inform the public and generate awareness of the project.
 - Discussion of potential events included an event to coincide with the release of the draft Environmental Assessment in the fall, a briefing of the Legislature in spring/summer, and/or award of TOD Pilot Program funds to communities this fall.
- **Rail 101**
 - The Rail 101 public education program should be rolled out after the draft Environmental Assessment is made public in the fall.

Action item Register: May 9, 2011

Action Item	Lead	Due Date
1. Logo/Branding – Establish framework for selecting project name	CTDOT	May
2. Logo/Branding – Prepare memo detailing process for selecting project name	PB	June
3. Website – Prepare Interactive map storyboard	PB	June
4. Website – Create Facebook and Twitter	PB	May

**Project No: 170-2296
New Haven-Hartford-Springfield (NHHS) Rail Project**

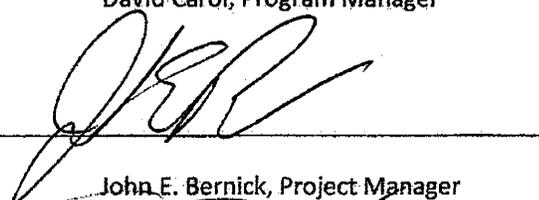
5. Website – Develop options for Spanish translation	PB	May
6. CTDOT Website - Update CTDOTs NHHS project webpage	PB	May
7. Prepare plan for Title VI for Limited English Proficiency Populations (LEP)	CTDOT	May/June
8. Provide contacts for LEP community groups	CTDOT	May
9. Provide mapping for LEP populations	CTDOT	May/June
10. Develop newsletter mock-up for CTDOT review	PB	May 13
11. Distribute newsletter via email and website	PB/FHI	May 31
12. Develop media kit	PB	May/June
13. Develop program and schedule of public events	PB	May
14. Prepare Rail 101 Educational Program outline	PB/STV	June

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Submitted By: 

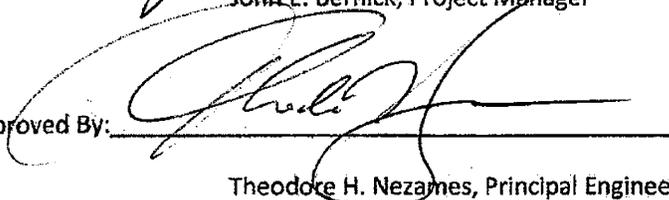
Date: 5-11-11

David Carol, Program Manager

Reviewed By: 

Date: 5-11-11

John E. Bernick, Project Manager

Approved By: 

Date: 5-12-11

Theodore H. Nezames, Principal Engineer

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Julianne Chatman	CTDOT	860-594-2085	Julianne.Chatman@ct.gov
Kevin Nursick	CTDOT	860-594-3003	Kevin.Nursick@ct.gov
Debra Goss	CTDOT	860-594-2169	Debra.Goss@ct.gov
Shari Pratt	CTDOT	860-594-2171	Shari.Pratt@ct.gov
Irma Reyes	CTDOT	860-594-2168	Irma.Reyes@ct.gov
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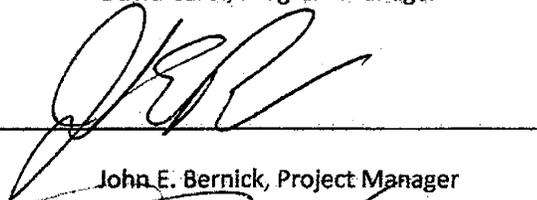
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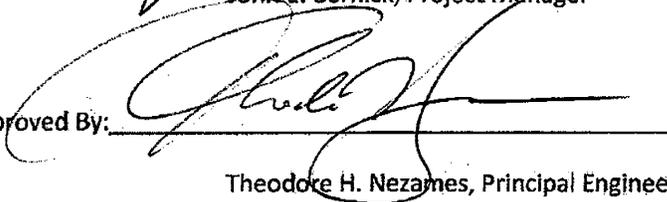
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David Carol, Program Manager

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Date: 5-11-11

John E. Bernick, Project Manager

Approved By: 

Date: 5-12-11

Theodore H. Nezames, Principal Engineer

Organization	Date	Location	Type of Meeting
CPTC	6/2/09	Norwich City Hall, Norwich	Public Hearing
CPTC	6/4/09	DOT Headquarters, Newington	Monthly
CPTC	7/9/09	Legislative Office Building, Hartford	Monthly
Job Access Regional	7/9/09	Eastern Workforce Investment Board, Franklin	Bi-monthly
GHTD	7/15/09	Union Station, Hartford	GHTD ADA Group Forum
Job Access Regional	7/16/09	GHTD, Union Station, Hartford	Bi-monthly
Job Access Regional	7/21/09	The WorkPlace, Bridgeport	Bi-monthly
CPTC	8/6/09	Union Station, New Haven	Monthly
GNHTD	8/21/09	Regional Water Authority, Sargent Drive, New Haven	ADA Advisory Committee Meeting
Job Access Regional	8/27/09	Northwest Workforce Investment Board, Waterbury	Bi-monthly
CPTC	9/1/09	Mansfield Town Hall, Storrs	Public Hearing
CPTC	9/3/09	Legislative Office Building, Hartford	Monthly
CPTC	9/15/09	Windsor Town Hall, Windsor	Public Hearing
GHTD	9/16/09	Union Station, Hartford	GHTD ADA Group Forum
Job Access Regional	9/17/09	Capitol Region Council of Governments, Hartford	Bi-monthly
Job Access Regional	9/22/09	The WorkPlace, Bridgeport	Bi-monthly
CPTC	10/1/09	Union Station, New Haven	Monthly
Job Access Regional	10/1/09	Eastern Workforce Investment Board, Franklin	Bi-monthly
CPTC	10/6/09	Sullivan Senior Center, Torrington	Public Hearing
Job Access Regional	10/13/09	Regional Growth Connection, New Haven	Bi-monthly
CPTC	10/20/09	Plainville Municipal Center, Plainville	Public Hearing
Job Access Regional	10/22/09	Northwest Workforce Investment Board, Waterbury	Bi-monthly
CPTC	11/5/09	DOT Headquarters, Newington	Monthly
Job Access Regional	11/5/09	Eastern Workforce Investment Board, Franklin	Bi-monthly
GHTD	11/12/09	Union Station, Hartford	GHTD ADA Group Forum
CPTC	11/19/09	Union Station, New Haven	Monthly
Job Access Regional	11/19/09	Capitol Region Council of Governments, Hartford	Bi-monthly
Job Access Regional	11/24/09	The WorkPlace, Bridgeport	Bi-monthly
CPTC	12/3/09	DOT Headquarters, Newington	Monthly
Job Access Regional	12/10/09	Eastern Workforce Investment Board, Franklin	Bi-monthly
CPTC	1/7/10	Union Station, New Haven	Monthly
Job Access Regional	1/12/10	Regional Growth Connection, New Haven	Bi-monthly
Job Access Regional	1/19/10	The WorkPlace, Bridgeport	Bi-monthly
GHTD	1/20/10	Union Station, Hartford	GHTD ADA Group Forum
Job Access Regional	1/21/10	Capitol Region Council of Governments, Hartford	Bi-monthly
CPTC	2/4/10	DOT Headquarters, Newington	Monthly
Job Access Regional	2/4/10	Eastern Workforce Investment Board, Franklin	Bi-monthly
Job Access Regional	2/9/10	Regional Growth Connection, New Haven	Bi-monthly
GNHTD	2/12/10	Regional Water Authority, Sargent Drive, New Haven	ADA Advisory Committee Meeting
Job Access Regional	2/18/10	Capitol Region Council of Governments, Hartford	Bi-monthly
CPTC	3/4/10	Union Station, New Haven	Monthly
Job Access Regional	3/4/10	Eastern Workforce Investment Board, Franklin	Bi-monthly
Job Access Regional	3/9/10	Regional Growth Connection, New Haven	Bi-monthly
CPTC	3/16/10	Bridgeport City Hall, Bridgeport	Public Hearing
Job Access Regional	3/16/10	The WorkPlace, Bridgeport	Bi-monthly
Job Access Regional	3/18/10	Capitol Region Council of Governments, Hartford	Bi-monthly
GHTD	3/18/10	Union Station, Hartford	GHTD ADA Group Forum
CPTC	3/24/10	Hall of Records, New Haven	Public Hearing
CPTC	4/1/10	Motor Transport Association of CT, Hartford	Monthly
Job Access Regional	4/15/10	Capitol Region Council of Governments, Hartford	Bi-monthly
CPTC	4/20/10	Danbury City Hall, Danbury	Public Hearing
Job Access Regional	4/22/10	Northwest Workforce Investment Board, Waterbury	Bi-monthly
CPTC	4/27/10	New Britain City Hall, New Britain	Public Hearing
CPTC	5/6/10	Union Station, New Haven	Monthly
Job Access Regional	5/7/10	Eastern Workforce Investment Board, Franklin	Bi-monthly
Job Access Regional	5/11/10	Regional Growth Connection, New Haven	Bi-monthly
Job Access Regional	5/18/10	The WorkPlace, Bridgeport	Bi-monthly
GHTD	5/19/10	Union Station, Hartford	GHTD ADA Group Forum
Job Access Regional	5/20/10	Capitol Region Council of Governments, Hartford	Bi-monthly
CPTC	6/3/10	DOT Headquarters, Newington	Monthly
Job Access Regional	6/3/10	Northwest Workforce Investment Board, Waterbury	Bi-monthly
Job Access Regional	6/8/10	Regional Growth Connection, New Haven	Bi-monthly
CPTC	7/8/10	Legislative Office Building, Hartford	Monthly
Job Access Regional	7/15/10	Capitol Region Council of Governments, Hartford	Bi-monthly
GHTD	7/15/10	Union Station, Hartford	GHTD ADA Group Forum
GNHTD	7/16/10	Regional Water Authority, Sargent Drive, New Haven	ADA Advisory Committee Meeting
Job Access Regional	7/22/10	The WorkPlace, Bridgeport	Bi-monthly
CPTC	8/5/10	Union Station, New Haven	Monthly
Job Access Regional	8/5/10	Eastern Workforce Investment Board, Franklin	Bi-monthly

Job Access Regional	8/26/10	Northwest Workforce Investment Board, Waterbury	Bi-monthly
CPTC	9/2/10	Legislative Office Building, Hartford	Monthly
CPTC	9/7/10	Chase Building, Waterbury	Public Hearing
Job Access Regional	9/14/10	Regional Growth Connection, New Haven	Bi-monthly
GHTD	9/15/10	Union Station, Hartford	GHTD ADA Group Forum
Job Access Regional	9/16/10	Capitol Region Council of Governments, Hartford	Bi-monthly
Job Access Regional	9/21/10	The WorkPlace, Bridgeport	Bi-monthly
CPTC	9/29/10	Newington Town Hall, Newington	Public Hearing
CPTC	10/5/10	Stamford Government Center, Stamford	Public Hearing
CPTC	10/7/10	CT Transit, New Haven Division Bus Storage and Maintenance Facility, Hamden	Monthly
CPTC	10/20/10	New London City Hall, New London	Public Hearing
Job Access Regional	10/21/10	Eastern Workforce Investment Board, Franklin	Bi-monthly
Job Access Regional	10/28/10	Northwest Workforce Investment Board, Waterbury	Bi-monthly
CPTC	11/4/10	DOT Headquarters, Newington	Monthly
Job Access Regional	11/4/10	Eastern Workforce Investment Board, Franklin	Bi-monthly
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Job Access Regional	11/18/10	Capitol Region Council of Governments, Hartford	Bi-monthly
CPTC	12/2/10	DOT Headquarters, Newington	Monthly
Job Access Regional	12/16/10	Northwest Workforce Investment Board, Waterbury	Bi-monthly
GNHTD	12/17/10	Regional Water Authority, Sargent Drive, New Haven	ADA Advisory Committee Meeting
CPTC	1/6/11	Union Station, New Haven	Monthly
Job Access Regional	1/13/11	Eastern Workforce Investment Board, Franklin	Bi-monthly
Job Access Regional	1/18/11	The WorkPlace, Bridgeport	Bi-monthly
GHTD	1/19/11	Union Station, Hartford	GHTD ADA Group Forum
Job Access Regional	1/20/11	Capitol Region Council of Governments, Hartford	Bi-monthly
CPTC	2/3/11	Bozzuto's Grocery Wholesale Distribution Co., Cheshire	Monthly
Human Service Transp Plan	2/8/11	GHTD, Union Station, Hartford	Information
Job Access Regional	2/10/11	Northwest Workforce Investment Board, Waterbury	Bi-monthly
Human Service Transp Plan	2/10/11	Eastern Workforce Investment Board, Franklin	Information
Human Service Transp Plan	2/14/11	South Central CT Council of Governments, North Haven	Information
Human Service Transp Plan	2/15/11	Western CT Area Agency on Aging, Waterbury	Information
CPTC	3/3/11	DOT Headquarters, Newington	Monthly
Human Service Transp Plan	3/3/11	Bridgeport City Hall Annex, Bridgeport	Information
Job Access Regional	3/8/11	Rides To Work/Workforce Alliance, New Haven	Bi-monthly
Job Access Regional	3/10/11	Eastern Workforce Investment Board, Franklin	Bi-monthly
Job Access Regional	3/15/11	The WorkPlace, Bridgeport	Bi-monthly
GHTD	3/16/11	Union Station, Hartford	GHTD ADA Group Forum
Job Access Regional	3/24/11	Northwest Workforce Investment Board, Waterbury	Bi-monthly
CPTC	4/7/11	DOT Headquarters, Newington	Monthly
Job Access Regional	4/13/11	Capitol Region Council of Governments, Hartford	Bi-monthly
CPTC	5/4/11	New Milford Town Hall, New Milford	Public Hearing
CPTC	5/5/11	Bozzuto's Grocery Wholesale Distribution Co., Cheshire	Monthly
CPTC	5/11/11	Windham Town Hall, Willimantic	Public Hearing
GHTD	5/18/11	Union Station, Hartford	GHTD ADA Group Forum
CPTC	5/19/11	Meriden City Hall, Meriden	Public Hearing
CPTC	5/26/11	West Haven City Hall, West Haven	Public Hearing
CPTC	6/2/11	DOT Headquarters, Newington	Monthly
CPTC	7/14/11	Legislative Office Building, Hartford	Monthly
CPTC	8/4/11	DOT Headquarters, Newington	Monthly
CPTC	9/1/11	Legislative Office Building, Hartford	Monthly
CPTC	10/6/11	Union Station, New Haven	Monthly
CPTC	11/3/11	Legislative Office Building, Hartford	Monthly
CPTC	11/17/11	Union Station, New Haven	Monthly
CPTC	12/1/11	DOT Headquarters, Newington	Monthly

Public Hearing

Proposed MTA Metro-North Railroad Fares for Fairfield Metro Station

MTA Metro-North Railroad will hold a public hearing on a proposal to establish fares for travel to and from the new Fairfield Metro station in the Town of Fairfield, Connecticut, in conjunction with the opening of the new station on or about October 16, 2011.

The proposed fares for the new Fairfield Metro station will be the same as the fares charged at the existing Fairfield Station in effect on the date of the opening of the station.

Time and Place of Hearing:

RECEIVED JUL 20 2011

Monday, August 1, 2011

Starting at 5:00 p.m. (Registration begins at 4:30 p.m.)

Metropolitan Transportation Authority, Board Room, 5th Floor
347 Madison Avenue, New York, NY (Between 44th and 45th Streets)

Directions:

By Subway: **4 5 6 7 S** to Grand Central - 42nd St.

By Bus: M1, M2, M3, M4, M42, M101, M102, M103, M104

By Rail: Metro-North Railroad to Grand Central Terminal

Registration to speak will remain open until 6:00 p.m. on the date of the hearing. Oral testimony limited to 3 minutes. To register in advance of the hearing, for more information, or to comment, go to www.mta.info or contact (212) 532-4900 (select "more options"; then select "comments and concerns" to register with an MTA representative during regular business hours.)

This hearing location is accessible to the mobility impaired. An interpreter for hearing impaired people will be available upon advance request.



Metropolitan Transportation Authority

www.mta.info

The department has made use of the 2000 census information to create maps with the GIS program to determine LEP populations in CT. Along with census data, a survey being conducted of transit operators across the state to find out the most frequently used foreign languages within each system. Currently, the state is waiting for the arrival of the 2010 Census data to further assist in identifying and fostering outreach to LEP populations.

The Department developed three milestones related to finding other means to identify LEP individuals and, if additional populations were identified, analyzing and mapping that information to use later in determining appropriate LEP actions. The additional data sources the department committed to consider were the American Community Survey and data from local school districts.

The Department reviewed both the American Community Survey and school district data. It was determined that these data sources did not provide additional information to meaningfully assist in the identification of LEP populations in transit regions.

The Department looked into using the American Community Survey data. It was determined that while the information was helpful in determining language usage trend, it was at a scale and level of detail that did not assist the department in our effort to identify current LEP populations.

Also, the Department looked into data supplied by school districts across CT. The data is not useful to the department's analysis because it aggregates the information at the district level which is not refined enough for the department's purpose.

The Department has concluded that until the new 2010 census data is released, work will continue with the current information/data and survey results. No further research is necessary.

For LEP Maps, see Attachment A:

There is no additional mapping at this time. The Connecticut Department of Transportation is working with the consultant to review the current census and will make any changes to the maps based upon the 2010 Census data.

Please find the links for the Title VI Maps listed below:

http://www.ct.gov/dot/lib/dot/documents/dpolicy/title6maps/bus_pdf/titlevibus.pdf

http://www.ct.gov/dot/lib/dot/documents/dpolicy/title6maps/rail_pdf/titlevirail.pdf

2011 Public Transportation Language Survey Analysis

A survey was developed and sent to bus and rail operations in the state for distribution to all front-line personnel that interact with the public. The survey was printable and available online. A total of 683 completed surveys were received and enumerated. Some operations were initially underrepresented (New Britain Transportation and Shore Line East). However, follow-up requests were made and the survey deadline was extended for those operations to ensure they were adequately represented in the sample. Metro-North was not included in the survey. Metro-North has an existing Title VI plan that covers all of their operations, including the New Haven Line and Branch Lines in Connecticut.

Completed surveys were entered into an online database. These were analyzed in a statewide grouping, nine geographic bus service region groupings, and a rail grouping.

The survey measured both the frequency of contact with non-English speaking persons and the approximate number non-English speaking persons encountered. The ten languages selected for inclusion on the survey were based on Connecticut census data for people who speak English at home “not well” or “not at all”. An additional category was added for “Language not listed”.

Frequency of contact with our transit systems was analyzed using a formula that assigned a weighted frequency score to each language (a weight of 1 for “rarely”, 5 for “sometimes” and 10 for “very often”). The approximate number of LEP individuals was estimated using the median of each range offered.

The results verified that our customers that were unable to communicate in English predominantly spoke Spanish. Spanish was identified over seven (7) times more frequently than the next most utilized language. The next highest non-English speaking community was Chinese followed by Polish, Italian, and Portuguese. The numbers of contacts from these languages were low. However, we should continue to monitor the number of customer contacts speaking these languages.

Transit Operator Survey

Transit Operator Mailing List

LEP Survey Groupings	CT Region	Organization
1	Stamford	CTTransit Stamford Division
2	Northwest	Kelley Transit Company Northwestern Connecticut Transit District (NWCTD)
3	Waterbury	211/Info line United Way of Connecticut Northeast Transportation Company
4	Hartford	CTTransit Hartford Division Greater Hartford Transit District (GHTD)
5	New Haven	CTTransit New Haven Division Greater New Haven Transit District (GNHTD) Valley Transit
6	Estuary	Estuary Transit District
7	Middletown	Middletown Transit District (MAT)
8	Windham	Windham Region Transit District (WRTD)
9	New Britain	New Britain Transportation Company (NBT) DATTCO
10	Statewide Rail	Rideworks AMTRAK
Statewide	Statewide	All of the above services and Rideshare

Sample Transit Operator Survey

The Connecticut Department of Transportation (Department), as a recipient of Federal Transit Administration (FTA) funds, has the responsibility under Title VI of the Civil Rights Act to evaluate the frequency with which individuals with Limited English Proficiency (LEP) come in contact with our programs, activities and services. One of the tools the Department has selected to measure this contact is to conduct a survey of all persons that have direct contact with current or prospective public transportation customers.

Please administer this survey to all drivers, customer service and outreach staff, ticket sales staff, and anyone else in your organization that has direct contact with current or prospective customers. The survey is available as the attached pdf document, which can be printed and disseminated as needed or online at <https://www.surveymonkey.com/s/CTDOTlanguages>. It should be noted that each individual should fill out the survey only once - either online or with the hard copy.

2011 Public Transportation Language Survey

Complete and submit no later than May 27, 2011.

RETURN COMPLETE SURVEYS TO: _____

The purpose of this survey is to evaluate the needs of Connecticut public transportation customers who are not able to communicate in English. *(Items marked with * are required)*

1. Your Name*: _____

2. Organization you work for*: _____

3. Your Job Title*: _____

4. Can you communicate in a language other than English? Yes No

If so, what language(s)? _____

5. In the previous year, have you encountered customers through your work who were unable to communicate in English? Yes No *If so, complete questions 6. and 7. If "no", skip to question 8.*

In the next section, you will find a list of the ten languages spoken by Connecticut individuals indicating in Census data that they speak English "not at all." If you have encountered these languages, note the frequency with which you find customers speaking it, and estimate the number of individuals you encounter communicating in that language.

Select N/A if you have not encountered this language among customers unable to communicate in English.

Following this section, you will find a place in which you can also indicate any "other" language you encounter.

6a. The Customer spoke: Chinese? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6b. The Customer spoke: French Creole? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6c. The Customer spoke: Italian? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6d. The Customer spoke: Laotian? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6e. The Customer spoke: Polish? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6f. The Customer spoke: Portuguese or Portuguese Creole? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

Continued on back

6g. The Customer spoke: Russian? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6h. The Customer spoke: Serbo-Croatian? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6i. The Customer spoke: Spanish or Spanish Creole? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6j. The Customer spoke: Vietnamese? Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

6k. The Customer spoke: Language not listed above? _____ (note language)

Rarely Sometimes Very Often N/A

Number of Individuals: Fewer than 10 10 to 25 26 to 50 51 to 100 More than 100

7. What types of needs or requests for assistance do you receive from persons unable to communicate in English?

8. Do you have suggestions for a procedure, product, or service that would help in assisting customers unable to communicate in English?

Thank you for completing our survey! Your input is very helpful to us.

STAMFORD REGION

Total Completed Bus LEP Surveys n= 26

Speak another language? yes 17
no 9
blank 0

Encountered non-English? yes 22
no 4
blank 0

Chinese	rarely	7	Frequency Score	27
	sometimes	4		
	very often	0		
	<10	6	Number of Individuals	102
	10 to 25	4		
	26 to 50	0		
	51 to 100	0		
	>100	0		

French Creole	rarely	1	Frequency Score	141
	sometimes	6		
	very often	11		
	<10	2	Number of Individuals	970
	10 to 25	3		
	26 to 50	6		
	51 to 100	3		
	>100	3		

Italian	rarely	8	Frequency Score	23
	sometimes	3		
	very often	0		
	<10	6	Number of Individuals	142
	10 to 25	2		
	26 to 50	2		
	51 to 100	0		
	>100	0		

Laotian	rarely	2	Frequency Score	2
	sometimes	0		
	very often	0		
	<10	1	Number of Individuals	5
	10 to 25	0		
	26 to 50	0		
	51 to 100	0		
	>100	0		

Polish	rarely	6	Frequency Score	46
	sometimes	6		
	very often	1		
	<10	9	Number of Individuals	197
	10 to 25	0		
	26 to 50	4		
	51 to 100	0		

>100	0		
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Portuguese

rarely	5	Frequency Score	30
sometimes	1		
very often	2		
<10	4	Number of Individuals	112
10 to 25	3		
26 to 50	1		
51 to 100	0		
>100	0		

Russian

rarely	6	Frequency Score	21
sometimes	1		
very often	1		
<10	6	Number of Individuals	124
10 to 25	1		
26 to 50	0		
51 to 100	1		
>100	0		

Serbo-Croatian

rarely	3	Frequency Score	13
sometimes	2		
very often	0		
<10	3	Number of Individuals	51
10 to 25	2		
26 to 50	0		
51 to 100	0		
>100	0		

Spanish

rarely	0	Frequency Score	195
sometimes	1		
very often	19		
<10	0	Number of Individuals	1990
10 to 25	2		
26 to 50	4		
51 to 100	2		
>100	11		

Vietnamese

rarely	2	Frequency Score	12
sometimes	0		
very often	1		
<10	1	Number of Individuals	61
10 to 25	1		
26 to 50	1		
51 to 100	0		
>100	0		

Language not listed

rarely	0	Frequency Score	0
sometimes	0		
very often	0		
<10	0	Number of Individuals	0
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

NORTHWEST REGION

Total Completed Bus LEP Surveys n= 31

Speak another language? yes 3
no 25
blank 3

Encountered non-English? yes 18
no 13
blank 0

Chinese	rarely	3	Frequency Score	23
	sometimes	2		
	very often	1		
	<10	2	Number of Individuals	196
	10 to 25	2		
	26 to 50	0		
	51 to 100	0		
	>100	1		

French Creole	rarely	3	Frequency Score	13
	sometimes	2		
	very often	0		
	<10	3	Number of Individuals	33
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		
	>100	0		

Italian	rarely	1	Frequency Score	36
	sometimes	3		
	very often	2		
	<10	4	Number of Individuals	56
	10 to 25	2		
	26 to 50	0		
	51 to 100	0		
	>100	0		

Laotian	rarely	3	Frequency Score	18
	sometimes	1		
	very often	1		
	<10	3	Number of Individuals	71
	10 to 25	1		
	26 to 50	1		
	51 to 100	0		
	>100	0		

Polish	rarely	3	Frequency Score	23
	sometimes	2		
	very often	1		
	<10	3	Number of Individuals	33
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		

>100	0		
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Portuguese

rarely	2	Frequency Score	27
sometimes	1		
very often	2		
<10	1	Number of Individuals	137
10 to 25	1		
26 to 50	1		
51 to 100	1		
>100	0		

Russian

rarely	2	Frequency Score	12
sometimes	2		
very often	0		
<10	1	Number of Individuals	23
10 to 25	1		
26 to 50	0		
51 to 100	0		
>100	0		

Serbo-Croatian

rarely	2	Frequency Score	7
sometimes	1		
very often	0		
<10	2	Number of Individuals	10
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Spanish

rarely	2	Frequency Score	102
sometimes	4		
very often	8		
<10	3	Number of Individuals	407
10 to 25	3		
26 to 50	1		
51 to 100	0		
>100	2		

Vietnamese

rarely	2	Frequency Score	17
sometimes	1		
very often	1		
<10	0	Number of Individuals	38
10 to 25	0		
26 to 50	1		
51 to 100	0		
>100	0		

Language not listed

rarely	0	Frequency Score	10
sometimes	0		
very often	1		
<10	0	Number of Individuals	150
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	1		

WATERBURY REGION

Total Completed Bus LEP Surveys n= 68

Speak another language? yes 18
no 50
blank 0

Encountered non-English? yes 44
no 24
blank 0

Chinese	rarely	13	Frequency Score	38
	sometimes	1		
	very often	2		
	<10	14	Number of Individuals	88
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		
	>100	0		

French Creole	rarely	7	Frequency Score	32
	sometimes	1		
	very often	2		
	<10	8	Number of Individuals	40
	10 to 25	0		
	26 to 50	0		
	51 to 100	0		
	>100	0		

Italian	rarely	12	Frequency Score	82
	sometimes	12		
	very often	1		
	<10	18	Number of Individuals	180
	10 to 25	5		
	26 to 50	0		
	51 to 100	0		
	>100	0		

Laotian	rarely	6	Frequency Score	31
	sometimes	1		
	very often	2		
	<10	4	Number of Individuals	488
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		
	>100	3		

Polish	rarely	10	Frequency Score	30
	sometimes	4		
	very often	0		
	<10	12	Number of Individuals	60
	10 to 25	0		
	26 to 50	0		
	51 to 100	0		

>100	0		
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Portuguese

rarely	13	Frequency Score	58
sometimes	9		
very often	0		
<10	19	Number of Individuals	131
10 to 25	2		
26 to 50	0		
51 to 100	0		
>100	0		

Russian

rarely	7	Frequency Score	22
sometimes	1		
very often	1		
<10	7	Number of Individuals	35
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Serbo-Croatian

rarely	8	Frequency Score	8
sometimes	0		
very often	0		
<10	6	Number of Individuals	30
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Spanish

rarely	11	Frequency Score	256
sometimes	7		
very often	21		
<10	12	Number of Individuals	2010
10 to 25	8		
26 to 50	4		
51 to 100	4		
>100	9		

Vietnamese

rarely	5	Frequency Score	15
sometimes	0		
very often	1		
<10	4	Number of Individuals	20
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Language not listed

rarely	1	Frequency Score	26
sometimes	3		
very often	1		
<10	2	Number of Individuals	64
10 to 25	3		
26 to 50	0		
51 to 100	0		
>100	0		

HARTFORD REGION

Total Completed Bus LEP Surveys n= 347

Speak another language? yes 176
no 166
blank 5

Encountered non-English? yes 301
no 32
blank 14

Chinese	rarely	106	Frequency Score	401
	sometimes	39		
	very often	10		
	<10	121	Number of Individuals	1813
	10 to 25	25		
	26 to 50	12		
	51 to 100	2		

French Creole	rarely	80	Frequency Score	205
	sometimes	19		
	very often	3		
	<10	82	Number of Individuals	1266
	10 to 25	14		
	26 to 50	2		
	51 to 100	3		

Italian	rarely	90	Frequency Score	460
	sometimes	52		
	very often	11		
	<10	107	Number of Individuals	1871
	10 to 25	28		
	26 to 50	8		
	51 to 100	3		

Laotian	rarely	68	Frequency Score	353
	sometimes	17		
	very often	20		
	<10	72	Number of Individuals	2062
	10 to 25	17		
	26 to 50	5		
	51 to 100	6		

Polish	rarely	100	Frequency Score	570
	sometimes	56		
	very often	19		
	<10	113	Number of Individuals	2299
	10 to 25	31		
	26 to 50	13		
	51 to 100	7		

	>100	1		
Portuguese	rarely	88	Frequency Score	453
	sometimes	53		
	very often	10		
	<10	104	Number of Individuals	1838
	10 to 25	29		
	26 to 50	7		
	51 to 100	5		
	>100	1		
Russian	rarely	101	Frequency Score	316
	sometimes	23		
	very often	10		
	<10	104	Number of Individuals	1286
	10 to 25	11		
	26 to 50	9		
	51 to 100	1		
	>100	1		
Serbo-Croatian	rarely	68	Frequency Score	178
	sometimes	14		
	very often	4		
	<10	63	Number of Individuals	891
	10 to 25	11		
	26 to 50	6		
	51 to 100	0		
	>100	1		
Spanish	rarely	31	Frequency Score	2141
	sometimes	50		
	very often	186		
	<10	42	Number of Individuals	16838
	10 to 25	31		
	26 to 50	43		
	51 to 100	36		
	>100	78		
Vietnamese	rarely	105	Frequency Score	225
	sometimes	16		
	very often	4		
	<10	87	Number of Individuals	951
	10 to 25	16		
	26 to 50	4		
	51 to 100	1		
	>100	0		
Language not listed	rarely	12	Frequency Score	212
	sometimes	12		
	very often	14		
	<10	13	Number of Individuals	1265
	10 to 25	6		
	26 to 50	3		
	51 to 100	3		
	>100	5		

NEW HAVEN REGION

Total Completed Bus LEP Surveys n= 109

Speak another language? yes 37
no 71
blank 1

Encountered non-English? yes 92
no 13
blank 4

Chinese	rarely	31	Frequency Score	111
	sometimes	10		
	very often	3		
	<10	34	Number of Individuals	562
	10 to 25	7		
	26 to 50	3		
	51 to 100	2		
	>100	0		

French Creole	rarely	20	Frequency Score	70
	sometimes	8		
	very often	1		
	<10	24	Number of Individuals	214
	10 to 25	1		
	26 to 50	0		
	51 to 100	1		
	>100	0		

Italian	rarely	30	Frequency Score	160
	sometimes	12		
	very often	7		
	<10	38	Number of Individuals	788
	10 to 25	4		
	26 to 50	2		
	51 to 100	0		
	>100	3		

Laotian	rarely	13	Frequency Score	113
	sometimes	4		
	very often	8		
	<10	15	Number of Individuals	395
	10 to 25	3		
	26 to 50	3		
	51 to 100	2		
	>100	0		

Polish	rarely	20	Frequency Score	85
	sometimes	5		
	very often	4		
	<10	22	Number of Individuals	258
	10 to 25	4		
	26 to 50	0		
	51 to 100	1		

>100	0		
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Portuguese

rarely	22	Frequency Score	72
sometimes	8		
very often	1		
<10	25	Number of Individuals	387
10 to 25	2		
26 to 50	0		
51 to 100	1		
>100	1		

Russian

rarely	27	Frequency Score	47
sometimes	4		
very often	0		
<10	27	Number of Individuals	247
10 to 25	2		
26 to 50	0		
51 to 100	1		
>100	0		

Serbo-Croatian

rarely	13	Frequency Score	28
sometimes	1		
very often	1		
<10	13	Number of Individuals	255
10 to 25	0		
26 to 50	1		
51 to 100	2		
>100	0		

Spanish

rarely	13	Frequency Score	623
sometimes	24		
very often	49		
<10	25	Number of Individuals	3547
10 to 25	16		
26 to 50	11		
51 to 100	16		
>100	10		

Vietnamese

rarely	21	Frequency Score	31
sometimes	2		
very often	0		
<10	22	Number of Individuals	128
10 to 25	1		
26 to 50	0		
51 to 100	0		
>100	0		

Language not listed

rarely	5	Frequency Score	30
sometimes	5		
very often	0		
<10	5	Number of Individuals	101
10 to 25	0		
26 to 50	2		
51 to 100	0		
>100	0		

ESTUARY REGION

Total Completed Bus LEP Surveys n= 1

Speak another language?
 yes 0
 no 1
 blank 0

Encountered non-English?
 yes 1
 no 0
 blank 0

Chinese	rarely	1	Frequency Score	1
	sometimes	0		
	very often	0		
	<10	1	Number of Individuals	5
	10 to 25	0		
	26 to 50	0		
	>100	0		

French Creole	rarely	0	Frequency Score	0
	sometimes	0		
	very often	0		
	<10	0	Number of Individuals	0
	10 to 25	0		
	26 to 50	0		
	>100	0		

Italian	rarely	0	Frequency Score	0
	sometimes	0		
	very often	0		
	<10	0	Number of Individuals	0
	10 to 25	0		
	26 to 50	0		
	>100	0		

Laotian	rarely	0	Frequency Score	0
	sometimes	0		
	very often	0		
	<10	0	Number of Individuals	0
	10 to 25	0		
	26 to 50	0		
	>100	0		

Polish	rarely	1	Frequency Score	1
	sometimes	0		
	very often	0		
	<10	1	Number of Individuals	5
	10 to 25	0		
	26 to 50	0		
	51 to 100	0		

>100	0		
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Portuguese

rarely	0	Frequency Score	0
sometimes	0		
very often	0		
<10	0	Number of Individuals	0
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Russian

rarely	1	Frequency Score	1
sometimes	0		
very often	0		
<10	1	Number of Individuals	5
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Serbo-Croatian

rarely	0	Frequency Score	0
sometimes	0		
very often	0		
<10	0	Number of Individuals	0
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Spanish

rarely	1	Frequency Score	1
sometimes	0		
very often	0		
<10	1	Number of Individuals	5
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Vietnamese

rarely	0	Frequency Score	0
sometimes	0		
very often	0		
<10	0	Number of Individuals	0
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Language not listed

rarely	0	Frequency Score	0
sometimes	0		
very often	0		
<10	0	Number of Individuals	0
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

MIDDLETOWN REGION

Total Completed Bus LEP Surveys n= 22

Speak another language? yes 6
no 16
blank 0

Encountered non-English? yes 17
no 5
blank 0

Chinese	rarely	7	Frequency Score	17
	sometimes	2		
	very often	0		
	<10	6	Number of Individuals	66
	10 to 25	2		
	26 to 50	0		
	>100	0		

French Creole	rarely	4	Frequency Score	9
	sometimes	1		
	very often	0		
	<10	4	Number of Individuals	58
	10 to 25	0		
	26 to 50	1		
	>100	0		

Italian	rarely	4	Frequency Score	69
	sometimes	7		
	very often	3		
	<10	6	Number of Individuals	196
	10 to 25	5		
	26 to 50	2		
	>100	0		

Laotian	rarely	2	Frequency Score	2
	sometimes	0		
	very often	0		
	<10	2	Number of Individuals	10
	10 to 25	0		
	26 to 50	0		
	>100	0		

Polish	rarely	6	Frequency Score	31
	sometimes	5		
	very often	0		
	<10	9	Number of Individuals	81
	10 to 25	2		
	>100	0		

	>100	0		
Portuguese	rarely	4	Frequency Score	9
	sometimes	1		
	very often	0		
	<10	5	Number of Individuals	25
	10 to 25	0		
	26 to 50	0		
	>100	0		
Russian	rarely	4	Frequency Score	9
	sometimes	1		
	very often	0		
	<10	3	Number of Individuals	33
	10 to 25	1		
	26 to 50	0		
	>100	0		
Serbo-Croatian	rarely	2	Frequency Score	2
	sometimes	0		
	very often	0		
	<10	2	Number of Individuals	10
	10 to 25	0		
	26 to 50	0		
	>100	0		
Spanish	rarely	2	Frequency Score	102
	sometimes	6		
	very often	7		
	<10	5	Number of Individuals	551
	10 to 25	4		
	26 to 50	4		
	>100	1		
Vietnamese	rarely	4	Frequency Score	4
	sometimes	0		
	very often	0		
	<10	4	Number of Individuals	20
	10 to 25	0		
	26 to 50	0		
	>100	0		
Language not listed	rarely	1	Frequency Score	1
	sometimes	0		
	very often	0		
	<10	1	Number of Individuals	5
	10 to 25	0		
	26 to 50	0		
	>100	0		

WINDHAM REGION

Total Completed Bus LEP Surveys n= 28

Speak another language? yes 5
no 23
blank 0

Encountered non-English? yes 22
no 6
blank 0

Chinese	rarely	6	Frequency Score	81
	sometimes	1		
	very often	7		
	<10	3	Number of Individuals	503
	10 to 25	4		
	26 to 50	5		
	51 to 100	1		
>100	1			

French Creole	rarely	5	Frequency Score	40
	sometimes	5		
	very often	1		
	<10	10	Number of Individuals	86
	10 to 25	2		
	26 to 50	0		
	51 to 100	0		
>100	0			

Italian	rarely	8	Frequency Score	23
	sometimes	1		
	very often	1		
	<10	9	Number of Individuals	63
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		
>100	0			

Laotian	rarely	2	Frequency Score	32
	sometimes	2		
	very often	2		
	<10	4	Number of Individuals	134
	10 to 25	0		
	26 to 50	1		
	51 to 100	1		
>100	0			

Polish	rarely	6	Frequency Score	21
	sometimes	3		
	very often	0		
	<10	7	Number of Individuals	71
	10 to 25	2		
	26 to 50	0		
	51 to 100	0		

>100	0		
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Portuguese

rarely	5	Frequency Score	20
sometimes	3		
very often	0		
<10	7	Number of Individuals	53
10 to 25	1		
26 to 50	0		
51 to 100	0		
>100	0		

Russian

rarely	5	Frequency Score	15
sometimes	2		
very often	0		
<10	6	Number of Individuals	30
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Serbo-Croatian

rarely	3	Frequency Score	3
sometimes	0		
very often	0		
<10	2	Number of Individuals	10
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Spanish

rarely	3	Frequency Score	168
sometimes	5		
very often	14		
<10	2	Number of Individuals	1210
10 to 25	6		
26 to 50	3		
51 to 100	3		
>100	5		

Vietnamese

rarely	6	Frequency Score	31
sometimes	3		
very often	1		
<10	9	Number of Individuals	139
10 to 25	1		
26 to 50	0		
51 to 100	1		
>100	0		

Language not listed

rarely	0	Frequency Score	20
sometimes	0		
very often	2		
<10	0	Number of Individuals	36
10 to 25	2		
26 to 50	0		
51 to 100	0		
>100	0		

NEW BRITAIN

Total Completed Bus LEP Surveys n= 30

Speak another language? yes 14
no 16
blank 0

Encountered non-English? yes 26
no 4
blank 0

Chinese	rarely	8	Frequency Score	23
	sometimes	3		
	very often	0		
	<10	9	Number of Individuals	197
	10 to 25	0		
	26 to 50	2		
	>100	0		

French Creole	rarely	8	Frequency Score	13
	sometimes	1		
	very often	0		
	<10	5	Number of Individuals	99
	10 to 25	2		
	26 to 50	1		
	>100	0		

Italian	rarely	6	Frequency Score	36
	sometimes	6		
	very often	0		
	<10	6	Number of Individuals	140
	10 to 25	4		
	26 to 50	1		
	>100	0		

Laotian	rarely	3	Frequency Score	8
	sometimes	1		
	very often	0		
	<10	2	Number of Individuals	48
	10 to 25	0		
	26 to 50	1		
	>100	0		

Polish	rarely	4	Frequency Score	79
	sometimes	9		
	very often	3		
	<10	8	Number of Individuals	414
	10 to 25	4		
	51 to 100	1		

	>100	1		
Portuguese	rarely	6	Frequency Score	26
	sometimes	2		
	very often	1		
	<10	5	Number of Individuals	119
	10 to 25	1		
	26 to 50	2		
	51 to 100	0		
	>100	0		
Russian	rarely	5	Frequency Score	25
	sometimes	2		
	very often	1		
	<10	7	Number of Individuals	91
	10 to 25	1		
	26 to 50	1		
	51 to 100	0		
	>100	0		
Serbo-Croatian	rarely	4	Frequency Score	9
	sometimes	1		
	very often	0		
	<10	3	Number of Individuals	33
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		
	>100	0		
Spanish	rarely	3	Frequency Score	123
	sometimes	2		
	very often	11		
	<10	6	Number of Individuals	1286
	10 to 25	5		
	26 to 50	1		
	51 to 100	3		
	>100	6		
Vietnamese	rarely	6	Frequency Score	6
	sometimes	0		
	very often	0		
	<10	5	Number of Individuals	43
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		
	>100	0		
Language not listed	rarely	1	Frequency Score	1
	sometimes	0		
	very often	0		
	<10	1	Number of Individuals	5
	10 to 25	0		
	26 to 50	0		
	51 to 100	0		
	>100	0		

STATEWIDE SUMMARY - RAIL

Total Completed Rail LEP Surveys n= 14

Speak another language? yes 2
no 12
blank 0

Encountered non-English? yes 11
no 3
blank 0

Chinese	rarely	2	Frequency Score	42
	sometimes	4		
	very often	2		
	<10	3	Number of Individuals	89
	10 to 25	2		
	26 to 50	1		
	51 to 100	0		
>100	0			

French Creole	rarely	3	Frequency Score	8
	sometimes	1		
	very often	0		
	<10	0	Number of Individuals	18
	10 to 25	1		
	26 to 50	0		
	51 to 100	0		
>100	0			

Italian	rarely	3	Frequency Score	23
	sometimes	2		
	very often	1		
	<10	3	Number of Individuals	71
	10 to 25	1		
	26 to 50	1		
	51 to 100	0		
>100	0			

Laotian	rarely	2	Frequency Score	12
	sometimes	0		
	very often	1		
	<10	1	Number of Individuals	81
	10 to 25	0		
	26 to 50	0		
	51 to 100	1		
>100	0			

Polish	rarely	4	Frequency Score	4
	sometimes	0		
	very often	0		
	<10	3	Number of Individuals	15
	10 to 25	0		
	26 to 50	0		
51 to 100	0			

>100	0		
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Portuguese

rarely	2	Frequency Score	7
sometimes	1		
very often	0		
<10	2	Number of Individuals	10
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Russian

rarely	5	Frequency Score	5
sometimes	0		
very often	0		
<10	4	Number of Individuals	20
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Serbo-Croatian

rarely	3	Frequency Score	3
sometimes	0		
very often	0		
<10	2	Number of Individuals	10
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Spanish

rarely	2	Frequency Score	77
sometimes	3		
very often	6		
<10	3	Number of Individuals	467
10 to 25	2		
26 to 50	1		
51 to 100	3		
>100	1		

Vietnamese

rarely	3	Frequency Score	3
sometimes	0		
very often	0		
<10	2	Number of Individuals	10
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

Language not listed

rarely	0	Frequency Score	0
sometimes	0		
very often	0		
<10	0	Number of Individuals	0
10 to 25	0		
26 to 50	0		
51 to 100	0		
>100	0		

STATEWIDE SUMMARY

Total Completed LEP Surveys n= 683

Speak another language?
 yes 278
 no 396
 blank 9

Encountered non-English?
 yes 555
 no 110
 blank 18

Chinese	rarely	184	Frequency Score	769
	sometimes	67		
	very often	25		
	<10	199	Number of Individuals	3639
	10 to 25	48		
	26 to 50	23		
	51 to 100	6		
>100	3			

French Creole	rarely	131	Frequency Score	531
	sometimes	44		
	very often	18		
	<10	138	Number of Individuals	2784
	10 to 25	24		
	26 to 50	10		
	51 to 100	7		
>100	5			

Italian	rarely	162	Frequency Score	912
	sometimes	98		
	very often	26		
	<10	197	Number of Individuals	3507
	10 to 25	52		
	26 to 50	16		
	51 to 100	3		
>100	5			

Laotian	rarely	101	Frequency Score	571
	sometimes	26		
	very often	34		
	<10	104	Number of Individuals	3294
	10 to 25	22		
	26 to 50	11		
	51 to 100	10		
>100	8			

Polish	rarely	161	Frequency Score	891
	sometimes	90		
	very often	28		
	<10	188	Number of Individuals	3438
	10 to 25	44		
	26 to 50	19		
	51 to 100	9		

>100	2		
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Portuguese

rarely	147	Frequency Score	702
sometimes	79		
very often	16		
<10	172	Number of Individuals	2812
10 to 25	39		
26 to 50	11		
51 to 100	7		
>100	2		

Russian

rarely	164	Frequency Score	474
sometimes	36		
very often	13		
<10	167	Number of Individuals	1899
10 to 25	17		
26 to 50	10		
51 to 100	3		
>100	1		

Serbo-Croatian

rarely	106	Frequency Score	251
sometimes	19		
very often	5		
<10	96	Number of Individuals	1300
10 to 25	14		
26 to 50	7		
51 to 100	2		
>100	1		

Spanish

rarely	68	Frequency Score	3793
sometimes	103		
very often	321		
<10	99	Number of Individuals	28349
10 to 25	77		
26 to 50	73		
51 to 100	69		
>100	123		

Vietnamese

rarely	154	Frequency Score	349
sometimes	23		
very often	8		
<10	134	Number of Individuals	1428
10 to 25	21		
26 to 50	6		
51 to 100	2		
>100	0		

Language not listed

rarely	20	Frequency Score	305
sometimes	21		
very often	18		
<10	22	Number of Individuals	1644
10 to 25	12		
26 to 50	5		
51 to 100	3		
>100	6		

Language Survey

Connecticut Department of Transportation
Title VI Corrective Action Plan

Item 1.1k: Data Collection Methodology to Evaluate Alternative Language Use on
Transit Websites

METHODOLOGY:

The Department will have Google Translate and Google Analytics installed on websites for all transit systems that are owned by the State or for which the State is required by FTA to provide direct oversight (the CTTRANSIT system, rural systems and Shore Line East). Google Translate allows website users to select a language from a drop-down list, and the tool translates the text on each website. Google Analytics is a tool installed in the html code that allows the website owner to analyze the traffic visiting the website. These tools are already in use on both the www.cttransit.com and www.shorelineeast.com websites. Google Analytics data will be accessed and a Language Report will be generated for each website on a Quarterly basis.

The Language Report identifies the languages used to access the website and the frequency. The data will be analyzed to determine the level of requests for non-English languages machine translation of the site. This information will be utilized to help identify if deploying a more user friendly customized translation service for a parallel website would be prudent. The threshold for additional consideration is 1% of all website traffic in the quarter. If the 1% threshold is achieved, further analysis will be done in order to identify the traffic geographically.

Google Translate and Google Analytics Tools

1. Estuary Transit District
2. Middletown Transit District
3. Northwestern Connecticut Transit District
4. Northeastern Connecticut Transit District
5. Norwalk Transit District
6. Valley Transit District
7. Greater Hartford Transit District
8. Greater New Haven Transit District
9. Windham Transit District
10. Northeast Transportation Company
11. New Britain Transportation Company
12. Kelley Transit
13. DATTCO
14. CTTransit All divisions



CONNECTICUT DEPARTMENT OF
TRANSPORTATION
NEWS RELEASE

2800 BERLIN TURNPIKE P.O. BOX 317546 NEWINGTON CONNECTICUT 06131-7546

FOR RELEASE: *March 29, 2011*

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CTTRANSIT Information Available Online in Multiple Languages

The Connecticut Department of Transportation announced today the availability of language tools on the www.cttransit.com website. These tools are made available to help people get information about and use the public transportation resources in the state.

CTTRANSIT's Spanish-language web content has been up and running for over two years. This feature "went live" in mid-February 2009 as an additional service for those who do not speak English fluently. The link to toggle to a Spanish-language version is prominently displayed in the upper right corner of every page on the site. Once selected, as one navigates through the content all the pages appear in their translated form—an exact mirror of the English-language content. This translation includes the navigation tools, the graphics, images, and all of the content.

The aim of this Internet feature is to make CTTRANSIT more accessible to those Spanish-speakers who prefer finding information online. Already, CTTRANSIT publishes printed service-change notices and important brochures in both English and Spanish. Census data show that over 40 percent of Hartford residents identify themselves as persons of Hispanic or Latino origin. Recent census updates confirm that the state's Hispanic and Latino population grew nearly 50 percent to about 479,000 over the decade.

Use of this web-based tool has grown since 2009. In the calendar year beginning January 1, 2011, there have been over 4,300 "pageviews" of 150 of the web pages, representing 0.26% of the total pageviews at www.cttransit.com. Similar to the use patterns observed on the English-language version of the site, the Routes & Schedules page is the most often accessed, followed by "new rider" information and details on the senior & disabled reduced-fare program.

As evidenced in census data, in Hartford nearly 50 percent of the population indicated that a language other than English is spoken at home. Throughout the state of Connecticut, particularly in the large metropolitan regions, similar percentages of persons identify that English is not their native language. Therefore, in September 2010, to provide a translation option for a wider array of languages,

the Google Translate feature was added to www.cttransit.com. This pull down menu, which takes users to translated content, is also featured on each of the web pages to facilitate ease of switching languages.

Overall growth in reliance on the online information provided by CTTRANSIT is reflected in heavy site visitation on days when weather or other events require timely announcements to inform customers of the status of service. CTTRANSIT is committed to continuing to explore options to ensure the greatest number of customers find this information in a form most useful to them. The steady utilization over the past two years of CTTransit's Spanish-language content parallels that broader increase in consuming web-based information.

CTTRANSIT is the state-owned bus transit system serving the greater Hartford, New Haven, Stamford, Waterbury, New Britain, Meriden, Bristol and Wallingford areas. Information online can be found at www.cttransit.com.

March 29, 2011

CTTRANSIT Información disponible en línea en diversos idiomas.

El Departamento de Transporte de Connecticut (CTDOT) anunció hoy que están disponibles las herramientas de idiomas en su página web www.cttransit.com. Estas herramientas se ofrecen para ayudar a la población a obtener información sobre los recursos estatales de transporte público y su uso.

El contenido de la página web en español de CTTRANSIT ha estado funcionando por más de dos años. Esta aplicación "cobró vida" a mediados de febrero de 2009, como un servicio adicional para aquellos que no hablan inglés con fluidez.

El vínculo para activar la versión en español se visualiza de manera destacada sobre la parte superior derecha de cada página del sitio. Una vez seleccionado, a medida que uno explora el contenido, todas las páginas se verán en su versión traducida - de manera idéntica al contenido en la versión en idioma inglés. Esta traducción incluye las herramientas de navegación, los gráficos, las imágenes y todo el contenido.

El objetivo de esta aplicación de internet es hacer que CTTRANSIT sea más accesible para aquellos hispanohablantes que prefieran buscar información en línea. CTTRANSIT ya publica de manera impresa los avisos de cambios en el servicio y folletos importantes tanto en inglés como en español. Datos censales muestran que más del 40% de los residentes de Hartford se identifican como personas de origen hispano o latino. Recientes actualizaciones censales confirman que la población hispana y latina de Hartford creció aproximadamente un 50% para alcanzar los 479 000 a lo largo de la década.

La utilización de esta herramienta basada en internet ha crecido desde el año 2009. En el año que comenzó el 1 de enero de 2011, se han registrado 4 300 visitas a la página, de 150 páginas web, que representan 0.26% del total de las páginas visitadas en www.cttransit.com. De manera similar a los patrones de uso observado en la versión en idioma inglés del sitio, la página de rutas y horarios es a la que más frecuentemente se accede, seguida de "new rider" información y detalles sobre el programa de tarifa reducida para personas mayores y para discapacitados.

Tal como evidencian los datos censales, el 50% de la población de Hartford manifestó hablar otro idioma, y no inglés, dentro de hogar. A lo largo del estado de Connecticut, y en particular en la amplia región metropolitana, porcentajes similares de población manifestaron que inglés no es su lengua madre. Por ello, en septiembre de 2010, para ampliar la opción de idiomas ofrecida, se incluyó la aplicación de traducción de Google a www.cttransit.com. Este menú desplegable, que lleva a los usuarios al contenido traducido, se encuentra también en cada una de las páginas web para facilitar el cambio de idiomas.

El crecimiento global basado en la información en línea brindada por CTTRANSIT se refleja en un alto flujo de visitas en los días en los que el clima u otros eventos requieren de avisos a buen tiempo para informar a los usuarios sobre el estado del servicio.

CTTRANSIT se compromete a continuar explorando alternativas para asegurar que cada vez más usuarios accedan a esta información del modo que les resulte más conveniente. El uso sostenido, durante los últimos dos años de nuestro contenido en idioma español es paralelo al amplio aumento en el consumo de información basada en la web.

CTTRANSIT es el sistema de transporte de autobús propiedad del estado, que brinda servicios en las áreas de gran Hartford, New Haven, Stamford, Waterbury, New Britain, Meriden, Bristol y Wallingford. Para más información en línea dirigirse a www.cttransit.com.

Reyes, Irma I.

Distribution List Name: CBO List March 2011

This list was parsed from Irma Reyes (Contract Compliance) list from an email dated 3/21/2011. It is to be used for a Title VI news release mailing list.

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(May 12, 2010)

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mgodin@entravision.com; analeh@analeh.com; fmorales@zgsgroup.com;
ocabrera@zgsgroup.com; Catalina@elcanillita.com; advertise@elcanillita.com;
news@elsol.com; avisos@elsolnews.com; news@identidadlatina.com;
militza@identidadlatina.com; losandes50@aol.com; info@lavozhispanact.com;
Ar401@sbcglobal.net; tribunact@tribunact.com; manuelbataguas@live.com;
info@postlatino.com; carlosm@postlatino.com; info@comunidadenews.com;
comunidadenews@sbcglobal.net; pdjc3975@aol.com; margarita@mymega910.com;
asiesmiperuhartford@yahoo.com; RobbieDJtrigueno@yahoo.com;
egarcia@mymega910.com; studio@labomba975.com; wprx1120@Comcast.net;
wmartinez@wrym840.com; radioavivamiento@gmail.com;
werner.oyanadel@cga.ct.gov

Television

1. Telefutura (formerly Univision) – (Hartford) WUVN-18

General Manager: Ulysses Arrigoitia

E-mail: uarrigoitia@entravision.com

Other e-mails: ssuarez@entravision.com; rbarbour@entravision.com;
mgodin@entravision.com

El Show de Analeh

Ana Alfaro – Producer & Host

analeh@analeh.com

2. WRDM – Telemundo (Hartford/Springfield)

Phone: 860-956-1303

Contact: Fran Morales (x122)

E-mail: fmorales@zgsgroup.com

Online contact: Omar Cabrera

E-mail: ocabrera@zgsgroup.com

Newspapers

El Canillita (Bethel, but moving to New Haven)

E-mails: Catalina@elcanillita.com; advertise@elcanillita.com

Phone: 203-798-2120

El Sol (Stamford)

Web address: <http://www.elsolnews.com/>

E-mails: news@elsol.com; avisos@elsolnews.com

Identidad Latina (Hartford)

Web address: <http://www.identidadlatina.com/>

E-mails: news@identidadlatina.com; militza@identidadlatina.com

Los Andes Spanish Newspaper (New Haven)

Phone: (203) 773-3577

E-mail: losandes50@aol.com

La Voz Hispana (New Haven, offices in Hartford and Stamford)

Web address: <http://www.lavozhispanact.com/>

Phone: (203) 865-2272

E-mails: info@lavozhispanact.com; Ar401@sbcglobal.net

La Tribuna Newspaper (Danbury)

Phone: (203) 730-0457

E-mail: tribunact@tribunact.com

The Immigrant (Danbury)

Phone: 203-798-6858

E-mail: manuelbataguas@live.com

Post Latino (Hartford)

E-mails: info@postlatino.com; carlosm@postlatino.com

Comunidade News (Danbury)

E-mails: info@comunidadenews.com; comunidadenews@sbcglobal.net

Radio

WCUM – 1450 AM (Bridgeport)

Phone: (203) 335-1450

E-mail: pdjc3975@aol.com

WLAT – 910 AM/1230 AM (East Hartford)

Phone: 860-524-0001

E-mails: margarita@mymega910.com; asiesmiperuhartford@yahoo.com;

RobbieDJtrigueno@yahoo.com; egarcia@mymega910.com

WMRQ – 97.5 FM (Glastonbury)

Email: studio@labomba975.com

WPRX – 1120 AM (Bristol) (Governor's office says: The radio station is the most listened to radio station among the Latino/Hispanic population in CT. 1120 AM covers 85 percent of the state.)

E-mail: wprx1120@Comcast.net

WRYM – 840 AM (New Britain)

Phone: (860) 666-5646

Contact: Walter Martinez

E-mail: wmartinez@wrym840.com

WSGG – 89.3 FM (Norfolk), 98.3 FM (Meriden), 89.7 FM (Manchester, Hartford)

Phone: 860-967-0718

E-mail: radioavivamiento@gmail.com

Latino and Puerto Rican Affairs Commission

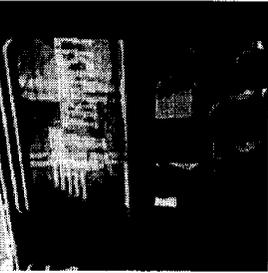
E-mail: werner.oyanadel@cga.ct.gov

Website: <http://www.cga.ct.gov/lprac/>

CT Spanish Media

Medium:	Radio
Station:	WMRQ
Owner:	
Format:	Tropical
Contact:	Jorel Claudio
email	claudio@labomba975.com
Phone:	860-657-1041
Fax	860-657-1042
Medium:	Radio
Station:	WRYM-AM (La Gigante)
Owner:	Eight Forty Broadcasting Corp.
Format:	Spanish-language Full Service
Contact:	Walter Martinez, General Manager
email	
Phone:	860-666-5646
Fax	860-666-5647
Medium:	Radio
Stations:	WLAT-AM (Mega 910) & WNEZ-AM 1230
Owner:	Antonio F. Gois
Formats:	Tropical; Spanish Full Service
Contact:	Paul Gois, General Manager
email	gparch1@aol.com
Phone:	860-524-0001
Fax	860-524-0336
Medium:	Radio
Station:	WPRX-AM 1120
Owner:	Nievesquez Productions Inc.
Format:	Spanish Full Service/Tropical
Contact:	Oscar Nieves, General Manager
email	wprx1120@Comcast.net
Phone:	860-348-0667
Fax	860-348-0711
Medium:	Radio
Station:	Radio Cumbre
Owner:	Radio Cumbre Broadcasting, Inc.
Format:	various
Contact:	Pablo de Jesus Colon
email	
Phone:	203-335-1450

Fax	203-337-1216
Medium:	TV
Stations:	WUVN-18; WUTH-47
Owner:	Entravision Communications Corp.
Affiliations:	Univision; TeleFutura; LATV
Contact:	Ulysses Arrigoitia, Vice President & General Manager
email	uarrigoitia@entravision.com
Phone:	860-278-1818
Fax	860-27-1811
Medium:	TV
Station:	WRDM-50/WDMR-51
Owner:	ZGS Communications
Affiliation:	Telemundo
Contact:	Brenda Mulero, General Manager
email	bmulero@zgsgroup.com
Phone:	860-956-1303
Fax:	860-956-6834
Medium:	Print
Newspaper:	La Voz Hispana de Connecticut
Owner:	Norma Rodriguez
Format:	Tabloid/Weekly
Contact:	Norma Rodriguez
email	
Phone:	203-865-2272
Fax	203-787-4023
Medium:	Print
Newspaper:	Identidad Latina
Owner:	Ruth Espinosa
Format:	Tabloid/Bi-monthly
Contact:	Adelia Santa-Cruz
email	adelia@identidadlatina.com
Phone:	860-231-9891
Fax	860-523-8224



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Wall

CTTRANSIT

More press coverage on the "bendy bus": <http://www.elsolnews.com/noticias/index.php/locales-noticias/29/4-locales/14737-en-varias-ciudades-de-connecticut-ponen-en-circulacion-nuevos-autobuses>

En varias ciudades de Connecticut ponen en circulacion nuevos autobuses
www.elsolnews.com



El Sol News - Periódico en español más leído de Connecticut y Connecticut. El Sol News le trae noticias local, estatal, nacional e internacional con temas como la política, comunidad, deportes, familia y salud.

13 hours ago · Like · Comment

Curtis Mack, Tiffany Ventura and Laurie Albano Black like this.

CTTRANSIT

The Connecticut Department of Transportation announced today the availability of language tools on the CTTRANSIT website. These tools are made available to help people get information about and use the public transportation resources in the state. Read more <http://www.ct.gov/dot/transportation.asp?A=1373&Q=476542>



ConDOT: CTTRANSIT Information Available Online in Multiple Languages
www.ct.gov

CTTRANSIT Information Available Online in Multiple Languages Available. The Connecticut Department of Transportation announced today the availability of language tools on the www.cttransit.com website. These tools are made available to help people get information about and use the public transportation.

13 hours ago · Like · Comment

Tiffany Ventura and John Gemett like this.

CTTRANSIT

"Monday morning was Williams' first day ... driving a new batch of 60-foot-long so-called "articulated" buses, accordion-like "bendy" buses to make more room on crowded routes.... 12 of the bendy buses have joined the New Haven area fleet. Also new ... are 14 40-foot environmentally friendly "hybrid buses." Read the story in the Independent: http://www.nh.com/independent.org/index.php/archives/entry/bendy_debut/

- Wall
- Info
- Photos
- Events

About
Connecticut Transit (CTTRANSIT) is the Connecticut Department of Transportation...

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- Hartford Cityline
- MTA Metro-North Railroad
- Tri-State Transportation Campaign
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2011



CONNECTICUT DEPARTMENT OF TRANSPORTATION NEWS RELEASE

2800 BERLIN TURNPIKE P.O. BOX 317546
NEWINGTON CONNECTICUT, 06131-7456

FOR RELEASE: March 29, 2011

FOR FURTHER INFORMATION:
OFFICE OF COMMUNICATIONS
TELEPHONE: (860) 594-3062
FAX: (860) 594-3065
WEB SITE: www.ct.gov/dot

CTRANST Information Available Online in Multiple Languages

The Connecticut Department of Transportation announced today the availability of language tools on the www.cttransit.com website. These tools are made available to help people get information about and use the public transportation resources in the state.

CTRANST's Spanish-language web content has been up and running for over two years. This feature "went live" in mid-February 2009 as an additional service for those who do not speak English fluently. The link to toggle to a Spanish-language version is prominently displayed in the upper right corner of every page on the site. Once selected, as one navigates through the content all the pages appear in their translated form—an exact mirror of the English-language content. This translation includes the navigation tools, the graphics, images, and all of the content.

The aim of this Internet feature is to make CTRANST more accessible to those Spanish-speakers who prefer finding information online. Already, CTRANST publishes printed service-change notices and important brochures in both English and Spanish. Census data show that over 40 percent of Hartford residents identify themselves as persons of Hispanic or Latino origin. Recent census updates confirm that the state's Hispanic and Latino population grew nearly 50 percent to about 479,000 over the decade.

Use of this web-based tool has grown since 2009. In the calendar year beginning January 1, 2011, there have been over 4,300 "pageviews" of 150 of the web pages, representing 0.26 percent of the total pageviews at www.cttransit.com. Similar to the use patterns observed on the English-language version of the site, the Routes & Schedules page is the most often accessed, followed by "new rider" information and details on the senior & disabled reduced-fare program.

As evidenced in census data, in Hartford nearly 50 percent of the population indicated that a language other than English is spoken at home. Throughout the state of Connecticut, particularly in the large metropolitan regions, similar percentages of persons identify that English is not their native language. Therefore, in September 2010, to provide a translation option for a wider array of languages, the Google Translate feature was added to www.cttransit.com. This pull down menu, which takes users to translated



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PROCUREMENTS

SENIOR / DISABLED

NEW RIDER?

FARES

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PRESS RELEASES

CTTRANSIT Information Available Online in Multiple Languages

HARTFORD, Conn., 3/29/2011

The Connecticut Department of Transportation announced today the availability of language tools on the www.cttransit.com website. These tools are made available to help people get information about and use the public transportation resources in the state.

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The aim of this Internet feature is to make CTTRANSIT more accessible to those Spanish-speakers who prefer finding information online. Already, CTTRANSIT publishes printed service-change notices and important brochures in both English and Spanish. Census data show that over 40 percent of Hartford residents identify themselves as persons of Hispanic or Latino origin. Recent census updates confirm that the state's Hispanic and Latino population grew nearly 50 percent to about 479,000 over the decade.

Use of this web-based tool has grown since 2009. In the calendar year beginning January 1, 2011, there have been over 4,300 "pageviews" of 150 of the web pages, representing 0.25 percent of the total pageviews at www.cttransit.com. Similar to the use patterns observed on the English-language version of the site, the Routes & Schedules page is the most often accessed, followed by "new rider" information and details on the senior & disabled reduced-fare program.

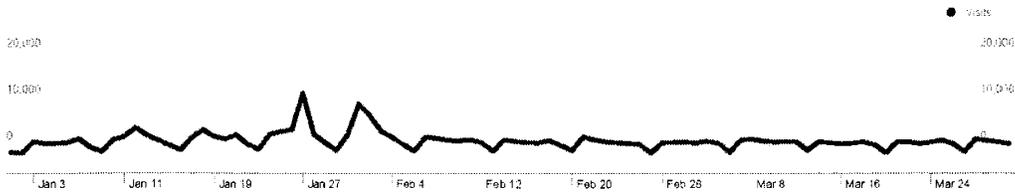
As evidenced in census data, in Hartford nearly 50 percent of the population indicated that a language other than English is spoken at home. Throughout the state of Connecticut, particularly in the large metropolitan regions, similar percentages of persons identify that English is not their native language. Therefore, in September 2010, to provide a translation option for a wider array of languages, the Google Translate feature was added to www.cttransit.com. This pull-down menu, which takes users to translated content, is also featured on each of the web pages to facilitate ease of switching languages.

Overall growth in reliance on the online information provided by CTTRANSIT is reflected in heavy site visitation on days when weather or other events require timely announcements to inform customers of the status of service. CTTRANSIT is committed to continuing to explore options to ensure the greatest number of customers find this information in a form most useful to them. The steady utilization over the past two years of CTTRANSIT's Spanish-language content parallels that broader increase in consuming web-based information.

Associated Link:

<http://www.ct.gov/dot/cmp/view.asp?A=1373&Q=476242>

CTTRANSIT is the state-owned bus transit system serving the greater Hartford, New Haven, Stamford, Waterbury, New Britain, Meriden, Enston and Wallingford areas.



420,910 visits used 93 languages

Site Usage				
Visits	Pages/Visit	Avg. Time on Site	% New Visits	Bounce Rate
420,910	4.35	00:03:11	38.09%	23.67%
% of Site Total: 100.00%	Site Avg: 4.35 (0.00%)	Site Avg: 00:03:11 (0.00%)	Site Avg: 38.08% (0.03%)	Site Avg: 23.67% (0.00%)
Language	Visits	Visits	Visits	Visits
en-us	353,879			84.07%
en	55,986		13.30%	
en_us	3,277		0.78%	
es-es	1,278		0.30%	
*30775594307752e1307755a430775578307753f0	1,058		0.25%	
es	987		0.23%	
zh-cn	848		0.20%	
en-gb	752		0.18%	
de	347		0.08%	
fr	338		0.08%	
ja	195		0.05%	
ko	194		0.05%	
pt-br	127		0.03%	
es-419	121		0.03%	
zh-tw	116		0.03%	
pl	113		0.03%	
ja-jp	108		0.03%	
de-de	108		0.03%	
ko-kr	102		0.02%	
it	95		0.02%	
ru	89		0.02%	
fr-fr	74		0.02%	

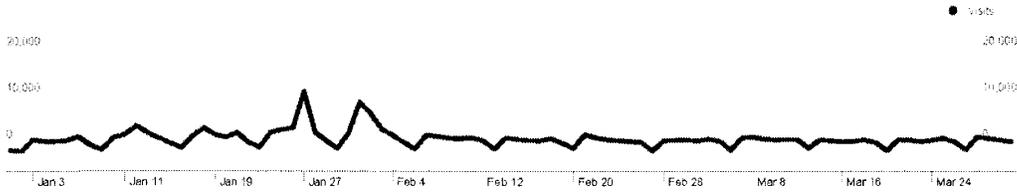
tr	69	0.02%
*3077219030771edd307721a03077217430771fec	60	0.01%
es-mx	51	0.01%
nl	43	0.01%
pt-pt	39	0.01%
sv	32	0.01%
tr-tr	29	0.01%
zh-hk	27	0.01%
es-ar	25	0.01%
ru-ru	25	0.01%
ja-jp-mac	24	0.01%
ar	20	> 0.00%
pt	16	> 0.00%
hu	14	> 0.00%
sv-se	14	> 0.00%
it-it	13	> 0.00%
c	12	> 0.00%
en-ca	11	> 0.00%
pl-pl	10	> 0.00%
th	10	> 0.00%
el	9	> 0.00%
es_us	9	> 0.00%
cs	8	> 0.00%
th-th	8	> 0.00%
da	7	> 0.00%
he	7	> 0.00%
he-il	7	> 0.00%
no	7	> 0.00%
(not set)	6	> 0.00%
en-ie	6	> 0.00%
et	6	> 0.00%
id	6	> 0.00%
ar-sa	5	> 0.00%
da-dk	5	> 0.00%
en-au	4	> 0.00%

es-ec	4	> 0.00%
es-la	4	> 0.00%
nb-no	4	> 0.00%
uk	4	> 0.00%
us	4	> 0.00%
es-co	3	> 0.00%
fi	3	> 0.00%
hr-hr	3	> 0.00%
nl-nl	3	> 0.00%
ro	3	> 0.00%
af-za	2	> 0.00%
bg-bg	2	> 0.00%
ca	2	> 0.00%
en-us; shc; shc-kiosk; shc-hts; shc-unit-01444; shc-mac-0hts	2	> 0.00%
es-cl	2	> 0.00%
es-xl	2	> 0.00%
fa	2	> 0.00%
ne-np	2	> 0.00%
sk	2	> 0.00%
*307755043077525130775514307754e830775360	1	> 0.00%
br	1	> 0.00%
cs-cz	1	> 0.00%
el-gr	1	> 0.00%
en_ca	1	> 0.00%
eu	1	> 0.00%
fa-ir	1	> 0.00%
fi-fi	1	> 0.00%
iu-ca	1	> 0.00%
km	1	> 0.00%
lv-lv	1	> 0.00%
sl	1	> 0.00%
sr	1	> 0.00%
ta	1	> 0.00%
tl	1	> 0.00%
uk-ua	1	> 0.00%

vi-vn

1 > 0.00%

1 - 93 of 93



420,910 visits used 93 languages

Site Usage				
Visits 420,910 % of Site Total: 100.00%	Pages/Visit 4.35 Site Avg: 4.35 (0.00%)	Avg. Time on Site 00:03:11 Site Avg: 00:03:11 (0.00%)	% New Visits 38.09% Site Avg: 38.08% (0.03%)	Bounce Rate 23.67% Site Avg: 23.67% (0.00%)
Language	Visits	Visits		
en-us	353,879	84.07%		
en	55,996	13.30%		
en_us	3,277	0.78%		
es-es	1,278	0.30%		
*30775594307752e1307755a430775578307753f0	1,058	0.25%		
es	987	0.23%		
zh-cn	846	0.20%		
en-gb	752	0.18%		
de	347	0.08%		
fr	338	0.08%		
ja	195	0.05%		
ko	194	0.05%		
pt-br	127	0.03%		
es-419	121	0.03%		
zh-tw	118	0.03%		
pl	113	0.03%		
ja-jp	108	0.03%		
de-de	106	0.03%		
ko-kr	102	0.02%		
it	95	0.02%		
ru	89	0.02%		
fr-fr	74	0.02%		

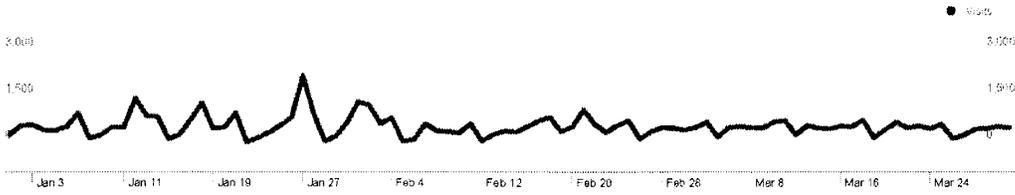
tr	69	0.02%
*3077219030771edd307721a03077217430771fec	60	0.01%
es-mx	51	0.01%
nl	43	0.01%
pt-pt	39	0.01%
sv	32	0.01%
tr-tr	29	0.01%
zh-hk	27	0.01%
es-ar	25	0.01%
ru-ru	25	0.01%
ja-jp-mac	24	0.01%
ar	20	> 0.00%
pt	16	> 0.00%
hu	14	> 0.00%
sv-se	14	> 0.00%
it-it	13	> 0.00%
c	12	> 0.00%
en-ca	11	> 0.00%
pl-pl	10	> 0.00%
th	10	> 0.00%
el	9	> 0.00%
es_us	9	> 0.00%
cs	8	> 0.00%
th-th	8	> 0.00%
da	7	> 0.00%
he	7	> 0.00%
he-il	7	> 0.00%
no	7	> 0.00%
(not set)	6	> 0.00%
en-ie	6	> 0.00%
et	6	> 0.00%
id	6	> 0.00%
ar-sa	5	> 0.00%
da-dk	5	> 0.00%
en-au	4	> 0.00%

es-ec	4	> 0.00%
es-la	4	> 0.00%
nb-no	4	> 0.00%
uk	4	> 0.00%
us	4	> 0.00%
es-co	3	> 0.00%
fi	3	> 0.00%
hr-hr	3	> 0.00%
nl-nl	3	> 0.00%
ro	3	> 0.00%
af-za	2	> 0.00%
bg-bg	2	> 0.00%
ca	2	> 0.00%
en-us; shc; shc-kiosk; shc-hts; shc-unit-01444; shc-mac-0hts	2	> 0.00%
es-cl	2	> 0.00%
es-xl	2	> 0.00%
fa	2	> 0.00%
ne-np	2	> 0.00%
sk	2	> 0.00%
*307755043077525130775514307754e830775360	1	> 0.00%
br	1	> 0.00%
cs-cz	1	> 0.00%
el-gr	1	> 0.00%
en_ca	1	> 0.00%
eu	1	> 0.00%
fa-ir	1	> 0.00%
fi-fi	1	> 0.00%
iu-ca	1	> 0.00%
km	1	> 0.00%
lv-lv	1	> 0.00%
sl	1	> 0.00%
sr	1	> 0.00%
ta	1	> 0.00%
tl	1	> 0.00%
uk-ua	1	> 0.00%

vi-vn

1 | > 0.00%

1 - 93 of 93



89,054 visits used 54 languages

Site Usage				
Visits	Pages/Visit	Avg. Time on Site	% New Visits	Bounce Rate
89,054	3.25	00:02:20	46.65%	29.94%
% of Site Total: 100.00%	Site Avg: 3.25 (0.00%)	Site Avg: 00:02:20 (0.00%)	Site Avg: 46.60% (0.10%)	Site Avg: 29.94% (0.00%)
Language	Visits	Visits		
en-us	80,899	90.62%		
en	6,837	7.68%		
en_us	235	0.26%		
en-gb	194	0.22%		
fr	180	0.20%		
de	123	0.14%		
zh-cn	99	0.11%		
*30775594307752e1307755a430775578307753f0	93	0.10%		
es	71	0.08%		
it	60	0.07%		
es-es	52	0.06%		
ja	49	0.06%		
pt-br	44	0.05%		
ko	33	0.04%		
fr-fr	31	0.03%		
de-de	24	0.03%		
nb-no	20	0.02%		
zh-tw	16	0.02%		
it-it	15	0.02%		
nl	15	0.02%		
(not set)	14	0.02%		
ko-kr	13	0.01%		

cs	12	0.01%
ja-jp	10	0.01%
nl-nl	9	0.01%
ru	9	0.01%
sv-se	9	0.01%
pt-pt	7	0.01%
es-419	6	0.01%
he	6	0.01%
pt	6	0.01%
sv	6	0.01%
tr	6	0.01%
c	5	0.01%
pl	5	0.01%
el	4	> 0.00%
hu	4	> 0.00%
no	4	> 0.00%
ca	3	> 0.00%
fi	3	> 0.00%
ja-jp-mac	3	> 0.00%
ar	2	> 0.00%
ar-sa	2	> 0.00%
da	2	> 0.00%
is	2	> 0.00%
ru-ru	2	> 0.00%
th	2	> 0.00%
zh-hk	2	> 0.00%
*3077219030771edd307721a03077217430771fec	1	> 0.00%
da-dk	1	> 0.00%
hr	1	> 0.00%
pl-pl	1	> 0.00%
ro	1	> 0.00%
ta	1	> 0.00%

Fluency in Other Than English Languages

NAME	LANGUAGE(S)	PHONE NUMBER	SPEAK	READ	WRITE	UNION
Niyazi Alsaqri	Arabic	203-789-1369	X			
Marcelle Zeitoun	Arabic	860-258-0704	X			P-4
Ghazi Alsaqri	Arabic	203-785-8082	X			P-4
Basel Hashem	Arabic	203-537-2325	X			P-4
Mohammed Bishtawi	Arabic	203-389-3167	X			P-4
Rabih M. Barakat	Arabic	860-594-3389	X			P-4
Catarina Pond	Italian	860-594-3188	X			P-5
Ann M. Calafiore	Italian	860-594-2530	X			NP-3
Barbara Wozniak	Polish	860-594-2915	X			P-4
Robert J. Wiecki	Polish	203-389-3170	X			P-4
Marcelle Zeitoun	French	860-258-0704	X			P-4
Robert P. Brown	French	860-594-3207	X			P-4
Prosper Walter	French	203-972-0388	X			NP-3
Gabriele Hallock	German	860-594-3352	X	X	X	P-4
Ernest E. Lagoja	German (Bavarian-Austrian Dialect)	203-389-3026	X			P-4
Anna S. Mermelstein	Russian	860-594-2715	X			P-4
Alex Mermelstein	Russian	860-594-2742	X			
Vitalij Staroverov	Russian	860-594-2582	X	X	X	P-4
Vosco Ferreira	Portuguese	203-579-6211	X	X		
Anthony Estanislau	Portuguese	860-594-3230	X			P-4
Rosmery Rodrigues	Spanish	860-594-2127	X			P-4
Marisol Colon	Spanish	860-594-3106	X	X	X	NP-3
Mario Marrero	Spanish	860-594-3481	X			P-4
Irma Reyes	Spanish	860-594-2168	X	X	X	MGMT.
Edgardo Block	Spanish	860-258-0303	X	X	X	P-4
Edgar Alvarado	Spanish	203-881-0529	X			

NAME	LANGUAGE(S)	PHONE NUMBER	SPEAK	READ	WRITE	UNION
Ada Alvarez	Spanish	860-594-3068	X	X	X	NP-3
William Caicedo	Spanish		X	X	X	
Maria Gonzalez	Spanish	860-258-1980	X			
David Fairlie	Spanish	860-594-2731	X	X	X	NP-3
Tiffany Velasco	Spanish		X			
Betty S. Ambler	Mandarin Chinese	860-594-3035	X			P-5
Xiuyun Cai	Mandarin Chinese	860-594-2783	X			
Yiu (Kevin) K. Ng	Chinese/Cantonese	860-594-2749	X			P-4
Julia Pang	Chinese	860-594-2717	X	X	X	
Mimosa Pham	Vietnamese	860-594-2322	X	X		
Won S. Song	Korean	860-594-3236	X			P-4
Nick Ozkan	Turkish	860-594-3222	X			P-4
Nick Ozkan	Albanian	860-594-3222	X			P-4
Sohrab Afrazi	Farsi (Persian)	860-594-3262	X			
Sohrab Afrazi	Azari	860-594-3262	X			
Anna S. Mermelstein	Ukranian	860-594-2715	X			P-4
Olasupo Gbadebo	Yoruba	860-258-0335	X			
Mohammed Azimi	Dari (Afghan language)	860-594-3259	X			P-4
Ernest E. Lagoja	Slovenian	203-389-3026	X			P-4
Mohammed Khadeer	Hindi	860-283-7490	X			
Ahsan K. Saghir	Hindi	860-594-2076	X			P-4
Kiran Jain	Hindi	860-292-2019	X			MGMT
Mohammed Khadeer	Urdu	860-283-7490	X			
Ahsan K. Saghir	Urdu	860-594-2076	X			P-4
Kiran Jain	Urdu	860-292-2019	X			MGMT
Kiran Jain	Swahili	860-292-2019	X			MGMT
Kiran Jain	Punjabi	860-292-2019	X			MGMT
Kiran Jain	Gujrati	860-292-2019	X			MGMT

Environmental Justice

ENVIRONMENTAL JUSTICE

Executive Order 12898 (“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”) required each federal agency to develop a written strategy to identify and address disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income communities. This can be realized through the development and implementation of an integrated approach towards Environmental Justice (EJ) through the collection, analysis, and dissemination of understandable and useful information on the adverse environmental and health impacts on protected populations. Through the National Environmental Policy Act of 1969 (NEPA) process, the EJ analysis is included as an individual section of the environmental document and is thereby disseminated to the public. For a Regional Planning Organization (RPO), the EJ analysis is included as another area of study under Title VI during the Planning process for transportation projects, plans and programs. Additionally, RPOs should analyze the impact of benefits provided by the RPO upon low-income and minority communities within the RPO’s boundaries. This should include benefits already offered as well as benefits to be offered.

There are three fundamental EJ principles. The principles are as follows:

- 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; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Environmental Justice is applicable to persons belonging to any of the following groups:

- **Black**—a person having origins in any of the black racial groups of Africa.
- **Hispanic**—a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- **Asian**—a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- **American Indian and Alaskan Native**—a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.
- **Native Hawaiian or Other Pacific Islander**—a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **Low-Income**—a person whose household income (or in the case of a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines.

The Title VI Coordinator reviews both the draft and final Environmental Assessments and Environmental Impact Statements and provides feedback and guidance to insure that the process is compliant with Title VI and the appropriate considerations have been made including adequate outreach to LEP and EJ populations.

The Coordinator is also notified of public meetings and hearings. The Coordinator will insure that the meeting/hearing notices include information on how to obtain LEP assistance, and is held in a venue that is ADA accessible. The Coordinator will periodically attend public hearings and meetings to determine how well the outreach process is working and will make recommendations for outreach enhancements. The Department has developed a state-wide resource listing of Community Based Organizations that can be used to assist with outreach to LEP and EJ populations. The Department will review the GIS maps to determine the impacted communities and consult the COB resource directory for organizations and agencies that may serve those communities. These organizations will receive public meeting and public hearing notifications; the Department may also reach out to these organizations for their input on how to improve its community outreach processes. The Department will also look to identify ways to reach out to communities that are traditionally underrepresented, by selecting venues in those communities. The Department will continue to provide information about Title VI and the protections offered under Title VI.

Section VI
Notifying Beneficiaries

Section VI
Notifying Beneficiaries of
Protection Under Title VI



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Connecticut... on the Move!

James P. Redeker
Commissioner



Thank you for visiting the Connecticut Department of Transportation website. There is a wealth of information here, ranging from our long-range goals to the best ways to do business with our agency.

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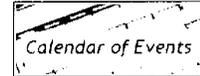
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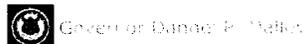


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**CONNECTICUT DEPARTMENT OF TRANSPORTATION
Bureau of Finance and Administration
WELCOME TO THE OFFICE OF CONTRACT COMPLIANCE**

MISSION

To ensure that the Connecticut Department of Transportation and any entity performing work and/or providing goods or services, are in full compliance with all relevant Federal and State non-discrimination and equal opportunity laws, regulations, directives and executive orders in all programs and activities.

OUR PROGRAMS

The Office of Contract Compliance is responsible for the administration of four Federal-Aid programs; the Disadvantaged Business Enterprise (DBE) Program; the On the Job Training (OJT) Program; the Contractor Compliance Program and the Title VI Program. The Office of Contract Compliance is also responsible for monitoring the State Affirmative Action Contract Compliance requirements.

Message from the Contract Compliance Program Manager



Do you need to reach us?
For Contract Compliance Staff Contact Information, Look Here.

**Disadvantaged
Business Program
(DBE)**

**Title VI
Program**

**On-The-Job Training (OJT)
Workforce
Development Pilot**

**External
Affirmative Action
Requirements**

**Contractor
Compliance
Requirements**

**Resource
List Of
Useful Websites**



**Contract Compliance Forms
Need Forms? Look Here**

[Printable Version](#)

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CONNECTICUT DEPARTMENT OF TRANSPORTATION
Bureau of Finance and Administration
WELCOME TO THE OFFICE OF CONTRACT COMPLIANCE

TITLE VI PROGRAM

What is Title VI?

Title VI of the Civil rights Act of 1964, as amended, (prohibits race, color and national origin discrimination including language access for limited English proficient persons), 49 CFR Part 21, and 23 CFR Part 200, Section 504 of the Rehabilitation Act of 1973 (prohibiting disability discrimination), Title IX of the Education Amendments of 1972 (prohibiting sex discrimination in education and training programs), Age discrimination Act of 1975 and other directives.

The Connecticut Department of Transportation will ensure that no person in the United States shall, on the ground of race, color, national origin, sex, age or disability 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 from the United States Department of Transportation.

What is LEP?

On August 11, 2000, President Clinton issued Executive Order 13166, entitled "Improving Access to Services by Persons with Limited English Proficiency" - that requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to Limited English Proficiency (LEP), cannot fully participate in or benefit from those programs and activities.

The Connecticut Department of Transportation (ConnDOT) understands its responsibilities and obligations to LEP person's pursuant to Title VI of the Civil Rights Act of 1964 and implementing ConnDOT's Title VI regulations to ensure LEP persons are not subject to discrimination.

Title VI and its accompanying regulation prohibit recipients from discriminating on the basis of race, color, or national origin. Discrimination on the basis of national origin may occur if a recipient does not provide appropriate language assistance to LEP individuals, because these individuals whose language is usually tied to their national origin, will not have access to the same benefits, services, and information or rights that the recipient provide to everyone else.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP", and are, therefore, entitle to language assistance under title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter.

Examples of populations likely to include LEP persons who are served or encountered by the DOT recipients and should be considered when planning language services include, but are limited to:

- Public transportation passengers
- Persons living in areas affected or potentially effected by transportation projects
- Persons served by emergency transportation response programs, and/or transportation programs for the elderly
- Business owners who apply to participate in ConnDOT's Disadvantaged Business Enterprise Program

What is Environmental Justice?

A 1994 Presidential Executive Order directed every Federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on "minority populations and low-income populations."

There are three fundamental environmental justice principles:

- 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.

Title VI Policy

Title VI Brochure

Americans with Disabilities Act (ADA) - Complaint Procedure

Title VI Discrimination Complaint Form

ADA / 504 Complaint Form

ADA Transition Plan

Examination of Title VI Compliance

[Listing of Interpreters and Translators Contracted with DAS](#)

[Listing of Community Based Organizations](#)

[GIS Mapping](#)

[Title VI/Non-Discrimination Program](#)

Community Based Organization Listing.doc

Additional Community Based Organizations.xls

Title VI Program Coordinator

Debra Goss, Manager

Phone: (860) 594-2169

Debra.goss@ct.gov

Irma Reyes

Equal Employment Opportunity Specialist I

Phone: (860) 594-2168

Irma.reyes@ct.gov

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Connecticut Department of Transportation

TITLE VI POLICY STATEMENT

The Connecticut Department of Transportation (ConnDOT) is committed to ensuring that no person is excluded from participation, denied benefits, or otherwise subjected to discrimination under any program or activity, on the basis of race, color, national origin, sex, age, or disability.

ConnDOT as a recipient of federal financial assistance will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended, and related statutes and regulations in all ConnDOT programs and activities.

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, national origin, sex, age, or disability may file a Title VI complaint. Complaints may be filed directly to ConnDOT or to the Federal Funding agency. Complaints must be filed in writing and signed by the complainant or a representative and should include the complainants name, address, and telephone number or other means by which the complainant can be contacted. Complaints must be filed within 180 days of the date of the alleged discriminatory act.

To request additional information on ConnDOT's non-discrimination obligations or to file a Title VI complaint, please submit your request or complaint in writing to:

Division of Contract Compliance, Manager
Connecticut Department of Transportation
2800 Berlin Turnpike
Newington, Connecticut 06111.

Complaint forms can be obtained online at the ConnDOT website www.ct.gov/dot

Federal Transit Administration (FTA) Title VI complaints may be filed directly to:

Title VI Program Coordinator
East Building, 5th Floor, TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Federal Highway Administration (FHWA) Title VI complaints may be filed directly to:

Ms. Brenda Armstead, Investigations & Adjudication Team Director
FHWA Office of Civil Rights
1200 New Jersey Avenue, SE, Suite E-81
Washington, DC 20590

Federal Aviation Administration (FAA) Title VI complaints may be filed directly to:

Mr. Ossie Jordan, Civil Rights Officer
New England Region Headquarters, ANE-9
18 New England Executive Park
Burlington, MA 02302

If you believe that a Federal Transit Administration (FTA) recipient has retaliated against you, immediately contact the FTA to investigate your allegation. Filing a complaint does not prevent an individual or group from seeking remedy through other sources.

Who may file a Title VI complaint?

A complaint may be filed by any individual or group that believes that they have been subjected to discrimination or retaliation based on their race, color, national origin, sex, age, disability/handicap and/or income level. The complaint may be filed by the affected party or a representative, and must be in writing.

What information do I include in my complaint?

A signed, written complaint should be filed within 180 days of the date of the alleged discrimination, including:

- Your name, address and telephone number. If you are filing on behalf of another person, include their name, address, telephone number and your relation to that person.
- The name and address of the agency, firm or department you believe discriminated against you.
- Your signature.
- A description of how, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged acts.
- The names of individuals whom you allege discriminated against you if you know them.
- The names of any persons, if known, that can be contacted for additional information to support or clarify your allegations.

How can I file a discrimination complaint?

If you believe that a USDOT recipient has discriminated against you or others protected by Title VI, you may file a complaint. Complaints may be filed with any of the following person:

Debra Goss, Title VI Coordinator
CT Department of Transportation
Newington, CT 06131-7546
Tel: (860) 594-2169

Complaints may also be filed directly with the United States Department of Transportation (USDOT). For information on how to file a complaint directly with USDOT please contact Ms. Debra Goss.

Your Rights Under Title VI of the Civil Rights Act of 1964

"No person in the United States shall, on the ground 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." (42 U.S.C. 2000d)

This brochure is designed to assist you to understand your rights under the Title VI of the Civil Rights Act of 1964.

**STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION**

What is Title VI?

Title VI of the Civil Rights Act of 1964 is the Federal Law that protects individuals and groups from discrimination on the basis of their race, color, and national origin in programs and activities that receive Federal financial assistance. However, USDOT's reference to Title VI includes other Civil Rights provisions of Federal statutes and related authorities to the extent that they prohibit discrimination in programs and activities receiving Federal financial assistance.

Title VI Policy

Pursuant to Title VI of the Civil Rights Act of 1964, the Restoration Act of 1987 and other nondiscrimination authorities, it is the policy of ConnDOT that discrimination on the ground of race, color, national origin, disability/handicap, sex, age, or income status shall not occur in connection with programs or activities receiving financial assistance from the USDOT.

The Connecticut Department of Transportation will ensure that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability 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 from the USDOT.

Title VI Compliance

Title VI compliance is a situation where a recipient has effectively implemented all the Title VI requirements or can demonstrate that every good faith effort has been made toward achieving this end.

USDOT Recipient

A USDOT Federal-aid recipient is any State, territory, possession, political subdivision, instrumentality, public or private agency, organization, entity or individual to whom USDOT assistance is extended either directly or through another recipient.

Programs Covered

Federally-assisted programs include any USDOT Project, program or activity for the provision of services, financial aid, and other benefits. This includes education or training, work opportunities, health,

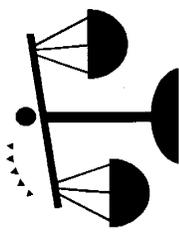
welfare, rehabilitation, housing or other services, whether provided directly by the recipient or other agents, through contracts or other arrangements with the recipient.

What discrimination is prohibited by the ConnDOT Title VI Program?

Discrimination under our Title VI program is an act (action or inaction) whether intentional or unintentional, through which a person or group, solely because of race, color, national origin, disability/handicap, sex, age, or income status has been otherwise subjected to unequal treatment or impact, under any program or activity receiving financial assistance from USDOT.

In operating USDOT-assisted programs, a recipient cannot discriminate either directly or through contractual or other means by:

- Denying programs services, financial aids, or other benefits;
- Providing different program services, financial aids or other benefits, or providing them in manner different from that provided to others;
- Segregating or separately treating individuals or groups in any matter related to the receipt of any program service, financial aid or benefit;
- Restricting in any way the enjoyment of any advantage or privilege enjoyed by others receiving any program service, financial aid or other benefits;
- Denying person(s) the opportunity to participate as a member of a planning, advisory or similar body;
- Denying person(s) the opportunity to participate in the program through the provision of services, or affording the opportunity to do so differently from those afforded others.



Connecticut Department of Transportation TITLE VI DISCRIMINATION COMPLAINT FORM

Complainants Name: _____

Street Address: _____

City/State/Zip: _____

Phone: _____

Discrimination because of: Race/ Color/ National
Origin/ Sex/ Age/ Disability/ Creed(FAA only)/ Other

Please provide the date(s) and location of the alleged discrimination, the name(s) of the individual(s) who allegedly discriminated against you including their titles (if known).

Please provide the names, addresses and telephone numbers of any witnesses.

Explain as briefly and as clearly as possible what happened, how you feel that you were discriminated against and who was involved. Please include how other persons were treated differently from you.

Signature: _____ **Date:** _____

You may use additional sheets of paper if necessary. Also include any written materials pertaining to your complaint.

Section VII
Pending Applications for
Financial Assistance

FTA Open Grants and Reporting Schedule

Grant No.	Description	Funding Source	Submission (Quarterly/Annual)
CT-03-0097	Norwich Transportation Center	Section 5309	Quarterly
CT-03-0109	Construct New Haven Bus Garage	Section 5309	Quarterly
CT-03-0110	Griffin Line Corridor/Trans Alt Study	Section 5309	Quarterly
CT-03-0111	New Bus Facility Waterbury	Section 5309	Quarterly
CT-03-0119®	Feasibility Study Danbury To Norwalk	Section 5309	Quarterly
CT-03-0120®	8 Projects for CDOT's FY 2002 POP	Section 5309	Quarterly
CT-03-0123	New Pedestrian Bridge at New London RR	Section 5309	Quarterly
CT-03-0124®	FY 2003 POP with 4 Projects - Rails	Section 5309	Quarterly
CT-03-0126®	FY 2004 Program of Projects w/5 Projects	Section 5309	Quarterly
CT-03-0134®	FY 2005 Program of Projects - Rails	Section 5309	Quarterly
CT-03-0140®	FY 2005 Program of Projects - Rails	Section 5309	Quarterly
CT-03-0145	Waterbury Bus Maintenance Facility	Section 5309	Quarterly
CT-03-0146®	Orange Intermodal Fac - Environmental As	Section 5309	Quarterly
CT-03-0149	New Britain/Hartford Busway	Section 5309	Quarterly
CT-04-0005	New Britain - Hartford Busway	Section 5309	Quarterly
CT-04-0009	Waterbury Bus Maintenance Facility	Section 5309	Quarterly
CT-04-0012	NW Transit Bus Maint & Storage Facility	Section 5309	Quarterly
CT-04-0013	Norwich Transportation Center	Section 5309	Quarterly
CT-04-0017	NW Bus Maintenance Facility	Section 5309	Quarterly
CT-04-0018	New London Intern Ctr Streetscape	Section 5309	Quarterly
CT-04-0021	New Britain/Hartford Busway	Section 5309	Quarterly
CT-04-0022	Waterbury Bus Facility Earmark	Section 5309	Quarterly
CT-04-0023	Northwestern CTTD Bus Facility Earmark	Section 5309	Quarterly
CT-04-0024	Bridgeport Rail Station Improvement	Section 5309	Quarterly
CT-04-0032	Waterbury Bus Facility Earmark	Section 5309	Quarterly
CT-04-0031	Northwestern CTTD Bus Facility Earmark	Section 5309	Quarterly
CT-05-0101®	SAFETEA - LU Rail Mod FFY 2006 POP	Section 5309	Quarterly
CT-05-0104®	Cat C1b Repl; FF Sta; NHY Fuel Facility	Section 5309	Quarterly
CT-05-0105®	New Haven Line Fixed Guideway Modernizat	Section 5309	Quarterly
CT-05-0106	New Britain/Hartford Busway	Section 5309	Quarterly
CT-15-X001	New Britain - Hartford Busway	Section 5309	Quarterly
CT-55-0001	Development of Fuel Cell Buses	Section 5309	Quarterly
CT-58-0001	Purchase 4 40-ft Hybrid Replacement Buses	Section 5308	
CT-70-X002	Norwich Transportation Center	Section 5307	Quarterly
CT-90-X300®	CTC SIGNAL 7 OPERATING ASST	Section 5307	Quarterly
CT-90-X324	Waterbury Bus Facility, PE/Dsgn, Land Acq.	Section 5307	Quarterly
CT-90-X378®	FFY 2002 Section 5307 Program of Projects	Section 5307	Quarterly
CT-90-X384	FFY 2002 Section 5307 Program of Projects	Section 5307	Quarterly
CT-90-X391	FY 2003 Program of Projects (6 Projects)	Section 5307	Quarterly
CT-90-X393®	FY 2003 Section 5307 POP 5 Rail Projects	Section 5307	Quarterly
CT-90-X404®	FY 2004 Program of Projects - Reg 2	Section 5307	Quarterly
CT-90-X405	FY 2004 Section 5307 POP (8 Projects)	Section 5307	Quarterly
CT-90-X421	FY 2006 Program of Projects - Bus	Section 5307	Quarterly
CT-90-X431	FFY 2006/2007 Bus POP - Amend	Section 5307	Quarterly
CT-90-X501®	Section 5307 POP, Pre-SAFETEA-LU	Section 5307	Quarterly
CT-90-X507®	FY 2010 POP	Section 5307	Quarterly
CT-90-X510	FY 2011 POP (Bus & Rail)	Section 5307	Quarterly
CT-95-X001	New Britain/Hartford Busway	Section 5307	Quarterly
CT-95-X008	Purchase 4 60 ft. Hybrid Repl Buses	Section 5307	Quarterly
CT-95-X010	Waterbury Evening Bus Service	Section 5307	Quarterly
CT-37-X004	Job Access and Reverse Commute FFY 2003	Section 5316	Quarterly
CT-37-X005	JARC FFY 2004	Section 5316	Quarterly
CT-37-X006	Job Access and Reverse Commute FY 05	Section 5316	Quarterly
CT-37-X008	FY 2007 JARC	Section 5316	Quarterly
CT-37-X009	JARC FFYæ08 and FFYæ09	Section 5316	Quarterly
CT-57-X001	New Freedom Initiative FY '06	Section 5317	Quarterly

FTA Open Grants and Reporting Schedule

CT-57-X002	FY 2007 New Freedom (Lapsing Funds)	Section 5317	Quarterly
CT-57-X003	FY 2008 New Freedom Program	Section 5317	Quarterly
CT-56-0002®	NH Yard Change Shop; Danbury CTC	ARRA Grants	Quarterly
CT-77-X001	Stationary Fuel Cells & Hybrid Buses	ARRA Grants	?
CT-86-X001	Vehicles, Facility Improvements, Shelters	ARRA Grants	Quarterly
CT-96-X003	Statewide Vehicles (136)/P&R Lot Improvs	ARRA Grants	Quarterly
CT-96-X004®	Region 2 ARRA POP	ARRA Grants	Quarterly
CT-16-0033	Section 5310 Program FY 2007	Section 5310	Annual
CT-16-0034	Section 5310 Program FFY 2008	Section 5310	Annual
CT-16-0035	FFY 2009 Section 5310	Section 5310	Annual
CT-16-0036	Section 5310 Program FFY 2010	Section 5310	Annual
CT-18-X026	Asset Transfer Administrative Amendment	Section 5311	Annual
CT-18-X027	Rural POP: Ops, Vehicles, Equip & PIng	Section 5311	Annual
CT-18-X028	Section 5311 Program of Projects	Section 5311	Annual
CT-18-X029	Section 5311 Program FFY 2006	Section 5311	Annual
CT-18-X030	Section 5311 Program FFY 2006	Section 5311	Annual
CT-18-X031	Rural Operating Assistance	Section 5311	Annual
CT-18-X032	FFY 2009 Section 5311	Section 5311	Annual
CT-26-0006	United We Ride	Section 5314	Annual
CT-80-X013 (P&P)	Metropolitan and Statewide Planning	Section 5305	Annual
CT-80-X014 (P&P)	Statewide Transit Planning	Section 5305	Annual

Section VIII
Analysis of Construction Projects

8 ENVIRONMENTAL JUSTICE/TITLE VI

8.1 EXISTING SETTING

The U.S. Department of Transportation has a policy to insure nondiscrimination under Title VI of the Civil Rights Act of 1964. The specifics of Title VI are that “no person in the United States shall, on the ground 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, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued in 1998. The Order states “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

U.S. Census Bureau (Census) data (2000) were used to determine the presence or concentration of environmental justice (minority and low-income) populations in the Census Tracts and Block Groups which surround the Proposed Action site (the study area). The U.S. Census Block Groups that comprise the study area and the environmental justice populations within this study area are shown in Figure 6. The largest minority category included in the study area is Black or African American. Table 5 provides information about environmental justice populations in the study area, compared to the larger surrounding areas.

Table 5: Comparison of Environmental Justice Populations

	Study Area	SCRCOG New Haven			
		New Haven	Region	County	Connecticut
Population	6,890	123,626	546,799	824,008	3,405,565
Minority	4,373	69,546	105,045	170,294	627,771
Percent Minority	63.47%	56.26%	19.21%	20.67%	18.43%
Below Poverty*	2,195	27,613	51,203	75,733	259,514
Percent Below Poverty	31.86%	22.34%	9.36%	9.19%	7.62%
Median Household Income	\$27,700**	\$29,604	\$62,859**	\$48,834	\$53,935

*Poverty is defined by the Census as \$8,500 per capita annually or less

**Median Household Income derived by averaging from multiple sources.

Source: U.S. Census 2000. The Census Tracts and Block Groups that comprise the study area are: Census Tract 140100 Block Group 1, Census Tract 140200 Block Group 1, Census Tract 140300 Block Group 2, and Census Tract 140300 Block Group 3.

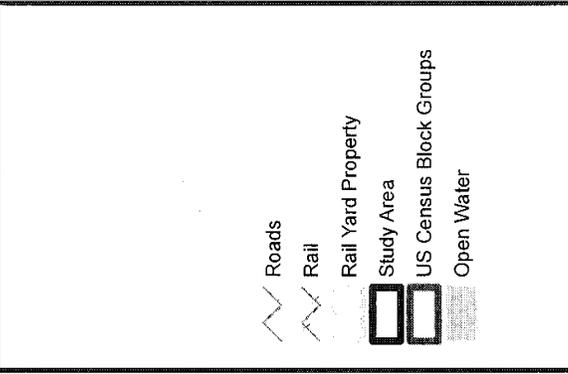
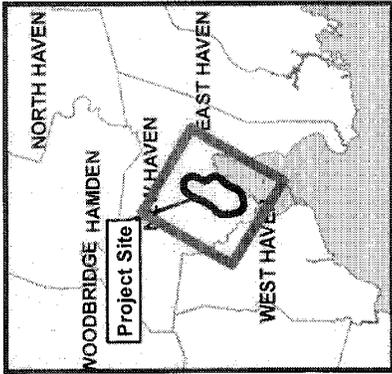
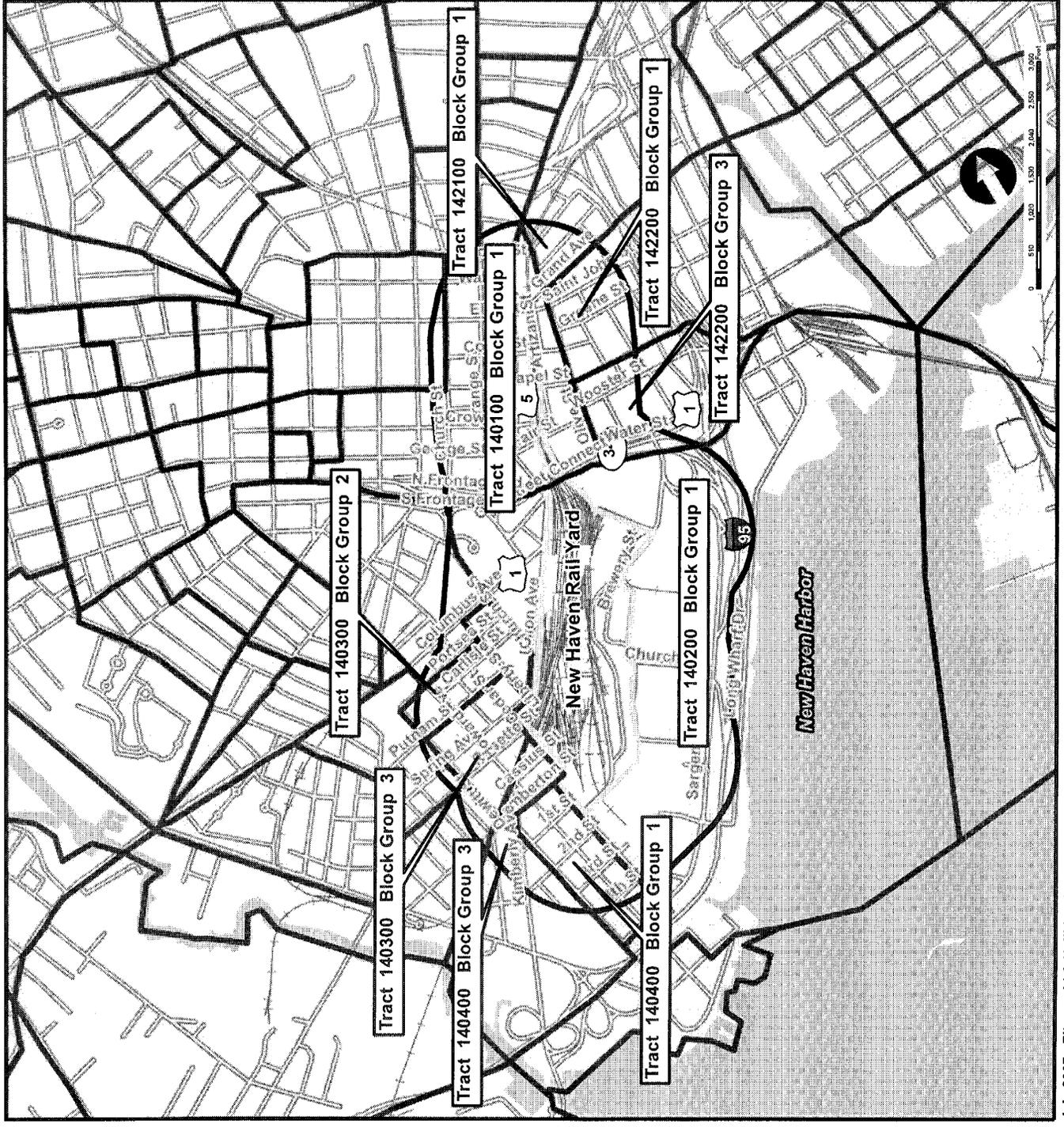


Figure 6
U.S. Census Block
Groups in the Study Area
New Haven Rail Yard EA/EIE
New Haven, CT
State Project # 301-0088



The total population of the study area represents approximately 5.6 percent of the total population of the city of New Haven. The study area has a higher minority population (63.5 percent) than New Haven (56.3 percent), the SCRCOG Region (19.2 percent), New Haven County (20.7 percent), or the state as a whole (18.4 percent). The study area also has a higher percentage of persons living below the poverty level (31.9 percent) than New Haven (22.3 percent), the SCRCOG Region (9.4 percent), New Haven County (9.2 percent), or the state as a whole (7.6 percent). Based on these findings, the study area has a relatively high concentration of minority and low-income populations. People living close to the Proposed Action site reside primarily in the Church Street South Apartments, the Robert T. Wolfe Apartment Building, and a portion of the Hill neighborhood (particularly along Union Avenue, Hallock Street, Cedar Street, and Spring Street).

8.2 DIRECT AND INDIRECT IMPACTS ON ENVIRONMENTAL JUSTICE/TITLE VI

Impacts to environmental justice populations are assessed based on anticipated changes to community cohesion, access to transportation options, access to community resources and institutions, safety, and economic opportunity and natural and historic resources.

No-Build Alternative

The No-Build Alternative would be a continuance of existing conditions, such that there would be no direct or indirect effects to environmental justice populations.

Proposed Action

The Proposed Action's effects on the concentrations of low-income populations and minority populations in the study area were evaluated to identify whether impacts would be disproportionate and adverse. The impacts from the Proposed Action include temporary construction period impacts (see Chapter 27, Construction Impacts) to air quality, traffic, public utilities and services, and temporary impacts from noise. Temporary construction impacts, such as increased noise from truck traffic and dust from construction, will be mitigated to the greatest extent possible. The Proposed Action is contained within the existing NHRY facility; therefore, there will be very little noticeable alteration to the existing landscape. On-site activity once the Proposed Action is constructed will essentially be similar to the activity that presently occurs on site.

There will be socio-economic benefits from the Proposed Action, as additional jobs will be created (see Chapter 9, Socio-Economics).

The proposed improvements will effectively provide improved rail and increased transportation choices via the ability to store, service, and maintain the new M-8 rail cars in the NHRY. The net direct impacts would be positive for rail passengers, and neutral for those who do not utilize the railroad.

Compliance with Executive Order 12898 calls for particular efforts to reach out to environmental justice populations during the environmental assessment public involvement process. Public outreach specifically targeted to minority and low-income individuals included:

- Municipal stakeholder meetings January 5, 2007, and May 16, 2008
- Attendance of CTDOT representatives at the monthly meeting of the Hill South Development Team on March 23, 2007
- A public hearing was held in the Proposed Action area June 25, 2008, at Gateway Community College. Legal notices and display ads were published in the New Haven Register on May 20, June 10, and June 20, 2008 and in LaVoz, an Hispanic news publication, on May 29 and June 19, 2008.
- Display plans and the environmental document were made available for public inspection at the New Haven City Clerk's Office, the New Haven Free Public Library, the South Central Region Council of Governments office, the Connecticut State Library and at CTDOT's offices.

8.3 MITIGATION

Based on the foregoing discussion, although the area includes environmental justice populations, the Proposed Action would not result in any adverse effects; therefore, no mitigation is proposed.

Temporary construction impacts, as well as mitigation measures, are discussed in Chapter 27 of this document.

8.4 SUMMARY OF IMPACTS

The Proposed Action will not have any adverse impacts to low-income or minority Environmental Justice populations.

9 SOCIO-ECONOMICS

9.1 EXISTING SETTING

Until very recently, the socio-economic conditions have been relatively stable in the Proposed Action area (the Long Wharf area). Economic development projects in the Long Wharf area (such as opening of IKEA home furnishings store) have created jobs, but have been counter-balanced by the closure of other businesses, such as Pirelli Tire. Recent development plans, such as the relocation of Gateway Community College and Long Wharf Theater moves jobs and economic activity from Long Wharf to Downtown New Haven, but still within the overall Proposed Action area. Future projects, such as the proposed new “ring road” around the Long Wharf area to provide better traffic circulation, may bring positive changes to this once stable area.

The NHRY currently employs 662 people. Projected employment is 1,611 employees by 2015 and 1,632 by 2030. This increase in jobs from the Proposed Action is beneficial to the Long Wharf/Downtown New Haven area.

Socio-economic conditions are characterized by demographic makeup, and by state of the local economy, housing, employment, and income levels. Factors that define socio-economic and demographic conditions include resident population, household characteristics, and race. Information on socio-economic conditions in the study area were obtained from the U.S. Census Bureau (Census) 2000, the Connecticut Economic Resource Center, and the City of New Haven.

Demographics, Housing, and Income

New Haven has a total population of 123,626 (U.S. Census 2000). The regional population, defined by the South Central Region planning area, is approximately 546,800. While the South Central Region’s population has continued to increase since the 1960s, New Haven has been experiencing a decline in population since its peak in the 1950’s.

Table 6 shows U.S. Census data for the study area and surrounding areas. As described in Chapter 8, Environmental Justice, the study area has both a higher minority and low-income percentage than New Haven, the SCRCOG Region, New Haven County, or Connecticut.

Table 6: Comparison of Socio-Economic Characteristics

	Study Area	New Haven	SCRCOG Region	New Haven County	Connecticut
Population					
Population	6,890	123,626	546,799	824,008	3,405,565
Males	3,188	59,097	261,692	395,879	1,648,523
Females	3,702	64,529	285,107	428,129	1,757,042
Median Age	26.4***	29.3	39.2***	37.0	37.4
65+ Years	660	12,754	78,383	119,134	469,287
Percent 65+ Years	9.58%	10.20%	14.33%	14.46%	13.78%
White	2,517	54,080	441,754	653,714	2,777,794
Minority****	4,373	69,546	105,045	170,294	627,771
Percent Minority	63.47%	56.26%	19.21%	20.67%	18.43%
Income/Poverty					
Median Household Income (1999)	\$27,700** 2,195	\$29,604 27,613	\$62,859** 51,203	\$48,834 75,733	\$53,935 259,514
Below Poverty*					
Percent Below Poverty	31.86%	22.34%	9.36%	9.19%	7.62%
Housing/Households					
Total Households	2,863	47,094	212,894	319,040	1,301,670
Average Household Size	2.68	2.40	2.57	2.50	2.53
Housing Units	3,161	52,941	227,660	340,732	1,385,975
Occupied Housing Units	2,863	47,094	212,894	319,040	1,301,670
Vacant Units	298	5,847	14,766	21,692	84,305
Percent Vacant	9.43%	11.04%	6.49%	6.37%	6.08%
Owner Occupied	366	13,918	132,666	201,349	869,742
Percent Owner Occupied	11.58%	26.29%	58.27%	59.09%	62.75%
Renter Occupied	2,497	33,176	80,228	117,691	431,928
Percent Renter Occupied	78.99%	62.67%	35.24%	34.54%	31.16%

*Poverty is defined by the Census as \$8,500 per capita annually or less

**Median Household Income derived by averaging multiple sources.

***Median Age derived by averaging multiple sources.

****Minority includes all non-Caucasians, including: American Indian, Eskimo, and Aleut Persons; Asian and Pacific Islander Persons; Black Persons; and all persons of Hispanic origin. The largest minority category included in the study area is Black or African American.

Source: U.S. Census 2000. The Census Tracts and Block Groups that comprise the study area are: Census Tract 140100 Block Group 1, Census Tract 140200 Block Group 1, Census Tract 140300 Block Group 2, and Census Tract 140300 Block Group 3.

New Haven provides the South Central Region with its greatest inventory of affordable housing. The percentage of those owning the home in which they reside is lower in the study area (11.9 percent), than in New Haven as a whole (26.3 percent), and much lower than the SCRCOG Region (58.3 percent), New Haven County (59.1 percent), or Connecticut (62.8 percent). The vacancy rate in the study area (9.4 percent) and New Haven (11 percent) is higher than the region, the county, or the state (all slightly over 6 percent).

Employment and Economy

The key elements of the economy considered for this evaluation include jobs, employers, and economic trends. Table 7 provides an economic profile of New Haven, the central city and regional core of South Central Connecticut. New Haven, like other cities in the Northeast, is moving away from its manufacturing base and toward a more diversified economy. Biotechnology, as well as the food and allied products sector, are areas in manufacturing where New Haven continues to grow. However, services (55.9 percent) and trade (21.7 percent) are the most important sectors in New Haven. Educational services are a core element in the region's economy. The top five major employers in New Haven are Yale University, Yale-New Haven Hospital, The Hospital of Saint Raphael, Southern New England Telephone (SNET), and Southern Connecticut State University. As the central city, New Haven provides retail, arts and entertainment, and many services for the region.

Table 7: Economic Profile of New Haven

Jobs	68,211
Employers	5,352
<u>Businesses By Sector</u>	
Agriculture	0.6%
Construction/Mining	4.9%
Manufacturing	2.9%
Transportation And Utilities	2.9%
Trade	21.7%
Finance, Insurance, and Real Estate	7.1%
Services	55.9%
Government	4.0%

Source: Connecticut Economic Resource Center, Town Profile (2006)

As shown in Table 8, the study area represents 4.6 percent of New Haven's contribution to the regional workforce. New Haven represents 20.2 percent of the region's workforce. The unemployment rate in the study area and New Haven is between 8 and 9 percent, while the regional, county, and state unemployment rate is between 3 and 4 percent. A higher unemployment rate for an urban regional core, such as New Haven, which provides a myriad of services, is not uncommon. Of the approximately 7,900 unemployed in New Haven, 450 (or 5.6 percent) reside within the study area.

Table 8: Summary of Employment and Unemployment Data

<u>Employment</u>	<u>Study Area</u>	<u>New Haven</u>	<u>SCRCOG Region</u>	<u>New Haven County</u>	<u>Connecticut</u>
Labor Force	2,642	57,314	283,548	421,514	1,765,319
Of Employment Age	5,161	95,568	429,996	643,641	2,652,316
Armed Forces	21	49	238	324	8,211
Employed	2,171	49,358	266,097	396,326	1,664,440
Unemployed	450	7,907	17,213	24,864	92,668
Percent Unemployed	8.72%	8.27%	4.00%	3.86%	3.49%
Not In Labor Force	2,519	38,254	146,448	222,127	886,997

Source: U.S. Census 2000

9.2 DIRECT AND INDIRECT IMPACT ON SOCIO-ECONOMICS

No-Build Alternative

The No-Build Alternative would be a continuance of existing conditions, such that no direct or indirect impacts to socio-economic conditions would occur.

Proposed Action

As noted in Chapter 8, Environmental Justice, the Proposed Action is not expected to have any adverse impacts on the resident population in the vicinity of the site. The number of jobs generated directly by the improved New Haven Rail Maintenance Facility is projected to increase from 662 people currently employed to 1,611 employees by 2015 and 1,632 by 2030. With the addition of jobs in the area, there may be a small benefit to local businesses and restaurants as people patronize stores and restaurants near their place of work. The impact of the Proposed Action to direct job creation will be beneficial.

9.3 MITIGATION

Based on the foregoing discussion, the Proposed Action will not result in any adverse effects on socio-economic conditions. The impact instead would be somewhat beneficial. Therefore, no mitigation is proposed.

9.4 SUMMARY OF IMPACTS

The Proposed Action will not result in any adverse Socio-economic impacts, but rather beneficial impacts.

10 COMMUNITY DISRUPTION

10.1 EXISTING SETTING

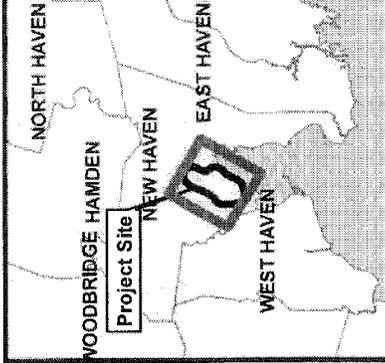
Community cohesion is the sense of unification, “belonging,” or closeness of a neighborhood or community. Community cohesion can be defined both in terms of physical characteristics of neighborhoods and through the less tangible perceptions of residents about their neighborhood quality of life. Physical characteristics important to neighborhood cohesion include access within the neighborhood, common historical and/or architectural themes among buildings, and the presence of community resources such as libraries, churches, and fire stations. Access within a neighborhood is characterized by the ability to travel by a variety of modes, including walking and bicycling. Disruption of community cohesion sometimes alters the quality of life for residents, through, for example, changes in spatial layout and/or travel routes. Community cohesion is often evaluated by looking at impacts on a neighborhood level. Information on neighborhoods in New Haven was obtained from the City of New Haven, City Plan Department.

According to the City Plan Department, there are several neighborhoods or planning areas within the vicinity of the Proposed Action (see Figure 7, Community Resources). The Proposed Action will occur largely in the Long Wharf section of the city. The Hill neighborhood borders the Proposed Action site on the west. Some of the proposed railroad track improvements extend north of Route 34, where the railroad tracks serve as a boundary between Downtown New Haven and the Wooster Square neighborhood.

The Long Wharf area is a loosely cohesive community, characterized by industrial and commercial activity, as well as governmental and institutional uses. The Harborside Trail and park adjacent to New Haven Harbor is a focal point and is used by those who live, work, study, or visit the area.

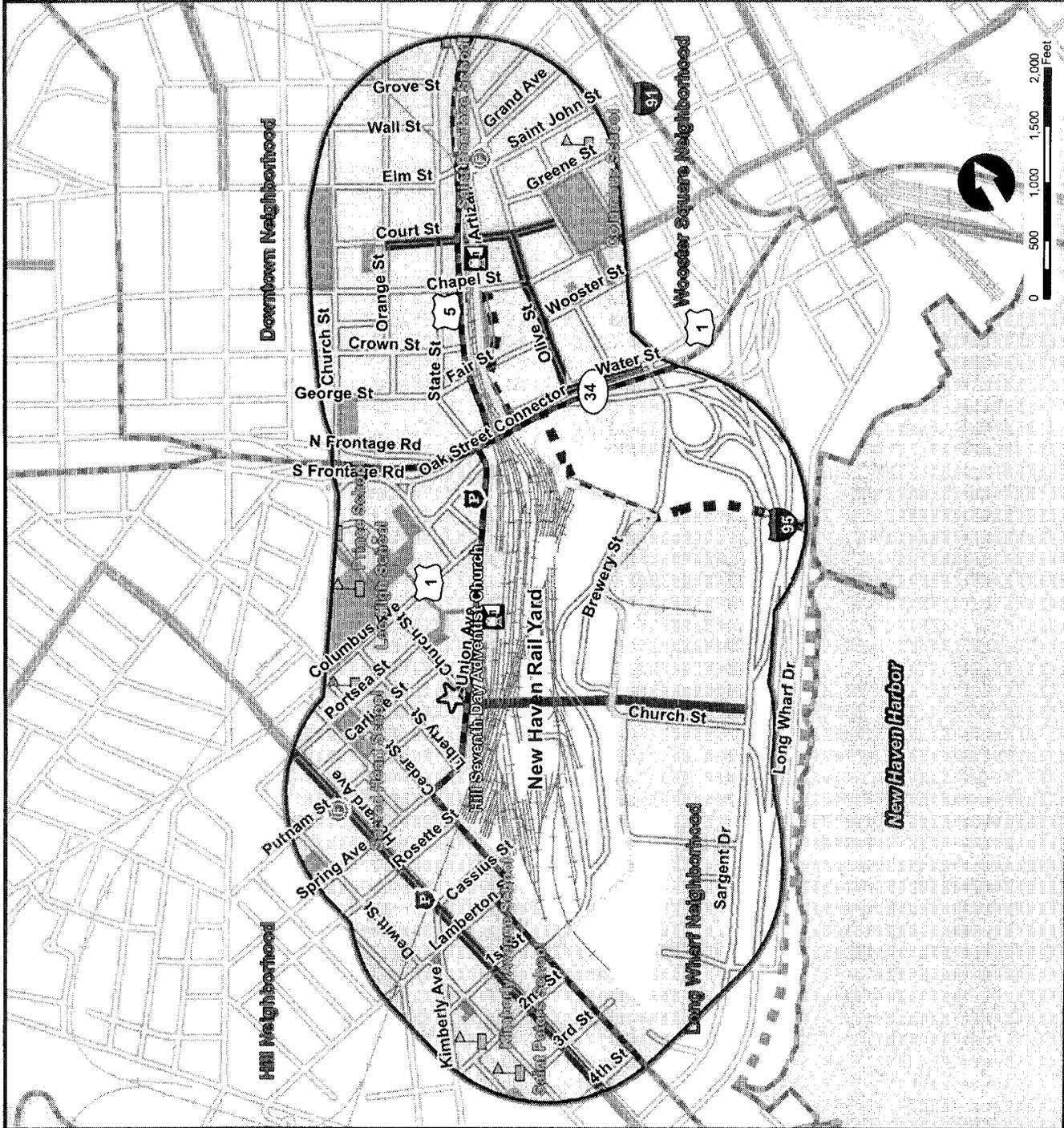
Directly west of the Proposed Action site and extending to West River is the Hill neighborhood. This older, lower-income, distressed neighborhood is characterized by vacancy rates and foreclosure activity higher than in New Haven as a whole. There are also some commercial and institutional uses in the area.

The Wooster Square neighborhood, located northeast of Route 34 and the railroad tracks, is a cohesive and well established neighborhood, rich with cultural activities and small businesses. Wooster Square was established as a historic district in 1970, and property values in this neighborhood are higher than the median for New Haven. The Wooster Square neighborhood is pleasantly streetscaped and contains one large and two smaller parks. Wooster Street restaurants provide focal points for this community.



- Rail Stations
- Fire Stations
- Police Station
- Religious Institutions
- Schools
- Roads
- Rail
- Vision Trail
- Bicycle Routes
- Planning Neighborhoods
- Municipal Properties
- Sewer Service Area
- Open Water
- Rail Yard Property
- Study Area

Figure 7
Community Resources
 New Haven Rail Yard EA/EIE
 New Haven, CT
 State Project # 301-0088



The Downtown neighborhood, located northwest of Route 34 and the railroad tracks, contains the central business district (CBD) and Ninth Square. The Ninth Square is a revitalized neighborhood, with a mix of residential, commercial, and industrial uses. Although not as established or cohesive as the Wooster Square neighborhood, the Ninth Square is developing a “sense of place,” as a residential and entertainment center.

10.2 DIRECT AND INDIRECT IMPACTS ON COMMUNITY

No-Build Alternative

The No-Build Alternative would be a continuance of existing neighborhood conditions, such that no direct or indirect impacts on community cohesion or neighborhoods would occur.

Proposed Action

The Proposed Action would not result in any residential displacements, alter any neighborhood institutions or cultural resources, or inhibit access within neighborhoods and would not create any visual or physical barriers.

There will be temporary construction period impacts (see Chapter 27, Construction Impacts) to air quality, traffic, public utilities and services, and temporary impacts from noise. Temporary construction impacts, such as increased noise from truck traffic and dust from construction, will be mitigated to the greatest extent possible. The Proposed Action is contained within the existing NHRY facility; therefore, there will be very little noticeable alteration to the existing landscape. On-site activity once the Proposed Action is constructed will essentially be similar to the activity that presently occurs on site.

The proposed improvements will also effectively provide improved rail and increased transportation choices via the ability to store, service, and maintain the new M-8 rail cars in the NHRY. The net direct impacts would be positive for rail passengers, and neutral for those who do not utilize the railroad.

10.3 MITIGATION

Based on the foregoing discussion, the Proposed Action will not result in any direct adverse effects on community cohesion or neighborhoods. Therefore, no mitigation is proposed. Mitigation for temporary construction period impacts is proposed and discussed in Chapter 27 of this EA.

10.4 SUMMARY OF IMPACTS

The Proposed Action will not result in any adverse impacts to Community or Neighborhoods.

3.1.5 Zoning

The northern-most portion of Hollyhock Island occupied by Parcel 1 (20-acre city-owned parcel that includes the WWTF) is zoned as Recreation Open Space (ROS) District. Beyond the WWTF facility, all remaining parcels on Hollyhock Island are included in the Waterfront Development (WD) District. Allowable uses in this zone are described in detail in Section 4.1.4 of this document.

3.1.6 Coastal Zone Management

The proposed transportation center will be located within Connecticut's coastal boundary as defined by Section 22a-94 of the Connecticut General Statutes (CGS) and is subject to the provisions of the Connecticut Coastal Management Act (CCMA) (CGS Sections 22a-90 through 22a-112). In accordance with CGS Section 22a-100, state actions and state funded actions within the coastal boundary that may significantly affect the environment must be consistent with the goals and policies of the CCMA.

The coastal boundary is determined as follows: (1) a continuous line on the landward side by the interior contour elevation of the 100-year frequency coastal flood zone, as defined and determined by the National Flood Insurance Act; or (2) a 1,000 foot setback measured from the mean high water mark in coastal waters; or a 1,000 foot linear setback measured from the inland boundary of tidal wetlands mapped under CGS Section 22a-20, whichever is farthest inland.

Coastal waters are defined as those waters of Long Island Sound and its harbors, embayments, tidal rivers, streams and creeks which contain a salinity concentration of at least 500 parts per million (0.5 parts per thousand, ppt) under the low flow stream conditions as established by the Commissioner of the Department of Environmental Protection (CGS Section 22a-93(5)). The entire project area is within the coastal boundary and is surrounded by coastal waters.

The CCMA coastal resource mapping indicates the shoreline of the southern two-thirds of Hollyhock Island is characterized as highly engineered areas with minimal natural features. The entire area has been designated as a "developed shoreline." No coastal resources (per statutory definition) are located in or adjacent to the project site.

3.2 Socioeconomics

The following information regarding demographics, employment, and tax base has been obtained from the City of Norwich Plan of Conservation and Development, regional documents, census information and statistics, as well as data obtained from the Norwich

Assessor's Office and field investigations. This discussion is intended to provide an overall background of the demographic make-up of the City of Norwich and the project area.

3.2.1 Demographics / Identification of Environmental Justice Population

On February 11, 1994, President Clinton signed an Executive Order requiring federal actions to address environmental justice in minority populations and low income populations to ensure that Federal departments and agencies identify and address disproportionately high and adverse human health or environmental effects of their policies, programs and activities on minority populations and low-income populations.

Specifically, each Federal agency shall ensure that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin. Each Federal agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by NEPA.

Based on the most recent updated census data (2004), the City of Norwich has a population of 36,645 people. During the past three decades, population has trended downward, beginning in the 1970s. The sharpest decline occurred between 1970 and 1980, with a 9.6% drop in population from almost 41,000 to just over 38,000. From 2000 to 2004, however, Norwich's population began to incline again, with the addition of over 500 people in less than four years.

In the decade from 1990 to 2000, while the population dropped by almost 1,300 people, the number of households increased by almost 75. Household size dropped from 2.44 in 1990 to 2.34 in 2000, a common trend throughout Connecticut in recent years. Tables 3-2 through 3-4 present demographic data for the city.

As reported in Table 3-3, the percentage of minority population increased by almost 4% from 1990 to 2000. Based on local anecdotal data, this trend has continued since the 2000 census, with an influx of people of Asian origin. A significant percentage of this new population has located in the downtown area and many are employed at one of the two area casinos in Montville and Ledyard. Additionally, a majority of the new downtown residents are not vehicle owners and rely on public transportation.

**TABLE 3-2
Historic Population in Norwich (1900 – 1950)**

<i>Year</i>	<i>Population</i>	<i>% Change</i>	<i>Year</i>	<i>Population</i>	<i>% Change</i>
1900	24,637		1960	38,506	+2.3%
1910	28,219	+12.7%	1970	41,739	+7.7%
1920	29,685	+4.9%	1980	38,074	-9.6%
1930	32,438	+8.5%	1990	37,391	-1.8%
1940	34,140	+5.0%	2000	36,117	-3.5%
1950	37,633	+9.3%	2004	36,645	+1.5%

Source: U.S. Census

**TABLE 3-3
Norwich Demographics**

<i>Universe</i>	<i>1990 Census</i>	<i>2000 Census</i>	<i>%Change</i>
Population	37,391	36,117	-3.5%
Households	15,018	15,091	+0.5%
Household Size	2.44	2.34	-4.3%

Source: U.S. Census

**TABLE 3-4
Demographic and Socio-Economic Characteristics – City of Norwich**

<i>Parameter</i>	<i>1990</i>	<i>2000</i>
Population	37,391	36,117
Household Units	16,472	16,600
% Racial Minority	8.68	12.3
Renter-Occupied Housing Units	7,099	7,167
Owner-Occupied Housing Units	7,919	7,924
Median Household Income	29,354	39,181
Per Capita Income	14,844	20,742

Source: 2000 Census; U.S. Department of Housing and Urban Development

3.2.2 Employment

Norwich is an important employment center in the region. Of the civilian labor force in the Norwich-New London local market area, Norwich has the largest labor force and the highest number of people employed (Table 3-5). While the city experienced a decline in employment by over 10% at the end of the 1970s, numbers since then have improved (Table 3-6).

Casino and tourism related employment is the fastest growing source of employment for Norwich workers and for the southeast region, according to the Norwich Plan of Conservation and Development (October 2002). For the most part, the loss in manufacturing jobs has been replaced with employment opportunities provided by the two casinos located in Ledyard and Montville. In 2000, for instance, the city's employed labor force increased by 885. According to the Connecticut Department of Labor, employment in Norwich increased by 8.1% between 1995 and 2004.

TABLE 3-5
Employment by Civilian Labor Force for the Norwich-New London
Local Market Area - 2004 Annual Average

<i>Town - Local Market Area (LMA)</i>	<i>Labor Force</i>	<i>Employment</i>	<i>Percent</i>
Norwich-New London, LMA (CT only)	133,834	127,867	
Norwich	20,172	19,064	15%
Groton	18,946	18,072	14%
New London	13,469	12,657	10%
Montville	10,729	10,283	8%
Waterford	10,359	9,933	8%
Stonington	10,241	9,922	8%
East Lyme	9,474	9,128	7%
Ledyard	8,321	8,022	6%
Griswold	6,884	6,555	5%
Old Lyme	4,162	4,028	3%
North Stonington	3,185	3,069	2%
Canterbury	3,043	2,898	2%
Preston	2,750	2,648	2%
Lisbon	2,520	2,415	2%
Salem	2,502	2,418	2%
Sprague	1,777	1,670	1%
Voluntown	1,574	1,499	1%
Bozrah	1,438	1,374	1%
Franklin	1,161	1,120	1%
Lyme	1,129	1,094	1%

Source: Connecticut Department of Labor

TABLE 3-6
Employment Trends by Labor Force for the City of Norwich – Annual Average

	<i>Labor Force</i>	<i>Employed</i>	<i>Change</i>	<i>%Change</i>
1970		18,390		
1980		16,480		-10.4%
1985		17,990		9.2%
1990		18,500		2.8%
1995	18,815	17,630	-870	-4.7%
1996	19,027	17,642	12	0.1%
1997	19,158	17,830	188	1.1%
1998	18,582	17,649	-181	-1.0%
1999	18,663	17,839	190	1.1%
2000	19,277	18,724	885	5.0%
2001	19,214	18,531	-193	-1.0%
2002	19,787	18,855	324	1.7%
2003	20,284	19,051	196	1.0%
2004	20,172	19,064	13	0.1%
1995-2004			1,434	8.1%

Sources: Data for 1997-1990 from Norwich Commission on the City Plan, 2002; 1995-2004 data from the Connecticut Department of Labor.

The existing Norwich Transportation Center does not constitute a major employer. The land upon which the future intermodal transportation center is proposed is currently vacant and therefore does not support employment of any kind.

3.3 Community Facilities and Services

The following information relative to education, health care, public safety, emergency services, and parks and recreation has been taken in part from the City of Norwich Plan of Conservation and Development. Personal telephone interviews have been conducted to update and verify this information, which will serve as the basis for evaluation of potential impacts as presented in Section 4.3 of this document.

3.3.1 Education

The City of Norwich provides a full range of educational services to its residents. Nine elementary schools located throughout the city provide educational services for children in grades K through 5. These elementary schools include the Mahan, Uncas, Veterans Memorial, Wequonnoc, Stanton, Bishop, Huntington, Greenville, Hickory Street, and Moriarty Elementary Schools. Middle school services are provided at the Teachers Memorial Junior High School and Kelley Middle School for grades 6-8.

High school education in Norwich is provided by two independent schools, Norwich Free Academy and Norwich High School (also known as Thames Academy). Norwich Free Academy is a privately run school that serves as Norwich's public high school. All Norwich students attend free, whereas children from any other part of Connecticut may apply and pay tuition, similar to other preparatory schools. The facility is treated by the State Board of Education like any other public high school. Thames Academy is an alternate high school. Both schools receive funds from the city.

Numerous religious and private educational facilities operate in Norwich, including Saint Patrick School, Saint Joseph School, Sacred Heart, Orthodox Hebrew Day School, Wildwood Christian School, Day Charter School, and the Montessori Discovery School.

There are no educational facilities on Hollyhock Island.

3.3.2 Public Safety and Emergency Services

The City of Norwich provides a variety of police, fire and emergency services in an effort to reduce the loss of life and property and protect the public's safety. The Norwich Police Department headquarters (staffed 24 hours per day) is located on West Thames Street. Fire service in the City of Norwich is provided through a combination of two paid city departments and five volunteer stations. The city's central station is a state-of-the-art fire fighting facility that is located in close proximity to the proposed transportation center, on West Main Street. This facility was constructed in 1994. EMT and ambulance services are provided in Norwich by the privately owned American Ambulance Service, Inc., located off Thames Street, just west of Hollyhock Island.

There is no security at the existing Norwich Transportation Center station. There is only a pay phone.

3.3.3 Parks and Recreation

The city owns and operates recreational facilities that are scattered throughout Norwich and vary in type, size, and quality. They include playgrounds, ball fields, tennis courts, an ice rink, a skateboard park, a municipal golf course, and Dodd Stadium. There are no recreational facilities on Hollyhock Island.

3.3.3 Public Transit Services

The largest bus transportation service in the greater Norwich area is South East Area Transit (SEAT), connecting the major cities and towns in southeastern Connecticut. Major service stops within the City of Norwich include Backus Hospital and the former Norwich State Hospital. SEAT runs local service in Norwich and operates out of its existing transportation hub at the viaduct at Routes 2 and 12 in Norwich, which is one of

four main transfer points for corridor and local service. This hub is referenced as the existing transportation center; however it is little more than a converted parking lot.

SEAT runs three separate corridor transportation routes that service the City of Norwich, providing transportation to New London, Groton, and Jewett City in Griswold. Service is available Monday through Saturday, as early as 6:00 a.m. and as late as 12:00 a.m. SEAT also operates three transportation routes that locally service the City of Norwich, including service to the Norwich Industrial Park, Backus Hospital, and the Mohegan Sun Casino. Specific SEAT service locations and schedules are presented in Appendix A.

In addition to the SEAT operations, the existing Norwich Transportation Center serves as the connection point for the Foxwood Casino employee shuttle, which runs every 15 minutes, including hourly connections with the SEAT routes. At present, Arrow Bus Company runs the Foxwood Shuttle.

The existing Norwich Transportation Center also serves as a connection point for the Windham Regional Transit (WRT) bus, which stops in Norwich four times each day. The WRT line services residents in Norwich who work in the greater Windham area. The WRT line interfaces with SEAT twice each day, at 8:00 a.m. and 4:00 p.m.

3.4 Aesthetic/Visual Resources

The following discussion provides background on the aesthetic and visual condition of the project area.

3.4.1 Regional Landscape

The City of Norwich was once a major hub for shipping and trade in the State of Connecticut. The harbor and the historic characteristics of the mixed land use in the downtown area reflect some of the city's past maritime history. While the downtown area has struggled in the past, there has been recent effort to restore many of the 18th century buildings. In 1984, the downtown was recognized as a National Register Historic District.

One of the most striking elements of the downtown Norwich area is the view of the river system, where the Yantic and Shetucket Rivers converge to form the Thames River at Norwich Harbor. The steep topography and narrow river valleys give Norwich a great aesthetic quality. Efforts to improve the use of such visual and aesthetic resources include the development of walkways and greenways along the rivers. The Heritage Walkway, for example, provides recreational and pedestrian access along the Yantic River. The City of Norwich also has plans to construct a greenway along the Shetucket River that will eventually connect with the Heritage Walkway.

4.1.7 Summary of Direct and Indirect Land Use Impacts

The proposed intermodal transportation center is believed to be consistent with pertinent local, regional, and statewide land use plans and policies. Additionally, the proposed land use is consistent with the adjacent land uses and with the surrounding urban neighborhood. The proposed transportation center will result in the development of land that is currently vacant. The relocation of Falls Avenue will impact two existing land uses that will require relocation. Neither use is water dependent. Relocation will occur in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 As amended.

4.2 Socioeconomic Impacts

The proposed transportation center is expected to have a positive impact on the regional socioeconomic horizon by providing convenient, multi-modal transportation to tourists and the regional population. The project is not expected to create a significant amount of new employment in the city, nor is it expected to displace any existing employment. It is, however, expected to complement the efforts to bring in economic stimulus to the region, by providing multi-modal transportation opportunities and amenities.

The proposed intermodal transportation center will result in economic benefits in the region through the availability of transportation linkages that will promote more convenient and efficient travel to and from tourist attractions and employment destinations in the region. This amenity is consistent with state and federal goals and policies relative to public transportation and has positive implications on the quality of life for residents and visitors in the southeast region. Additionally, the accessibility and availability of multiple modes of transportation to low-income populations residing in the City of Norwich is consistent with environmental justice goals and policies.

4.3 Community Facilities and Services Impacts

Education – The proposed transportation center is not expected to generate secondary residential growth in the City of Norwich and will not tax the city's educational resources.

Fire Protection – The proposed transportation center will be constructed of concrete and brick construction and will be designed to meet current fire code requirements per the City of Norwich and the State of Connecticut. The majority of new construction will be in the form of an open frame parking garage that will be largely devoid of combustible materials. Due to the size, construction material, and limited ability for sustained fire,

this site will not place an undue burden on fire protection resources in the City of Norwich.

Police Protection – Hollyhock Island is not an area of reported high crime, nor is the existing SEAT bus facility at the Route 12 Viaduct site. The human activity associated with the proposed transportation center, along with ample lighting, will tend to discourage activities warranting police intervention. For these reasons, this facility is not expected to place an undue burden on police protection resources in the City of Norwich.

Public Safety – The existing transportation center in Norwich is not serviced by any security systems or measures. The design of the proposed intermodal transportation center provides an opportunity to incorporate security and safety measures such as a camera system to enable the monitoring of activities; state-of-the-art alarm system for the enclosed ticket area; provision of pay phones in the ticket area and in the garage; and improved site lighting. Additionally, an increase in human presence is expected to provide safety and security through the presence of ticket area staff, garage operations personnel, and the public recreational areas.

Health Care – The proposed transportation center is not expected to influence the influx of resident population in the City of Norwich and does not include any component that could impact healthcare.

Recreation – Development of an intermodal transportation facility on Hollyhock Island is expected to have a positive impact on recreation. The proximity and functionality of a transportation center adjacent to the city's ferry pier and land transportation modes is expected to enhance the ability to transport a transient population into and out of Norwich for employment purposes and to enjoy many of the region's recreational amenities. In the immediate proximity of the project, recreational opportunities will be introduced through creation of the proposed riverwalk, designated fishing area, and passive recreation along the Yantic River.

Public Transit – Safety has long been one of SEAT's concerns relative to its current location and is one of the most significant benefits of the proposed ITC. The new facility will enable passenger loading and unloading in one location, with clearly marked bus and pedestrian accessways. This will greatly diminish the risk of accidents or injury to SEAT patrons. The new facility will also operate in a more orderly and organized fashion, resulting in less confusion and fewer missed busses. The predictability of bus locations is also expected to improve passenger efficiency and user-friendliness.

Traffic patterns and bus ingress in egress at the proposed ITC are superior to existing operations at the Route 12 viaduct. Traffic flow at the existing Route 12 facility is cumbersome. Ingress and egress to and from the site occurs via a two-lane roadway.

When the 40-foot long busses pull into traffic, they cause a bottle neck in traffic flow. The signaled intersection at Falls Avenue and West Main Street will allow for safer, more controlled traffic patterns.

The proposed facilities will also offer numerous added amenities. The new facility will provide covered parking, covered passenger waiting areas, driver restrooms, and vending machines, all of which will add to the comfort and safety of bus drivers and passengers. The new facility will be equipped with security cameras that will also improve the safety aspects of operations. Finally, the proposed ITC will expand operations up to 11 bus berths, whereas the existing facility is limited, with no room for expansion.

The proposed intermodal transportation site on Hollyhock Island will move the existing SEAT hub approximately one-half mile from its existing location, and approximately 0.35 miles from the center of downtown Norwich, which is taken to be the intersection of Chelsea Harbor Drive and Main Street. The one-half mile between the existing viaduct lot site and the proposed Hollyhock Island location is relatively insignificant in the scale of regional geography, service area, and superior transportation connectivity. This shift will represent a greater walking and/or travel distance for some patrons.

To mitigate for the location change, SEAT will run regular shuttle service between downtown bus stops and the new ITC such that residents who currently walk to the Route 12 site will be able to take a bus shuttle to the new ITC. SEAT will reroute existing service to go through downtown on the way to and from the ITC. These routes will be able to pick up riders and bring them to the ITC for transfers to other routes. The City of Norwich has committed to working with SEAT to locate additional, suitable bus stops such that riders will not be significantly impacted by this change. More than one bus route would incorporate the new downtown stops. At this time, it is anticipated that SEAT bus routes 2, 9, and 7 would provide expanded downtown service.

In contrast, the relocation of the SEAT hub to Hollyhock Island will provide a more convenient location for some SEAT patrons who have previously complained about the walking distance to the existing SEAT hub. The proposed site on Hollyhock Island will provide a marked improvement relative to pedestrian access and safety as compared to the existing viaduct site, which is physically isolated by the rail line and extensive roadway network.

In summary, no significant adverse direct or indirect impacts on community facilities and services are expected to occur as a result of the proposed action. Positive benefits are expected relative to public safety, recreational opportunities, and public transit services.

provide public access and facilitate recreational use, including a riverfront walkway along the west branch of the Yantic River, and fishing access.

The incorporation of public access and open space to a site that currently offers none will improve both the aesthetic and environmental quality of the site. In addition, these features are consistent with the policy goals of the state Plan. The transportation facility design will include flood hazard protection, public access and recreational use while providing a service that has the potential to improve air quality in the region.

Relocation Mitigation

Relocation of land uses associated with the Thayer boat repair operations and the Silver Star Athletic Club will occur as a result of the relocation of Falls Avenue. Relocation will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 As amended. The act was developed in accordance with the following objectives:

- (a) To ensure that owners of real property to be acquired for federal and federally-assisted projects are treated fairly and consistently, to encourage and expedite acquisition by agreements with such owners, to minimize litigation and relieve congestion in the courts, and to promote public confidence in the federal and federally assisted land acquisition program.
- (b) To ensure that persons displaced as a direct result of federal or federally-assisted projects are treated fairly, consistently, and equitably so that such displaced persons will not suffer disproportionate injuries as a result of projects designed for the benefit as a whole; and
- (c) To ensure that Agencies implement these regulations in a manner that is efficient and cost effective.

Voluntary acquisition will be pursued as an initial measure for the Thayer and Silver Star Athletic club properties. NCDC will make every reasonable effort to acquire these properties expeditiously by negotiation. If negotiations fail to result in an agreement, the procedures, protocols, and requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended will be followed.

5.3 Socioeconomic Mitigation Opportunities

The proposed project is expected to improve the socioeconomic climate in the region. The project will provide positive growth to the region's economy via short-term construction employment. Long term socioeconomic opportunities are also expected to have a positive impact on the regional socioeconomic horizon, by providing convenient

intermodal transportation to tourists and the regional population. No other mitigation opportunities have been identified.

5.4 Community Facilities and Services Mitigation Opportunities

While the ITC site is technically located within downtown Norwich, it is somewhat less centrally located as compared to the existing SEAT hub near the Route 12 viaduct. To mitigate for the location change, SEAT will run regular service between downtown bus stops and the new ITC such that residents who currently walk to the Route 12 site will be able to take a bus to the new ITC. The City of Norwich has committed to working with SEAT to locate additional; suitable bus stops such that riders will not be significantly impacted by this change. More than one bus route would incorporate the new downtown stops. At this time, it is anticipated that SEAT bus routes 2, 9, and 7 would provide expanded downtown service.

SEAT regularly surveys runs that are funded by programs aimed at providing transportation to low income, transit dependent individuals. In addition, SEAT, along with it's paratransit provider Eastern Connecticut Transportation Consortium (ECTC), examine databases that provide locations of individuals who fall into the "transit dependent" category due to average income, number of vehicles per household, and the like. By using these databases SEAT can develop routes that give service to those areas that are most likely to use it.

The proposed recreation areas, such as the riverwalk, will have positive impacts and can be considered forms of mitigation for the historic lack of public access to regionally unique water resources. No other mitigation opportunities have been identified.

5.5 Aesthetic/Visual Resource Mitigation Opportunities

A number of enhancements to visual aspects of the project area have been proposed that include improved views of the Yantic River and Norwich Harbor via maintained open space and the riverwalk, as well as aesthetic improvements to Hollyhock Island. No other mitigation opportunities have been identified.

5.6 Public Utilities and Services Mitigation Opportunities

No utility impacts have been identified; however utility improvements and upgrades will be performed in the project area. The existing storm drainage system will be modified to correct deficiencies in the existing system. Stormwater quality renovation elements, such

as inlet chambers and/or infiltration systems will be incorporated as necessary to meet stormwater general permit requirements. Pipe design will utilize conventional engineering for storm sewer systems. No other mitigation opportunities have been identified.

5.7 Cultural Resources Mitigation Opportunities

5.7.1 Archeological Review Process

The Connecticut Commission on Culture and Tourism (CCCT) has defined the archeological review process in its *Environmental Review Primer for Connecticut's Archeological Resources* (Poirier 1987). The process generally includes four stages of investigation for site identification, evaluation of significance, and site mitigation. These stages of investigation are the archeological assessment survey (Phase 1a), reconnaissance survey (Phase 1b), intensive-level survey (Phase 2), and data recovery (Phase 3). At each stage of investigation, options can be explored for preserving archeological sites.

An archeological assessment survey (Phase 1a) has been conducted for the project area. Assessment survey involved documentary investigations in order to evaluate whether prehistoric and/or historic period archeological sites are possible or likely in the project area. A detailed summary of this work is presented in Sections 3.6 and 4.6 of this document.

Archeological reconnaissance surveys (Phase 1b) are often conducted in sensitive areas to identify whether prehistoric and/or historic period archeological sites are present or absent. Archeological reconnaissance surveys usually employ rapid and cost-effective shovel test excavations at broad intervals, or backhoe trenching to investigate stratigraphic patterns or disturbances, and to identify whether artifacts and/or architectural features are present that reflect various periods of human occupation.

If no archeological sites are identified during the reconnaissance survey, CCCT does not usually recommend additional investigations. When archeological sites are identified, numerous options exist for future development. The sensitive areas can be preserved as open space; they can be integrated into passive use activities; or additional archeological investigations can be conducted to evaluate whether the site or sites are significant.

Intensive-level surveys (Phase 2) are often conducted at archeological sites that cannot be preserved in development plans. The objective of intensive surveys is to identify whether sites are significant (e.g., meet eligibility standards for the National Register of Historic Places). Intensive surveys usually involve sampling designs oriented to identify architectural features and associated artifact assemblages such as systematic excavations (one meter squares). Field work, artifact analyses, specialized analyses (floral, faunal, radiometric dating, etc.), and report preparations are often involved in Phase 2 archeological surveys.



U.S. Department
of Transportation
Federal Transit
Administration

REGION I
Connecticut, Maine,
Massachusetts,
New Hampshire,
Rhode Island, Vermont

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617-494-2055
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JUN 03 2008

Edgar T. Hurlle
Transportation Planning Director
Bureau of Policy and Planning
Connecticut Department of Transportation
2800 Berlin Turnpike, P.O. 317546
Newington, CT 06131-7546

Re: Norwich Intermodal Transportation Center – Reevaluation of Environmental Assessment

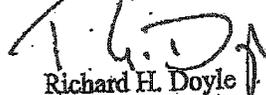
Dear Mr. Hurlle:

Thank you for your April 23, 2008 letter and supporting documentation advising the Federal Transit Administration (FTA) of proposed minor modifications to the scope for the Norwich Intermodal Transportation Center. Based upon a review of material submitted, FTA concurs with ConnDOT that the project changes will cause minor environmental impacts and do not alter the conditions under which a Finding of No Significant Impact (FONSI) and §106 determination was issued in August 7, 2007.

Per the Reevaluation letter, ConnDOT proposes to proceed with Alternate seven from the Environmental Assessment rather than Alternate five, as originally proposed. Alternate seven is identified as virtually the same as Alternate five, with the exception that Alternate seven represents a reduction in the number of bus berths from eleven to eight and does not require the relocation of Falls Avenue. The represents a reduction in environmental impacts, better circulation and is consistent with the service plan of the operator (SEAT).

Please let me know if you have any questions regarding this matter. FTA looks forward to continuing to work with the ConnDOT on this important transit improvement.

Sincerely,


Richard H. Doyle
Regional Administrator

cc: A. Martin, ConnDOT

April 23, 2008

Mr. Richard H. Doyle, Administrator
Federal Transit Administration, Region 1
Volpe National Transportation Systems Center
Kendall Square
55 Broadway – Suite 920
Boston, MA 02142-1093

Dear Mr. Doyle:

Subject: Federal Environmental Assessment
State Project No. 103-245
Intermodal Transportation Center
Norwich, Connecticut

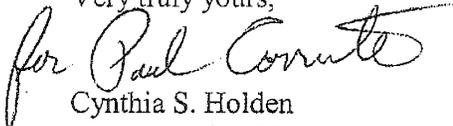
On August 7, 2007, the Connecticut Department of Transportation (The Department) received a Finding of No Significant Impact (FONSI) for the subject project. (copy attached) Mr. Edgar Hurle, Transportation Planning Director, recently received a letter from The Norwich Community Development Corporation Inc. (NCDC) stating that there is insufficient funding to build the facility indicated in the EA as Alternative five. (copy attached)

The NCDC would like to reduce the scope of the project and proceed with Alternate seven which is virtually identical to Alternate five with the exception that Alternative seven has eight bus berths as opposed to eleven and does not provide for the realignment of Falls Avenue.

Upon reviewing the EA/FONSI, it is the opinion of this office that this change does not affect the FONSI and actually provides better traffic flow by retaining the alignment of Falls Avenue.

Based upon this review, it is requested that your office concur that the FONSI issued for Alternate five is valid for Alternate seven.

Very truly yours,



Cynthia S. Holden
Transportation Planning Assistant Director
Bureau of Policy and Planning

KENTH

Concurrence: _____ Date: _____

Regional Administrator
Federal Transit Administration
Region Two

bcc: Mr. Peter Polubiatko (NCDC)
Jeanine Bonin (Milone and MacBroom)

cc: ~~Charles Barone – Edgar Hurle~~
~~Cynthia Holden – Keith T. Hall~~

**FEDERAL TRANSIT ADMINISTRATION
REGION 1**

Finding of No Significant Impact

Project: *Norwich Intermodal Transportation Center*

Applicant: *Connecticut Department of Transportation*

Project Location: *Norwich, Connecticut*

Purpose and Need

The purpose of the Project is to construct a modern regional intermodal transportation center in downtown Norwich, Connecticut on Hollyhock Island at West Main Street and a re-located Falls Avenue. The Norwich Intermodal Transportation Center (NITC) will replace an inadequate bus terminal and park and ride lot at Route 12 and serve as a hub for Southeast Area Transit District (SEAT) fixed route service, intercity bus, shuttle and limousine services, taxi and water transportation. The new facility will include a sheltered bus station with 1,250 square feet of enclosed passenger waiting area, restrooms, kiosks, ticketing and other amenities; eleven (11) bus berths; a three-level, 220-car, 80,000 square foot garage for transit-supportive parking; accommodations for shuttle and limousine services to nearby attractions; bicycle facilities and linkages to water transportation services. The NITC will also be designed so as not to preclude future rail use along an existing New England Central railroad right-of-way, should such service be developed. SEAT has experienced an 8% annual ridership increase for each of the last four years and cannot continue to meet projected future growth without the added capacity afforded by this project.

Alternatives Considered

The Connecticut Department of Transportation (ConnDOT), in consultation with the Norwich Community Development Corporation (NCDC) considered seven alternative sites within the City of Norwich and a "No Action" alternative. The alternatives were evaluated according to seven objectives: (1) Maintaining proximity to regional road networks; (2) Maintaining proximity to existing SEAT bus routes; (3) Maintaining proximity to potential future commuter rail service; (4) Maintaining proximity to navigable waters; (5) Maintaining proximity to downtown Norwich; (6) Facilitating pedestrian access to the transportation center; and (7) Maintaining a high degree of visibility. Three sites were eliminated during the initial evaluation process because they failed multiple criteria originally set by the selection committee. The "No Action" alternative was also eliminated because of the antiquated nature of the current facility and its inability to accommodate the existing SEAT service in an optimum simultaneous pulse transfer operation.

The remaining four (4) sites were identified as: (1) Hollyhock West, (2) Hollyhock Central, and (3) 74 West Main Street, and (4) the Police Station. The first three sites are all on the Hollyhock Island

and the fourth lies just to the west of the island, across the river from Downtown Norwich. All sites were within close proximity to major roadways, to the existing City owned vessel dock and potential commuter rail rights-of-way. The site at 74 West Main Street was eliminated because of the need to acquire private property and the site's small lot size. The Police Station site was eliminated because it lacked good access to the waterfront and because of the site's physical constraints. The remaining sites, located at Hollyhock West and Hollyhock Central, are on adjacent parcels and a final design will combine land from both sites.

Proposed Project

The new transportation center will be located at the northwest corner of West Main Street and a relocated Falls Avenue on Hollyhock Island in downtown Norwich. The site will extend along Falls Avenue under the Route 32 Bridge. The Norwich Transportation Center will include an open public plaza on West Main Street, waiting areas (covering 1,250 square feet), space for ticket vendors and retail space (covering 1,700 square feet). The bus terminal will be located at ground level and a three level, 220-car garage will be located directly overhead. The transportation center will feature a brick façade and incorporate architectural themes of the adjacent American Wharf and historic Hollyhock Island. The proposal includes plans for a river walkway along the west branch of the Yantic River to connect the site to the American Wharf. The site will be designed so as not to preclude connections with a future commuter rail line, should such service be developed.

Agency Coordination and Public Opportunity to Comment

ConnDOT coordinated and consulted with other state agencies and public groups on the proposed Norwich Transportation Center. Numerous meetings were held with the Norwich City Council, the Norwich Community Development Corporation and SEAT to coordinate the project. Public involvement and outreach has occurred at various public meetings and through the formal legal notice of the existence of the *Environmental Assessment* document, which was made available to the public on February 20, 2007. Comments were accepted through May 14, 2007, well in excess of the required 45-day public review period. A Public Hearing was held on March 26, 2007. Public comments and responses have been incorporated into the document. The Connecticut Department of Public Health, the Connecticut Commission on Culture and Tourism and the Connecticut Department of Environmental Protection were all consulted on the Norwich Transportation Center proposal.

Determinations and Findings

National Environmental Policy Act (NEPA) Finding

FTA served as the lead agency under NEPA for the project. ConnDOT submitted an Environmental Assessment (EA) in compliance with NEPA, 42 U.S.C. 4321 *et seq.*, and with FTA's regulations, 23 CFR Part 771. The EA analyzes and describes the project's potential for significant impact.

After reviewing the EA and supporting documents, as well as public comments, FTA finds under 23 CFR 771.121 that the proposed project will have no significant adverse impact on the

environment. The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement (EIS) is not required.

Federal Uniform Relocation Act Compliance

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, ensures the fair and equitable treatment of persons whose real property is acquired or who are displaced as a result of a Federal or Federally-assisted project.

ConnDOT has identified two property takings associated with project implementation, which will require the relocation of two active businesses: (1) Thayer Boat Repair and (2) Silver Star Athletic Club. In accordance with Federal and State guidelines, the City of Norwich will pay fair market value for all parcels in private ownership that need to be acquired. Relocation will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Voluntary acquisition will be pursued as an initial measure.

Section 106 Compliance

Section 106 of the National Historic Preservation Act of 1966, as amended, requires the review of Federally assisted projects for impacts to districts, sites, buildings, structures and objects listed in, or eligible for inclusion in the National Register of Historic Places. Federal agencies must coordinate with the State Historic Preservation Office (SHPO) and potentially affected Tribes to make this determination. The Advisory Council on Historic preservation (ACHP) has established procedures for the protection of historic and cultural properties in, or eligible for, the National Register (36 CFR Part 800).

In a letter dated December 13, 2007, the Connecticut State Historic Preservation Office (CT SHPO) affirmed that "the proposed Intermodal Transportation Center will constitute *no adverse effect* upon Connecticut's cultural resources." CT SHPO's determination is conditional on ConnDOT undertaking prior to construction a thorough archeological review of the historic fill encompassing Hollyhock Island to determine whether late 18th century to mid 19th century maritime vessels were incorporated as part of historic fill episodes between 1837 and 1891.

Based on documentation submitted by ConnDOT and Consultation with CT SHPO, FTA finds, in accordance with 36 CFR Part 800 Protection of Historic Properties, that the proposed project will have no adverse effect on historic resources, provided ConnDOT complies with CT SHPO's conditional requirements.

Section 4(f) Findings

Section 4(f) of the Department of Transportation Act of 1966, codified at 49 U.S.C. 303, articulates a National policy affirming that a special effort shall be made to preserve the natural beauty of the countryside, public park and recreational lands, wildlife and waterfowl refuges, and historic sites. The Secretary of Transportation may not approve transportation projects that require use of such resources unless a determination is made that there is no feasible and prudent alternative, and that all possible planning has been done to minimize harm to §4(f) land(s) resulting from such use (23 CFR 771.135).

The project lies within the Yantic River Conservation Area. However, due to Hollyhock's history of intense urban development and its status as part of the Norwich Urban Regional Center, the project will not impact any environmental areas or parklands. There are no public parks and recreation lands or wildlife and waterfowl refuges located within the proposed Norwich Transportation Center project area. Based on documentation submitted by ConnDOT, FTA has determined, in accordance with 23 CFR 771.135, that §4(f) requirements do not apply since no §4(f) resources will be used as a result of this project.

National Ambient Air Quality Standards

The Environmental Protection Agency (EPA) has developed National Ambient Air Quality Standards (NAAQS) for each of six criteria air pollutants: SO₂, NO₂, CO, O₃, Pb, and particulate matter less than or equal to 10 micrometers (PM₁₀). Current air quality designations for the region are well below the CO NAAQS and the proposed project is unlikely to change the emission sources/quantities.

Hazardous Materials

Phase I, II and III Environmental Site Assessments was performed on the project site, determining that the site is located on land fill dating back to the 1800s. The quality of the fill is unknown. ConnDOT commits that all site specific areas of contamination, including but not limited to abandoned tanks, drums, and solid areas will be removed and disposed of in compliance with local, State and Federal laws. In areas of the site that will be paved, the top two feet of soil will be removed and replaced with a clean gravel and sub-base material suitable for blacktop. In areas that will be left unpaved, the top four feet of soil will be removed and replaced by clean material.

Permits

ConnDOT will be required to obtain all necessary permits, as documented in Section 4.19 of the *Environmental Assessment*, and approvals prior to the construction of this project.

Incorporation by Reference

The full text of the *Federal Transit Administration Environmental Assessment* for the Norwich Transportation Center, and all accompanying documentation, are hereby incorporated by reference in this Finding of No Significant Impact.

Approved: _____

Richard H. Doyle
Regional Administrator
FTA, Region I

Date: _____

August 7, 2007

Concur: _____

Wendy A. Lee
Regional Counsel

Date: _____

8/7/07

The Norwich Community Development Corporation, Inc.

77 Main Street • Norwich, Connecticut 06360
Telephone (860) 887-6964 • Fax (860) 887-3438

David L. DiBattista
President

April 8, 2008

Mr. Edgar Hurle, Transportation Planning Director
Bureau of Policy and Planning
Connecticut Department of Transportation
2800 Berlin Turnpike, P.O. Box 317546
Newington, CT 06131-7546

RE: Norwich Intermodal Transportation Center, Norwich, CT

Dear Mr. Hurle:

On July 15, 2007, the Secretary of the Connecticut Office of Policy and Management approved the final Environmental Impact Evaluation (EIE) dated June, 2007 for the Norwich Intermodal Transportation Center (NITC) and stated that the evaluation satisfies the requirements of the Connecticut Environmental Policy Act (CEPA).

On August 7, 2007, the Federal Transit Administration (FTA) Regional Administrator issued a Finding of No Significant Impact (FONSI) for the project satisfying the requirements of the National Environmental Policy Act (NEPA).

The Norwich Community Development Corporation (NCDC), the project Program Managers and the Design Team then proceeded to develop plans and specifications to build the preferred option, Plan 5, as described on page 2-43 and shown on Figure 2-12 of the EIE.

It became apparent in December, 2007 that there would be insufficient funding to build Plan 5. Additionally, the DOT indicated that the relocation of Falls Avenue was problematical from a permitting perspective.

For these reasons the City of Norwich and the NCDC decided to reduce the scope of the project by eliminating the relocation of Falls Avenue and propose to build the alternate Plan 7, described on page 2-40 and shown on figure 2-11.

The structure footprint is virtually identical in both Plan 5 and Plan 7 with the only difference being that Falls Ave remains in place and the upper floors span the road. Based on comments from the Manager of the Southeast Area Transit District (SEAT), the ground level bus parking arrangement was modified to eliminate the need for buses to back up in order to exit. This modified the internal configuration of busses. Attached is the most recent site plan.

Page 2-43 of the EIE states the following:

"Of the seven alternatives, Alternatives 5 and 7 are believed to most suitably meet the project criteria as follows:

- *This general layout results in an efficient operation located close to the intersection of Falls Avenue with West Main Street.*
- *The location of the facility on the corner of the intersection facilitates easy pedestrian access and fosters public safety. It is also a more visible location.*
- *The structure does not encroach over the Yantic River.*
- *This layout is among the lowest in terms of impervious surface coverage.*

All environmental impacts associated with Alternative 7 have been evaluated in the EIE and all are identical to Alternative 5 except that the roadway relocation would have increased impervious surfaces and would have required acquisition of several private parcels. By proceeding with Alternative 7, the roadway relocation portion of the project will be eliminated (i.e. relocation of Falls Avenue) and therefore impacts will be reduced.

It is our opinion and that of our consultants that these revisions actually reduce the project impact by:

- Reducing the paved area from 62,000 Square feet to 40,000 square; and
- Eliminating the need to purchase a portion of the Thayer Boat Yard and the Silver Star Athletic Club.

Since these changes act to lessen the impact on the environment, we believe that the EIE of record sufficiently characterizes and evaluates all environmental impacts, and that the conclusion of no significant impact is unchanged.

In a recent meeting with representatives from the Connecticut Department of Transportation and FTA Region One, we were requested to obtain a determination from your office as to whether these changes warrant a technical modification to the EIE or if the approved EIE continues to satisfy the Requirements of CEPA .

Thank you for your consideration of this matter. If you need additional information feel free to contact Peter Polubiatko, NCDC Project Manager or Program Manager Michael MacDonald of the Downes Group.

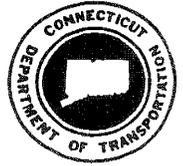
Sincerely,


David DiBattista
President NCDC

Cc:
Keith T. Hall
Mark Neri
Jon Hanifin
Jayantha Mather
Alan Bergren
Michael MacDonald
Jeanine Bonin
Ella Bowman
Mark Block



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546

Phone: (860) 594-2885

December 8, 2009

Ms. Margaret Griffin
Civil Rights Officer
US Department of Transportation
Federal Transit Administration, Region 1
Office of Program Management and Oversight
55 Broadway, 9th Floor
Cambridge, MA

Dear Ms. Griffin:

Subject: Connecticut State Project No. 103-238
Norwich Intermodal Transportation Facility
Title VI Assessment

Enclosed for your review is a copy of the Title VI Assessment prepared for the subject project. This document has been approved by the Department's Contract Compliance Unit.

Questions concerning this document may be directed to the Project Manager, Mr. Yure Kuljis at 860-594-2895, or to the Contract Compliance Officer, Ms. Debra Goss at 860-594-2169.

Very truly yours,

Jayantha Mather
Principal Engineer
Bureau of Public Transportation

Enclosure

cc: Mr. Peter Polubiatko – The Norwich Community Development Corporation

Ms. Margaret Griffin

- 2 -

December 8, 2009

Michael C. Kulak/mck

bcc: Mark D. Neri - Jayantha Mather
Y. Y. Yure E. Kuljis - Michael C. Kulak *mck*
Rail File

TITLE VI ASSESSMENT

Prepared and Submitted Pursuant to Circular FTA C 4702.1A

NORWICH INTERMODAL TRANSPORTATION CENTER

Norwich, Connecticut

State Project Number DOT01030245
FTA Grant Number CT-70-X002-00

Norwich Community Development Corporation

October 2009

Revised November 2009

TITLE VI ASSESSMENT

Prepared and Submitted Pursuant to Circular FTA C 4702.1A

NORWICH INTERMODAL TRANSPORTATION CENTER

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State Project Number DOT01030245
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Norwich Community Development Corporation

October 2009

Revised November 2009

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B. SEAT Bus Routes and Time Schedules		
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1.0 Project Description

1.1 Introduction and Background

Under Title VI of the 1964 Civil Rights Act and related statutes, each Federal agency is required to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on basis of race, color national origin, age sex, disability, or religion. The City of Norwich, as the recipient of Federal financial aid from several federal sources adheres to policies and practices to ensure that minorities and low income individuals have equal opportunity to participate in local planning processes, that the benefits of Federal funds made available to the City are equitably distributed, and that adverse impacts of projects are not disproportionately distributed to low income and minority individuals or neighborhoods.

The Norwich Community Development Corporation (NCDC), as agent for the City of Norwich, is undertaking a project that involves the planning, design and construction of a modern regional intermodal transportation center in downtown Norwich, Connecticut on Hollyhock Island. Figure 1.1 is a location plan of the City of Norwich and the nine-town Southeast Area Transit District (SEAT). Figure 1.2 shows the project site and the surrounding area.

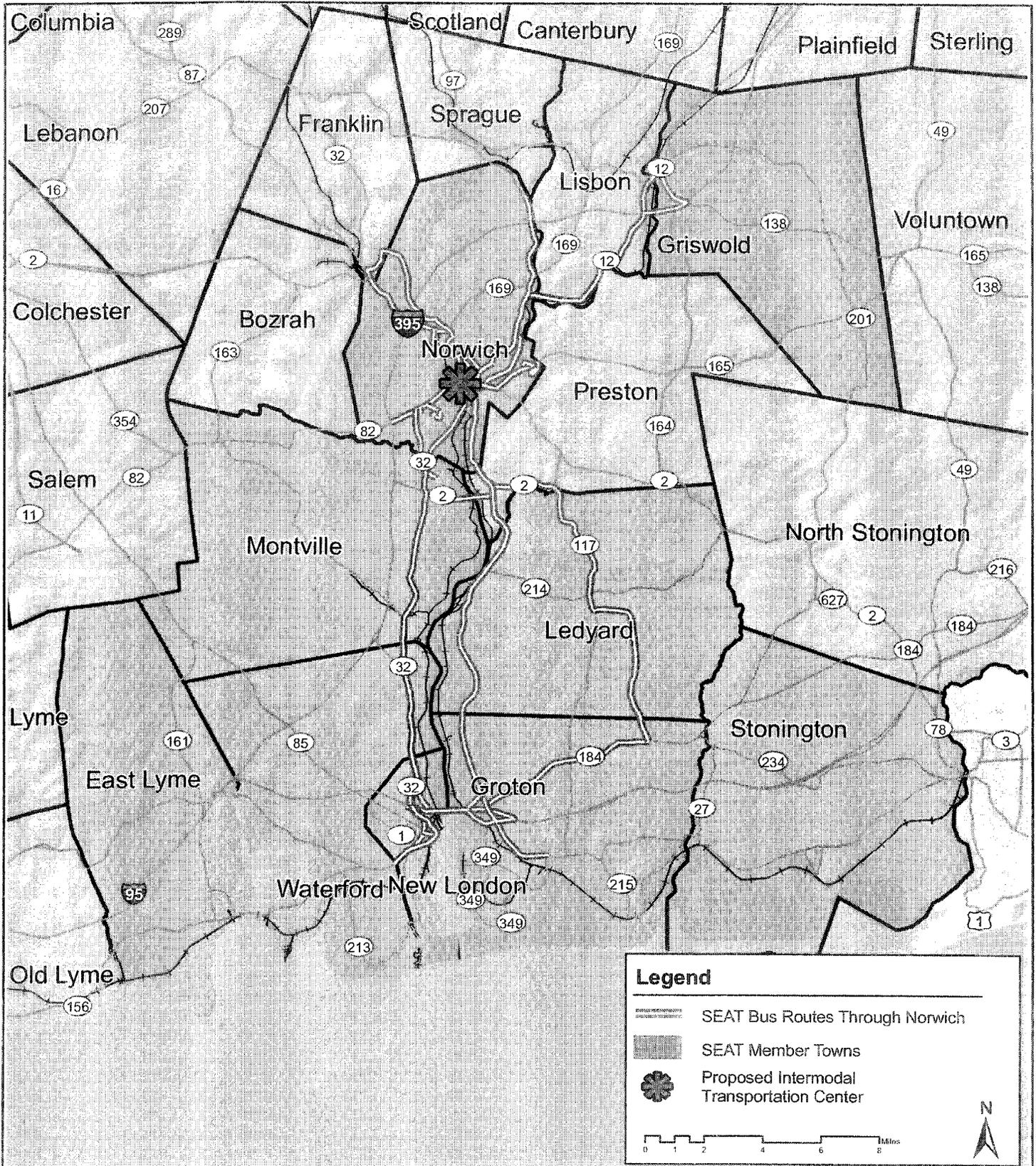
The transportation center will include:

- (1) A new multi-level parking structure;
- (2) A new bus station with passenger waiting area;
- (3) Accommodations for shuttle and limousine service to nearby attractions;
- (4) Bicycle facilities;
- (5) Linkage to water transportation; and
- (6) Services compatible with the activation of passenger rail service.

The project will also include related site improvements and utility relocation to support the new development.

This project is being implemented through the Norwich Community Development Corporation (NCDC). NCDC is a not-for-profit economic development agency that promotes economic vitality within Norwich. Formed in 1964, NCDC supports the economic development efforts of the City of Norwich. NCDC is governed by the Corporation Board of Directors which is comprised of 16 volunteer members. NCDC staff consists of three full-time staff members.

A significant portion of the funding is being provided by and/or through the Federal Transit Administration (FTA). FTA funding is being supplemented by the Federal Highway Administration (FHWA), the Connecticut Department of Economic and



 MILONE & MACBROOM Engineering Landscape Architecture and Environmental Science 99 Realty Drive Cheshire, Connecticut 06410 (203) 271-1773 Fax: (203) 272-9733 www.miloneandmacbroom.com	Title VI Assessment Norwich Intermodal Transportation Center		LOCATION: Norwich, CT	
	MMI#: 2674-01 SOURCE: U.S. Census Bureau (2000) & HUD (2009). Highway Basemap: Environmental Systems Research Institute (2007). Base Data: Connecticut Department of Environmental Protection (2006).	SEAT Bus Service Area & Participating Municipalities		DATE: 10/14/2009



<p>Engineering, Landscape Architecture and Environmental Science</p> <p>MILONE & MACBROOM[®]</p> <p>99 Realty Drive Cheshire, Connecticut 06410 (203) 271-1773 Fax: (203) 272-9733 www.miloneandmacbroom.com</p>	<p>Title VI Assessment Norwich Intermodal Transportation Center</p>		<p>LOCATION: Norwich, CT</p>	
	<p>MMI#: 2674-01-5 SOURCE: U.S. Census Bureau (2003) & HUD (2009). Highway Blueprint. Environmental Systems Research Institute (2007). Base Data Connecticut Department of Environmental Protection (2006).</p>	<p>Aerial of Downtown Site of Norwich Intermodal Transportation Center</p>		<p>DATE: 10/16/2009</p>

Community Development (DECD), and local funding sources. Both state and federal funding is being administered through the Connecticut Department of Transportation.

As funding for this project is being provided through the Connecticut Department of Transportation and the Federal Transit Administration, the preparation and acceptance of an environmental assessment under the National Environmental Policy Act (NEPA) and an Environmental Impact Evaluation under the Connecticut Environmental Policy Act (CEPA) has been accomplished. In addition, federal regulations require that projects receiving federal financial assistance submit a Title VI assessment of the project prior to the drawdown of funds.

An intermodal transportation center has long been a goal of the City of Norwich. The physical location of the City at the convergence of land and water-based transportation corridors creates a nucleus for regional travel. The need for a transportation center has been underscored by the enormous success of the Mashantucket Pequot's *Foxwoods Casino* in Ledyard (seven miles south and east of Norwich) and the Mohegan Tribal Nation's *Mohegan Sun Casino* in nearby Montville, along with increased attendance at other tourist attractions in the region. Accordingly, the overarching purpose of this project is to replace the existing inadequate bus terminal/parking lot at Route 12, expand the existing service base, and act as a hub for transit, limousine, taxi, water, passenger rail transportation in the future and potentially bus services to the Hartford and Providence airports.

1.2 Project Location

The City of Norwich is located in southeastern Connecticut, approximately 34 miles southeast of Hartford and 39 miles southwest of Providence, Rhode Island. It is a waterfront community, with a harbor at the convergence of the Shetucket and Yantic Rivers, which join to form the Thames River at Norwich Harbor. According to the U.S. Census Bureau, the City of Norwich had a year 2000 population of 36,117. Casino and tourism-related employment is the fastest growing source of employment for Norwich workers and for the Southeast region, according to the Norwich Plan of Conservation and Development (October 2002).

The new Norwich Intermodal Transportation Center will be located on Hollyhock Island. Hollyhock Island is a man-made landform that is located at the mouth of the Yantic River. The island has an overall length of about 3,700 feet and an average width of about 400 feet. The island divides the Yantic River into its east and west branches. The island was gradually created by the placement of fill moving from south to north. As the island was established, industrial uses and later the city's Wastewater Treatment Plant were developed. For many years, the southern part of the island was used as a coal depot. Although numerous factory and mill buildings have been demolished, land use on the island is still primarily characterized by light industrial and utility uses. The island is a functional part of Norwich's Downtown, primarily accessed by West Main Street which also functions as Connecticut Route 82 eastbound. The bridge over the East Branch of

the Yantic River is only a 150 foot span separating the island from the Downtown Norwich business area. See Figure 1-2.

The Norwich Intermodal Transportation Center will be built on City property to the west of Falls Avenue. The transportation center will consist of the following elements:

- A new multi-level, 169-space, 87,000 square foot transit supportive parking structure;
- A new surface bus station, including approximately 1,250 square feet of enclosed structure with waiting area for passengers, restrooms, kiosks, ticketing and other amenities;
- Accommodations for shuttle and limousine service to nearby resorts;
- Bicycle facilities;
- Linkage to water transportation services;
- Related site improvements and utility infrastructure relocation to support the new development.

The facility will be located proximate to the north/south New England Central rail line in anticipation of future passenger rail service, and therefore the facility has been designed so as not to preclude future rail connections. In addition, the close proximity of the transportation center to Connecticut Routes 82 and 32, as well as the short walk to the newly-constructed large vessel pier in Norwich Harbor, makes the facility highly accessible to the community and the region. Refer to Figure 1.3 for a site plan view of the Transportation Center.

1.3 Project Purpose

The overarching purpose of this project is to develop a regional intermodal transportation center to serve the southeastern Connecticut region. This facility will replace the existing inadequate bus terminal/parking lot at Route 12, expand the existing service base, and act as a hub for transit, limousine, taxi, water, and potentially passenger rail transportation in the future. More specifically, the project purpose is as follows:

1. To reduce traffic congestion by providing access to alternative transportation in southeastern Connecticut;
2. To gain better access to highways;
3. To combine rail, automobile, bus and water transportation with pedestrian movements;
4. To create improved public access to the waterfront and foster attraction to tourist-oriented businesses in the greater Norwich region; and
5. To provide a safer environment for pedestrian and vehicular traffic as compared to the existing bus transit hub on Route 12 in Norwich;

The main locational objectives of the Norwich Intermodal Transportation Center are to:

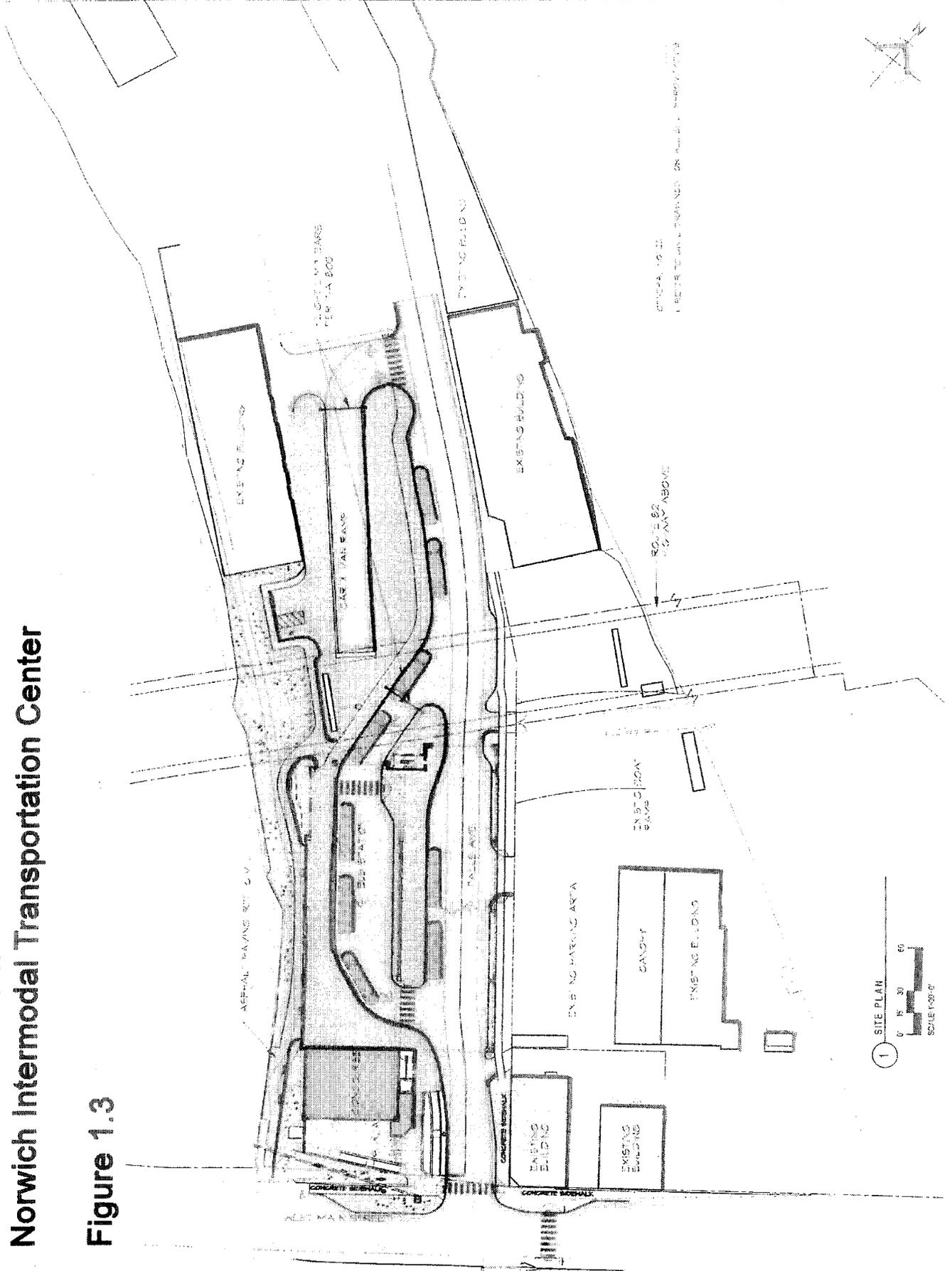
1. Maintain proximity to regional road networks to facilitate access by passenger vehicles;

2. Maintain proximity to the regional transit provider (South East Area Transit or SEAT) existing bus routes;
3. Maintain proximity to possible future commuter rail service;
4. Maintain proximity to navigable waters, preferably near the existing city large vessel ferry pier;
5. Maintain proximity to downtown Norwich;
6. Facilitate pedestrian access to the transportation center; and
7. Maintain a high degree of visibility.

Note that "proximity to downtown Norwich" is defined more broadly than the traditional one-quarter mile catchment area that is typically used for buses. The proposed facility is intended to serve as the hub of SEAT, the regional bus provider, servicing nine cities and towns and covering nearly 500 square miles in area. Therefore, "proximity to downtown Norwich" is viewed in a regional context.

Title VI Assessment Norwich Intermodal Transportation Center

Figure 1.3



PROJECT:
Norwich Intermodal Transportation Center
Title VI Assessment
Site Plan

PREPARED BY:
The Norwich
Community
Development
Corporation

77 High Street
Norwich, Connecticut

DESIGNED BY:
BERNARD ASSOCIATES
1000 Main Street, Suite 200
Norwich, Connecticut 06258

ENGINEER:
BERNARD ASSOCIATES
1000 Main Street, Suite 200
Norwich, Connecticut 06258

ARCHITECT:
BERNARD ASSOCIATES
1000 Main Street, Suite 200
Norwich, Connecticut 06258

PLANNING:
BERNARD ASSOCIATES
1000 Main Street, Suite 200
Norwich, Connecticut 06258

**NORWICH
INTERMODAL
TRANSPORTATION
CENTER**
Hollyhock Island
Norwich, Connecticut

SITE PLAN

**CONSTRUCTION
DOCUMENTS
100% SUBMISSION**

AS SHOWN
100-245
LD/RW
CONTRACT NO.
JH

SEPT. 4, 2009

A-050

The primary operational objectives are:

1. Safety and security of bus riders and parking garage users;
2. Ease of the riding public's access to buses;
3. Efficiency of bus operations (easy in/easy out); and
4. Regional transportation center image.

The result of the proposed development will be an attractive, revitalized downtown site that provides:

- Alternate transportation opportunities;
- Increases public access to the region's employment and service centers, a factor that is of particular importance to Norwich residents;
- Promotes waterfront accessibility;
- Spurs economic development in the City and the region; and
- Provides opportunities to reduce traffic congestion in southeastern Connecticut.

Figure 1.4 is an illustration of the Norwich Intermodal Transportation Center.

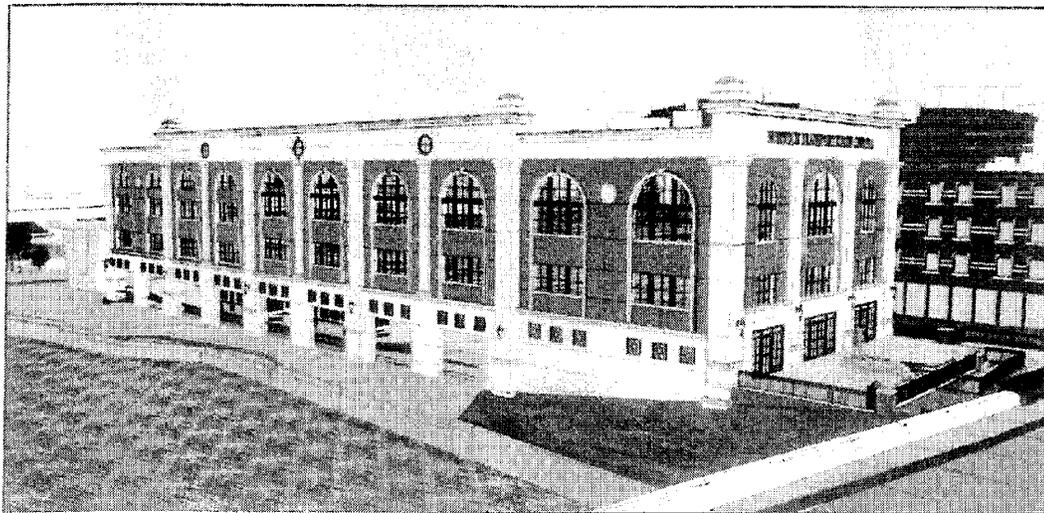


Figure 1.4

1.4 Project Need

An intermodal transportation center has long been a goal of the City of Norwich. The physical location of the city at the convergence of land and water-based transportation corridors create a nucleus for regional travel. The need for a transportation center has been underscored by the enormous success of the Mashantucket Pequot's *Foxwoods Casino* in Ledyard (south and east of Norwich) and the Mohegan Tribal Nation's *Mohegan Sun Casino* in nearby Montville, along with increased attendance at other tourist attractions in the region.

The proposed intermodal transportation center is needed for the following reasons:

1. The increase in traffic volumes generated by regional development creating increased daily tourist visits, coupled with limitations in highway capacity and available land for parking, has heightened the need for southeastern Connecticut to increase its transit carrying capacity.
2. At present, different modes of regional transportation are scattered, with little opportunity for linkage among them and an overall lack of parking and infrastructure to support their use.
3. The existing transportation facilities in the City of Norwich are inefficient and inadequate and do not meet the City's or the region's transportation needs.
4. The site currently serving as the pulse transfer function of the seven SEAT bus lines is a landlocked outdoor surface parking lot with no indoor facilities. The lot cannot adequately accommodate the required buses in an optimum simultaneous pulse transfer operation, and riders are subject to variable weather conditions.
5. There are currently no parking facilities or infrastructure to support future ferry operations at the City's ferry pier on Hollyhock Island.
6. There are currently no facilities or infrastructure to support passenger rail service along the New England Central rail line corridor, a candidate for future passenger service.

In response, the Norwich Intermodal Transportation Center is being developed to accommodate and integrate passenger vehicle, bus, future passenger rail, pedestrian and water modes of transit in order to make alternate modes of transportation more attractive and convenient, and to aid in alleviating traffic congestion.

Transit and Parking Needs, Deficiencies, and Opportunities

For several decades, regional transit needs in southeastern Connecticut have been a focal point of the City of Norwich, as well as the Connecticut Department of Transportation

and the Southeastern Connecticut Council of Governments (SCCOG). During this time, SCCOG has generated a significant amount of data and analysis that documents the transit need in the region. In 2004, the Southeastern Regional Council of Governments (SCCOG) published the *Intermodal Connections Study Southeast*, which evaluated an expanded regional transit system in the region.

Perhaps the single most compelling demonstration for transit need in the region is the marked growth trends in SEAT ridership, as well as the Foxwoods Casino employee shuttle and the Windham Regional Transit service. The SEAT bus system alone has seen an 8% increase in ridership per year for each of the past four years.

The existing transportation center at the Route 12 viaduct provides minimal parking spaces for transit passengers who may be taking the bus to work in Windham, at the casinos, or in surrounding regional areas. With the expanded passenger services to be provided at the proposed transportation center (i.e. rail, ferry, taxi, limousine, airport shuttle, and others), additional transit related parking needs will be realized. In order for regional transit to be attractive to passengers who own vehicles, on-site parking will be essential.

Bus Transportation Needs, Deficiencies, and Opportunities

Background

The largest bus transportation service in the greater Norwich area is South East Area Transit (SEAT), connecting the major cities and towns in southeastern Connecticut. Major service stops within the City of Norwich include Backus Hospital, the Downtown, Norwich Industrial Park, Foxwoods Resort and Casino and the Mohegan Sun Casino. SEAT runs local service in Norwich and operates out of its existing transportation hub at Route 12 in Norwich, which is one of four main transfer points for corridor and local



Figure 1.5

service. This hub is referenced as the existing transportation center; however it is little more than a parking lot with a small bus shelter. Passengers using the SEAT system may board and disembark buses anywhere along the route at the discretion of the driver.

SEAT runs three separate corridor transportation routes that service the City of Norwich, providing transportation to New London, Groton, and Jewett City in Griswold. Service is available Monday through Saturday, as early as 6:00 a.m. and as late as 12:00 a.m. SEAT also operates five transportation routes that locally service the City of Norwich, including service to the Norwich Industrial Park, Backus Hospital, and the Mohegan Sun Casino. Specific SEAT service routes, locations and schedules are presented in Appendix B.

In addition to the SEAT operations, the existing Norwich Transportation Center serves as the connection point for the Foxwoods Casino employee shuttle, which runs every 15 minutes, including hourly connections with the SEAT routes.

The existing Norwich Transportation Center also serves as a connection point for the Windham Regional Transit District(WRT) bus, which stops in Norwich four times each day. The WRT line services residents in Norwich who work in the greater Windham area.

Existing Facility Deficiencies

The existing SEAT Norwich hub terminal is located at the viaduct near Routes 2 and 12, where it has been operating since 1994. The site, known as the Route 12 Viaduct Site, was designed as a parking lot, with no anticipation of accommodating 40-foot buses. This long, narrow site serves a dual function as a bus terminal and a parking lot. Space is very limited, and it is common for parked cars to become blocked by the buses.

Traffic flow at the existing Route 12 facility is cumbersome. Ingress and egress to and from the site occurs via a two-lane roadway. When the 40-foot long buses pull into traffic, they cause a bottleneck in traffic flow.



Figure 1.6

The existing facility is equipped with a small bus shelter, but the loading area is uncovered and open to the elements. Pedestrian safety is an ongoing concern at this site. Riders walking to the hub must cross an at grade unprotected railroad track to reach the site. Since there is no ticket area, bus passengers must either purchase their tickets off-site or they must have exact fare.

As presented in the document entitled *Comparative Analysis of Potential Sites for the Norwich Transportation Center; Norwich, Connecticut*, dated July 1999, prepared by Diversified Technology Consultants, the Route 12 Viaduct Site falls short of fulfilling the programmatic requirements that the city and the region hope to achieve.

2.0 Study Area Description

2.1 Overview

The Norwich Intermodal Transportation Center will be built on a City owned parcel of land located on an island occupied exclusively by non-residential uses. For purposes of this Title VI Assessment, a broader study area needs to be defined than just the building site for the new transportation center. The Title VI Assessment needs to compare the impact upon low-income and minority populations of relocating the pulse point of the Norwich bus transit system operated by the Southeast Area Transit District (SEAT) from its current location at the Route 12 Viaduct parking lot to the Falls Avenue site upon low-income and minority populations.

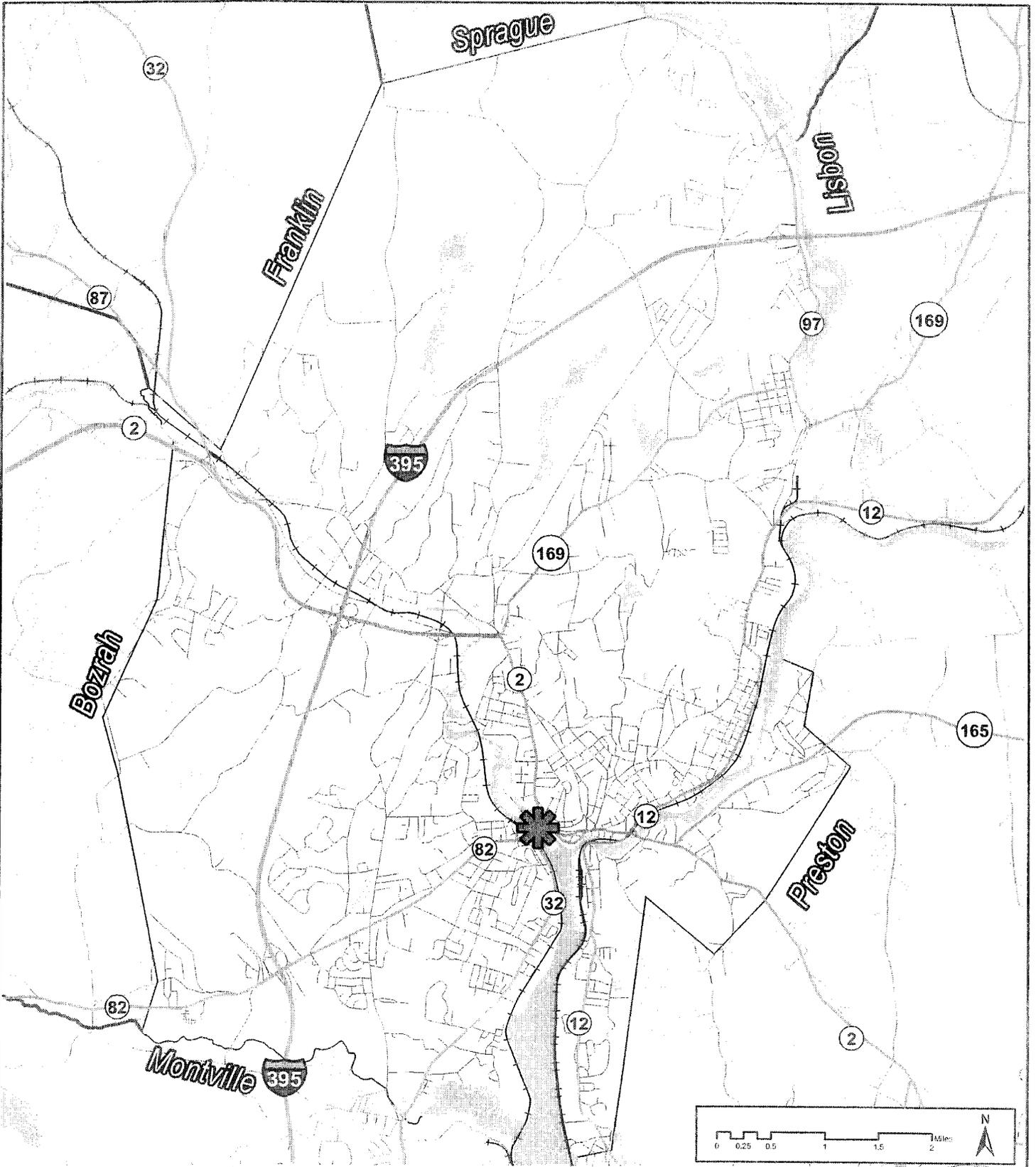
2.2 Study Area Description

For the immediate future, the Norwich Intermodal Transportation Center will function as the pulse point or hub for local and regional fixed route bus service serving the City of Norwich and as a parking facility for transit users. Eventually, connections to rail and waterborne transportation options will be provided from the transportation center, but no definitive plans with requisite funding exist at this time to initiate such service. Therefore, in defining a study area for purposes of the Title VI Assessment, the relationship of before and after access to bus routes and the transit hub for low-income and minority populations needs to be assessed. The assessment needs to focus upon whether any disproportionate degradation in the level of service will impact low-income and minority populations. While the SEAT bus system is a regional service, the location of the Norwich Intermodal Transportation Center has no impact on users outside of the City of Norwich as all routes serving Norwich pass through the Norwich Transportation Center irrespective of its location. In addition, the Norwich Transportation Center is being developed and will be owned and operated by the City of Norwich as an important facility and activity generator within its Downtown district. Therefore, the Study Area will be defined as the municipal boundaries of the City of Norwich. Refer to Figure 2.1 for a map of the City of Norwich Study Area.

2.3 Transportation Center Site Selection Description

The evolution of the Norwich Intermodal Transportation Center project spans almost two decades of public discussion, study, assembling of financing, engineering and design. This section presents a general chronology of events to provide the reader with a general understanding of the evolution of the project.

- 1992 – the success of Foxwoods Casino generates discussion on the need for a regional transportation center in Norwich
- 1998 – ConnDOT prepares analysis of developing a transportation center on the Route 2 Viaduct site



 MILONE & MACBROOM Engineering, Landscape Architecture, and Environmental Science 99 Realty Drive Cheshire, Connecticut 06410 (203) 271-1773 Fax: (203) 272-9733 www.miloneandmacbroom.com	Title VI Assessment Norwich Intermodal Transportation Center		LOCATION: Norwich, CT	
	MMI#: 2674-01 SOURCE: U.S. Census Bureau (2000) & HUD (2009). Highway Basemap: Environmental Systems Research Institute (2007). Base Data: Connecticut Department of Environmental Protection (2008).	Study Area	DATE: 10/14/2009	SHEET: Figure 2.1

- July 1999 – report completed on a comparative analysis of seven potential sites for the location of a transportation center. Hollyhock Island is recommended.
- Aug. to Dec. 1999 – Norwich Commission of City Plan reviews and approves report
- Dec. 1999 to Jan. 2000 – Norwich City Council review and approves Hollyhock Island for a transportation center
- 2000 to 2003 – funding and project management negotiated with ConnDOT
- 2004 – site development evaluation and design commences
- May 2005 – formal EA/EIE initiated
- June to Aug. 2005 – public scoping conducted – seven sites evaluated
- March. 2007 – public hearing on completed EA/EIE
- July & August 2007 – EA/EIE approved
- July 2009 Final Design completed – project ready for bid

Throughout this long period of project development there has been continual coverage in the local media and numerous public meetings, mostly held in the Downtown area, where site locations have been evaluated and ultimately selected. Opportunity for input into the planning process for this project has been ample over the extended period of deliberations for this project. Additionally SEAT representatives have had a direct involvement in the EA/EIE process bringing the concerns of the ridership to the process. Riders comments are routinely relayed to management by the bus drivers and surveys of the ridership are used to gauge needs and concerns.

For a full discussion of the alternatives considered the reader is referred to Appendix A, Section 2.0, Alternatives Considered, of the approved Federal Environmental Assessment and Connecticut Environmental Impact Evaluation.

3.0 Description Of Low-Income And Minority Populations Within The Study Area

3.1 Sources of Information

In order to locate the low-income and minority population within the City of Norwich U.S. Census block group information was consulted and mapped using Geographic Information System mapping and data sets. Please refer to Figure 3.1 for a Census Block Group map of Norwich. Also, the City of Norwich Community Development Block Grant (CDBG) Program was consulted for information on the location of low-income and minority population and for information on organizations and groups that represent or provide services to these groups. Census 2000 Low and Moderate Income Summary Data (LMISD), provided by the U.S. Department of Housing and Urban Development (HUD), was also used to calculate the low-income population of Norwich at the block group level.

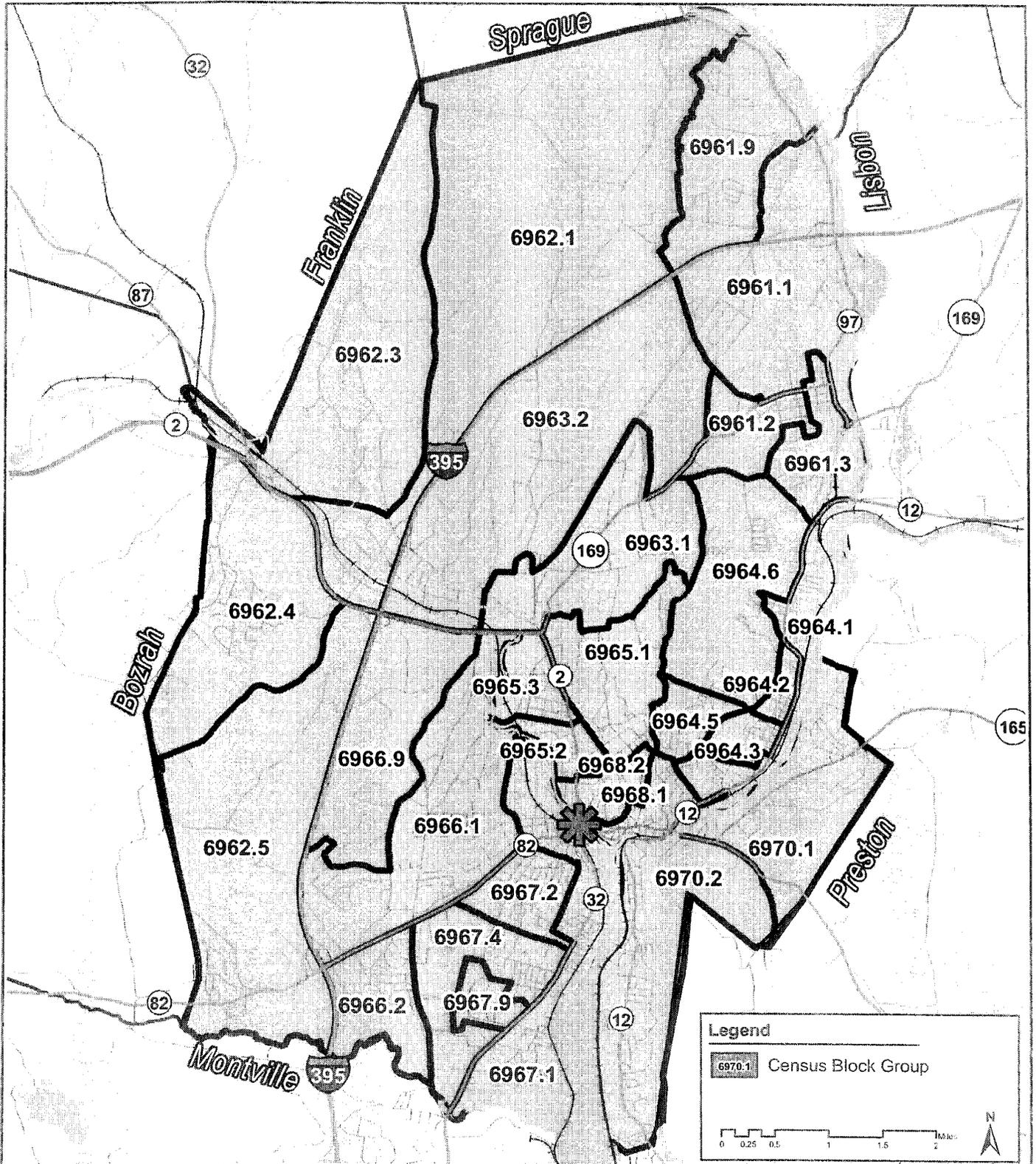
3.2 Low-Income Population

Census 2000 Low and Moderate Income Summary Data (LMISD), provided by the U.S. Department of Housing and Urban Development (HUD), was analyzed to determine the percentage of low-income people residing in Norwich's individual block groups. According to this data, approximately 31.7% of Norwich's population falls within the HUD-defined "low income" category. This category is defined as those individuals residing in households where the household income is equal to or less than 50% of the area median income (as defined by HUD). The adjacent table lists Norwich's block groups and their corresponding low-income population percentages.

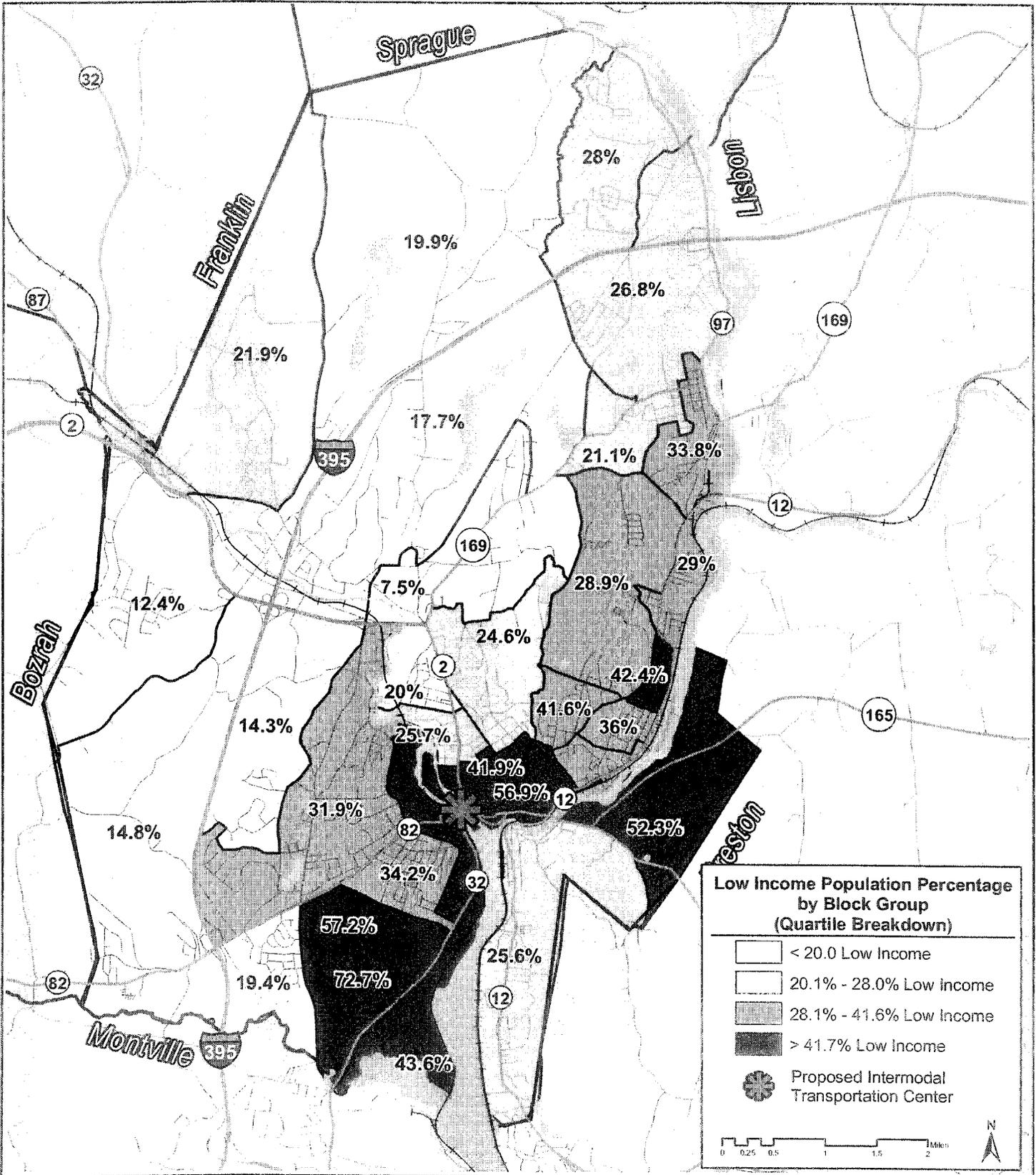
Norwich's low income population is heavily concentrated in several Census block groups situated along the banks of the Thames, Yantic and Shetucket Rivers, areas that include the traditional urban neighborhood centers of the City. These areas include Downtown Norwich, the Greenville and Taftville sections of the City, and the southern section of the City along Route 32 and Route 82. The highest low income concentrations are found in Block Group 6967.9 (72.7%), Block Group 6967.4 (57.2%), Block Group 6968.1 (56.9%) and Block Group 6970.1 (52.3%).

Low Income Population Percentage by Census Block Group Norwich, CT	
Census Block Groups	Low Income Percentage
6961.1	26.8%
6961.2	21.1%
6961.3	33.8%
6961.9	28.0%
6962.1	19.9%
6962.3	21.9%
6962.4	12.4%
6962.5	14.8%
6963.1	7.5%
6963.2	17.7%
6964.1	29.0%
6964.2	42.4%
6964.3	36.0%
6964.5	41.6%
6964.6	28.9%
6965.1	24.6%
6965.2	25.7%
6965.3	20.0%
6966.1	31.9%
6966.2	19.4%
6966.9	14.3%
6967.1	43.6%
6967.2	34.2%
6967.4	57.2%
6967.9	72.7%
6968.1	56.9%
6968.2	41.3%
6970.1	52.3%
6970.2	25.6%
CITY	31.7%

Please refer to Figure 3.2 for a map illustrating these block groups.



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MMI#: 2674-01-5
SOURCE:
U.S. Census Bureau (2010) & HUD (2009),
Highway Bureau, Environmental Systems
Research Institute (2007),
Base Data, Connecticut Department of
Environmental Protection (2008).

**Low Income Population
Percentage by Block Group**

LOCATION:
Norwich, CT

DATE:
10/16/2009

SHEET:
Figure 3.2

3.3 Minority Population

According to 2000 Census data, the City of Norwich's White Non-Hispanic population is 29,054, or 80.6% of the total City population of 36,117. The remaining 19.6% of the population falls within the category of minority population. As in the case of the low-income population distribution described above, Norwich's minority population is heavily concentrated in several Census block groups situated along the banks of the Thames, Yantic and Shetucket Rivers. In addition to constituting the areas of Norwich that have been historically the most intensely developed, these block groups are situated along three important state routes: Route 2, Route 12 and Route 32. All three of these state routes are served by local and regional bus lines, one of the most important transportation modes for residents of these block groups. The adjacent table lists Norwich's block groups and their corresponding minority population percentages.

Minority Population Percentage by Census Block Group Norwich, CT	
Census Block Groups	Minority Percentage
6961.1	8.0%
6961.2	11.8%
6961.3	16.4%
6961.9	4.2%
6962.1	9.4%
6962.3	11.3%
6962.4	8.3%
6962.5	7.3%
6963.1	7.9%
6963.2	6.5%
6964.1	22.9%
6964.2	24.9%
6964.3	25.1%
6964.5	29.1%
6964.6	16.6%
6965.1	14.4%
6965.2	12.8%
6965.3	7.8%
6966.1	18.4%
6966.2	15.4%
6966.9	8.5%
6967.1	21.7%
6967.2	26.8%
6967.4	33.8%
6967.9	56.5%
6968.1	40.1%
6968.2	36.5%
6970.1	18.1%
6970.2	30.3%
CITY	19.6%

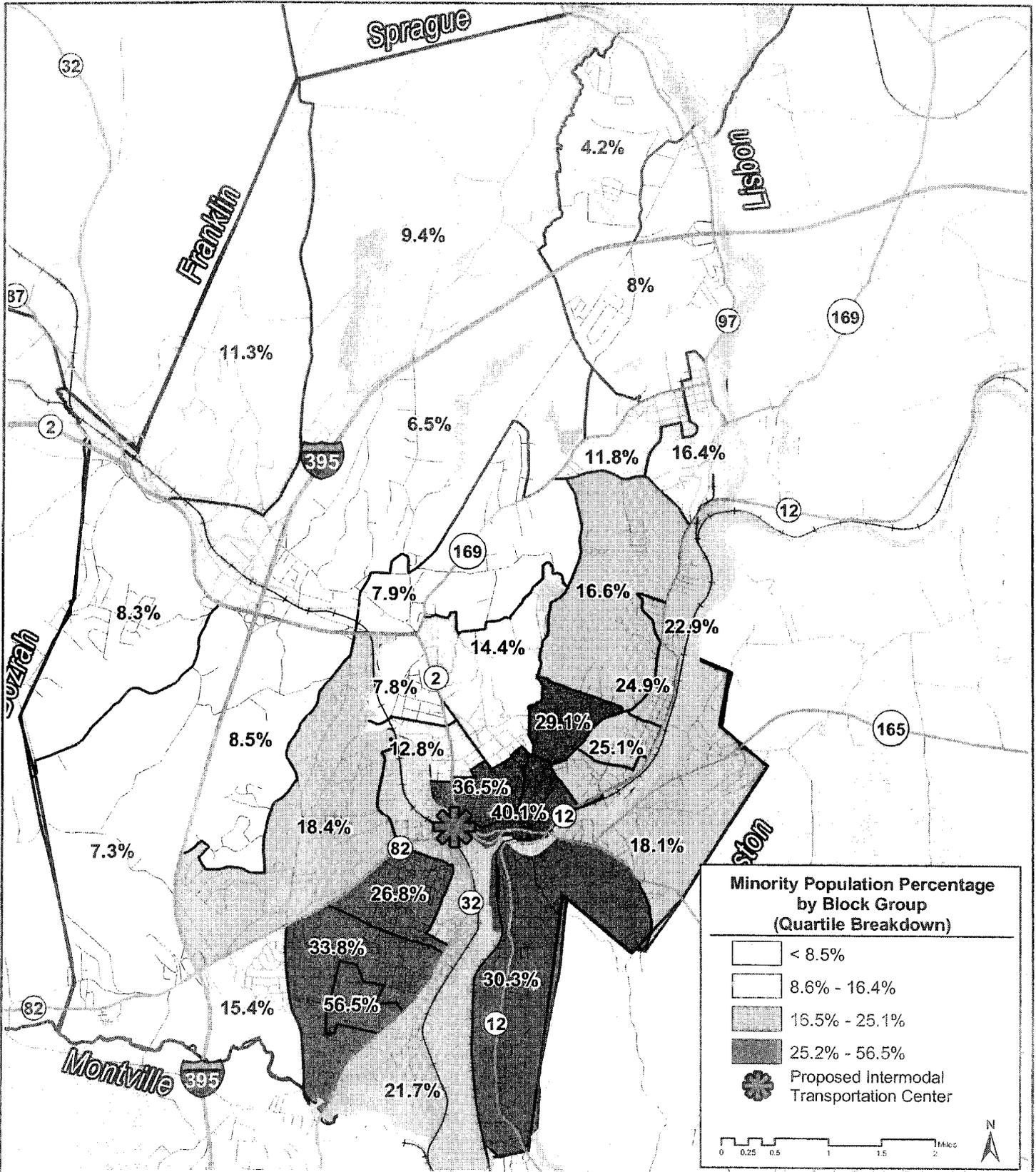
Block Groups 6968.1 and 6968.2, which form the center of Downtown Norwich, have minority populations of 40.1% and 36.5% respectively. Further north along Route 12, in the Greenville section of the City, block group minority populations range from 22.9% to 29.1%. Block Group 6970.2, which encompasses the Laurel Hill neighborhood along the eastern bank of the Thames River, has a minority population of 30.3%, while the area of the City on the western bank has block group minority populations of between 21.7% and 33.8%. Finally, Block Group 6967.9, which includes a large number of apartment complexes, has the highest minority population percentage of any block group in the City with 56.5%

Please refer to Figure 3.3 for a map illustrating these block groups.

3.4 Local Organizations Representing or Serving Low-Income and Minority Population

Low-Income Population

- Norwich Human Services
- Norwich Housing Authority
- Norwich Office of Community Development
- Thames Valley Council for Community Action (TVCCA)
- United Community and Family Services
- Downtown Revitalization Zone Committee Greenville Revitalization Zone Committee
- Thames River Transitional Housing
- Madonna Place



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	<p>MMI#: 2674-01-5</p> <p>SOURCE: U.S. Census Bureau (2000) & HUD (2009). Highway Basemap. Environmental Systems Research Institute (2007). Base Data Commercial Department of Environmental Protection (2008).</p>	<p align="center">Minority Population Percentage by Block Group</p>		<p>DATE:</p> <p align="center">10/16/2009</p>

Low-Income Population

Norwich Human Services
Norwich Housing Authority
Norwich Office of Community Development
Thames Valley Council for Community Action (TVCCA)
United Community and Family Services
Downtown Revitalization Zone Committee
Greenville Revitalization Zone Committee
Thames River Transitional Housing
Madonna Place

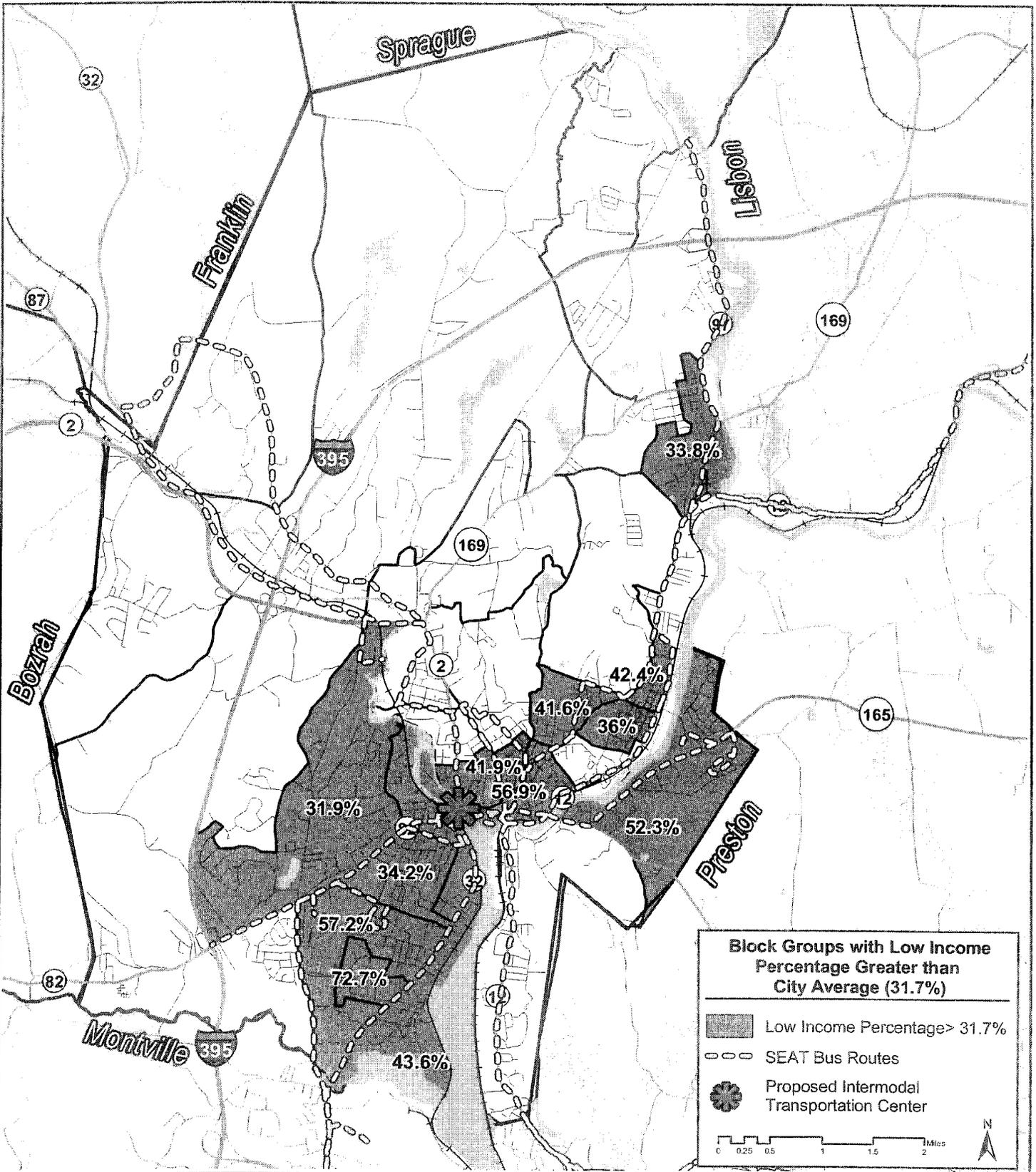
Minority Population

Norwich Chapter NAACP
Chinese American Cultural Assistance Association
Eastern Connecticut Asian and American Lions Club
Haitian Health Foundation
Cape Verdean Santiago Society
Spanish American Merchants Association
Norwich Human Services
Norwich Human Services – Newcomers Group

3.5 Connection Between Low-Income and Minority Populations and Local/Regional Mass Transit System

Figures 3.4 and 3.5 on the following pages illustrate the location of SEAT bus routes throughout the City of Norwich, along with the location of the proposed Norwich Intermodal Transportation Center. As this map indicates, most of the major arterial and collector roadways in Norwich are served by a SEAT bus line. In those areas identified as having high concentrations of low-income and/or minority residents, the presence of SEAT bus lines is particularly pronounced. One very important element of these bus lines is that although the buses have some designated stops, potential riders are able to “flag down” a bus anywhere along each route, regardless of where the designated bus stops may be. The ability to do this effectively enables direct access to the local and regional mass transit system at any point along Norwich’s main roadways, and therefore direct access to the transportation center.

The areas of concentrated low-income and minority populations are served by a number of different bus routes. In many cases, these routes are only one-quarter to one-half mile from each other. All SEAT bus routes that circulate within or through Norwich stop at the City’s existing open lot Transportation Center located off of Route 12 in the Downtown. The ease of access to several different bus routes for the low-income and minority residents of Norwich, combined with the presence of a regional transportation hub at the existing Transportation Center, enables these residents to commute to employment, shopping and services located throughout southeastern Connecticut.



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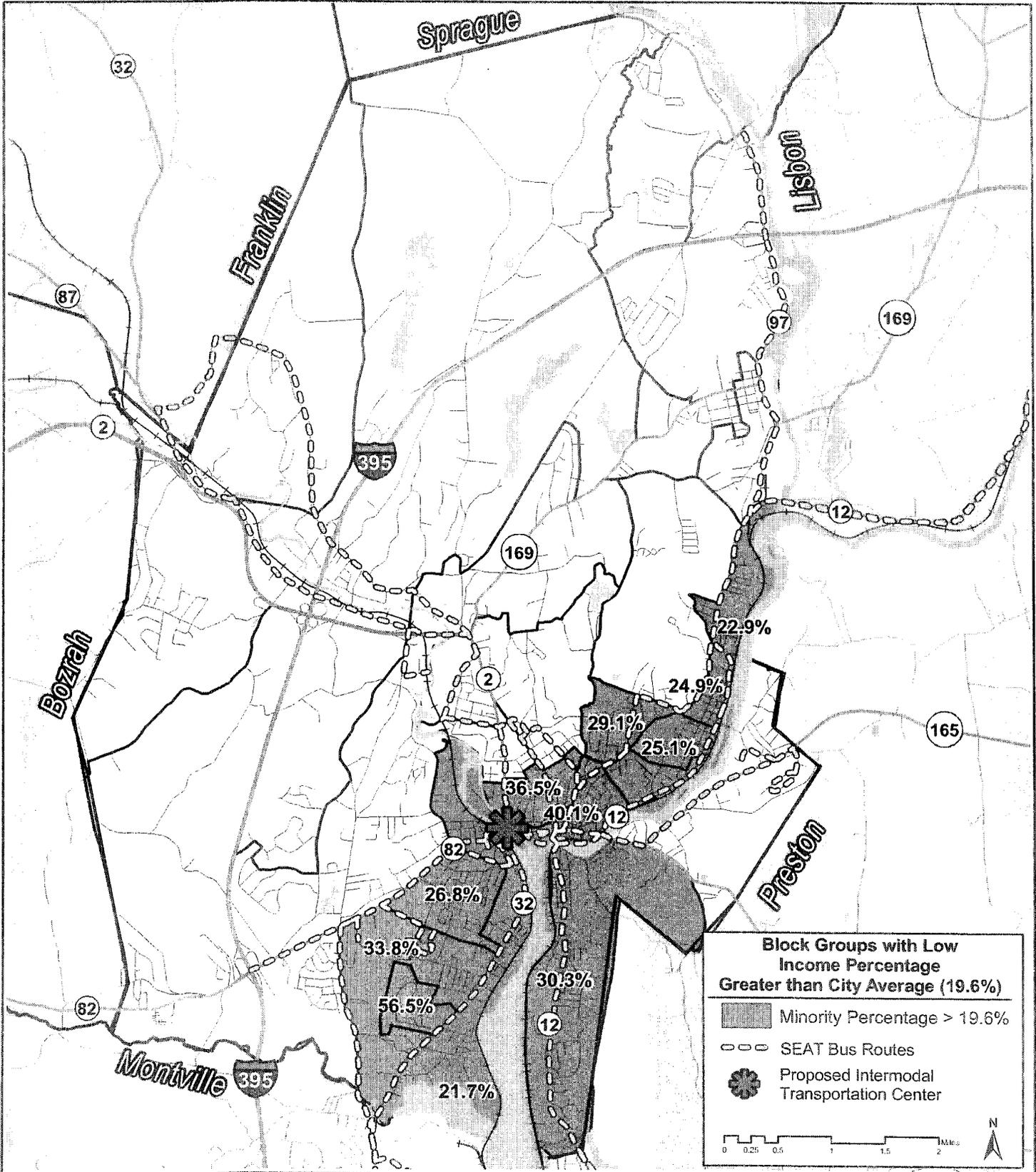
MMH#: 2674-01-5
SOURCE:
U.S. Census Bureau (2000) & HUD (2009),
Highway Basemap, Environmental Systems
Research Institut. (2007).
Base Data Connecticut Department of
Environmental Protection (2009).

**Block Groups with Low
Income Percentage
Greater than City Average**

LOCATION:
Norwich, CT

DATE:
10/16/2009

SHEET:
Figure 3.4



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Research Institute (2007).
Base Data Connecticut Department of
Environmental Protection (2008).

**Block Groups with Minority
Percentage Greater
than City Average**

LOCATION:
Norwich, CT

DATE:
10/16/2009

SHEET:
Figure 3.5

4.0 Adverse Effects of the Project on Identified Low-Income and Minority Population

The proposed Norwich Intermodal Transportation Center at Hollyhock Island is projected to have very limited, if any, adverse effects on the City of Norwich's low-income and minority populations.

The new transportation center at Hollyhock Island will be located approximately one-half mile west of the current transportation center on Route 12. This westward shift in location could result in some minor increases in commuting time for low-income and minority residents of the blocks groups immediately surrounding the existing transportation center location, as well as those to the north along Route 12 and to the east of the present transportation center. These block groups include 6961.3, 6964.1, 6964.2, 6964.3, 6964.5, 6968.1, 6970.1 and 6970.2. Any increases in commuting time would be related to the need for bus riders to travel slightly farther in order to reach the new transportation center to transfer from one bus line to another. However, since the location of the transportation center is only shifting by one-half mile, these increases in travel time likely would be negligible.

In addition, since the new Norwich Intermodal Transportation Center will still be located within a low-income/minority population concentration area, the net impact on this universe of households will be essentially neutral. While some low-income and minority residents will have to travel slightly farther than before to get to the transportation center, other such households will be closer to the new transportation center than they were to the existing transportation center, thereby reducing their commuting time.

More substantive adverse effects on low-income and minority residents could occur from the necessary changes to SEAT bus routes, also again these adverse effects are expected to be very limited. In order to accommodate the location of the new Norwich Intermodal Transportation Center, the SEAT bus routes in Downtown Norwich will need to be slightly adjusted. According to an analysis completed by SECCOG, the following impacts to individual bus routes are likely to occur as a result of the relocated transportation center:

Local Routes

Route #4 (Taftville/Occum): Allotted headway limit of one hour likely to be exceeded. Will need schedule destination adjustment. Some riders may no longer be able to use this route if schedule is adjusted.

Route #5 (Norwichtown): No adverse effects expected.

Route #6 (East Side/West Side): Already at headway limit of one hour; includes dropping off service to certain geographic areas during the day, resulting in a two-hour headway for these areas. No additional time available to schedule in a destination change.

Route #7 (Mohegan Sun/Hamilton Ave.): No adverse effects expected.

Regional Corridor Routes

Route #1 (Norwich to New London): Shifting this route to the new transportation center location will actually result in a time savings of several minutes.

Route #2 (Norwich to Groton): Shifting this route to the new transportation center location will add 4 minutes of travel time to the route. Might experience some conflicts when connecting with Route #11 buses in Groton due to the addition of this travel time, resulting in some delayed arrivals in Norwich.

Route #9 (Norwich to Jewett City): No adverse effects expected.

5.0 Positive Effects of the Project on Identified Low-Income and Minority Population

The proposed regional intermodal transportation center at Hollyhock Island is projected to have a number of positive effects on the City of Norwich's low-income and minority populations. These positive effects fall under the following categories, which will be discussed in greater detail below:

- Improved Transportation Facilities
- Future Access to Commuter Rail Service
- Enhanced Connections to Economic Opportunities

5.1 Improved Transportation Facilities

As previously described in Section 1.2, the development of the new regional multimodal transportation center will include a 169-space, 87,000 square foot transit supportive parking structure, and a new surface bus station that includes a 1,250 square foot of enclosed waiting area for passengers, restrooms, kiosks, ticketing and other amenities. These facilities will be a significant improvement from the existing outdoor facilities at the present transportation center on Route 12.

At the present transportation center, riders often must wait under bus stop canopies that are open on three sides to the elements. The new transportation center will offer a more comfortable, climate-controlled indoor waiting area. The availability of parking will be greater at the new transportation center, and the conflicts between bus and automobile circulation patterns that exist at the current transportation center will be eliminated.

5.2 Future Access to Commuter Rail Services

The present transportation center on Route 12 has access to a railroad line. However, this railroad line is owned by the Providence and Worcester Railroad, which uses the line only for freight transportation. The new regional multimodal transportation center on Hollyhock Island will be in close proximity to the former Central Vermont Railway line, now owned and operated by the New England Central Railroad (NECR), which runs through the western side of Norwich and has the potential to be reactivated for passenger rail service. NECR has had discussions with the State of Connecticut Department of Transportation (ConnDOT) about potentially implementing commuter rail service along this line from New London to as far north as the University of Connecticut campus in Storrs. The development of the new transportation center on Hollyhock Island would provide the City of Norwich with the opportunity to connect to any commuter rail service that might be implemented along this rail line.

Access to commuter rail service would yield many benefits for the low-income and minority populations in Norwich. For the many low-income and minority households

that do not have access to an automobile, commuter rail would provide an additional convenient transportation option. It would enable workers from these households to travel further out into the southeastern Connecticut region for employment, and it would represent a reduction in commuting time as compared to utilizing bus service over a similar trip distance.

5.3 Enhanced Connections to Economic Opportunities

The multimodal transportation center at Hollyhock Island will improve the connections between low-income and minority residents of Norwich and economic opportunities throughout the larger region. Since access to employment in southeastern Connecticut is often highly reliant upon reliable automobile transportation, the economic opportunities for households that do not have access to a car are limited. In these situations, mass transit is often the lifeline that enables low-income families to support themselves. Improving and potentially expanding mass transportation options will provide low-income and minority households with increased choice in transportation modes, improved service and greater access to employment centers throughout a wider geographic area.

6.0 Description of Mitigation and Environmental Enhancement Actions

6.1 "No Build" Scenario

A "no build" scenario would involve keeping the existing transportation center at its present location on Route 12 and not constructing the new Norwich Intermodal Transportation Center on Hollyhock Island. This scenario is neither feasible nor would this scenario mitigate any potential adverse effects on Norwich's low-income and minority populations.

As described previously in Section 1.4, the existing and transportation needs of both the City of Norwich and the southeastern Connecticut region necessitate expanding mass transportation facilities to meet both current and future projected demand. Thus, a new and/or expanded multimodal transportation center must be constructed within the City. In addition, the site and physical plant issues and problems experienced at the current transportation center and as described in Section 1.4 indicate that the current location is not suitable for a transportation center designed to meet the needs of the City and the region.

Since the location of the Hollyhock Island site is only one-half mile west of the present transportation center site, the new Norwich Intermodal Transportation Center will still be located in an area of low-income and minority population concentration. Thus, even if a "no-build" scenario were pursued and the existing transportation center was maintained at its current site, there would be no net difference in the potential adverse effects on low-income and minority populations in Norwich.

6.2 Mitigation and Enhancement Actions – Planning Phase

During the planning phase of this project, there were multiple opportunities for public involvement. In August of 2005, a scoping notice was published in the Connecticut Environmental Monitor and in the local newspaper. No public comments were received; however numerous state, regional and local agencies (Connecticut Commission on Culture & Tourism, Connecticut Department of Health, Connecticut Department of Environmental Protection, Southeastern Connecticut Council of Governments, City of Norwich Planning & Neighborhood Services, Southeast Area Transit District) provided written comments, which were incorporated into the planning, analysis, and design phases of the project. Additionally, informal scoping sessions took place via telephone, email, and written correspondence with numerous state agencies as well as South East Area Transit (SEAT). General presentations on the project and planning process were made to the Norwich City Council at various public meetings.

A public hearing specifically dedicated to the transportation center was held on March 26, 2007. That meeting, as well as the opportunity for the public to provide written comment on the project, was advertised several times in the local newspaper as well as the Environmental Monitor. No written comments were received from the public and

only three individuals provided verbal comment. Two of the three verbal comments were simply statements of project support. The third commenter spoke to future passenger railroad opportunities, air quality, green electricity, linkage to the pedestrian trail system, odor control at the nearby sewage treatment plant, and incorporation of project elements that addressed visibility and safety. No individual or group provided comment suggesting negative impacts to SEAT riders or specifically impacts to low income or minority populations.

During the planning phase efforts were made to avoid limited English proficiency impacts. SEAT operators and customer service representatives provide the most direct link to limited and non-English speaking populations who currently use the public transit system. SEAT representatives were consulted throughout the site selection and planning process, with documentation dating back to 2000. SEAT representatives attended consultation meetings, where they provided input relative to the alternatives analysis as well as the evaluation of potential impacts to their ridership. SEAT was also provided a working draft copy of the federal EA prior to its publication, whereupon they provided valuable input and direction relative to existing and future SEAT operations.

Most importantly, SEAT provided an important link with its ridership wherein riders were queried through an informal (undocumented) process relative to the impact of the transportation center's relocation. SEAT's interface with limited English proficiency populations provided a voice for such individuals. Their feedback was positive, with no indication of distressed reactions from its riders.

The SEAT ridership is a diverse and transient population. Through regular surveys and driver contact with the riders, SEAT representatives were able to relay rider needs and concerns to the CEPA/NEPA team throughout the planning process, all of which were considered in the alternatives and impact analyses. Meeting minutes from December 8, 2006 reflect outreach efforts, including posting of signs in the SEAT busses to complement public announcements in the local newspaper, newspaper articles. Additionally, direct SEAT rider input opportunities were provided in several open public forums, including a public meeting held on June 21, 2005, the public scoping process that commenced on August 2, 2005, and the public review of the Draft EA/EIE in February through April of 2007. No concerns were raised by SEAT riders in any of these public forums.

Appendix C contains the following available documentation:

- October 30, 2000 – Letter from Thomas Kirker, Sr, CEO and General Manager of SEAT supporting alternatives analysis and selection of preferred alternative. The record copy (provided by SEAT at a December 8, 2006 meeting) is unsigned.
- June 15, 2005 – Legal notice of a public informational meeting was held on June 21, 2005 by the City Council, with representatives of NLDC.
- November 16, 2005 – Letter from SEAT General Manager providing comments on the project during the planning process.

- January 3, 2006 – Distribution of the internal draft of the EA/EIE to SEAT and others for their input.
- December 8, 2006 – Notes from meeting at NCDC with Mark McClanan from SEAT.
- December 19, 2006 – Internal review and response to FTA.
- February 20, 2007 – Distribution copies of the Draft EA/EIE were provided to local and state officials, the City of Norwich town clerk, regional council of governments, and libraries, and were made available to the public.
- February and March 2007 – Notice of public hearing on the Draft EA/EIE was published in The Day and The Bulletin on three separate occasions (2/20/07, 3/7/07, and 3/14/07) prior to the public hearing on 3/26/09. These two newspapers cover the geographic newspaper distribution of low-income and minority populations who may be affected by this project. Free copies of these publications are also available at the Norwich Public Library. A copy of the notice content is included in Appendix C, as is a copy of the PowerPoint presentation that was made during the hearing.

6.3 Mitigation and Enhancement Actions – Construction Phase

During the construction phase of the project, it can be reasonably expected that construction activities will generate a certain amount of noise, dust and additional construction vehicle traffic. However, due to the site's location on Hollyhock Island, these effects are unlikely to impact low-income and minority populations in any measurable way. The site of the new transportation center is located at least 600 feet away from the nearest residential structure. Topography, rivers, vegetation, major roadways and urban development patterns will also help shield the site from residential neighborhoods.

The surrounding street system has adequate capacity to handle additional traffic generated by construction activity without this additional traffic spilling onto residential streets. The site is bracketed to the north and south by Connecticut Route 32 and Route 82, which consist of two to three lanes of travel in each direction.

As a result, any potential adverse effects associated with the construction of the new transportation center will not have any disproportionate impact on low-income or minority residents.

6.4 Mitigation and Enhancement Actions – Operations Phase

During the operations phase of the project, the shifting of SEAT bus routes to adjust for the location of the new transportation center will create the need to adjust the routes patterns for a few buses as they traverse Downtown Norwich. The adjustments will involve a few blocks in the Downtown and not have any effect on the vast majority of the route. As SEAT buses will stop to pick up riders along their route, the need to assemble

riders at bus stops is reduced. The important consideration is to evaluate the routing to maximize the convenience to home and business and services in the downtown area.

Low income and minority population concentrations are located within ¼ to ½ mile from the new facility. The minor change in route is not expected to have a significant impact on these populations with regard to access to employment, hospitals/medical care, schools, or other public facilities. SEAT provided formal comment on the project, indicating that the proposed project “will give the easiest and safest option” for their vehicles and passengers, and lent their full support to the project’s implementation.

In order to ensure that bus patrons have an opportunity to comment on fine tuning the proposed routing changes in Downtown Norwich, information on the proposed route changes will be posted on the buses, SEAT and City websites and distributed through the organizations identified in Section 3.4 herein. If there is sufficient interest, meetings will be held in the Downtown area to discuss the routing changes. These changes in bus routing are expected to be minimal and are not expected to have any measureable impact on the ridership or traffic volume or circulation in the surrounding street network. However, the out-reach activities will provide an opportunity for the ridership to comment on the route adjustments and allow for modifications to the proposed route if warranted.

The operation of the Norwich Intermodal Transportation Center facility itself will also generate a certain level of noise and increased traffic flow at the proposed site. However, for reasons described in Section 6.2 above, noise and traffic flow associated with the new transportation center will either have a very minimal impact or no impact at all on nearby low-income and minority areas. As the Transportation Center is not located adjacent to any residential streets and along two state routes with adequate traffic capacity, the new transportation site is well-situated to avoid causing any adverse effects on low-income and minority population concentration areas of Norwich.

In addition to outreach to low income and minority transit riders, the City of Norwich and NCDC will encourage and assist local Disadvantaged Business Enterprise DBE firms to become CT DOT approved DBE’s by advertising and hosting workshops. Contractors and sub-contractors will be encouraged to hire local minorities for the construction of the project. The Connecticut Department of Transportation Division of Contract Compliance has offered to participate in this effort. The CT DOT has set a goal of \$1,415,000 of project funds be available to CT DBE firms.

7.0 Description of Remaining Effects

No remaining effects have been identified.

8.0 Comparison of Mitigation and Environmental Enhancement Actions between Low-Income and Minority Areas and Predominantly Non-Low-Income and Minority Areas

Since the new Norwich Intermodal Transportation Center will be located within an area with a concentration of low-income and minority residents, any potential adverse effects resulting from this project will be experienced in this area rather than the predominantly non-low-income and non-minority areas of Norwich. However, as noted and discussed in Sections 4.0 through 6.0 above, any potential adverse effects are expected to be minimal at worst. In addition, the project is expected to generate significant positive effects for low-income and minority areas in Norwich that will outweigh any minimal adverse effects.

APPENDIX A

SECTION 2, Alternatives Considered

From the approved

Federal Environmental Assessment
and
Connecticut Environmental Impact Evaluation

FEDERAL ENVIRONMENTAL ASSESSMENT

AND

CONNECTICUT ENVIRONMENTAL IMPACT EVALUATION

Prepared and Submitted Pursuant to the Code of Federal Regulations Title 23, Part 771,
Sections 119 and 135 (23 CFR 771.119 and CFR 771.135) and
Sections 22a-1a-1-12, inclusive, of the Regulations of Connecticut State Agencies

INTERMODAL TRANSPORTATION CENTER

Norwich, Connecticut

State Project Number 103-238

**Norwich Community Development Corporation
State of Connecticut Department of Transportation
and
Federal Transit Administration**

Cooperating Agency: Federal Highway Administration

June 2007

Approved:

for Connecticut Department of Transportation

Date

2.0 ALTERNATIVES CONSIDERED

2.1 Overview

In accordance with CEPA and NEPA requirements, numerous alternatives have been analyzed for the Norwich Intermodal Transportation Center, including the "no action" alternative. The macro-scale alternatives analysis considered seven sites, all located within the City of Norwich (referenced as Sites A through G). The micro-scale analysis considered various configurations of layout alternatives in the central portion of Hollyhock Island (referenced as Alternatives 1 through 7).

Alternatives were measured against the identified project purpose, goals and objectives. The following operational and locational objectives have been carried through the development and evaluation of alternatives. Locational objectives are as follows:

1. Maintain proximity to regional road networks to facilitate access by passenger vehicles;
2. Maintain proximity to the regional transit provider (South East Area Transit or SEAT) existing bus routes;
3. Maintain proximity to possible future commuter rail service;
4. Maintain proximity to navigable waters, preferably near the existing city ferry pier;
5. Maintain proximity to downtown Norwich;
6. Facilitate pedestrian access to the transportation center; and
7. Maintain a high degree of visibility.

The primary operational objectives are:

1. Safety and security of bus riders and parking garage users;
2. Ease of the riding public's access to buses;
3. Efficiency of bus operations (i.e. easy in/easy out); and
4. The image of the regional transportation center.

2.2 Alternative Site Analysis

In 1999, a city-wide alternatives analysis was conducted to locate a suitable site for a new intermodal transportation center. The consulting firm of Diversified Technology Consultants (DTC) of North Haven, Connecticut in association with DMJM, Inc. of Hamden, Connecticut conducted this analysis, which is presented in a document entitled *Comparative Analysis of Potential Sites for the Norwich Transportation Center; Norwich, Connecticut; Final Report*, dated July 1999, prepared for the Norwich Community Development Corporation.

Seven sites within the downtown Norwich area were identified as potentially meeting the operational and locational objectives for a new intermodal transportation center, as well as a minimum land area requirement. Three of the identified sites are located on Hollyhock Island (Sites B, C, and D). The name, location and existing land use of each of the evaluated sites are summarized in Table 2-1. Their location is graphically depicted in Figure 2-1.

TABLE 2-1
Alternative Site Locations

<i>Site Designation</i>	<i>Reference Name</i>	<i>General Location</i>	<i>Current Use</i>	<i>Site Size</i>
Site A	Route 12 Viaduct Lot*	City-owned land between the P&W rail line and Route 12 near the historic train station.	Parking lot and SEAT bus loading area.	1.81 ac
Site B	Hollyhock West	Land on Hollyhock Island along Falls Avenue adjacent to and northwest of West Side Boulevard.	The recently demolished American Mills factory building rubble.	0.97 ac
Site C	Hollyhock Central	Privately-owned land on Hollyhock Island between West Side Boulevard and West Main Street.	Thayer Marine repair and storage yard.	0.86 ac
Site D	74 West Main Street	Privately-owned land on Hollyhock Island south of West Main Street (adjacent to the American Wharf marina).	The unoccupied condominium office building known as Marina Towers.	0.78 ac
Site E	Police Station Site	A narrow strip of land bounded by Route 82 (West Main Street) on the north; the west branch of the Yantic River and P&W rail line to the east; the City Police Station to the south; and Thames Street to the west.	Vacant land and the northerly parking area of the City of Norwich Police Department.	0.50 ac
Site F	Ferry Landing Site	A privately-owned site bounded by Murphy's Lane on the north; Ferry Street on the east; the Shetucket River on the South; and Ferry landing on the west.	Parking lot and Murphy's Lane (formerly the site of the Palace Theatre).	0.49 ac
Site G	South of Police Station	Various vacant parcels of land located south of the Police Station between the Thames River and Thames Street.	Mostly vacant.	2.27 ac

Source: DTC, 1999a *This site is home to the existing regional bus facility, also known as the Norwich Transportation Center.

The following evaluation criteria were applied to the analysis of the seven sites:

Cost Factors

1. Cost of Land
2. Utilization of DOT's "Sunk Cost" (i.e. grant funds spent to date on site investigation)
3. Relative Building Construction Costs
4. Relative Site Preparation Costs
5. Costs of Potential Utility Extensions or Upgrades
6. Costs of Potential Improvements to Off-Site Roads or Intersections
7. Potential Environmental Abatement Costs
8. Seismic Suitability of Site



 <p>MILONE & MACBROOM Engineering, Architecture, and Environmental Science</p>	<p align="center">Proposed Hollyhock Station Intermodal Transportation Center</p>		<p>LOCATION: Norwich, CT</p>	
<p>716 South Main Street Cheshire, Connecticut 06410 (203) 271-1773 Fax: (203) 272-9733 www.miloneandmacbroom.com</p>	<p>MM# 2674-01 MXD: H:\fig2_1_sites.mxd SOURCE: USGS Quad #72</p>	<p align="center">  Off-Site Alternatives Analysis </p>	<p>DATE: 12/05/05 SCALE: 1:6,000</p>	<p>SHEET: Figure 2-1</p>

Subjective/Qualitative Factors

1. Compatibility of Adjacent Land Uses
2. Visibility to Downtown
3. Community Attitude Towards Project

Objective Locational Factors

1. Walking Distance to Downtown
2. Proximity to a State Highway
3. Site Access/Bus Accessibility
4. Proximity to Existing Ferry Dock at City Pier
5. Proximity to Future Rail Service on Central New England Railroad Line
6. Site Size/Configuration to Accommodate Intended Use
7. Floodplain, Stream Channel Encroachment Lines and Wetlands
8. Proper Zoning in Place for Intended Use

As a result of the DTC analysis, the sites were ranked as follows:

TABLE 2-2
DTC Ranking of Site Locations

<i>Site Designation</i>	<i>Reference Name</i>	<i>DTC Ranking</i>
Site D	74 West Main Street	1
Site C	Hollyhock Central	2
Site A	Route 12 Viaduct Lot	3
Site F	Ferry Landing Site	4
Site E	Police Station Site	5
Site G	South of Police Station	6
Site B	Hollyhock West	7

Source: DTC, 1999a

Two of the three sites on Hollyhock Island, Sites D and C, were ranked 1 and 2 respectively. The third Hollyhock site, Site B, ranked last, primarily due to its weighted cost factor as well as its aesthetics and physical remoteness.

Because the initial site alternatives analysis was conducted prior to the start of the formal CEPA/NEPA process, it did not include a complete assessment of environmental impacts, nor did it consider the specific project purpose or locational and operational objectives of a multi-modal regional transportation center. Accordingly, the alternative site evaluation was revisited in the context of CEPA and NEPA standards as well as the current project goals and objectives. Each of the seven sites, along with the "no action" alternative, is evaluated in the ensuing text sections relative to environmental sensitivities and ability to meet the stated project goals and objectives.

2.2.1 No Action

The consideration of a "no action" alternative is necessary to establish a basis for comparison, as it provides a baseline that can be used to assess the level of impact associated with the implementation of the action alternatives. The no action alternative concedes that no action be taken to construct a new intermodal transportation facility.

The existing transportation facilities in the City of Norwich are inadequate and do not meet the city's or the region's transportation needs. The level of inefficiency associated with the existing SEAT transit facilities and lack of a centralized intermodal hub has been recognized by the city and has resulted in the proposal for a new intermodal transportation center. The site currently serving the pulse transfer function of the seven SEAT bus lines is a landlocked outdoor surface parking lot with an outdoor kiosk. The lot cannot accommodate the required busses in an optimum simultaneous pulse transfer operation.

The "no action" alternative contradicts the purpose, need, and goals and is therefore not believed to be a viable option.

Alternative site analysis is presented in Sections 2.2.2 through 2.2.9. All sites are located within the City of Norwich and all are located in reasonably close proximity to existing SEAT bus routes.

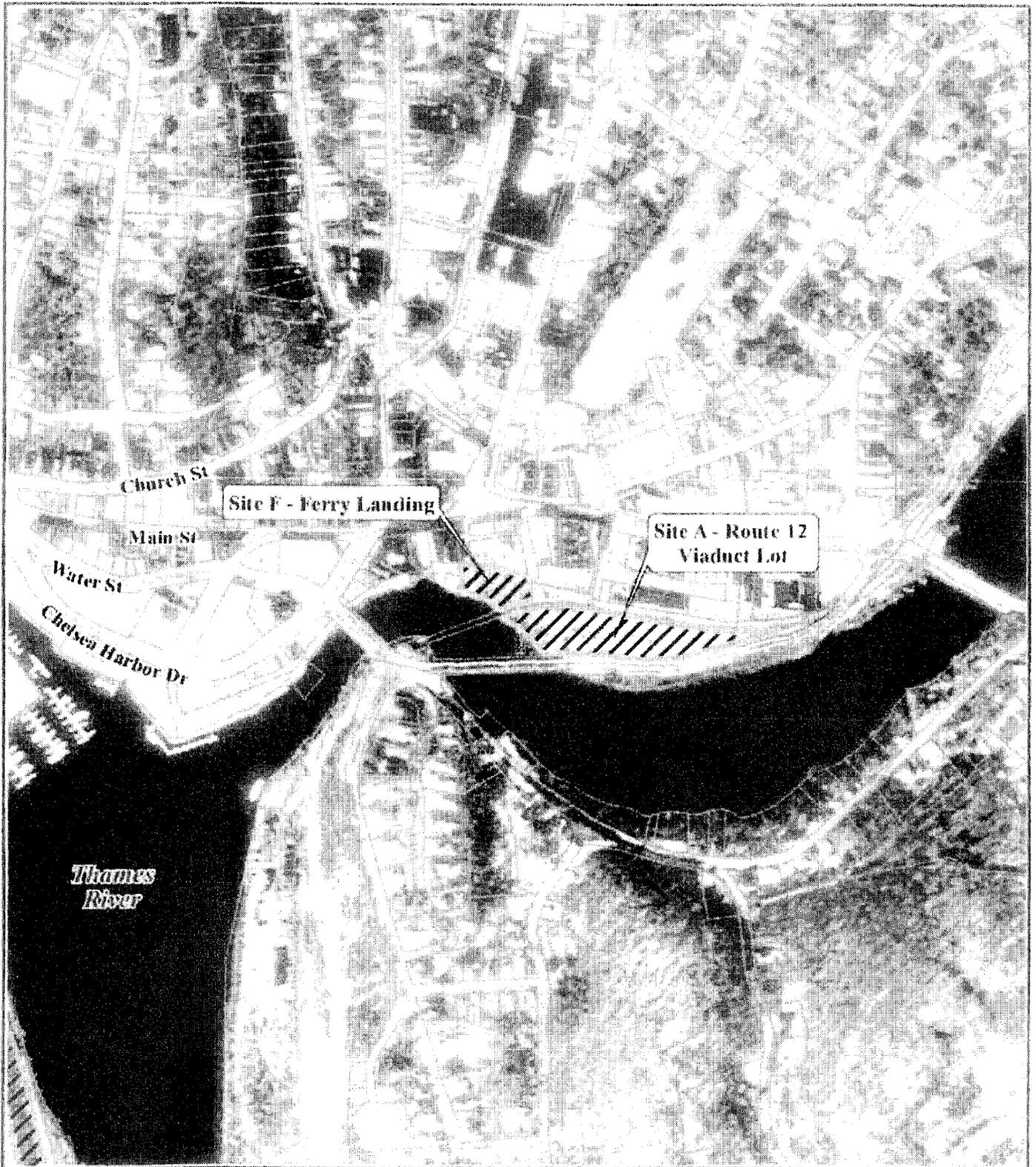
2.2.2 Site A – Route 12 Viaduct Lot

Site Location – Site A (shown in the adjacent photograph) is the city-owned land between the Providence & Worcester (P&W) freight rail line and Routes 2 and 12 near the historic train station. Figure 2-2 is a location plan of this site. It is home to the existing SEAT facility and public parking area.



Proximity to Regional Roadway Network –

Site A is located between Main Street and the Route 12 viaduct on the south side of the P&W railroad tracks. The location in the center of downtown Norwich and access to major roadways is compatible with the existing roadway network. The frontage with Route 12 places this site within the closest proximity to a state thoroughfare. While the site is located next to major roadways and is highly accessible, operation of an intermodal transportation center has the potential to negatively impact traffic flow on Route 12. Currently, Route 12 provides a bypass to downtown Norwich.



 <p>MILONI & MACBROOM</p>	<p align="center">Proposed Hollyhock Station Intermodal Transportation Center</p>	<p>LOCATION: Norwich, CT</p>	
<p>99 Realty Drive Cheshire, Connecticut 06410 (203) 271-1773 Fax: (203) 272-9733 www.miloniandmacbroom.com</p>		<p>MM#: 2674-01 MXD: 11/02 - relocation need SOURCE: GIS Quad #72</p>	<p>Parcels - Route 12 Viaduct Lot and Ferry Landing Site</p>

Proximity to Possible Commuter Rail Service – The Route 12 Viaduct site is located adjacent to the Providence and Worcester rail line, currently and historically an underutilized freight rail corridor that runs from Groton, Connecticut, north to Worcester, Massachusetts. The line does not currently link to any passenger rail corridor, nor are there any near-term plans for passenger service.

Ability to Support Water Transportation – The Route 12 Viaduct site is located on the Shetucket River, which is not navigable by boats capable of carrying commuters. As such, the accommodation of ferry service as a mode of transportation is not feasible at this location.

Proximity to Downtown Norwich / Site Visibility – This site is located approximately 0.04 miles from the center of downtown Norwich (taken as the intersection of Chelsea Harbor Drive and Main Street), which makes it readily visible from downtown Norwich. Despite its high visibility, the site is somewhat physically isolated from pedestrian traffic by the rail line and extensive roadway network.

Existing Land Use/Compatibility with a Future Transportation Center – This site is currently being used for public parking and activities associated with the SEAT transit operations. A new intermodal transportation center on this site would be consistent with the existing land uses.

Consistency with the State C&D Policies Plan for Connecticut – This site is located in a designated Regional Center in the state Plan. Regional Centers encompass land areas containing traditional core area commercial, industrial, transportation, specialized institutional services, and facilities of intertown significance. Siting a regional intermodal transportation center would be consistent with this designation.

Site Zoning Designation – The zoning designation of Site A is "CC" or Chelsea Central District. The intent of this district is to ensure that development complements and preserves the city's historic character, that it improves economic conditions, and promotes development that is consistent with the goals and objectives of the downtown plan of development. Permitted uses include retail, office/financial, customer service, restaurant, museums/art galleries, theater, parking lots and garages, schools, bars/taverns/cafes, outdoor vendors, parks/open space/public recreation facilities, docks/slips/piers, yacht clubs, marinas, boat rentals, and visitor/information centers. The regulations allow transportation centers, rail, bus, or taxi stations by special permit. Development of a new intermodal transportation center in this district is believed to be consistent with the city's zoning regulations.

Potential for Neighborhood Relocation Issues – This site is currently home to the existing SEAT transit operations and a city-owned parking lot. A new facility on this site would not require the demolition or relocation of any buildings or businesses.

Compatibility of an Intermodal Transportation Center with Surrounding Aesthetic Quality –

The heart of Norwich's historic downtown area is located north of the Shetucket River and east of the Yantic River. The zone between the downtown area and the north bank of the Shetucket River is predominantly industrial, marked by the railroad, the Route 12 viaduct, and several parking lots. Due to the industrial nature of this area, a transportation center would not be expected to significantly alter the existing aesthetic quality.

Availability of Public Utilities and Services – The Chelsea Central district is served by Norwich Public Utilities with water and sanitary sewer service. The area is also served with electric, telephone, and cable utilities.

Potential to Impact Sensitive Environmental Resources – The parcels located between Main Street and the Route 12 viaduct are highly disturbed and primarily consist of paved parking lots. The area has minimal natural or wildlife habitat. The Connecticut Department of Environmental Protection's (DEP) Natural Diversity Data Base (NDDB) indicates that this site does not lie within an area of special concern for endangered or threatened species or significant natural communities. Accordingly, an intermodal transportation facility at this location would be expected to have minimal impact on the surrounding natural environmental resources.

Flood Hazard Potential – FEMA mapping indicates that the Route 12 Viaduct site is located in the floodplain associated with the 500-year frequency storm event. This site is also located within the Coastal Area Management Zone. Accordingly, development would need to comply with the city's Coastal Management Plan and would require approval by local, state, and federal agencies.

Consistency of Physical Environment with Development Potential – The land area within Site A is predominantly flat, with no significant physical impediments to development. However, space is very tight on this site, as is evidenced by the existing bus operations. For instance, under existing operations, it is common for parked cars at this site to become blocked by busses. The narrow, irregular geometry of the site would not readily accommodate a multi-modal transportation center.

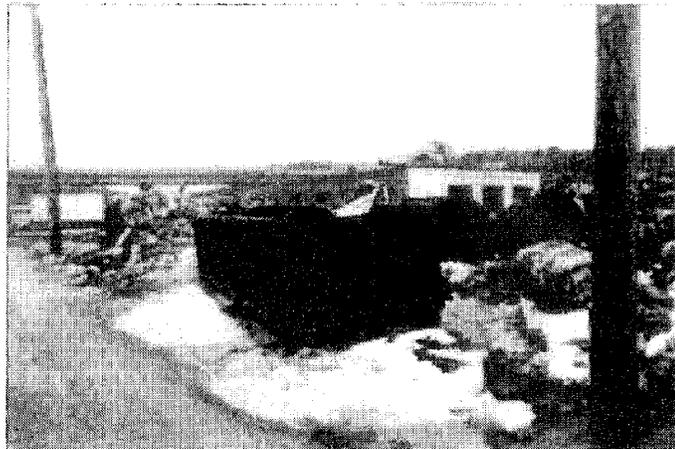
Ability to Meet Project Needs, Goals, and Objectives – The Route 12 Viaduct site is not believed to meet the goals of the proposed intermodal transportation facility, in that it fails to accommodate potential ferry service and is inadequate to accommodate the required busses in an optimum simultaneous pulse transfer operation. While the site is located adjacent to the P&W rail line, there are no plans for passenger rail service in the foreseeable future. Finally, the intermodal facility would be located in an area of existing heavy traffic congestion and has a difficult geometric layout.

2.2.3 Site B – Hollyhock West

Site Location – Site B is located on Falls Avenue adjacent to and northwest of West Side Boulevard (Route 32 southbound and 82 Westbound) on land owned by the City of Norwich. Refer to Figure 2-3 for a site location map. The site is comprised of interior parcels on Hollyhock Island.

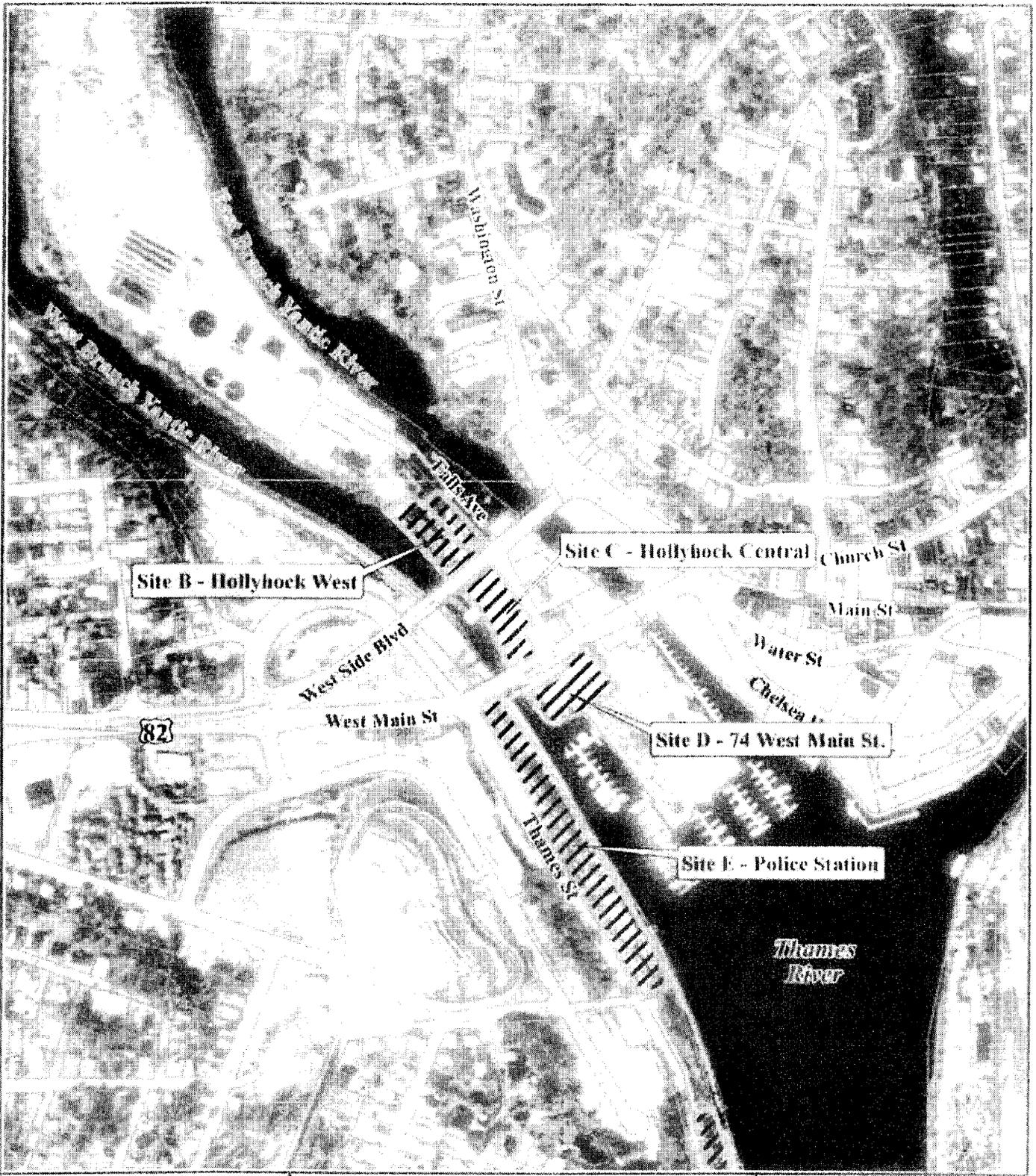
Proximity to Regional

Roadway Network – Site B is located north of West Main Street (Route 32), a major thoroughfare that conveys traffic flow into downtown Norwich. Its close proximity to a state highway makes this site accessible and compatible with the surrounding roadway network.



Proximity to Possible Commuter Rail Service – Site B is located just across the Yantic River from the New England Central (NEC) rail line, with the potential for a future pedestrian connection. Currently, the New England Central Line offers regular passenger service from Brattleboro, Massachusetts to New London. In a study entitled *Eastern Connecticut Rail Feasibility Study* (January 1999) conducted by ConnDOT's Office of Intermodal Planning, Bureau of Policy and Planning, ConnDOT concluded that the expansion of rail service was economically unfeasible. However, the study states that service between New London and Norwich has the potential for being a viable option. While there are currently no plans for activation of such service on the NEC line, Site B does provide a feasible link to this potential future passenger rail. The intermodal transportation facility could be linked via pedestrian bridge and walkway to future rail service on the west branch of the Thames and Yantic Rivers.

Ability to Support Water Transportation – Site B provides transportation linkages to potential ferry service. The site is located within walking distance to the city's large vessel pier, which is located on the southern end of Hollyhock Island. Also on the southern end of the island is the American Wharf Marina, a marina and mixed used development that provides a variety of boat services, retail shops, a restaurant, and a private waterfront outdoor area. On the northern side of West Main Street is the smaller Thayer's Marina and boatyard, a commercial marina that provides boat service, storage and sales.



 MILONE & MACBROOM 99 Realty Drive Cheshire, Connecticut 06410 (203) 271-1773 Fax: (203) 272-9733 www.miloneandmacbroom.com	Proposed Hollyhock Station Intermodal Transportation Center		LOCATION: Norwich, CT	
	MMB: 074-01 MND: July 2, 2005 (revised) SOURCE: PCS 060472	 Parcels - Hollyhock Island and Police Station Sites	DATE: 12-05-05 SCALE: 1:4,800	SHEET: Figure 2-3

Proximity to Downtown Norwich / Site Visibility – This site is located on the outskirts of historic downtown Norwich, approximately 0.42 miles from the city's centroid, considered to be the intersection of Main Street with Chelsea Harbor Drive. The site would be visible from Route 2A (Washington Street) and from the Route 82 overpass (West Side Boulevard); however, it is located some 600 feet from the intersection of West Main Street and Falls Avenue and would be visually blocked from view to the south by the West Side Boulevard viaduct as well as land uses immediately south of that.

Existing Land Use/Compatibility with a Future Transportation Center – In the past, the parcels on this site housed industrial buildings. While the American Mills factory buildings were recently demolished, one building remains on this site, which is currently being leased by the city to a private business. A new transportation center on this site would be consistent with the adjacent industrial and commercial land uses.

Consistency with the State C&D Policies Plan for Connecticut – Hollyhock Island sits in the heart of the downtown Norwich urban Regional Center, except that it has a Conservation Area designation due to its location within the 100-year floodplain. The Conservation designation is not congruent with existing or historic uses of the island, which has been characterized by industrial and public utility uses. Any future development on Hollyhock Island will need to be carefully evaluated relative to its consistency with flood management policies.

Site Zoning Designation – The City of Norwich zoning designation at Site B is WD or Waterfront Development District. Permitted uses in the waterfront development district include public and private parks and playgrounds; yacht clubs and marinas; boat docks, slips, piers and wharves; yards for building, storing, repairing, selling or servicing boats; boat and marine engine sales and display; yacht brokers; marine insurance brokers; rental of boats, retail sale or rental of boating, fishing, diving and bathing supplies and equipment; sale loft or ship's chandlery; swimming pools and swimming clubs; museums with nautical themes; restaurants; and cafes.

Parking and transportation facilities are allowed by special permit. Specifically, the regulations allow for transportation facilities, such as train or ferry stations or any combination of transportation facilities serving pedestrian, tourist traffic or other vehicular traffic, but excluding truck terminals and other transportation facilities serving industrial purposes. Development of a transportation center in this district is believed to be consistent with the city's zoning regulations.

Potential for Neighborhood Relocation Issues – With the exception of one building that is owned by the City of Norwich and is leased for storage, previously erected structures on this site have been demolished. The potential for neighborhood relocation issues is therefore low.

Compatibility of a Transportation Center with Surrounding Aesthetic Quality – The area surrounding this site is predominantly industrial and of poor aesthetic quality. There is currently no public waterfront access in this portion of the island. Construction of an intermodal transportation center at this site has the potential to improve the aesthetic quality and provide added recreational use.

Availability of Public Utilities and Services – Available utilities on Hollyhock Island include water, sanitary sewer, electric, and telephone service.

Potential to Impact Sensitive Environmental Resources – Hollyhock Island is a highly disturbed piece of land that consists of empty lots, demolished buildings, the city's wastewater treatment facility, a former landfill, and some commercial/industrial facilities. The area supports minimal natural wildlife habitat. The Connecticut Department of Environmental Protection's Natural Diversity Data Base (NDDB) indicates that Site B does not lie within an area of special concern for endangered and threatened species or significant natural communities. Location of a transportation facility at this site would be expected to have minimal impact on the surrounding natural environmental resources.

Flood Hazard Potential – Site B is located in the FEMA designated Zone AE 100-year floodplain. Therefore, any construction at this site would have to comply with requirements set forth by the FEMA, DEP, and local ordinances. Hollyhock Island is also located within the Coastal Area Management Zone. Any future development at this site would have to comply with the city's Coastal Management Plan and would require approval by local, state, and federal agencies.

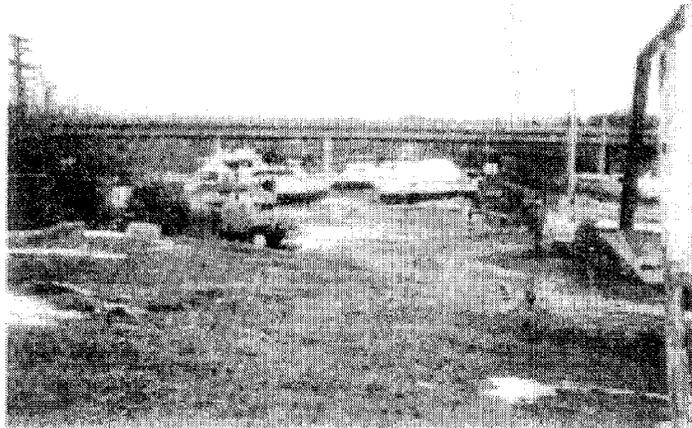
Consistency of Physical Environment with Development Potential – The land area within Site B is predominantly flat, with no obvious physical impediments to development.

Ability to Meet Project Needs, Goals, and Objectives – The close proximity of this site to ferry and rail infrastructure and to major roadways makes Site B a well linked site that is compatible with the existing roadway network. The site could support water transportation, given its relative proximity to the Thames River, which is a navigable waterway. However, it is somewhat physically remote on Hollyhock Island, in that it is located approximately 600 feet back from the intersection of Falls Avenue with West Main Street. The site is not accessible via West Side Boulevard.

2.2.4 Site C – Hollyhock Central

Site Location – This site is located between West Main Street and the West Side Boulevard viaduct on land owned by the City of Norwich and the State of Connecticut. It is depicted graphically on Figure 2-3.

Proximity to Regional Roadway Network – Site C is located to the north of West Main Street (Eastbound Route 82/32), a major thoroughfare that conveys traffic flow into downtown Norwich and Falls Avenue. Its close proximity to a state highway makes this site accessible and compatible with the surrounding roadway network.



Proximity to Possible Commuter Rail Service – Similar to Site B, Site C is located just across the Yantic River from the New England Central (NEC) rail line, with the potential for a future pedestrian connection. Currently, the New England Central Line offers regular passenger service from Brattleboro, Massachusetts to New London. In a study conducted by ConnDOT's Office of Intermodal Planning, Bureau of Policy and Planning entitled *Eastern Connecticut Rail Feasibility Study* (January 1999), ConnDOT concluded that the expansion of rail service was economically unfeasible. However, the study states that service between New London and Norwich has the potential for being a viable option. While there are currently no plans for activation of such service on the NEC line, Site C does provide a feasible link to future passenger rail. The intermodal transportation facility could be linked via pedestrian bridge and walkway to future rail service on the west branch of the Thames and Yantic Rivers.

Ability to Support Water Transportation – Site C provides excellent transportation linkages to existing ferry infrastructure on Hollyhock Island. The site is located in close proximity to the Thames River, which is a navigable waterway capable of supporting water transportation. The site is also located within close proximity to the city's large vessel pier, which is located on the southern end of the island. Also on the southern end of Hollyhock Island is the American Wharf Marina, a marina and mixed used development that provides a variety of boat services, retail shops, a restaurant, and a private waterfront outdoor area. On the northern side of West Main Street is the smaller Thayer's Marina and boatyard, a commercial marina that provides boat service, storage and sales.

Proximity to Downtown Norwich / Site Visibility – Site C is located 0.35 miles from the centroid of downtown Norwich. It is readily visible from West Main Street and the downtown area.

Existing Land Use/Compatibility with a Future Transportation Center – There are currently no buildings on this site. The parcels are primarily used for upland boat storage. A new transportation center on this site would be consistent with the existing industrial/commercial nature of the surrounding land uses.

Consistency with the State C&D Policies Plan for Connecticut – Hollyhock Island sits in the heart of the downtown Norwich urban Regional Center, except that it has a Conservation Area designation due to its location within the 100-year floodplain. The Conservation designation is not congruent with existing or historic uses of the island, which has been characterized by industrial and public utility uses. Any future development on Hollyhock Island will need to be carefully evaluated relative to its consistency with flood management policies.

Site Zoning Designation – Similar to site B, this site is also located within the WD (waterfront development) district. Development of a transportation center in this district is believed to be consistent with the city's zoning regulations.

Potential for Neighborhood Relocation Issues – This site is currently vacant and therefore neighborhood relocation would not be an issue.

Compatibility of a Transportation Center with Surrounding Aesthetic Quality – Hollyhock Island north of West Main Street is predominantly industrial and of poor aesthetic quality. There is currently no public waterfront access on this portion of the island. The location of the transportation center at this site would likely improve the aesthetic quality and provide recreational use.

Availability of Public Utilities and Services – Available utilities on Hollyhock Island include water, sanitary sewer, electrical service, and telephone service.

Potential to Impact Sensitive Environmental Resources – Hollyhock Island is a highly disturbed piece of land that consists of empty lots, demolished buildings, the city's wastewater treatment facility, a former landfill, and some industrial and commercial facilities. The area supports minimal natural wildlife habitat. The Connecticut Department of Environmental Protection's Natural Diversity Data Base (NDDDB) indicates that Site C does not lie within an area of special concern for endangered or threatened species or significant natural communities. The location of a transportation facility at this site would have minimal impact on the island's natural environmental resources.

Flood Hazard Potential – Site C is located in the FEMA designated Zone AE 100-year floodplain. Any construction at this site would have to comply with requirements set forth by FEMA, DEP and local ordinances. Hollyhock Island is also located within the Coastal

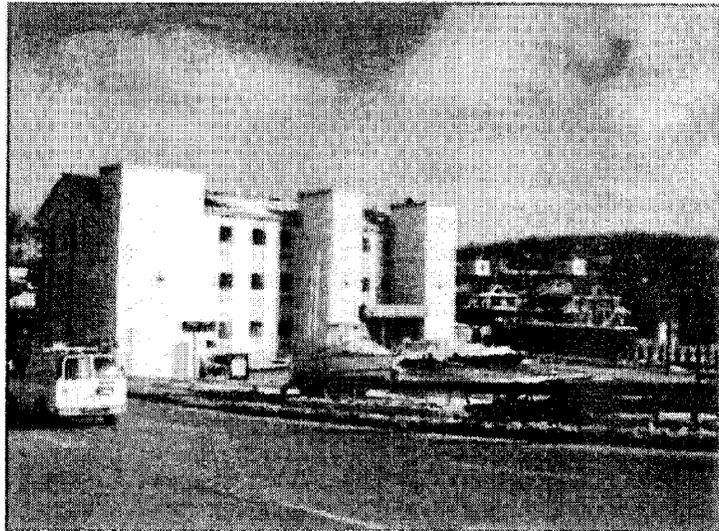
Area Management zone. Development at this site would be subject to the city's Coastal Management Plan and would require approval from local, state, and federal agencies.

Consistency of Physical Environment with Development Potential – The land area within Site C is predominantly flat, with no obvious physical impediments to development.

Ability to Meet Project Needs, Goals, and Objectives – The close proximity of this site to ferry and rail facilities and to major roadways makes Site C a well linked site that is compatible to the existing roadway network. The site could support water transportation, given its relative proximity to the Thames River, which is a navigable waterway. Furthermore, while Site B and Site C are similar, Site C has the advantage of being located at the intersection of Falls Avenue and West Main Street. This makes the site more accessible from local roadways, the city's ferry dock, and downtown Norwich.

2.2.5 Site D – 74 West Main Street

Site Location – This site is located on the south side of West Main Street on privately-owned land. The parcel is located adjacent to the American Wharf Marina. Figure 2-3 graphically depicts the location of this site.



Proximity to Regional Roadway Network – Site D is located on West Main Street (Eastbound Route 82/32), a major thoroughfare that conveys traffic flow into downtown Norwich. Similar to Sites B and C, Site D's close proximity to a state highway makes it accessible and compatible with the surrounding roadway network.

Proximity to Possible Commuter Rail Service – As noted in the previous site descriptions, the New England Central Line offers regular passenger service from Brattleboro, Massachusetts to New London, Connecticut. While there are currently no plans to expand service between Norwich and New London on the NEC line, Site D does provide a feasible pedestrian link to a future rail station. The intermodal transportation facility could be linked to the rail line located on the west branch of the Thames and Yantic Rivers.

Ability to Support Water Transportation – Site D provides excellent transportation linkages to existing ferry infrastructure. The site is located in close proximity to the Thames River, which is a navigable waterway capable of supporting water transportation.

The site is also located within close proximity to the city's large vessel pier, which is located on the southern end of Hollyhock Island. Also on the southern end of the island is the American Wharf Marina, a marina and mixed used development that provides a variety of boat services, retail shops, a restaurant, and a private waterfront outdoor area. On the northern side of West Main Street is the smaller Thayer's Marina and boatyard, a commercial marina that provides boat service, storage and sales.

Proximity to Downtown Norwich / Site Visibility – Site D is located 0.38 miles from the centroid of downtown Norwich and is readily visible from West Main Street and downtown Norwich.

Existing Land Use/Compatibility with a Future Transportation Center – Currently on this site is a commercial condominium building and its corresponding parking lot. The building is only partially occupied on the first floor. A state-owned small grassy lot with a utility pipe crossing defines the northern side of the parking lot. The America Wharf Marina comprises the majority of land to the south and east of this site, distinguishing it from the northern portion of the island, which has a more industrial use base.

Consistency with the State C&D Policies Plan for Connecticut – Hollyhock Island sits in the heart of the downtown Norwich urban Regional Center, except that it has a Conservation Area designation due to its location within the 100-year floodplain. The Conservation designation is not congruent with existing or historic uses of the island, which has been characterized by industrial and public utility land uses. Any future development on Hollyhock Island will need to be carefully evaluated relative to its consistency with flood management policies.

Site Zoning Designation – Similar to sites B and C, this site is also located within the WD (waterfront development) district. Development of a transportation center in this district is believed to be consistent with the city's zoning regulations.

Potential for Neighborhood Relocation Issues – Locating the Norwich Transportation Center on this site would require the demolition of the commercial condominium building. Even though the building is only partially occupied, relocation could be an issue at this site.

Compatibility of a Transportation Center with Surrounding Aesthetic Quality – This site is located in a zone that has waterfront access and is next to a marina that has banquet and restaurant facilities. The existing marina and ancillary facilities along the Norwich Harbor provide an aesthetic backdrop from West Main Street. Siting a multi-story transportation facility at this location, while not out of character with the general downtown area, would obstruct views of the harbor area from West Main Street and points on the island to the north.

Availability of Public Utilities and Services – Available utilities at this site include water, sanitary sewer, electrical service, and telephone service.

Potential to Impact Sensitive Environmental Resources – This site occupies a highly disturbed piece of land that is characterized by impervious surfaces and supports little to no natural wildlife habitat. The Connecticut DEP's Natural Diversity Data Base (NDDDB) indicates that Site D does not lie within an area of special concern for endangered or threatened species or significant natural communities. The location of a transportation facility at this site would have minimal impact on the surrounding natural environmental resources.

Flood Hazard Potential – Site D is located in the FEMA designated Zone AE 100-year floodplain. Any construction at this site would have to comply with requirements set forth by FEMA, DEP and local ordinances. This site is also located within the Coastal Area Management Zone. Any future development at this site would be subject to the city's Coastal Management Plan and would require approval from local, state, and federal agencies.

Consistency of Physical Environment with Development Potential – This site abuts the west branch of the Yantic River and is relatively flat. The existing land use is comprised of an office condominium building. It is a relatively flat piece of land; however is constrained by physical size at only 0.78 acres.

Ability to Meet Project Needs, Goals, and Objectives – The close proximity of this site to existing ferry and rail infrastructure and to major roadways makes Site D a well linked site that is compatible to the existing roadway network. Furthermore, Site D has the advantage of being located on West Main Street. It is proximal to downtown and has excellent visibility from West Main Street and the downtown area.

2.2.6 Site E – Police Station

Site Location – Site E is located on a narrow strip of land that is bounded by Route 82 (West Main Street) on the north; the west branch of the Yantic River and NEC rail line to the east; the City Police Station to the south; and Thames Street to the west. Figure 2-3 is a location map of this site.



Proximity to Regional Roadway Network – Site E is located on Route 32 (Thames Street), a major thoroughfare that conveys traffic flow into the center of the city. The site is also within close proximity to the intersection of Routes 32 and 82. It is well connected to the surrounding roadway network.

Proximity to Possible Commuter Rail Service – This site is located along the NEC rail line. While there is currently no Norwich service at this time, the site provides a feasible link to future rail service.

Ability to Support Water Transportation – Site E is located adjacent to the Thames River, which is a navigable waterway capable of supporting water transportation. Compared to the sites on Hollyhock Island, Site E is more remotely located from the existing city ferry dock and the downtown area.

Proximity to Downtown Norwich / Site Visibility – Site E is located 0.44 miles from the centroid of downtown Norwich. It is visible from West Main Street; however its sloping gradient (shown in the photograph to the left) makes it less visible from West Thames Street and West Main Street.



Existing Land Use/Compatibility with a Future Transportation Center –

This site is located on a parcel that currently houses the Norwich Police Department in the greater downtown Norwich area. Surrounding land uses are commercial in nature. A transportation center would be compatible with the industrial/commercial uses of the surrounding land.

Consistency with the State C&D Policies Plan for Connecticut – This site is located in a Regional Center. Regional Centers encompass land areas containing traditional core area commercial, industrial, transportation, specialized institutional services, and facilities of intertown significance. Siting of a regional transportation center is believed to be consistent with this designation.

Site Zoning Designation – The City of Norwich zoning designation at this site is GC or General Commercial. Permitted uses under this designation include a wide variety mixed use commercial establishments and offices as well as bus or taxi passenger stations, bus terminals, and railroad stations. An intermodal transportation center at this location is

believed to be consistent with the city's zoning regulations in the General Commercial District.

Potential for Neighborhood Relocation Issues – A transportation center at this site would be constructed on land that is currently either undeveloped or used as a parking area for the Police Department. Relocation is therefore not anticipated to be an issue at this site.

Compatibility of a Transportation Center with Surrounding Aesthetic Quality – The area along the west branch of the Yantic River off Thames Street is marked by a few buildings that sit high up on the edge of a steep embankment. Due to the surrounding views of the river and the city, the aesthetic quality of the area is rather high. An intermodal transportation center located next to the police station could be designed to be compatible with the existing quality of the surrounding parcels. In addition, the site's topographic setting would provide the transportation center with an impressive view of the city and the Yantic and Thames Rivers.

Availability of Public Utilities and Services – Site E is located in an area that is served by water and sanitary sewer utilities as well as by electrical and telephone services.

Potential to Impact Sensitive Environmental Resources – The Connecticut Department of Environmental Protection's Natural Diversity Data Base indicates that Site E location does not lie within an area of special concern for endangered and threatened species or significant natural communities. The location of a transportation facility at this site would have minimal impact on the surrounding natural environmental resources.

Flood Hazard Potential – A portion of Site E is located in the FEMA designated Zone AE 100-year floodplain. Any construction at this site would need to comply with requirements set forth by FEMA, DEP and local ordinances. This site is also located within the city's Coastal Area Management Zone. Any future development would need to comply with the city's Coastal Management Plan and would require approval from local, state, and federal agencies.

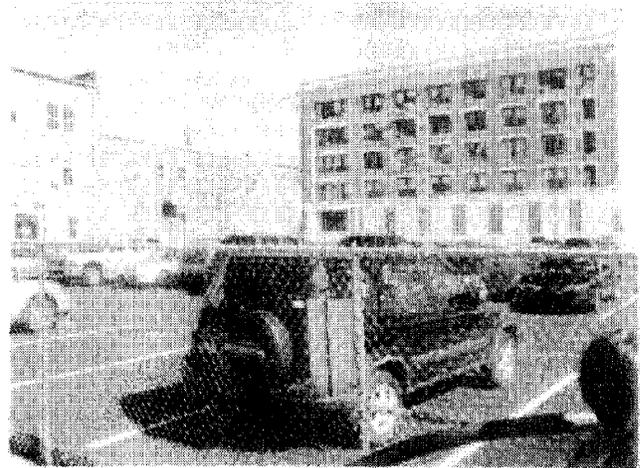
Consistency of Physical Environment with Development Potential – This site has a fairly steep embankment from West Thames Street towards the Yantic River. Additionally, the existing development associated with the Police Station and the adjacent railroad tracks would limit the developable area to about 0.5 acres.

Ability to Meet Project Needs, Goals, and Objectives – This site is located on a major thoroughfare that conveys traffic flow into the center of the city. It is also located along the NEC rail line and is capable of supporting water transportation, given its close proximity to the Thames River. This site is more remote from pedestrian access to the city's existing large vessel pier on Hollyhock Island. The size and physical shape of the

developable area (0.50 acres) may not be adequate for development of a regional intermodal transportation center and will need further evaluation.

2.2.7 Site F – Ferry Landing Site

Site Location – Site F is a privately-owned parking lot that is bounded by Murphy's Lane on the north; Ferry Street on the east; the Shetucket River on the south; and Ferry landing on the west. Figure 2-2 is a location plan of the site.



Proximity to Regional Roadway Network – This site is located between Main Street and the Route 12 Viaduct on the north side of the railroad tracks.

Its location in the center of town and access to major traffic ways makes it compatible with the existing roadway network. The frontage with Route 12 places this site within close proximity to a state thoroughfare. While the site is located next to major roadways and is highly accessible, the site's limitations are those noted for Site A in Section 2.2.2.

Proximity to Possible Commuter Rail Service – Studies by the State of Connecticut Department of Transportation rail planners have indicated that the New England Central rail line on the west bank of the Thames and Yantic Rivers is the most viable corridor for future passenger rail service. The Ferry Landing site is located adjacent to the Providence and Worcester rail line, currently and historically an underutilized freight rail corridor that runs from Groton, Connecticut, north to Worcester, Massachusetts. The line does not link to any passenger rail corridor, nor is it expected to support passenger service in the future.

Ability to Support Water Transportation – The Ferry Landing site is located in close proximity to the Shetucket River, which is not navigable by boats capable of carrying commuters. As such, the accommodation of ferry service as a mode of transportation is not feasible at this location.

Proximity to Downtown Norwich / Site Visibility – Site F is located 0.09 miles from the centroid of downtown Norwich. It is readily visible from the Route 12 viaduct; however, the dense coverage of buildings masks views from Main Street.

Existing Land Use/Compatibility with a Future Transportation Center – The existing land use at this site is parking. An intermodal transportation center would be compatible with existing and surrounding land uses.

Consistency with the State C&D Policies Plan for Connecticut – This site is located in a Regional Center. Regional Centers encompass land areas containing traditional core area commercial, industrial, transportation, specialized institutional services, and facilities of intertown significance. Siting of a regional transportation center is believed to be consistent with this designation.

Site Zoning Designation – This site is located within the CC (Chelsea Central) district. The intent of this district is to ensure that development complements and preserves the city's historic character, that it improves economic conditions, and promotes development that is consistent with the goals and objectives of the downtown plan of development. Permitted uses include retail, office/financial, customer service, restaurant, museums/art galleries, theater, parking lots and garages, schools, bars/taverns/cafes, outdoor vendors, parks/open space/public recreation facilities, docks/slips/piers, yacht clubs, marinas, boat rentals, and visitor/information centers. The regulations further allow transportation centers, rail, bus, or taxi stations by special permit. Development of a transportation center in this district is believed to be consistent with the city's zoning regulations.

Potential for Neighborhood Relocation Issues – Location of the Norwich Transportation Center on this site would require the relocation of the existing parking lot. Expected relocation issues would therefore be minimal.

Compatibility of a Transportation Center with Surrounding Aesthetic Quality – This site is located in the "backdoor" of the City of Norwich's historical downtown area. The zone between the downtown area and the north bank of the Shetucket River is predominantly commercial with some industrial, marked by the railroad, the Route 12 viaduct and several parking lots. Due to the urban nature of this area, a transportation center would not be likely to significantly alter the area's aesthetic quality.

Availability of Public Utilities and Services – The Chelsea Central district is served with water and sanitary sewer service by Norwich Public Utilities. The area is also served with electrical and telephone service.

Potential to Impact Sensitive Environmental Resources – The parcels located between Main Street and the Route 12 viaduct are highly disturbed and are covered almost entirely by impervious surfaces. The area has minimal natural wildlife habitat. According to the Connecticut Department of Environmental Protection's Natural Diversity Data Base, Site F does not lie within an area of special concern for endangered and threatened species or significant natural communities. The location of a transportation facility at this site would have minimal impact on the surrounding natural environmental resources.

Flood Hazard Potential – Site F is located in the FEMA designated 500-year floodplain. It is also located within the Coastal Area Management Zone. Any future development

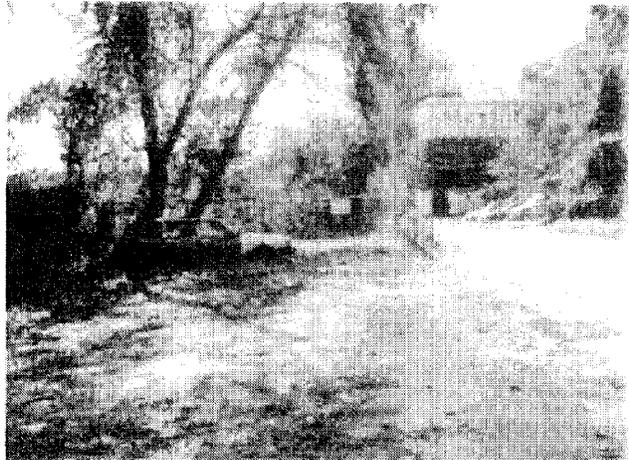
would be subject to the city's Coastal Management Plan and would require approval from local, state, and federal agencies.

Consistency of Physical Environment with Development Potential – This site is relatively flat and developable. However, the size of this parcel is quite limited at 0.49 acres and is likely to be inadequate for development of a regional intermodal transportation center.

Ability to Meet Project Needs, Goals, and Objectives – Site F is inconsistent with the goals of the proposed intermodal transportation facility in that it lacks compatibility with water transportation and passenger rail facilities, and may not be adequate for development of a regional intermodal transportation center, given the size of the site (0.49 acres).

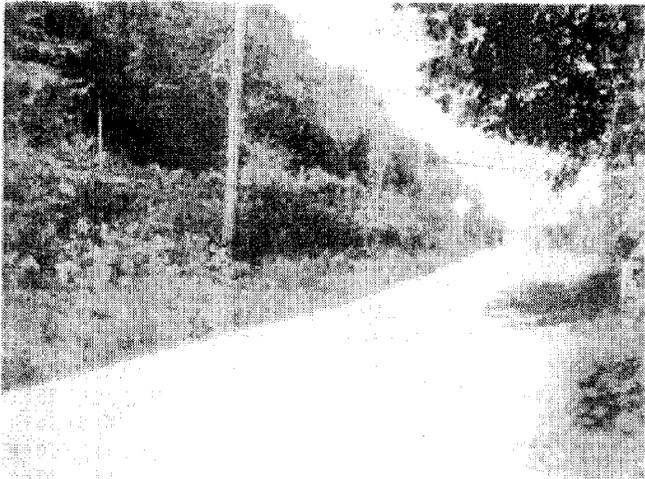
2.2.8 Site G – South of Police Station

Site Location – This site is comprised of various vacant parcels of land located south of the Police Station between the Thames River, the NEC rail line, and South Thames Street (Figure 2-4).



Proximity to Regional Roadway Network – Site G is located on Route 32 (Thames Street), a major thoroughfare that conveys traffic flow into the center of the city.

However, it is not within close proximity of other major highways or intersections. Of all locations evaluated, Site G is the most remote from the city center.



Proximity to Possible Commuter Rail Service – Site G is located along the NEC rail line. While there is currently no Norwich service at this time, the site provides a feasible link to future rail service.

Ability to Support Water Transportation – Site G is located adjacent to the Thames River, which is a navigable waterway capable of supporting water transportation. The site is located thousands of feet away from the city's large vessel pier on

Hollyhock Island. Therefore use of the existing water infrastructure is not likely to be feasible from this location.

Proximity to Downtown Norwich / Site Visibility – Site G is located off West Thames Street, 0.84 miles from the centroid of downtown Norwich. The entrance consists of a long drive that drops in elevation off South Thames Street, leaving it somewhat isolated and not readily visible.

Existing Land Use/Compatibility with a Future Transportation Center – The parcels on this site are currently undeveloped. Residential development occupies adjacent properties. Given the lack of similar land uses in the project area, siting of a transportation center at this location could potentially be out of character with the surrounding landscape. Any alternative at this location would need to carefully consider the adjacent land uses.

Consistency with the State C&D Policies Plan for Connecticut – This site is located in a Regional Center. Regional Centers encompass land areas containing traditional core area commercial, industrial, transportation, specialized institutional services, and facilities of intertown significance. Siting of a regional transportation center is believed to be consistent with this designation.

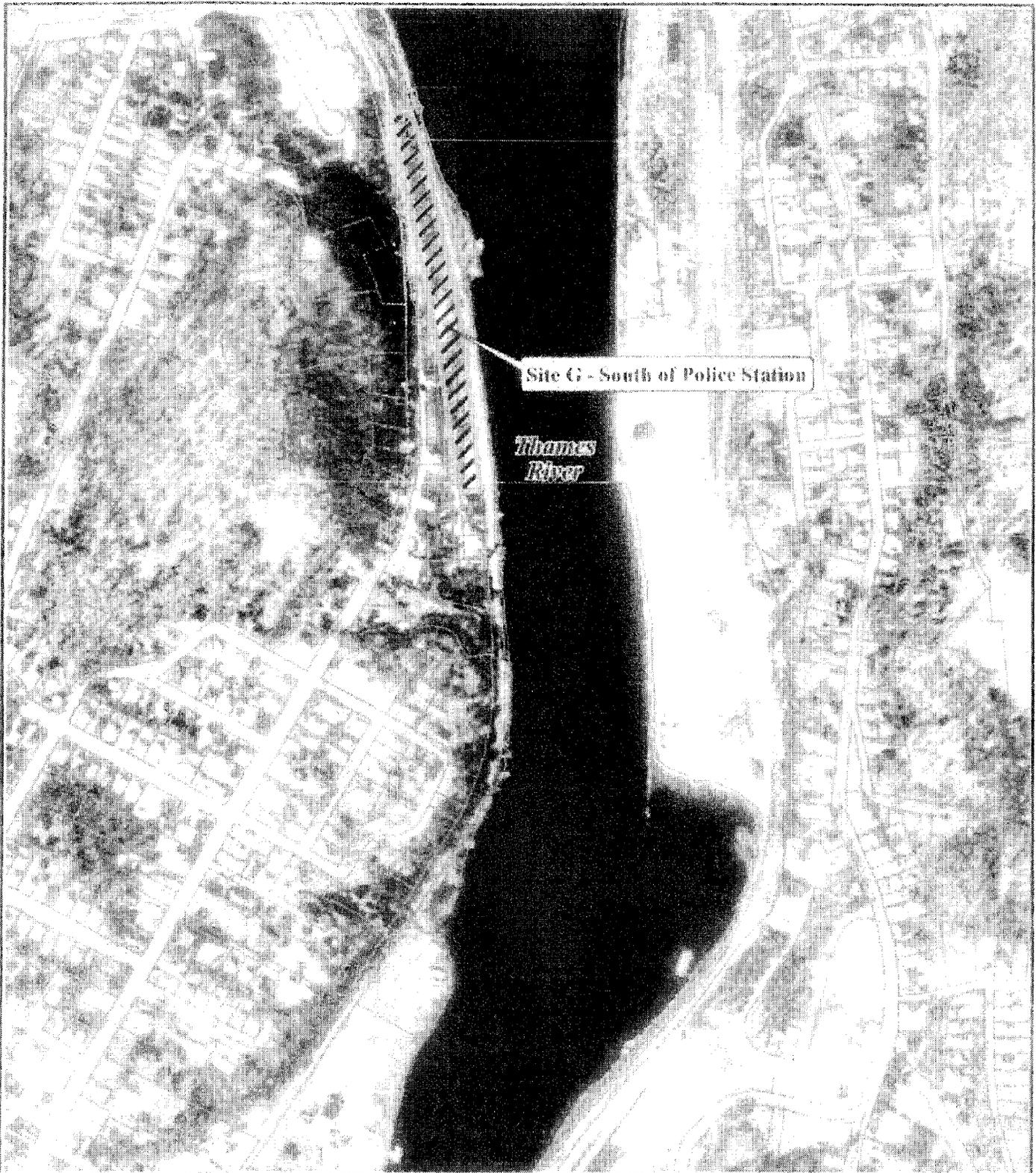
Site Zoning Designation – Similar to sites A and F, Site G is also located within the CC (Chelsea Central) district. Development of a transportation center in this district is believed to be consistent with the city's zoning regulations.

Potential for Neighborhood Relocation Issues – The potential for neighborhood relocation is very low given that a new facility on this site would not require the demolition or relocation of any buildings or business.

Compatibility of a Transportation Center with Surrounding Aesthetic Quality – Site G consists of empty parcels that border on a small residential neighborhood along South Thames Street. Its location along the Thames River makes this an attractive site, as it offers good views of the river. However, a transportation facility at this location could potentially be incompatible with the surrounding aesthetic quality.

Availability of Public Utilities and Services – Site G lies within the service zone of water and sanitary sewer utilities and electrical and telephone utilities.

Potential to Impact Sensitive Environmental Resources – The Connecticut Department of Environmental Protection's Natural Diversity Data Base indicates that Site G does not lie within an area of special concern for endangered and threatened species or significant natural communities. The location of a transportation facility at this site would have minimal impact on the surrounding natural environmental resources.



Site G - South of Police Station

Thames River

 <p>MILONE & MACBROOM</p>	<p>Proposed Hollyhock Station Intermodal Transportation Center</p>	<p>LOCATION: Norwich, CT</p>	
<p>99 Realty Drive Cheshire, Connecticut 06410 (203) 271-1773 Fax: (203) 272-9733 www.miloneandmacbroom.com</p>	<p>MINI#: 1674-01 MXD: 11/16/05 20locat000.mxd SOURCE: SCS - 06/16/02</p>	 <p>Parcel for South of Police Station Site</p>	<p>DATE: 12/05/05 SCALE: 1:4,800</p> <p>SHEET: Figure 2-4</p>

Flood Hazard Potential – Site G has no FEMA floodplain designation.

Consistency of Physical Environment with Development Potential – Given the narrow strip on land along the Thames River, the steep topography and the neighboring residential area, the development potential in this area is poor. The site is limited by its narrow width.

Ability to Meet Project Needs, Goals, and Objectives – Site G is not well linked to the existing roadway network or to the heart of downtown. Additionally, the adjoining residential land uses may not be compatible with a regional transportation center. For these reasons, this site is not believed to meet the project needs, goals, and objectives.

2.2.9 Summary of Alternative Site Analysis

Table 2-3 presents a summary assessment of the ability of each of the alternative sites to meet the basic project purpose, goals and objectives. Only four of the seven sites meet the basic purpose and need of the project (some just marginally). The Route 12 Viaduct site (Site A) and the Ferry Landing Site (Site F) do not meet the project criteria relative to proximity to navigable water or passenger rail transportation modes. Both of these sites are located near the Shetucket River, which is not navigable by larger boats. The site located south of the existing Police Station (Site G) is remote from downtown Norwich, may not be compatible with the surrounding residential land uses, and is out of character with the surrounding landscape. Additionally, Site G does not meet the location objective of maintaining a high degree of visibility, given its remote setting.

TABLE 2-3
Ability of Alternative Sites to Meet Project Purpose, Need, and Objectives

<i>Site</i>	<i>Reference Name</i>	<i>Proximal to Roadway Network?</i>	<i>Proximal to Existing SEAT Routes?</i>	<i>Proximal to Future Commuter Rail?</i>	<i>Conducive to Water Transportation?</i>	<i>Proximal to Downtown Norwich?</i>	<i>Is the Site Readily Visible?</i>	<i>Viable Alternative?</i>
Site A	Route 12 Viaduct Lot	Y	Y	N	N	Y	Y	N
Site B	Hollyhock West	Y	Y	Y	Y	Y	Y	Y
Site C	Hollyhock Central	Y	Y	Y	Y	Y	Y	Y
Site D	74 West Main Street	Y	Y	Y	Y	Y	Y	Y
Site E	Police Station Site	Y	Y	Y	Y	Y	Y	Y
Site F	Ferry Landing Site	Y	Y	N	N	Y	Y	N
Site G	South of Police Station	Y	Y	Y	Y	N	N	N

Table 2-4 summarizes the consistency of the remaining alternative sites (B, C, D, and E) with the surrounding land uses and zoning. All four of these sites are reasonably proximal to the center of downtown Norwich and all are believed to be compatible with the designated land use zones per the City of Norwich zoning regulations. Site E is limited in the land area that is available for development due to the slopes, existing development, and constraints posed by West Thames Street, West Main Street, and the rail line, leaving only a half acre of available land for development. Additionally, waterfront access would be hindered by the existing rail line, which segregates the remainder of the site from the water. For these reasons, Site E was eliminated from further consideration.

**TABLE 2-4
Developability of Remaining Alternative Sites**

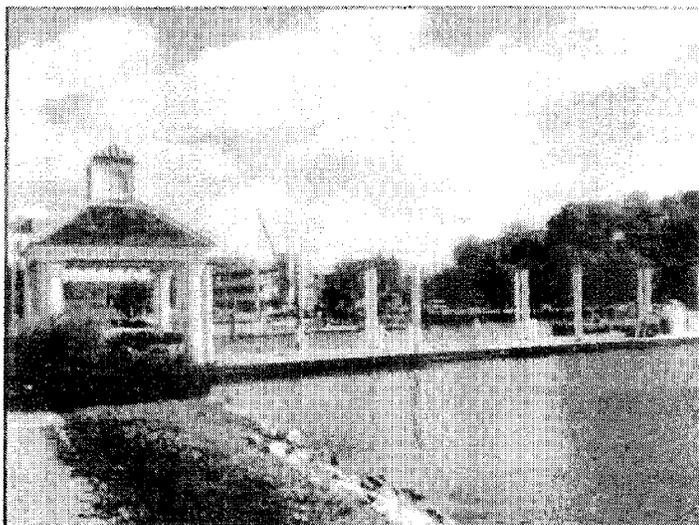
<i>Site</i>	<i>Reference Name</i>	<i>Distance to Downtown Norwich</i>	<i>Zoning Designation</i>	<i>Land Area Available to Develop</i>	<i>Property Ownership</i>
Site B	Hollyhock West	0.42 miles	WD	0.97 Acres	City of Norwich
Site C	Hollyhock Central	0.35 miles	WD	0.86 Acres	City of Norwich; State of CT
Site D	74 West Main Street	0.38 miles	WD	0.78 Acres	Privately Owned
Site E	Police Station Site	0.44 miles	GC	0.50 Acre	City of Norwich

The three remaining sites (B, C, and D) are situated on Hollyhock Island. The island is located within close proximity to major roadways, to the existing city's large vessel dock, and to the New England Central railroad line. These sites are suitable to all modes of public transportation. Similarly, all sites are located in the WD (Waterfront Development) district, where parking and transportation facilities are permitted by special permit. These sites are located within the FEMA designated 100-year floodplain. Given the basic project objective of maintaining proximity to water transportation and the fact that the downtown area is centered upon Norwich Harbor, where the Yantic, Shetucket, and Thames Rivers converge, it would be difficult to select a site that wasn't in the floodplain. The potential floodplain impacts are addressed in detail in Sections 3.9 and 4.9 of this document.

A number of years ago, Site D was under consideration for a new transportation facility. However, the site has numerous drawbacks. Of particular issue was the need for acquisition of private property, known locally as the Walker property. Its current use is a commercial condominium office building. At present, it is only partially occupied; however redevelopment plans are underway for this site. Demolition of an existing multi-story structure and displacement of an existing commercial use would result if this site

were selected. For this reason, the Norwich Planning Commission rejected the intermodal transportation center concept as the highest and best use at Site D, siting a preference to preserve this privately owned office building site for future development uses that might emerge in subsequent proposals.

Site D is located at the confluence of the east and west branches of the Yantic River with the Thames River at Norwich Harbor. The surrounding aesthetic characteristic is quite different as compared to the portion of Hollyhock Island that is located north of West Main Street, which has a more industrial setting. As can be seen in the adjacent photographs, the harbor area has more of an upscale



maritime setting. Siting a multi-story transportation facility at this location, while not out of character with the general downtown area, would likely obstruct views from West Main Street and points on the island to the north. It would also occupy a prime piece of real estate along the harbor and adjacent American Wharf Marina. Finally, this site has physical constraints due to its size at only 0.78 acres, with no room for expansion, since the site is bounded by West Main Street, the Yantic River, Norwich Harbor, and the adjacent marina.



Based on the project goals and objectives outlined in Section 2.2 and the foregoing site analysis, the sites on the northern portion of Hollyhock Island (Sites B and C) were selected for further consideration, due to their ability to most suitably meet the locational and operational project goals and objectives. Since these two sites are located adjacent to one another, the remainder of the alternatives analysis was conducted with the assumption that either site or portions of each site were available for the location of the transportation center. The combined land area of these two

Based on the project goals and objectives outlined in Section 2.2 and the foregoing site analysis, the sites on the northern portion of Hollyhock Island (Sites B and C) were selected for further consideration, due to their ability to most suitably meet the locational and operational project goals and objectives. Since these two sites are located adjacent to one another, the remainder of the alternatives analysis was conducted with the assumption that either site or portions of each site were available for the location of the transportation center. The combined land area of these two

sites, along with the area beneath the West Side Boulevard viaduct is approximately two acres. Site layout alternative analysis within the parcels that comprise Sites B and C is presented in Section 2.3 below.

2.3 Hollyhock Island Alternatives Analysis

Based on the selection of Hollyhock Island as the intended location for the Norwich Intermodal Transportation Center, the second phase of the analysis considered seven layout alternatives, as summarized in Table 2-5. All occur on portions of Sites B and C, some within the basic footprint of one site or the other, and some on both. The spatial and program requirements were maintained consistent in all layouts. The garage is a three and a half story structure with the capacity for approximately 220 parking spaces. Its approximate dimensions are ± 270 feet (length) by ± 125 feet (width). A minimum of seven bus berths are included in each layout.

**TABLE 2-5
Summary of Hollyhock Island Alternatives**

<i>Alternative #</i>	<i>General Description</i>
Alternative 1	Elevated garage and bus depot located on the corner of Falls Ave. and West Main St. (RT 32). Layout includes a cantilevered garage over the west branch of the Yantic River. Bus depot is on the ground floor. This alternative accommodates seven bus berths.
Alternative 2	Elevated garage located on the corner of Falls Ave. and West Main St. (RT 32). Structure is cantilevered over the west branch of the Yantic River. Bus depot is a separate at-grade facility located north of the West Side Blvd. (RT 32/82) viaduct and the garage. This alternative accommodates eight bus berths.
Alternative 3	Elevated garage and bus depot located on Falls Ave. north of West Side Blvd. (RT 32/82) viaduct. This alternative accommodates nine bus berths.
Alternative 4	Elevated garage and ground level bus depot. Bus depot is located on the corner of Falls Ave. and West Main St. (RT 32). The parking garage is located north of the West Side Blvd. (RT 32/82) viaduct. This alternative accommodates seven bus berths.
Alternative 5	Elevated garage and bus depot located on Falls Ave. and West Main St. (RT 32). The ticket station is located in existing Thayer Bldg. Layout includes a new intersection at Falls Ave. This alternative accommodates 11 bus berths.
Alternative 6	Elevated garage and bus depot located on Falls Ave. north of the West Side Blvd. (RT 32/82) viaduct. Design includes a reconfiguration of the intersection at Falls Ave. This alternative accommodates seven bus berths.
Alternative 7	Elevated garage and bus depot located on the corner of Falls Ave. and West Main St. (RT 32). Bus parking on ground floor. Structure spans over Falls Ave. This alternative accommodates eight bus berths.

Given the similar size, configuration, and operational elements, all of the layout configurations will have similar levels of impact on noise, air quality, economic, cultural resources, and utility improvements. For this reason, the description of alternatives in the ensuing discussion focuses on the differences among the layout alternatives, and the

advantages and disadvantages thereof. Particular attention is focused on those impacts relating to operational logistics, public access and safety, impervious cover, river encroachment, the potential for relocation and/or demolition of existing structures, and the need for roadway improvements.

2.3.1 Alternative 1 – Southerly Elevated Facility Extending out over the Yantic River

Layout – Figure 2-5 depicts Alternative 1. Located on the corner of Falls Avenue and West Main Street (Route 32), the layout for Alternative 1 consists of an elevated parking garage above a bus terminal that occurs at ground level. The garage area provides sufficient parking for approximately 220 vehicles. The garage entry/exit and bus loading/unloading areas are accessed via Falls Avenue. Pedestrian access is provided along West Main Street through a ticket station. Alternately, pedestrian access can be accomplished from the sidewalk along Falls Avenue.

Operational Efficiency – This facility layout is a compact and efficient design. It accommodates seven bus berths. Vehicular traffic would access the facility directly off West Main Street to Falls Avenue. The site location adjacent to West Main Street creates a close linkage to the downtown area for those individuals living in the area who are without vehicular transportation. The ticket area would be located close to parking facilities as well as the loading and unloading area, which makes for efficient operation.

Public Safety – The location of the parking garage immediately adjacent to Falls Avenue provides direct access from West Main Street in a well-traveled, populated area. This design places the garage and bus depot in a central location relative to pedestrian access.

Impervious Surface Coverage – The proposed design for Alternative 1 covers an impervious area of approximately 45,000 square feet, or slightly more than one acre.

Potential Impacts – This alternative would result in an encroachment out over the west branch of the Yantic River. The parking structure above the ground floor would extend approximately 20 feet over the water. Effects associated with the cantilevered structure include shadowing of the water, which has the potential to adversely impact aquatic habitat. Additionally this alternative would require the demolition of the existing leased City of Norwich building located north of the West Side Boulevard viaduct.

2.3.2 Alternative 2 – Split Facility with Parking in the Southerly Section and Transit Operations to the North

Layout – Figure 2-6 depicts Alternative 2. The layout for Alternative 2 consists of an elevated parking garage (220 spaces) on the corner of Falls Avenue and West Main Street (Route 32), similar to Alternative 1. The bus terminal extends to the north side of the West Side Boulevard overpass. The garage entry/exit and bus loading/unloading areas are accessible via Falls Avenue, with the loading/unloading area located in between the parking garage and the bus depot. Pedestrian access would be provided via sidewalks along Falls Avenue. The facility would be less visible, with the bus terminal located beyond the viaduct.

Operational Efficiency – This layout is expansive in nature, requiring much greater access distances for pedestrian and vehicular traffic, for both those using the garage as well as those accessing the facility on foot. The layout accommodates eight bus berths.

Public Safety – The location of the parking garage provides easy access to and from West Main Street. However, the bus depot would be located a significant distance from the intersection, making the pedestrian access route longer and potentially less safe. The northern portion of the site where the bus terminal would be located is more remote. Additionally, pedestrian traffic would need to cross one or more access drives, making this a less safe option as compared to Alternative 1.

Impervious Surface Coverage – The footprint for the layout proposed under Alternative 2 covers an area that is approximately 102,000 square feet, or approximately 2.3 acres.

Potential Impacts – Similar to the parking design proposed under Alternative 1, the garage layout under Alternative 2 cantilevers over the west branch of the Yantic River. The effects associated with the cantilevered structure include shadowing of the water, which has the potential to adversely impact aquatic habitat. Additionally, this alternative would require the demolition of several existing buildings located on the north side of the West Side Boulevard viaduct. Affected structures include the leased City of Norwich building on the west side of Falls Avenue and the privately owned "Drake Building" on the eastern side of Falls Avenue, raising potential relocation and acquisition issues.

2.3.3 Alternative 3 – Northerly Transit and Parking Operations

Layout – Figure 2-7 depicts Alternative 3. The proposed layout for Alternative 3 consists of an at-grade bus terminal with an elevated garage overhead, having capacity for 220 parking spaces. The facility would be located along Falls Avenue almost entirely north of the West Side Boulevard overpass. The garage entry/exit area would be located on the northeast end of the garage, while the bus loading and unloading area would be located on

the southeastern end. Pedestrian access would be provided via sidewalks along Falls Avenue.

This layout sets the majority of the facility to the north of the overpass, a significant distance from the West Main Street/Falls Avenue intersection. The land area between West Main Street and West Side Boulevard would remain undeveloped under this alternative.

Operational Efficiency – This alternative benefits from the compact nature of the double-decker layout; however the facility would be more remote from West Main Street. The layout accommodates nine bus berths. Similar to Alternative 2, this layout would require pedestrian traffic to traverse a greater distance to a more remote location on the island in order to utilize the facility, making it less operationally efficient. The facility would also have less visibility.

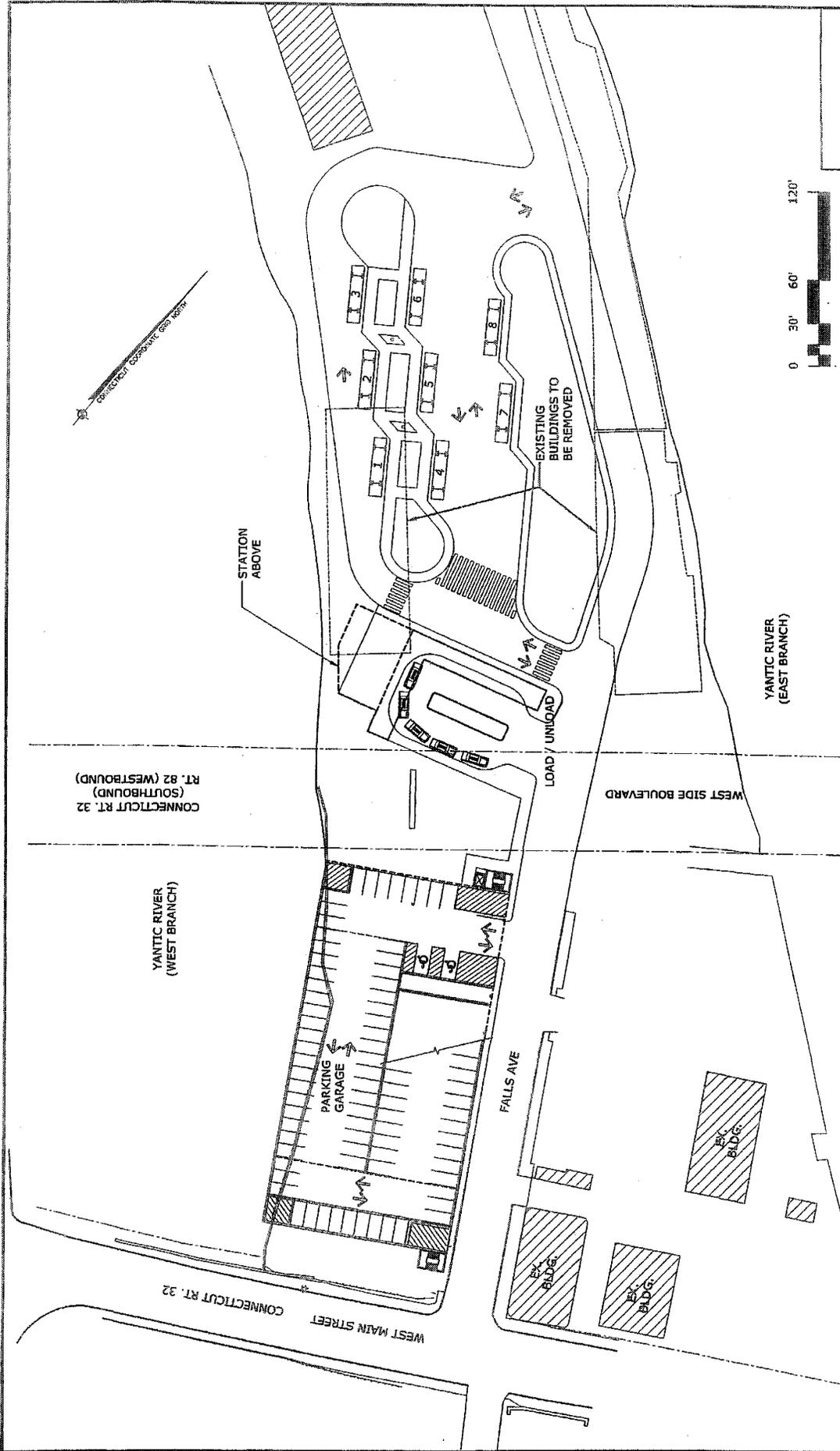
Public Safety – As indicated above, the facility under this layout alternative would be more remote from West Main Street, requiring pedestrian traffic to traverse a greater distance to a more remote location on the island in order to utilize the facility. This raises security concerns. Further, pedestrian traffic would need to traverse the bus loading and unloading area in order to access the ticket building, raising safety concerns.

Impervious Surface Coverage – Alternative 3 covers an area that is approximately 62,000 square feet, or approximately 1.4 acres.

Potential Impacts – Unlike Alternatives 1 and 2, the parking garage structure does not cantilever over the Yantic River under the Alternative 3 layout. However, there are greater public safety and security issues associated with the location of the transportation center as compared to the other alternatives. Like Alternative 2, the parking garage and bus depot is located farther from the West Main Street/Falls Avenue intersection, making the pedestrian access route longer. Similar to the two previous alternatives, Alternative 3 would require the demolition of the existing leased City of Norwich building located north of the West Side Boulevard viaduct.

2.3.4 Alternative 4 – Southerly Transit Operations with Parking to the North

Layout – Figure 2-8 depicts Alternative 4. Alternative 4 is a mirror image of the layout proposed under Alternative 2. The layout results in the bus terminal on the corner of Falls Avenue and West Main Street, with a separate parking garage north of the West Side Boulevard overpass. The garage entry/exit and bus loading/unloading areas would be accessed via Falls Avenue. Pedestrian access would be provided via sidewalks along Falls Avenue and directly off West Main Street.



Norwich Intermodal Transportation Center

Site Plan Alternate 2

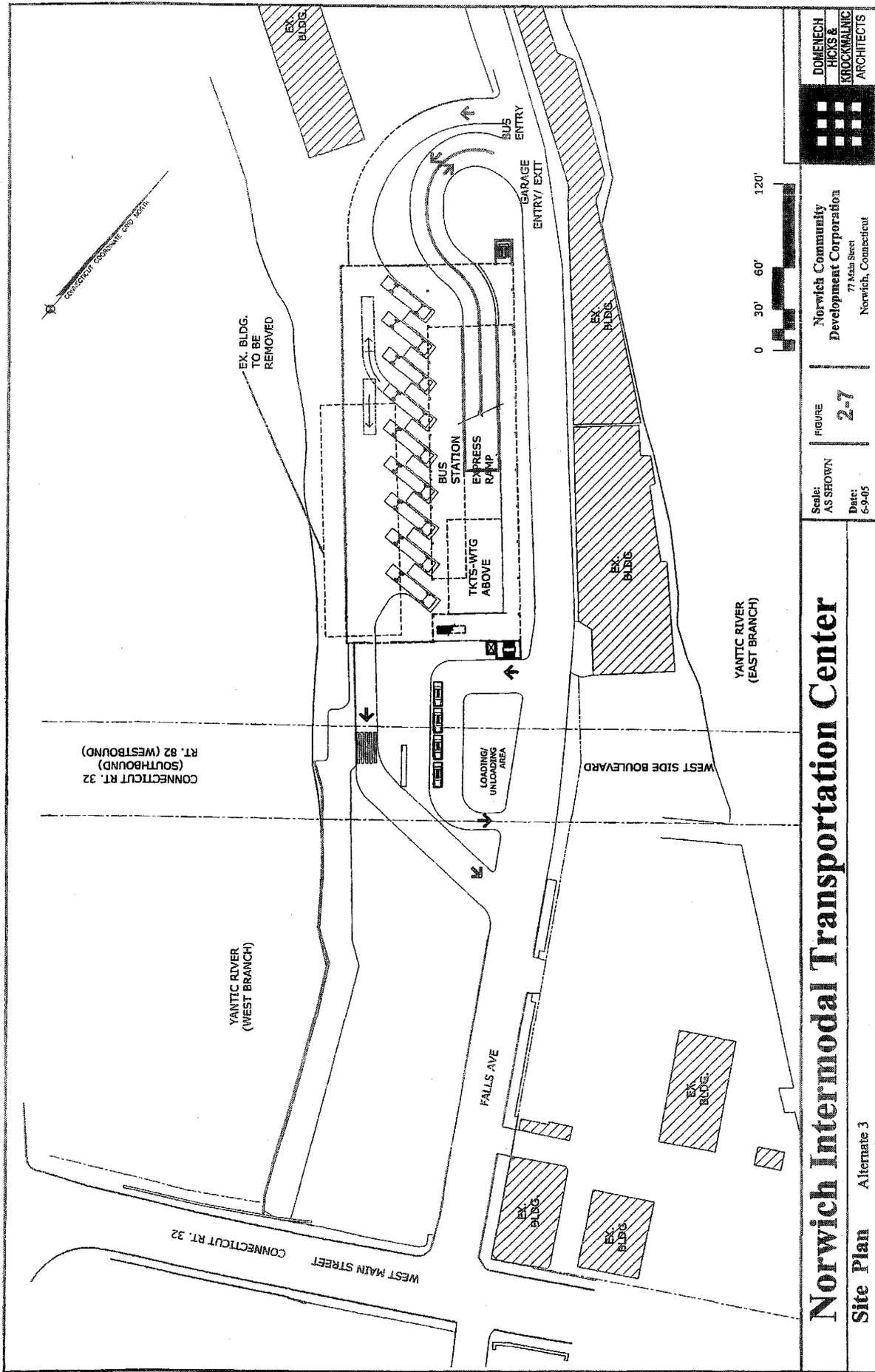
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FIGURE 2-6

Norwich Community Development Corporation
77 Main Street
Norwich, Connecticut

DOMENECH HICKS & KROCKMANN ARCHITECTS





Norwich Intermodal Transportation Center

Site Plan

Alternate 3

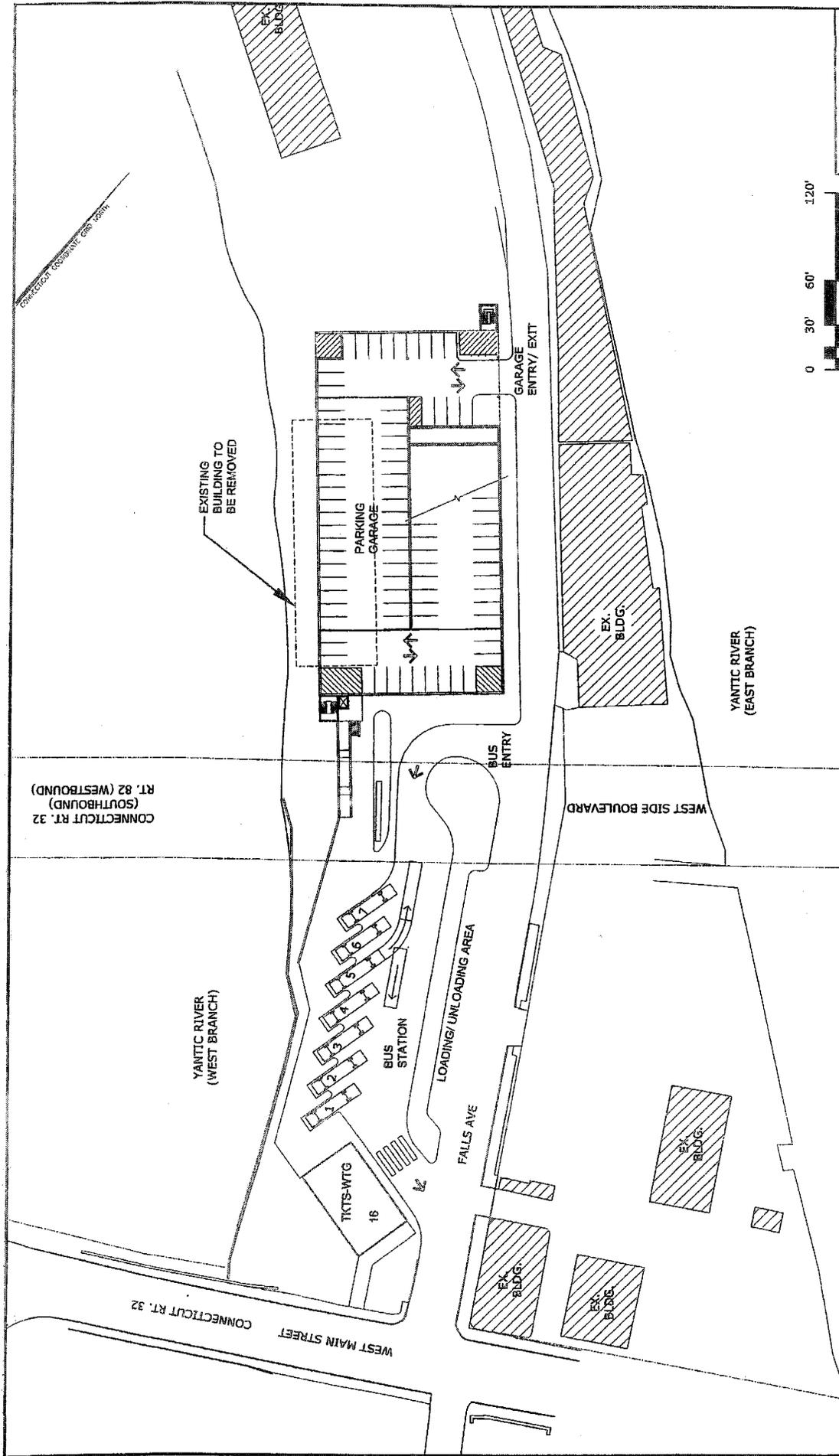
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Norwich Community
Development Corporation
77 Main Street
Norwich, Connecticut

FIGURE
2-7

DOMENECH
HICKS &
KRICKMANN
ARCHITECTS



Norwich Intermodal Transportation Center

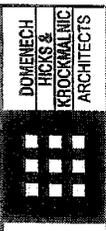
Site Plan Alternate 4

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6-9-05

FIGURE
2-8

Norwich Community
Development Corporation
77 Main Street
Norwich, Connecticut



Operational Efficiency – Similar to Alternative 2, this layout is expansive in nature, requiring much greater access distances for those using the garage. It accommodates seven bus berths. The area near the intersection of West Main Street and Falls Avenue has high visibility while providing easy pedestrian access for those individuals entering the facility on foot. However, those using the parking garage will need to walk behind the depot operations to get to the ticket and waiting area, making the operations less efficient.

Public Safety – Under this layout alternative, the garage would be located in a more remote area. Those individuals using the parking garage to travel a significant distance to reach the ticket and waiting area, raising safety and security concerns.

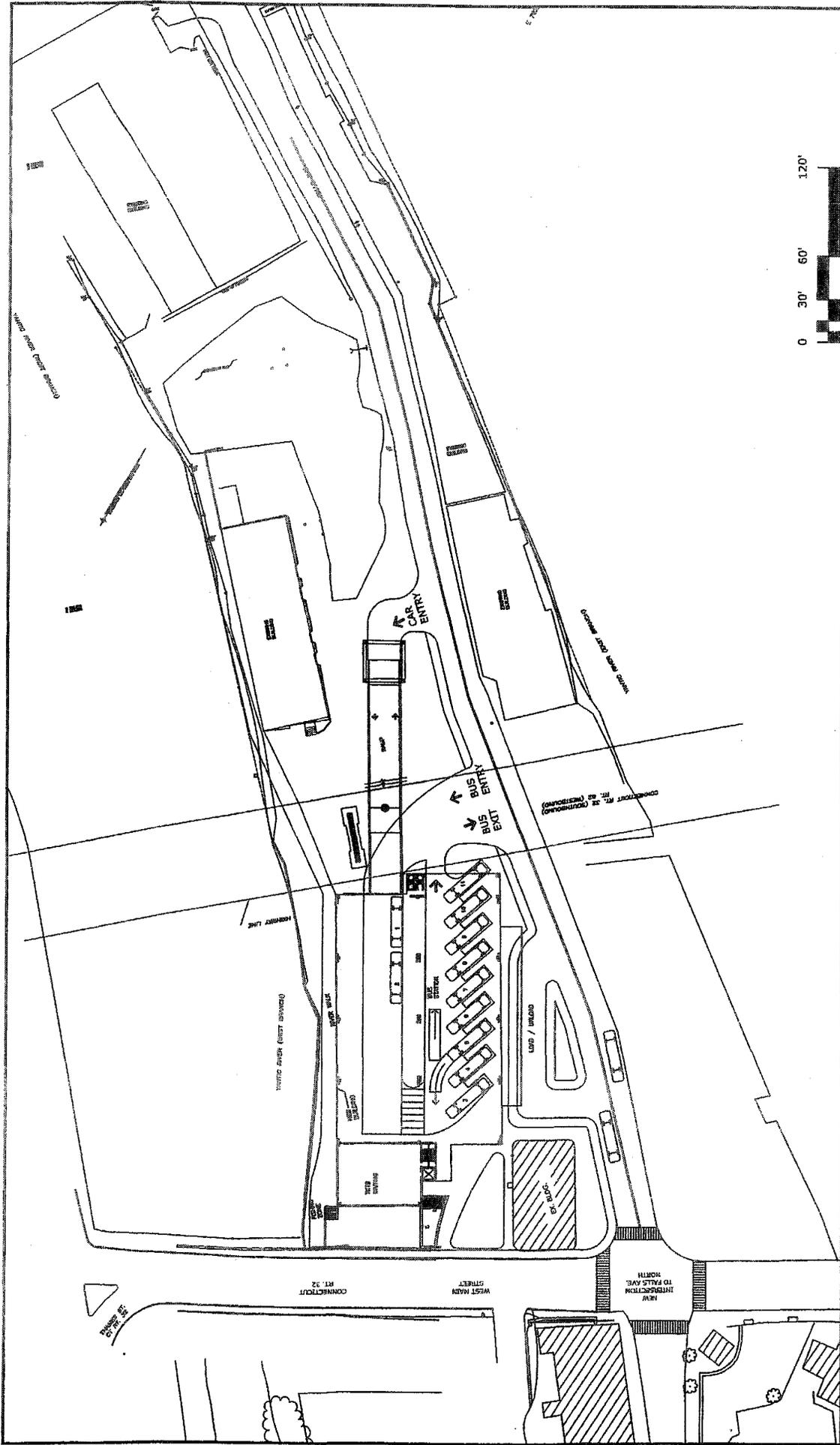
Impervious Surface Coverage – While the layout is similar to that proposed under Alternative 2, the footprint is smaller covering an area of approximately 78,000 square feet or approximately 1.8 acres.

Potential Impacts – The setback of the parking garage north of the West Side Boulevard viaduct allows for better use of space and eliminates the need for the parking garage to cantilever over the Yantic River, as compared to Alternatives 1 and 2. However, similar to Alternative 2, the parking garage would be located more remote from the West Main Street/Falls Avenue intersection, making the pedestrian access route longer, and giving way to pedestrian safety and operational efficiency concerns. Alternate 4 would require the demolition of the existing leased City of Norwich building located north of the West Side Boulevard viaduct.

2.3.5 Alternative 5 – Relocated Falls Avenue with Southerly Transit and Parking

Layout – Figure 2-9 depicts Alternative 5. Similar to Alternative 1, Alternative 5 locates the entire transportation center on the corner of Falls Avenue and West Main Street, with the bus terminal at ground level and the parking garage elevated above. The principal difference is that Alternative 5 shifts Falls Avenue to the east, thereby eliminating the need to cantilever the structure out over the Yantic River. The garage entry/exit and bus loading/unloading areas would be accessed via Falls Avenue. Pedestrian access would be provided from Falls Avenue as well as West Main Street. The design retains the existing Thayer Building on the corner of West Main Street and Falls Avenue by realigning Falls Avenue to the west of it.

Operational Efficiency – Like Alternatives 1 and 3, this alternative benefits from the compact nature of the double-decker layout. It also enjoys the efficiency of close proximity to West Main Street. This layout accommodates eleven bus berths, which is more than any of the other alternatives.



DOMENECH
HICKS &
KROCKMALLINC
ARCHITECTS



Norwich Community
Development Corporation
77 Main Street
Norwich, Connecticut

FIGURE
2-9

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1"=60'
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2-23-06



Norwich Intermodal Transportation Center

Site Plan Alternate 5

Public Safety – The location of the transportation center provides easy pedestrian and vehicular access from West Main Street. This design places the garage and bus depot in a central, well traveled area that is safer to access.

Impervious Surface Coverage – The proposed layout for Alternative 5 covers an area of approximately 63,000 square feet, or 1.45 acres.

Potential Impacts – This alternative does not require the demolition of the existing leased City of Norwich building located north of the West Side Boulevard overpass. It would, however, eliminate the Thayer repair shop and yard on the east side of Falls Avenue, as well as the Silver Star Athletic Club along West Main Street. Both of these facilities would need to be relocated. The multi-story Thayer retail building on the corner of West Main Street and Falls Avenue would remain. The design includes a reconfiguration of the West Main Street/Falls Avenue intersection, placing Falls Avenue on the eastern side of the Thayer building. The proposed changes to the roadway design would improve the intersection and would be more congruent with the traffic flow along West Main Street.

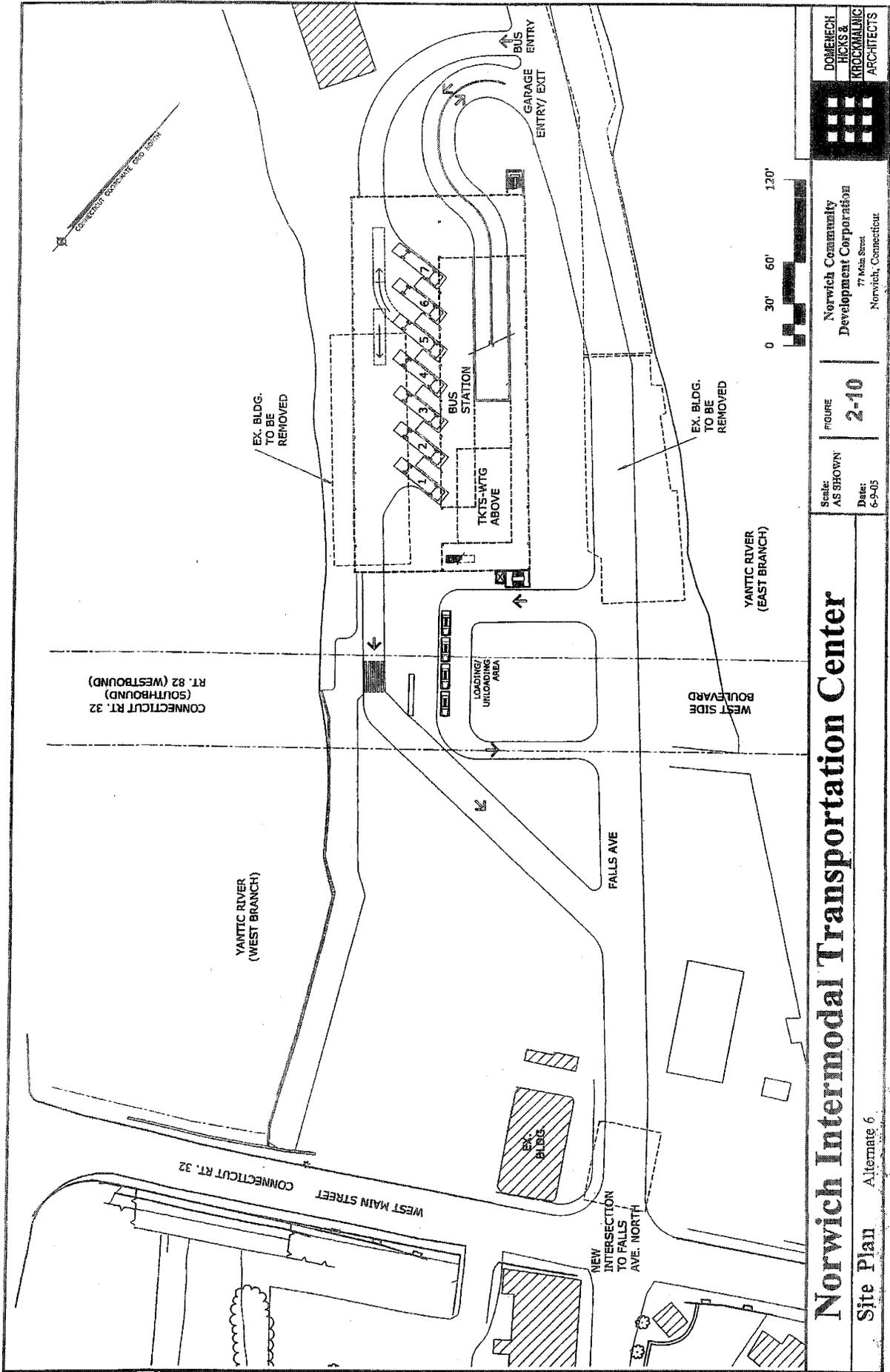
2.3.6 Alternative 6 – Relocated Falls Avenue with Northerly Elevated Facility

Layout – Figure 2-10 depicts Alternative 6. Alternative 6 combines elements of Alternatives 3 and 5, locating the transportation center almost entirely north of the West Side Boulevard viaduct, in combination with a relocation of Falls Avenue. The design consists of an at-grade transit depot beneath an elevated garage. The garage entry/exit and bus loading/unloading areas would be accessed via Falls Avenue. Pedestrian access would be provided on Falls Avenue via sidewalks.

Operational Efficiency – This alternative benefits from the compact nature of the double-decker layout; however the facility would be located more remote from West Main Street. The layout accommodates seven bus berths. This alternative would require pedestrian traffic to traverse a greater distance in order to utilize the facility. The facility would also be less visible on the far side of the viaduct.

Public Safety – There are security and public safety issues associated with the location of the transportation center. Similar to Alternative 3, the parking garage and bus depot would be located farther from the West Main Street/Falls Avenue intersection, making the pedestrian access route longer and the facility more remote.

Impervious Surface Coverage – The proposed layout covers an area of approximately 48,000 square feet, or 1.1 acre.



Norwich Intermodal Transportation Center

Site Plan Alternate 6

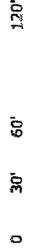
Scale:
AS SHOWN

Date:
6-9-05

FIGURE
2-10

Norwich Community
Development Corporation
77 Main Street
Norwich, Connecticut

DOMENECH
HICKS &
KROCKMANN
ARCHITECTS



Potential Impacts – Similar to Alternative 5, this layout includes a reconfiguration of the West Main Street/Falls Avenue intersection, placing Falls Avenue on the eastern side of the Thayer building. The proposed changes to the roadway design improve the intersection and are more congruent with the traffic flow along West Main Street. However, this alternative would locate the parking garage and bus depot farther from the West Main Street/Falls Avenue intersection, making the pedestrian access route longer. This alternative would require the demolition of the existing leased City of Norwich building located north of the West Side Boulevard viaduct as well as the Thayer repair shop and yard on the east side of Falls Avenue, and the Silver Star Athletic Club along West Main Street. The multi-story Thayer retail building on the corner of West Main Street and Falls Avenue would remain.

2.3.7 Alternative 7 – Southerly Transit and Parking Extending Over Falls Avenue

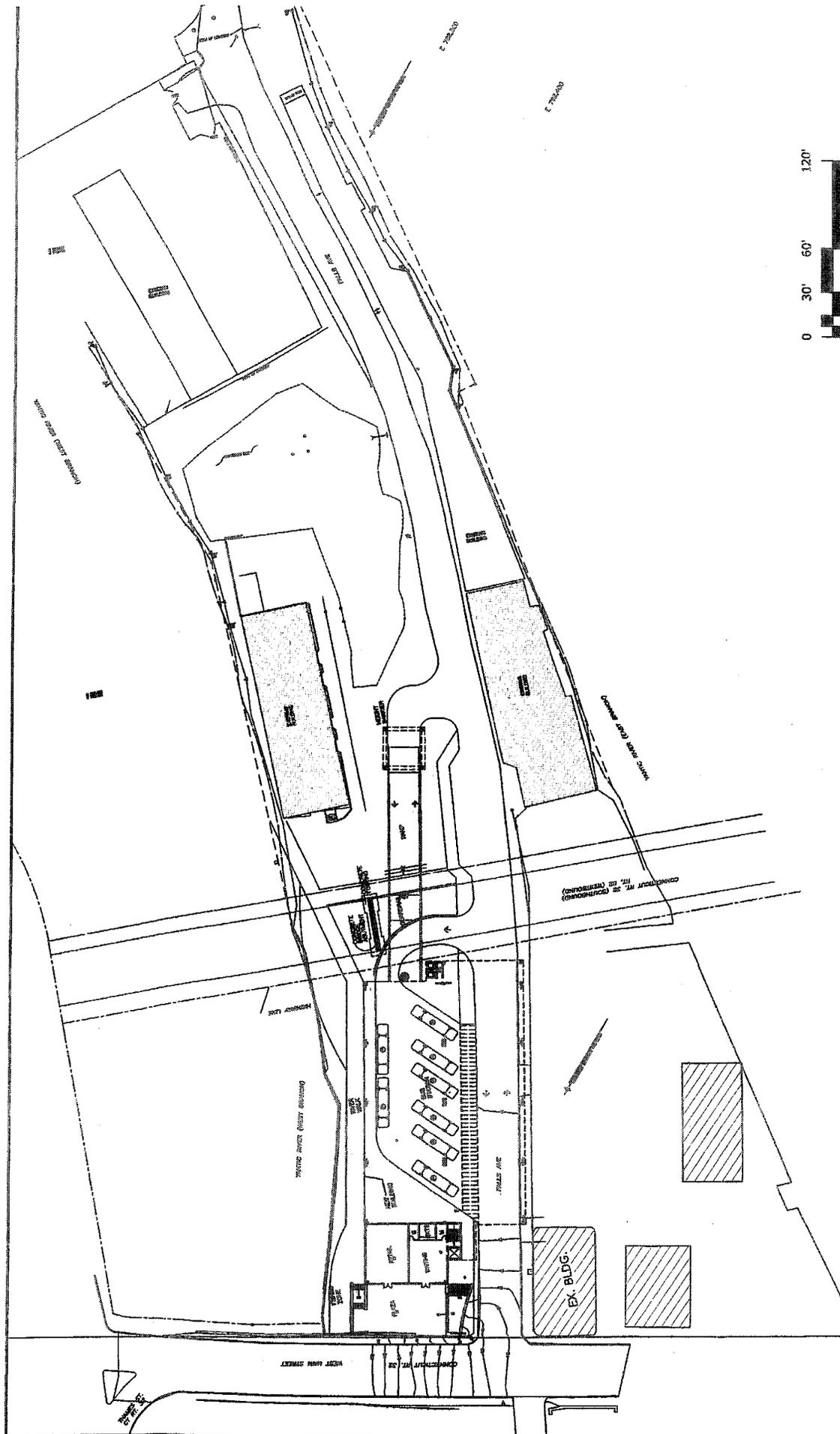
Layout – Figure 2-11 depicts Alternative 7. Alternative 7 is identical to Alternative 5 except that Falls Avenue would remain in its current alignment. The facility would span over Falls Avenue, such that vehicular traffic would travel beneath the garage structure.

Operational Efficiency – This alternative benefits from the compact nature of the double-decker layout. It also enjoys the efficiency of close proximity to West Main Street. It accommodates eight bus berths.

Public Safety – The location of the transportation center at the intersection of West Main Street and Falls Avenue provides good access and high visibility. This design places the garage and bus depot in a more central location.

Impervious Surface Coverage – The proposed layout for Alternative 7 covers an area of approximately 40,000 square feet, or 0.9 acres.

Potential Impacts – The location of the station in this alternative provides for easy, safe access and good visibility. Unlike some of the other layout alternatives that locate all or a portion of the facility to the north of the West Side Boulevard overpass, this design places the garage and bus depot in a central location. No building demolition is required under this alternative and no encroachment over the Yantic River would occur.



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KROCKMALLI
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Norwich Community
Development Corporation
77 Main Street
Norwich, Connecticut

FIGURE
2-11

Scale:
1"=60'
Date:
2-23-06

Norwich Intermodal Transportation Center

Site Plan Alternate 7



2.3.8 Summary

Table 2-6 summarizes the site layout alternatives.

TABLE 2-6
Summary of Site Layout Alternatives Assessment

	Alternatives						
	1	2	3	4	5	6	7
Operational Logistics	Efficient	Inefficient	Efficient	Inefficient	Efficient	Efficient	Efficient
Number of Bus Berths	7	8	9	7	11	7	8
Public access and safety	Easy, Safe Access	Access and Safety Issues	Access and Safety Issues	Access and Safety Issues	Easy, Safe Access	Access and Safety Issues	Easy, Safe Access
Impervious cover	45,000 sf	102,000 sf	62,000 sf	78,000 sf	63,000 sf	48,000 sf	40,000 sf
River Encroachment	Yes	Yes	No	No	No	No	No
Relocation and/or Bldg. Demolition of City Building	No	Yes	Yes	Yes	No	Yes	No
Relocation and/or Bldg. Demolition on Private Land	No	No	No	No	Yes	Yes	No
Relocation of Falls Avenue	No	No	No	No	Yes	Yes	No

Note: Shading denotes a potentially negative impact.

As depicted in Table 2-6, Alternatives 1 and 2 both encroach over the Yantic River, which has the potential to adversely impact aquatic habitat. Additionally, the cantilever design leaves little room for public access or recreational amenities. Additionally, Alternative 2 covers an area that is twice as large as some of the other proposed Alternatives.

The designs proposed under Alternatives 2, 3, 4 and 6 present safety concerns relative to the remoteness of all or a portion of the facility and the need for pedestrian traffic to cross vehicular accessways. These designs place all or a portion of the station north of the West Side Boulevard overpass, setting the transportation center a longer distance away from the more visible Falls Avenue/West Main Street intersection. Additionally, Alternatives 2 and 4 are physically expansive, resulting in greater impervious surface area and a less functional operation.

Of the seven alternatives, Alternatives 5 and 7 are believed to most suitably meet the project criteria as follows:

- This general layout results in an efficient operation located close to the intersection of Falls Avenue with West Main Street.
- The location of the facility on the corner of the intersection facilitates easy pedestrian access and fosters public safety. It is also a more visible location.
- The structure does not encroach over the Yantic River.
- This layout is among the lowest in terms of impervious surface coverage.

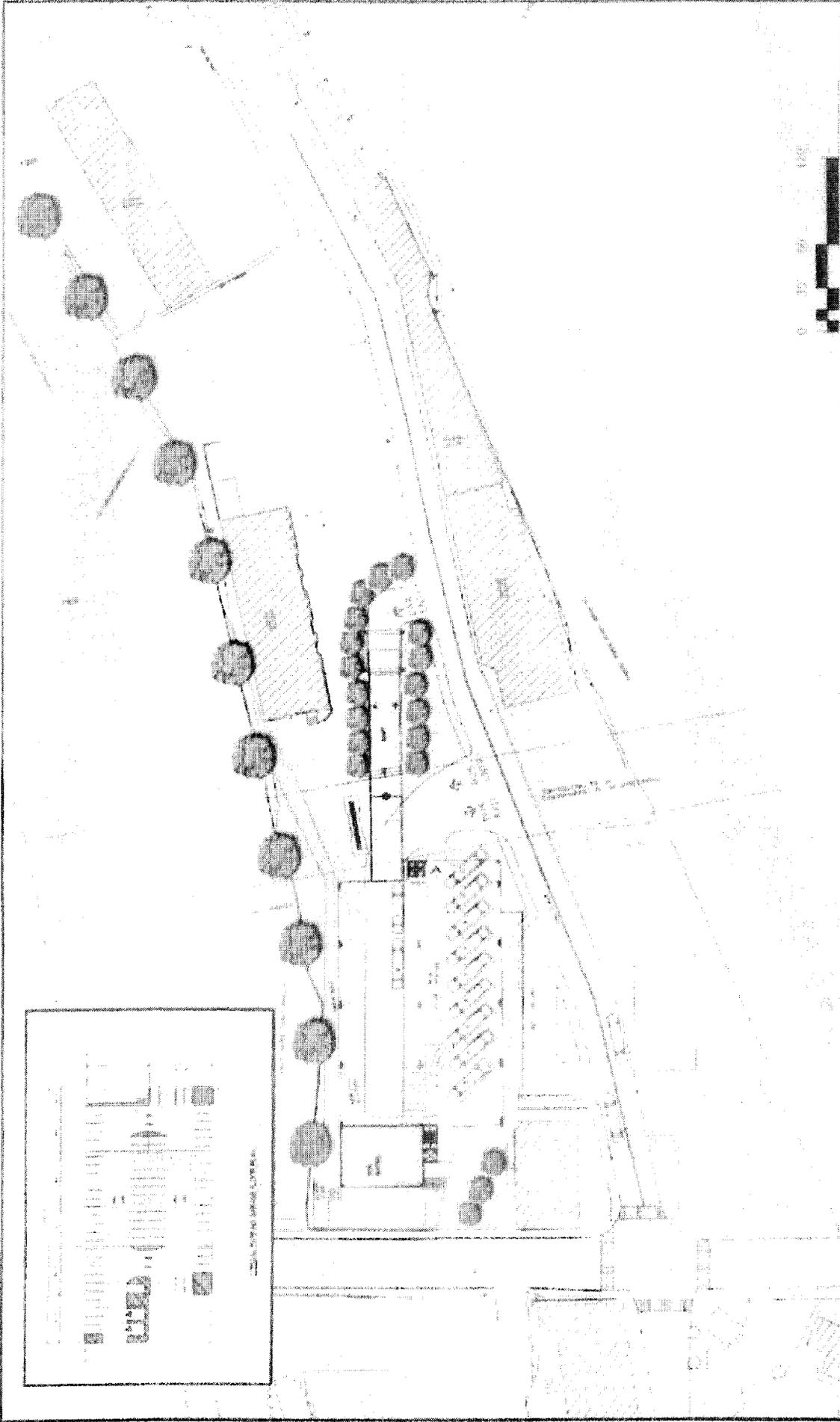
Alternatives 5 and 7 are similar, with the main differences being the alignment of Falls Avenue and the number of bus berths that can be accommodated. Alternative 5 can accommodate 11 bus berths, while Alternative 7 allows only eight. This difference is a result of the realignment of the intersection of Falls Avenue with West Main Street under Alternative 5. In addition to creating additional space for the bus loading/unloading area, realignment of the roadway will improve sight lines and correct the stagger in the accessway with the American Wharf Marina entrance. Alternative 5 will require acquisition of Thayer repair and storage yard as well as the two small Silver Star Athletic Club parcels.

Of the two designs, Alternative 5 is preferred, due to the improved intersection at Falls Avenue with West Main Street and the accommodation of three additional bus berths. The Thayer facility has a small marina and boat launch operation. This function would remain. The non-water dependent repair aspect of this facility would either be relocated on Hollyhock Island, or would be relocated to a nearby area. The Silver Star Athletic club property does not abut the Yantic River and is not water dependent. Therefore, it could be located elsewhere off the island.

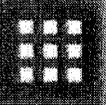
Voluntary negotiations with the two property owners for property acquisition and relocation of these operations will be pursued. Relocation impacts and mitigation are described in Section 4.1 and 5.2.

2.4 Preferred Alternative

Figure 2-12 depicts the layout of Alternative 5, showing greater detail in the design elements. The ensuing narrative describes the significant features of this alternative.



0 25 50 100
 Feet



NORWICH COMMUNITY
 DEVELOPMENT CORPORATION
 100 STATE STREET
 NORWICH, VT 05601

No. 17
 Date:

No. 17
 Date:

Norwich Intermodal Transportation Center

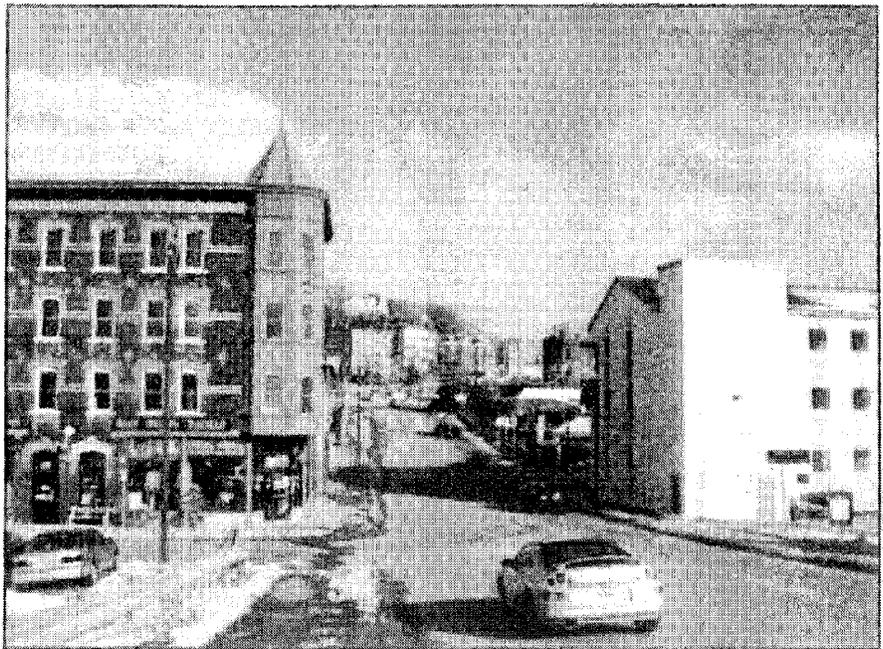
Site Plan

Layout - The facility will be located at the northwest corner of the intersection of West Main Street and Falls Avenue. Closest to West Main Street will be an open public plaza adjacent to the waiting, ticket, and vending areas. The bus terminal will be at ground level at approximate elevation 7.0 feet NGVD. The three-level garage will be located directly overhead, with a first floor elevation of approximately 23.0 feet, 16 feet above grade. The second level of the garage will be at approximate elevation 34.0 and the third level at approximate elevation 45.5 feet NGVD.

The parking structure dimensions will be approximately 124 feet wide by 256 feet long. The bus zone and parking garage will have separate entrances on Falls Avenue. Buses will access the station via a "bus only" ramp on Falls Avenue, while the parking garage access will be located north of the bus on-ramp. The entrance to the garage will consist of a 24-foot wide ramp that will direct cars to the second floor garage.

Vehicular Access and Movement -

Buses will enter the transportation center from West Main Street by making a left turn onto Falls Avenue and then a left turn into the bus station from Falls Avenue. In the photograph to the left, the silver vehicle is heading east along West Main Street and would take a left hand turn just prior to the large brick



Thayer building on the left hand side of the photograph onto Falls Avenue. Under Alternative 5, Falls Avenue would be relocated to the far side of the Thayer building.

The bus station will occupy the ground level of the new multi-level parking garage. A total of eleven spaces will be provided to accommodate short-term bus parking. Transit passengers will embark, disembark, and/or transfer between buses while they are temporarily parked. Similar to bus circulation, passenger vehicles will access the new transportation center by turning left onto Falls Avenue from West Main Street. However,

passenger vehicles will proceed past the bus entrance, which will be the first left turn off of Falls Avenue, to a second left turn that will access the ramp leading to the upper levels of the parking garage.

Development Footprint – The transportation station will cover approximately 40,000 square feet of impervious area within a ±1.4 acre site.

Falls Avenue – The transportation center will utilize the relocated Falls Avenue as the single point of entry and exit. The facility will improve street lighting, as well as vehicular and pedestrian traffic conditions at the intersection of Falls Avenue with West Main Street.

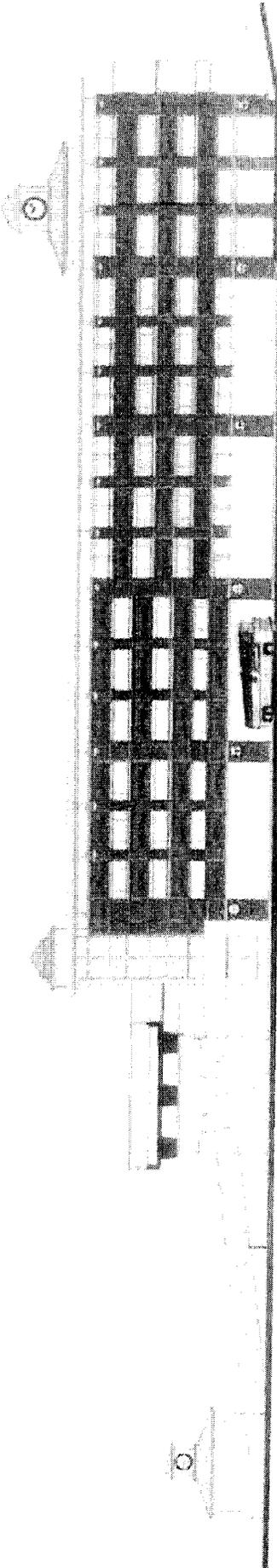
Plaza – A ±45-foot by 75-foot open public plaza area will be located along West Main Street. This will be outside of the waiting and vending area. As envisioned, the outdoor plaza space will be finished with brick pavers, and possibly some tables. Exterior access to the bus station will be possible from the Plaza area, as well as access to the Riverwalk to the west and the bus terminal to the east. The Plaza will be elevated above the adjacent Riverwalk and Falls Avenue at elevation ±17.0 feet NGVD, above the 100-year floodplain.

Ticket / Waiting Area – The passenger ticket and waiting areas will be located adjacent to West Main Street, contiguous to and north of the Plaza, south of the bus loading terminal. This space would house the SEAT operations and ticket sales and would provide an enclosed shelter for passengers who are waiting to board. Together, the ticket and waiting area will comprise approximately 1,250 square feet. The ticket and waiting area will be elevated to elevation ±17.0 feet NGVD, above the 100-year floodplain elevation. Public restrooms will be located in this area as well.

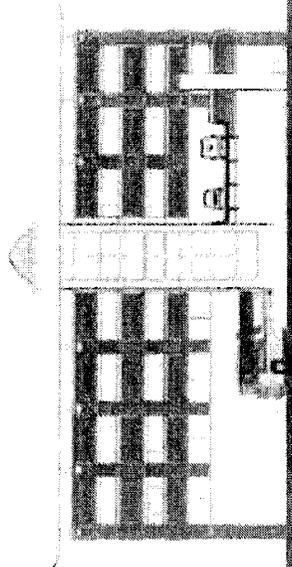
Vending Area – Immediately to the west and adjacent to the ticket and waiting area, a vending area is proposed. This multi-use space will comprise approximately 1,700 square feet at elevation ±17.0 feet NGVD. As envisioned, this area may be used for other types of ticket sales (i.e. ferry, Greyhound, etc.), vendors (a refreshment stand, newspaper stand, informational kiosk, etc.), or potentially rental space for canoes and kayaks.

Garage – The parking garage design consists of an elevated three and a half story structure that sits above the bus loading zone. It will provide 220 parking spaces. The garage will have stairs and an elevator to the ticket area. The elevator and lower level will be flood proof construction.

Architectural Style – The design of the bus depot/parking garage facility will incorporate themes compatible with adjacent recent structures at the American Wharf that will be consistent with the designated land use and character of the island. A brick façade will compliment and blend with the surrounding brick structures on the island. Figures 2-13 and 2-14 show elevational views of the building.



1 - WEST ELEVATION



2 - NORTH ELEVATION



Norwich Intermodal Transportation Center

Hollyhock Island, Norwich, CT

Building Elevations 2

Schematic Design Report

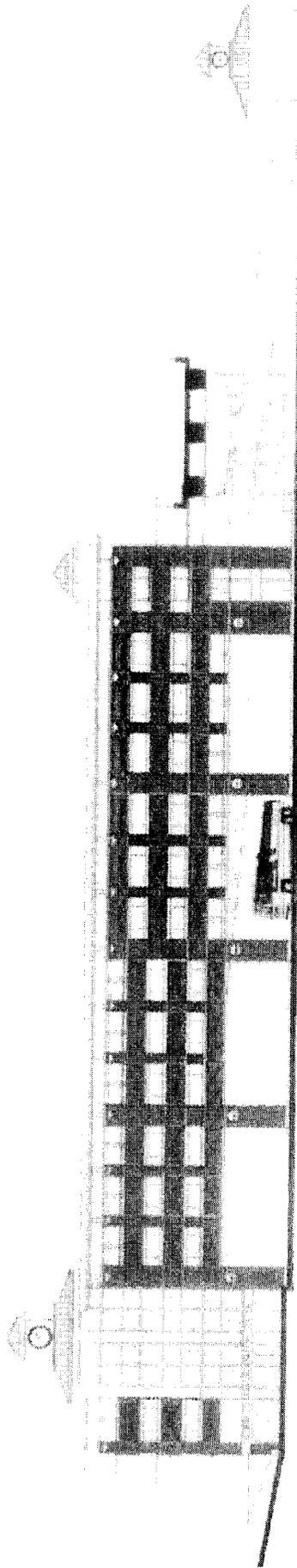
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Date:
March 2005

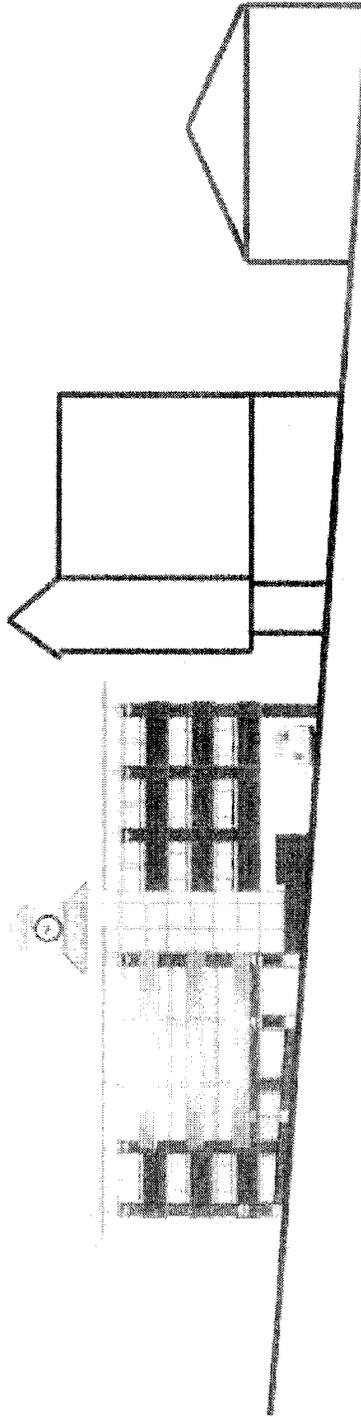
2-13

Norwich Community
Development Corporation
100 State Street
Norwich, Connecticut

EDMUNDS
KALISA
ARCHITECTS
ARCHITECTS



1 - EAST ELEVATION



2 - WEST MAIN ST ELEVATION



Norwich Intermodal Transportation Center

Hollyhock Island, Norwich, CT Building Elevations 1 of 5 Schematic Design Report

Scale:
AS SHOWN

Date:
January 2006

2/4

Norwich Community
Development Corporation



Architect:
Schematic Architecture

CONSTRUCTION
CHECKS &
PROVISIONS
ARCHITECT

Ferry Linkage – The riverwalk along the west branch of the Yantic River will provide a pedestrian link to the existing large vessel pier at the American Wharf Marina on the south side of West Main Street. The Riverwalk will connect to the staircase that leads up to the public Plaza area and West Main Street. Pedestrians can cross at the new crosswalk on West Main Street and access the marina and pier through the main entrance on the south side of West Main. Additionally, the Riverwalk will extend beneath West Main Street and end at the edge of the Marina Towers Condominium site at 78 West Main Street. The property owner of 78 West Main plans to renovate and redevelop this site, including extension of the riverwalk from the bridge to America Wharf Marina, thus providing a second and more formal linkage to the ferry dock.

Rail Linkage – Currently, there are no plans for passenger rail service in Norwich. However, the New England Central rail line runs along the west bank of the Yantic River across from Hollyhock Island and has been identified as the most viable line for future passenger service in Norwich. A conceptual plan for pedestrian linkage to the NEC rail line will be included in the intermodal transportation design. Additionally, a conceptual vehicular linkage to the P&W rail line at the existing Route 12 viaduct site will be programmed into the design concept, in the event that future rail service becomes available on that line.

Riverwalk – The proposed design includes a riverwalk along the west branch of the Yantic River. This design feature is intended to increase public access on the island and to the waterfront. The riverwalk will be accessible from the plaza on West Main Street and will be open to the public, regardless of whether or not they are using the transportation center. The riverwalk will be defined with decorative pavers and will have a width of approximately eight to 15 feet. Lighting will be mounted off the face of the garage. No railings are proposed.

Fishing Area – A designated fishing area is proposed along the west branch of the Yantic River near the West Main Street Bridge. Local anglers report that there is excellent fishing in Norwich Harbor and up into the Yantic River, particularly striped bass that have come up from Long Island Sound. They are reported to move up into the Yantic River as far as the falls at Indian Leap, approximately one mile above the project area. Norwich hosts an annual fishing tournament in May of each year. Winning striped bass can run up to four feet in size. The proposed fishing area on Hollyhock Island will provide fishing opportunities for tourists and city residents alike.

Long-Term Boat Launching Capabilities – Currently, the city maintains a public boat launch at Howard Brown Park on the mainland, where the Shetucket River and Norwich Harbor converge. This facility has a parking lot for truck and trailer parking, and a boat launch. The boat launch and parking area are heavily used and can become congested. Accordingly, the city is looking for a better location for a public boat launch. The east branch of the Yantic River has been identified as a prime location for a future boat launch.

Upstream of West Main Street, the river widens out considerably and has a scenic setting along the Heritage River Walk, upstream to the falls. The land adjacent to the east branch is currently under private ownership.

The west branch of the Yantic River, along the project site, is shallower than the east branch and the river becomes un-navigable for motorized watercraft a short distance upstream of the project site and is therefore not suitable for a public launching area. Additionally, space on the island along the west branch is limited.

The Thayer boat repair shop and marina is located on the east branch of the Yantic River, east of Falls Avenue. The facility is equipped with a boat launch to the river. This is a private facility; however, members of the general public can launch for a fee payable to Thayer Marine. Implementation of the proposed intermodal transportation center involves the relocation of Falls Avenue and will require acquisition of the Thayer property (upland area). However access to and use of the existing water-dependent marina and boat launch will remain with the current owner.

The vision of the Norwich City Planner and the Harbor Management Commission for the east branch of the Yantic River is for increased public access on Hollyhock Island across the channel from the Heritage River Walk. Plans include parking and a picnic area, enhanced boat launch, and use of the more broad and calmer waters for canoe and kayak enthusiasts. This program will be pursued separate from the intermodal transportation center project.

Expected Timeframes – Construction of the transportation center footprint and parking garage is expected to commence in 2008, following the successful conclusion of the CEPA/NEPA process, project design, and regulatory permitting. Specifically, the bus and shuttle operations area will be constructed, as well as the parking garage, relocation of Falls Avenue, the public plaza, ticket/waiting area, vending area, riverwalk, and fishing area. SEAT operations as well as shuttle services to the casinos, Backus Hospital, Three Rivers Community College, and Bradley Airport are expected to be operational within one year of completion of the transportation center, but possibly much sooner.

Ferry related project elements are anticipated to be implemented by 2011. Given the complexity of activating passenger rail service, it is likely that this component of the ITC will take on the order of ten years before it is implemented.

APPENDIX B

SEAT Bus Routes and Time Schedules

LOCAL BUS SCHEDULES
ALL ROUTES MONDAY THROUGH SATURDAY UNLESS OTHERWISE NOTED
 *Sat. service starts ** End of Saturday Service

Run #4: TAFTVILLE / OCCUM / THREE RIVERS - MOHEGAN CAMPUS / GREENVILLE

Viaduct, N. Main St., Central, N. Main, Norwich Ave., Occum Rd., Hooper, Railroad Ave., Baltic Rd., Occum Rd., South B St., Hunter's Ave., Merchants Ave., Harland Rd., Ox Hill Rd., Senior Center, Mohegan Park Rd., Hunters Rd., Harland Rd., Merchants Ave., Providence, North 5th Ave., Wequonnock Village, Providence St., Norwich Ave., N. Main St., Central Ave., N. Main St., Viaduct

Norwich / Trans. Centro.	6:00	*7:00	8:00	9:00	10:00	11:00	12:00	1:00	2:00	3:00	4:00	5:00	6:00	6:55
Occum	6:15	7:15	8:15	9:15	10:15	11:15	12:15	1:15	2:15	3:15	4:15	5:15	6:15	
Mohegan Campus	6:30	7:30	8:30	9:30	10:30	11:30	12:30	1:30	2:30	3:30	4:30	5:30	6:30	
Wequonnoc Village	6:40	7:40	8:40	9:40	10:40	11:40	12:40	1:40	2:40	3:40	4:40	5:40	6:40	
Central / 7th St.	6:50	7:50	8:50	9:50	10:50	11:50	12:50	1:50	2:50	3:50	4:50	5:50	6:50	

Run #5: INDUSTRIAL PARK / WAWECUS ST / NORWICHTOWN / BACKUS HOSPITAL

Viaduct, Main St., Franklin St., McKinley, Rockwell, Crescent, Sachem, Lafayette, Washington, W. Town, Industrial Park, Conn. Ave., Wisconsin Ave., New Park Ave, Route 32, West Town, Otrobando, Wawecus, Otrobando, N.L. Tpke, (Rollins, N.L. Tpke), Norwichtown Mall, Town, Washington, Lafayette, Sachem, Chelsea Parade, Broadway, Union, Main, Viaduct

Norwich / Trans. Cntr	6:30	7:15	8:00	*9:00	10:00	11:00	12:00	1:00	2:00	3:00	4:00	**5:00	6:00	6:55
Industrial Park	6:45	7:30	8:20	9:20	10:20	11:20	12:20	1:20	2:20	3:20	4:20	5:20	6:20	
Otrobando	-	-	8:27	9:27	10:27	11:27	12:27	1:27	2:27	3:27	4:27	5:27	6:27	
Wawecus St.	-	-	8:29	9:29	-	11:29	-	1:29	-	3:29	-	5:29	6:29	
Rollins Rd. / N.L. Tpke.	-	-	-	-	10:30	-	12:30	-	2:30	-	4:30	-	-	
Norwichtown Mall	6:55	7:40	8:35	9:35	10:35	11:35	12:35	1:35	2:35	3:35	4:35	5:35	6:35	
Backus Hospital	-	-	8:45	9:45	10:45	11:45	12:45	1:45	2:45	3:45	4:45	5:45	6:45	

Run #6: WEST SIDE

Viaduct, Water St., W. Main, High, Mechanic, W. Main, Dunham, Elizabeth, Westwood Park, Elizabeth St. Ext., Pembroke, Clifton, Stanley, Dunham, W. Main, Salem Tpke, Backus Outpatient Center, Salem Tpke., Wal-Mart/Big Y, Salem Tpke, W. Main, Dunham, Elizabeth, Westwood Park, Elizabeth St. Ext., Pembroke, Clifton, Stanley, Dunham, W. Main, Rt. 12, Viaduct

Norwich / Trans. Cntr.	7:00	8:00	*9:00	10:00	11:00	12:00	1:00	2:00	3:00	4:00	**5:00	6:00	6:55
Dunham / Elizabeth	7:15	8:15	9:15	10:15	11:15	12:15	1:15	2:15	3:15	4:15	5:15	6:15	
Backus Outpatient Cntr.	7:25	8:25	9:25	10:25	11:25	12:25	1:25	2:25	3:25	4:25	5:25	6:25	
Wal-Mart / Big Y	7:30	8:30	9:30	10:30	11:30	12:30	1:30	2:30	3:30	4:30	5:30	6:30	
Marcus Plaza	7:35	8:35	9:35	10:35	11:35	12:35	1:35	2:35	3:35	4:35	5:35	6:35	
Dunham / Elizabeth	7:45	8:45	9:45	10:45	11:45	12:45	1:45	2:45	3:45	4:45	5:45	6:45	

RUN #7 - DAYTIME - HAMILTON AVE. / MOHEGAN SUN / WEST MAIN / N.L. TPKE / -Route changes at 7:00 PM

Viaduct, East Main St., Hamilton Ave., Quarto Rd., Smith St., Pukallus, Hamilton Ave., East Main, Viaduct, Market St., Route 32 (West Thames), Sandy Desert Rd., Route 32, Norwich-New London Tpke., West Main, Viaduct

Norwich Trans. Cntr	6:00	7:00	8:00	9:00	10:00	11:00	12:00	1:00	2:00	3:00	4:00	5:00	6:00
Quarto Rd	6:05	7:05	8:05	9:05	10:05	11:05	12:05	1:05	2:05	3:05	4:05	5:05	6:05
Ahepa Housing	6:07	7:07	8:07	9:07	10:07	11:07	12:07	1:07	2:07	3:07	4:07	5:07	6:07
W. Thames/Dunham	6:25	7:25	8:25	9:25	10:25	11:25	12:25	1:25	2:25	3:25	4:25	5:25	6:25
Mohegan Sun	6:30	7:30	8:30	9:30	10:30	11:30	12:30	1:30	2:30	3:30	4:30	5:30	6:30
N.L. Tpke / W. Main	6:40	7:40	8:40	9:40	10:40	11:40	12:40	1:40	2:40	3:40	4:40	5:40	6:40

Run #7 - PM - HAMILTON AVE / MOHEGAN SUN / W. MAIN / W THAMES <See Sunday Schedule>

Viaduct, East Main St., Hamilton Ave., Quarto Rd., Smith St., Eighth St, Central Ave., N. Main, Market St, Westside Blvd, Rte 32, Sandy Desert Rd., Mohegan Sun (Employee & Winter entrances), Sandy Desert Rd, Rte 32, NL Tpke, W Main, Chelsea Harbor, Main St, Viaduct

Norwich Trans. Cntr	7:00PM	8:00	9:00	10:00	11:00	11:55
Quarto Rd	7:05	8:05	9:05	10:05	11:05	
Central Ave	7:10	8:10	9:10	10:10	11:10	
W. Thames / Dunham	7:25	8:25	9:25	10:25	11:25	
Mohegan Sun	7:30	8:30	9:30	10:30	11:30	
N.L. Tpke	7:35	8:35	9:35	10:35	11:35	
W. Main St / Westgate	7:40	8:40	9:40	10:40	11:40	
Franklin Square	7:50	8:50	9:50	10:50	11:50	

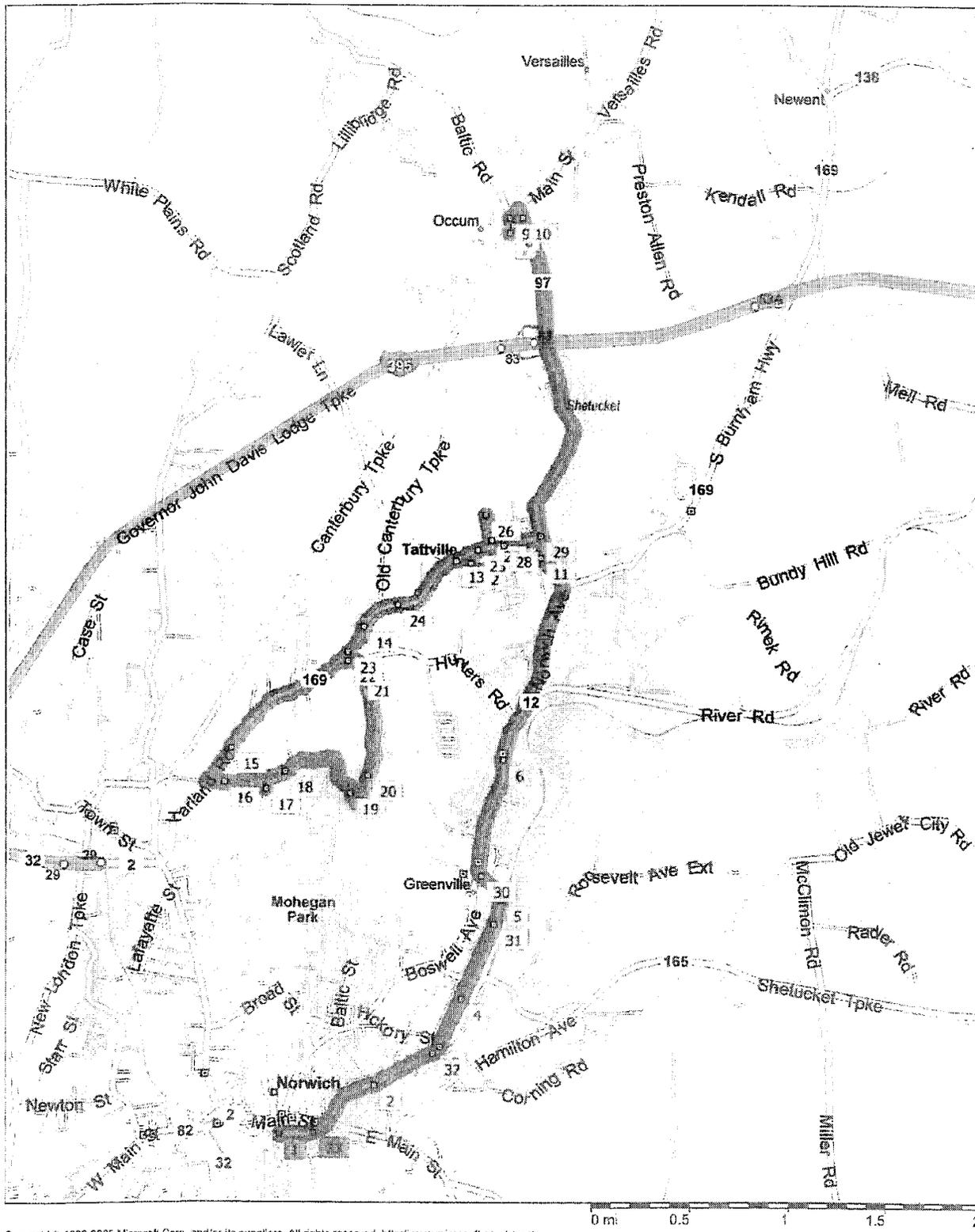
Run #8: JEWETT CITY / LISBON LANDING

Lisbon Landing (Walmart), Route 12, K of C Dr, South Main St., Matthewson St, Soule St, Senior Center, Soule St, Matthewson St, Tracy Ave, Ashland St, Taylor Hill Rd, Pleasantview, Ann St, Slater Ave, Route 12, North Main St, Green Ave, Matthewson St, Aspinook St, Route 12, Brown Ave, Russell St, Monroe Ave, Route 201, Indian Ridge Apts, Route 201, Hawkins St, Hill St, Ashland St, Pleasantview, Route 136, Ocean State Job Lot, Route 136, Slater Ave, Route 12, Better Val-U, Route 12, Lisbon Landing (Walmart)

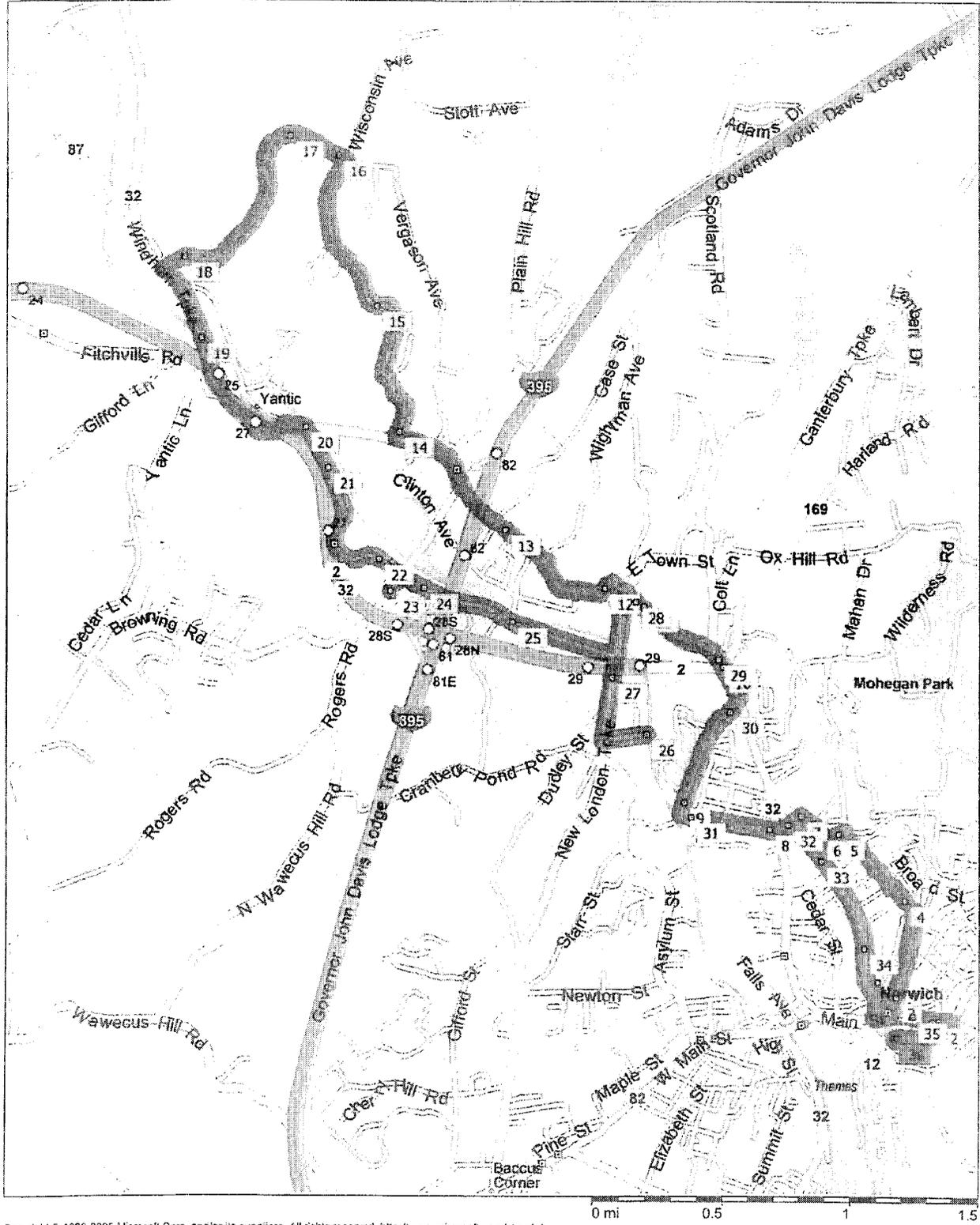
Norwich Viaduct	6:00	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lisbon Landing (Walmart)	6:30	7:30	8:30	9:30	10:30	11:30	12:30	1:30	2:30	3:30	4:30	5:30	6:30	7:30	8:30
Senior Center	6:40	7:40	8:40	9:40	10:40	11:40	12:40	1:40	2:40	3:40	4:40	5:40	6:40	7:40	8:40
Taylor Hill Apts	6:48	7:48	8:48	9:48	10:48	11:48	12:48	1:48	2:48	3:48	4:48	5:48	6:48	7:48	8:48
Indian Ridge Apts	7:00	8:00	9:00	10:00	11:00	12:00	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	9:00
Ocean State Job Lot	7:13	8:13	9:13	10:13	11:13	12:13	1:13	2:13	3:13	4:13	5:13	6:13	7:13	8:13	9:13
Better Val-U	7:21	8:21	9:21	10:21	11:21	12:21	1:21	2:21	3:21	4:21	5:21	6:21	7:21	8:21	9:21
Lisbon Landing (Walmart)	7:25	8:25	9:25	10:25	11:25	12:25	1:25	2:25	3:25	4:25	5:25	6:25	7:25	8:25	9:25
Norwich Viaduct															9:56

Note - bus will meet Run 9 at Lisbon Landing

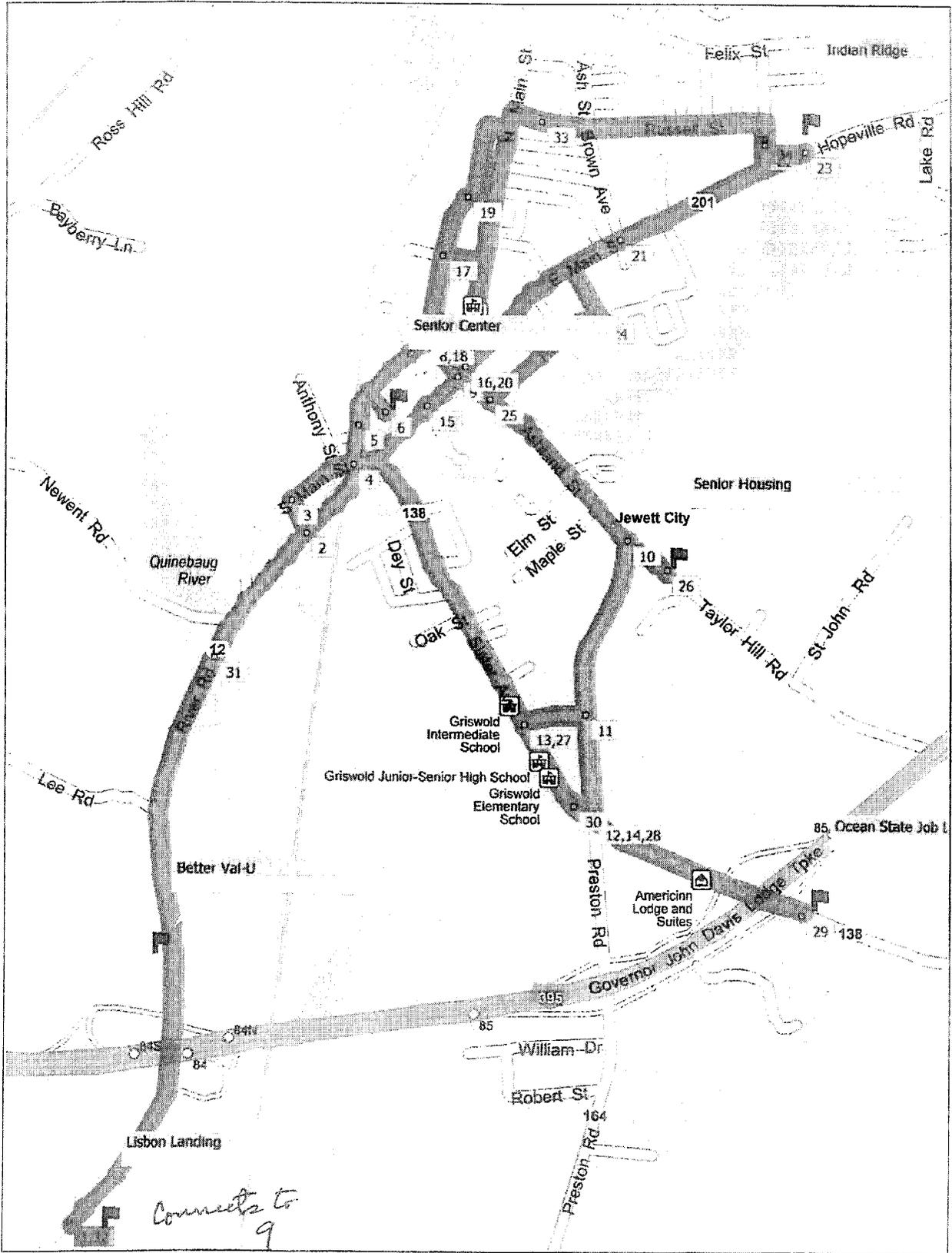
ROUTE 4 MAP



ROUTE 5 MAP



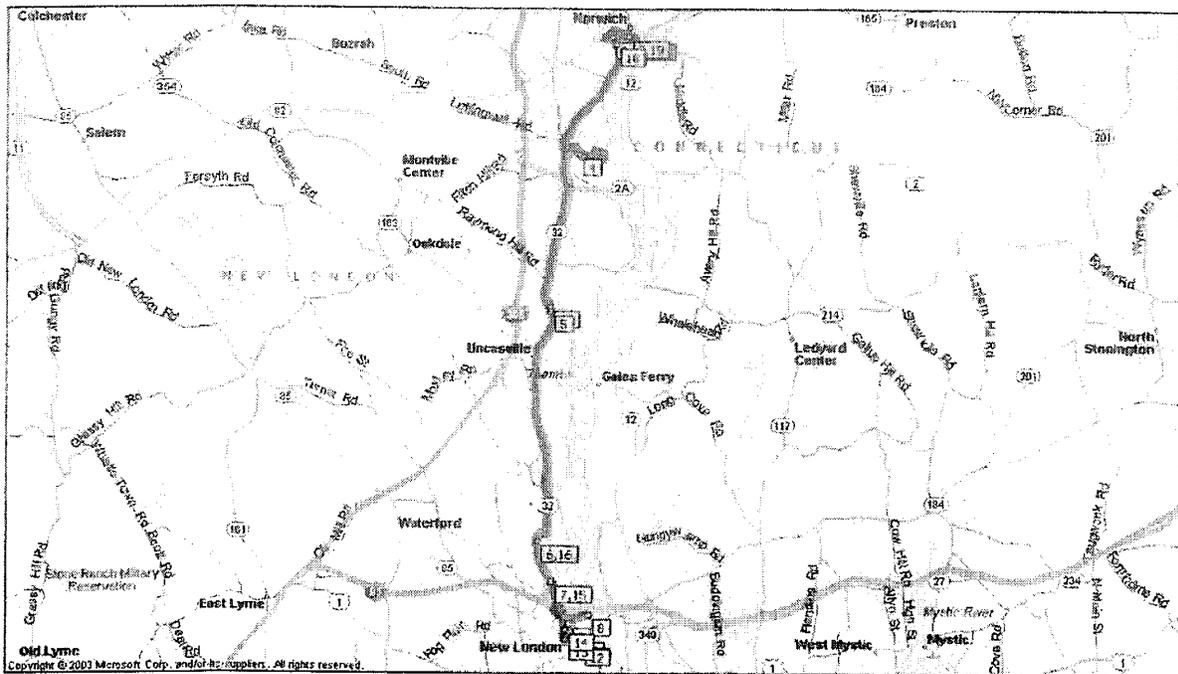
Run 8



Run #: NORWICH / NEW LONDON - Rt. 32

Rt. 12, Viaduct, Water St., W. Main, Rt. 32, Uncas-on-Thames, Rt. 32, Sandy Desert Rd., Mohegan Sun, (Employee & Winter Entrances)
 Sandy Desert Rd., Rt. 32, Montville Commons, Rt. 32, Old Norwich Rd., Williams St, State Pier, Crystal Avc, E. O'Neil, Atlantic St, Water St,
 Gov. Winthrop Blvd, Huntington, Williams, Old Norwich Rd, Rt. 32, Montville Commons, Rt. 32, Sandy Desert, Mohegan Sun (Employee &
 Winter entrances), Sandy Desert, Rt. 32, Uncas-on-Thames, Rt. 32, W. Main, Chelsea Harbor, Water St, Rt. 12, Viaduct

New London / Water St.	-	7:00	9:00	11:00	1:00	3:00	5:00	7:00
Rt. 32 / 163	-	7:20	9:20	11:20	1:20	3:20	5:20	-
Montville Commons	-	7:28	9:28	11:28	1:28	3:28	5:28	-
Mohegan Sun Casino	-	7:35	9:35	11:35	1:35	3:35	5:35	-
Uncas-on-Thames	-	7:45	9:45	11:45	1:45	3:45	5:45	-
Norwich / Trans. Cntr	6:00	8:00	10:00	12:00	2:00	4:00	6:00	-
Uncas-on-Thames	6:10	8:10	10:10	12:10	2:10	4:10	6:10	-
Mohegan Sun Casino	6:20	8:20	10:20	12:20	2:20	4:20	6:20	-
Montville Commons	6:27	8:27	10:27	12:27	2:27	4:27	6:27	-
Rt. 32 / 163	6:35	8:35	10:35	12:35	2:35	4:35	6:35	-
Hodges Square	6:45	8:45	10:45	12:45	2:45	4:45	6:45	-



**CORRIDOR BUS SCHEDULES
NO SUNDAY SERVICE**

Run #2: NORWICH / GROTON / NEW LONDON - Rt. 12 - Monday - Saturday

First and Last Trip

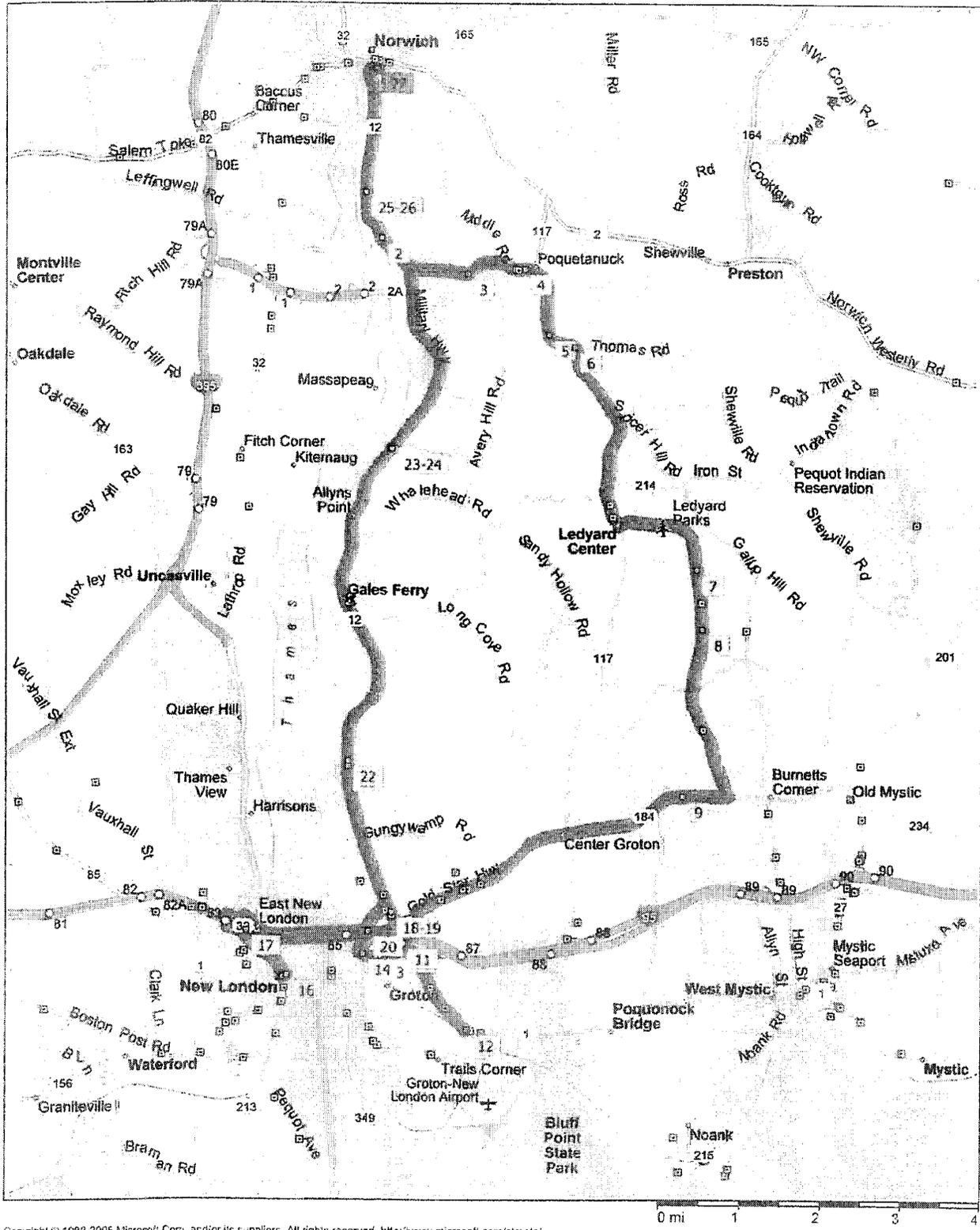
Viaduct, Laurel Hill, Rt. 12, Job Lot, Rt. 12, Sub Base, Rt. 12, Groton Square, Long Hill, Drozdyk, Plaza Court, Long Hill, King's Hwy., Bridge St., I-95, E. O'Neill, Water St., I-95, Bridge St., King's Hwy., Rt. 12, Groton Square, Rt. 12, Sub Base, Rt. 12, Job Lot, Rt. 12, Laurel Hill, Transportation Center.

Midday Route

Viaduct, Laurel Hill, Rt. 12, Route 2A, Route 117, Col. Led. Hwy, Route 184, Walmart, Groton Square, Long Hill, Drozdyk, Plaza Court, Long Hill, King's Hwy., Bridge St., I-95, E. O'Neill, Water St., I-95, Bridge St., King's Hwy., Rt. 12, Groton Square, Rt. 12, Sub Base, Rt. 12, Job Lot, Rt. 12, Laurel Hill, Transportation Center.

Norwich / Trans. Cntr.	7:00					
Job Lot	-	7:15				5:15
Ledyard Center	-	-	9:15	11:15	3:15	-
Sub Base	-	7:25				5:25
Route 184			9:22	11:22	1:22	3:22
Groton Square	-	7:30	9:30	11:30	1:30	3:30
Plaza Court	-	7:45	9:45	11:45	1:45	3:45
New London / Water St.	-	8:00	10:00	12:00	2:00	4:00
Groton Square	-	8:15	10:15	12:15	2:15	4:15
Sub Base	-	8:25	10:25	12:25	2:25	4:25
Job Lot	-	8:40	10:40	12:40	2:40	4:40
Norwich Hospital	-	8:45	10:45	12:45	2:45	4:45
Norwich / Trans. Cntr.		9:00	11:00	1:00	3:00	5:00
						6:55

route 2 map



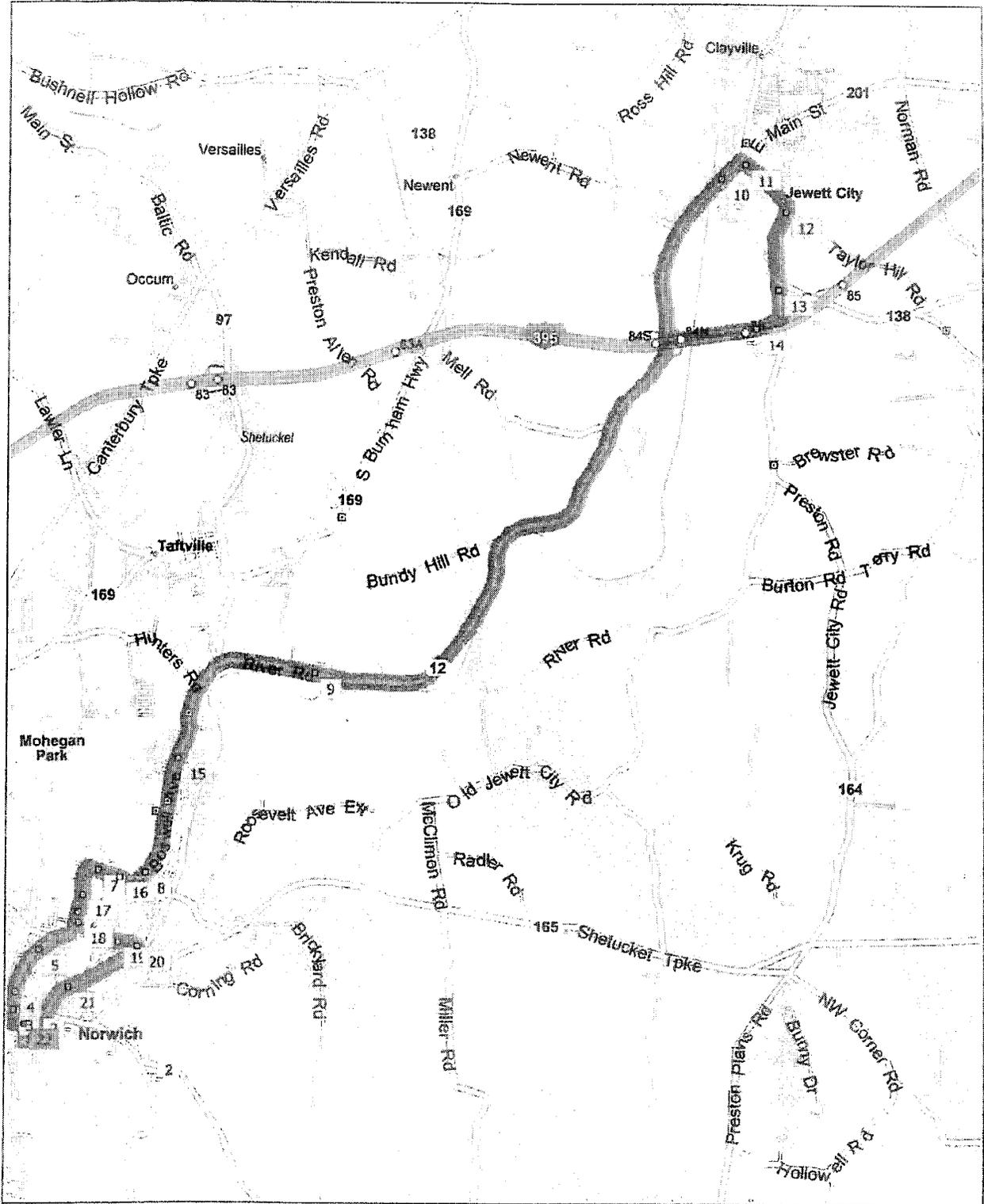
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Run #9 - NORWICH / LISBON LANDING - Rt. 12

Viaduct, Courthouse Sq., Franklin St., Boswell, North, Mohegan Park Rd., Boswell, Rt. 12, Lisbon Landing, Rt. 12, Boswell, Mohegan Park Rd., North St., Boswell, Hickory, Central Rt. 12, Transportation Center.

Norwich / Trans. Cntr.	7:00	8:00	9:00	10:00	11:00	12:00	1:00	2:00	3:00	4:00	5:00	6:00	7:00	8:00	8:55
North Street	7:07	8:07	9:07	10:07	11:07	12:07	1:07	2:07	3:07	4:07	5:07	6:07	7:07	8:07	
Taft Station	7:10	8:10	9:10	10:10	11:10	12:10	1:10	2:10	3:10	4:10	5:10	6:10	7:10	8:10	
Lisbon Landing	7:25	8:25	9:25	10:25	11:25	12:25	1:25	2:25	3:25	4:25	5:25	6:25	7:25	8:25	
Lisbon Landing	7:30	8:30	9:30	10:30	11:30	12:30	1:30	2:30	3:30	4:30	5:30	6:30	7:30	8:30	
Taft Station	7:45	8:45	9:45	10:45	11:45	12:45	1:45	2:45	3:45	4:45	5:45	6:45	7:45	8:45	
North Street	7:50	8:50	9:50	10:50	11:50	12:50	1:50	2:50	3:50	4:50	5:50	6:50	7:50	8:50	

ROUTE 9 MAP



How can I connect to a SEAT bus?

The WRTD Route 32 Commuter Bus serves SEAT's Transportation Center in Norwich, where you may catch one their buses (or you may catch a ride by flagging down a driver along any SEAT route). SEAT requires exact change and fares range from \$1.10 to \$2.10, depending on your destination. Please see a copy of their schedules or for more information call SEAT at **886-2634**.

I work in Norwich Industrial Park or at the Franklin™ Farms® - how will the driver know when I'm waiting for the bus?

This bus serves the Norwich Industrial Park and Franklin Farms only by request. If you would like to be picked up in the Industrial Park or at the Franklin Farms, you must let the dispatch office know at least one day ahead of time - otherwise the bus will not enter those locations. To schedule a ride, please call the bus dispatcher Monday through Friday between 8:00 a.m. and 4:00 p.m. at **456-1462**.

Can I transfer to another WRTD bus?

Yes. You may transfer to another WRTD bus without paying a second fare. Please ask your driver on the Route 32 Commuter Bus for a transfer. Transfers are good only for the next bus after you disembark, after which you'll be asked to pay the fare on the second bus.

What are ten-ride tickets and monthly passes?

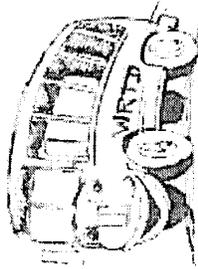
Buying a ten-ride ticket or monthly pass helps you save money. Both may be purchased from the bus driver, or at WRCC, 872 Main Street (call **456-1462** for more information) or at WRTD, 968 Main Street, Willimantic, (phone: **456-2223**)

For information, contact:

WRTD 456-2223

Dispatch 456-1462

Effective 8/04



FARES

Exact change only. Drivers do not handle money.

Within Willimantic (boarding and disembarking north of Old Plains Road)

Regular \$0.70
Person 65 years of age and over* \$0.35
Person with disability** \$0.35
Up to 3 children under age five** Free

Between Willimantic & Norwich

Regular \$2.00
Person 65 years of age and over* \$1.00
Person with disability** \$1.00
Up to 3 children under age five** Free

Save \$\$ with a Ten-ride ticket or monthly pass!

Monthly pass \$50.00
Ten-ride ticket \$15.00

* Proper I.D. required

** Must be accompanied by an adult

Passengers may board and disembark anywhere along the route, at the discretion of the driver. The bus will not stop at a location if passenger safety is at risk.

Route 32 Commuter Bus Service

Willimantic Norwich

Bus Schedules
Maps Fares
General Information

**This service operates
7 days per week.**

**All WRTD services are
open to the public.**



Windham Region Transit District Member Towns:
Ashford, Columbia, Coventry, Hampton,
Manchester and Westboro

Route 32 Commuter Bus Service Willimantic, Norwich and Foxwoods® Casino Resort

Fare: \$2.00 (In Willimantic Trips pay 70¢. Exact change required)

	1	2	3	4
Willimantic				
Windham Heights Apts.	7:55 a.m.	2:20 p.m.	4:50 p.m.	*10:25 p.m.
Holbrook @ Main Street	8:02	2:27	4:58	10:32
Cantor Drive @ Shaw's	8:10	2:35	5:05	10:40
Bridge Street Plaza	8:20	2:45	5:15	10:50
Norwich				
Washington @ Lafayette (closest stop to Backus Hospital)	8:48	3:13	5:43	11:18
SEAT Transportation Center (Viaduct)	8:55	3:20	5:50	11:20
Arrive Foxwoods Resort Casino Employee Entrance	9:15 a.m.	3:45 p.m.	6:15 p.m.	11:45 p.m.
Leave Foxwoods Resort Casino Employee Entrance	9:15 a.m.	3:45 p.m.	6:15 p.m.	12:10 a.m.
SEAT Transportation Center (Viaduct)	9:30	4:00	6:30	12:25
Washington @ Lafayette	9:35	4:05	6:35	12:30
Willimantic				
Downtown Willimantic	10:00	4:30	7:00	12:55

Passengers may board and disembark anywhere along the route, at the discretion of the driver.

The bus will not stop at a location if passenger safety is at risk.

*The Windham Heights stop at 10:25 p.m. is on Route 66 at the entrance to the complex.

APPENDIX C

Documentation of Outreach Efforts

October 30, 2000

Mr. Harry Harris
Bureau Chief
Bureau of Public Transportation
State of Connecticut Department of Transportation
2800 Berlin Turnpike
PO Box 317546
Newington, CT 06131-7546

RE: Hollyhock Station Intermodal Transportation Center
Norwich, Connecticut

Dear Mr. Harris,

Regarding the location of the proposed Transportation Center on Hollyhock Island in Norwich, SEAT offers the following comments in support of this new site:

1. SEAT was an active participant in the site analysis process of July, 1999. We concur with the conclusions of the study compiled by Diversified Technology Consultants (DTC).
2. The original site selected by the City of Norwich, referred to as the Viaduct site, and analyzed in both the Clough Harbour Associates (CHA) Engineering Study of September, 1998, and the DTC study of July, 1999, offers several critical limitations to the Intermodal concept and our operations:
 - Vehicle traffic in and out of the Viaduct site is limited to a single curb cut, on the congested Route 2/12 elevated roadway. The CHA report references "unacceptable over-saturated conditions in the year 2003 even without the parking facility's construction", and recommends Route 2/12 improvements without a corresponding budget allowance.
 - SEAT has requested bus parking for 8 vehicles, to accommodate our critical pulse activity. The Viaduct site schemes offer no more than 4 bus spaces. The Hollyhock site accommodates 8 bus spaces, and would become our new pulse location.
 - The Viaduct site abuts the Providence and Worcester rail line. The Hollyhock site abuts the New England Central rail line. NE Central is the former Amtrak connection to Montreal, and links directly to the New London train station. Your own planning study of September 1998 concluded the NE Central line to be the most viable for eventual passenger service through the Norwich area.
 - The Hollyhock site is across the street from the City of Norwich large vessel pier, and America's Wharf Marina. The Viaduct site, while bordering the Shetucket River, is not viable for boat landings due to a low railway bridge and difficult grade and river current conditions.

In light of the recent Transportation workshops and summit in Connecticut, and the ongoing work by SEAT in New London on Intermodal implementation, it is clear that the site at Hollyhock Island offers the most benefit to our existing bus system, and the most to the region for future rail and water alternatives.

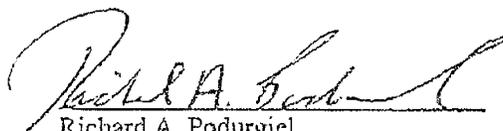
Sincerely,

Thomas F. Kirker, Sr.
CEO & General Manager
South East Area Transit District (SEAT)

NOTICE UNDER THE PROVISIONS OF CONNECTICUT
GENERAL STATUTES SECTION 1-225

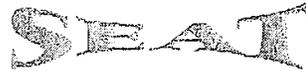
There is hereby posted with the City and Town Clerk of Norwich, Connecticut a notice that an Informational Meeting of the City Council with Representatives of the Norwich Community Development Corporation will be held on Tuesday, June 21, 2005 at 5:00 p.m. in the City Council Chambers for discussion of the following matter:

1. Norwich Intermodal Transportation Center – Design Architect/Engineer, Domenech Hicks & Krockmalnic, Boston, MA.



Richard A. Podurgiel
City Manager

RECEIVED
05 JUN 15 PM 1:07
DEF. ARIANE BRENNAN
TOWN CITY CLERK
NORWICH CT



SOUTHEAST AREA TRANSIT DISTRICT

November 16, 2005

Norwich Community Development Corporation
77 Main Street
Norwich, Ct 06360

Dear Mr. Polubiatko,

I would like to take this opportunity to show our support for additional funding for the Hollyhock Station Intermodal Transportation Center in Norwich, Connecticut. This Intermodal Center will be a great asset to Southeast Area Transit District and our passengers. We believe that with the additional funding to allow the preferred building and grounds scheme it will turn out even better. This scheme is safer, more user friendly and has room for growth.

Safety is always our number one concern in the transit industry. By allowing all eight buses to load and unload in one area the risk of accidents or injury is greatly diminished. The original parking diagram has up to two buses off to the side. This can cause confusion with the busses and the foot traffic around them, all of which can lead to problems. It also lowers the chance of someone missing their bus because it was parked over to the side. This new configuration allows for additional parking spots so we will not have problems with space as we grow.

Safety while exiting and entering the Center will also be addressed in this change. By moving the road the buses are entering and exiting at a bus friendly intersection. The curbs will be cut so that the 40 ft buses will not have to use oncoming traffic lanes when making their turns. There will be a light put in so that the vehicles do not have to cross the flow of traffic when making left turns. It will also help pedestrians by allowing them to cross at a single 4 way intersection, with crossing signals, instead of at one of two three-way intersections.

I feel that this preferred scheme will give the easiest and safest option for our vehicles and passengers. While it will require additional funding, I consider it money well spent for the public transit community. With our ridership continuing to grow and our hope of expanding routes in the future, this Intermodal Center will be a key hub in our service area. This additional funding will take a good thing and make it great.

Please let me reiterate my full support for NCDC in acquiring additional funding for this project. If there are any questions regarding SEAT and this project please contact me at 860-886-2631 ext. 104.

Sincerely,

A handwritten signature in black ink that reads 'Mark McClanan'. The signature is written in a cursive, flowing style.

Mark McClanan
GM, Southeast Area Transit District

ON THE MOVE FOR YOU!



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Engineering,
Landscape Architecture
and Environmental Science

January 3, 2006

NCDC – Pete Polubiatko, Dan Dennis, Dave DiBattista (c/o Pete Polubiatko)
Connecticut Department of Transportation – Dennis Murphy, Keith T. Hall
City of Norwich – Bob Zarnetska, Peter Davis (c/o Pete Polubiatko)
SEAT – Mark McClanan (c/o Pete Polubiatko)
The Downes Group – Mike MacDonald
Domenech Hicks & Krockmalnic – Mickey Krockmalnic, Bruce Hultgren

**Re: Norwich Intermodal Transportation Center
CEPA Environmental Impact Evaluation / NEPA Environmental Assessment
Norwich, Connecticut
MMI #2674-01**

Dear Team:

Enclosed for your review and comment is a Working Draft copy of the joint CEPA Environmental Impact Evaluation and NEPA Environmental Assessment for the Norwich Intermodal Transportation Center. This is a draft document and should not be circulated beyond the internal review team.

As you know, the project schedule for the EIE/EA is of critical importance, since the design and construction phases of the project are dependent upon approval of the EIE/EA. We are hoping to publicly notice the document by mid-January and therefore ask that you provide comments by next Wednesday, January 11, 2006. You may email comments to jeanineb@miloneandmacbroom.com or simply "mark up" the enclosed copy and send it back (via express mail, if possible) so that we can incorporate your comments, questions, and corrections prior to making the document available to the public. Also, please feel free to call me directly at 203-271-1773.

In addition to your technical, operational and administrative perspectives, the institutional and project history that you all bring to the table is enormously valuable. I thank you in advance for your time in reviewing the enclosed document and providing input.

Very Truly Yours,

MILONE & MACBROOM, INC.

Jeanine Armstrong Bonin, P.E.
Principal

Enclosure

010306-dist-ltr.doc

John M. Milone, P.E.
James G. MacBroom, P.E.
Vincent C. McDermott, P.A.S.L.A., A.I.C.P.

Robert A. Jackson, L.S.
John R. Gilmore, P.E.
Edward A. Hart, P.E.
Thomas R. Sheil, L.A.
Stephen R. Dieckro, P.E.
Jeanine A. Bonin, P.E.

David W. Dickson, L.A.
Thomas J. Daly, P.E.
W. Andrew Greene, P.E.
David L. Overton, P.E.
Anthony A. Chiello, P.E.
Nicole Burnham, P.E.
Mark Arigoni, L.A.
Michael J. Joyce, P.E.
Michael F. Mansfield, L.S.
David Murphy, P.E.

Rodney I. Shaw, L.A.
David R. Bragg, P.E., L.S.
William A. Root, M.E.S.
Garret Harlow, L.A.
Thomas P. Balskus, P.E.
Paul F. Mills, P.E.
Ken W. Klober, P.E.
Penelope B. Savinier, L.A.
Kishor Patel, P.E.
James F. Kulp, P.E.
Ted G. Crawford, P.E.
Steven D. George, P.E.
Ryan R. Chmielewski, L.A.
Reuben S. Jones, III, P.E.

Meeting Notes – Jeanine Bonin – Milone & MacBroom, Inc.
12-8-06 Meeting @ NCDC re: Norwich Transportation Center

Attendees:

Dave DeBatista, NCDC
Pete Polubiatko, NCDC
Michael MacDonald, Downes Group
Ben Lathrop, City of Norwich
Mark McClanan, SEAT
Jeanine Bonin, Milone & MacBroom, Inc.

Review of FTA letter dated November 17, 2006

Item #1 – Single Preferred Alternative

- pg 2-43, last paragraph of section 2.3.8 – delete, check for other in section 4.0

Item #2 – Documentation of Transit and Parking Needs

- Rail Service – one of two rail lines will develop – if not the one we are adjacent to, will run a shuttle to the other. Projected timeline is 5 to 10 years.
- Ferry will be navigable to state hospital. Mohegans have been emphasizing ferry, want access, would need to put a RR bridge. Norwich would be a logical touchdown point from LI to NTC, then shuttle to casino.
- 220 spaces – justification for parking demand – Bradley Airport
- Len Lapsis @ DOT – Rail – RFQ on commercial rail in next several months – study 1 to 2 years
- Regional study – surrounding cities and towns are the service area, not downtown Norwich – 32/82 intersection – popular source of riders, who will be closer to the new facility
- Service area within the region, locale to downtown area as a secondary proximal goal
- Size limitation – acreage, site geometry – minimum dimensions
- Lack of mass transit – casino has build commuter lots to address parking and shuttle service for its employees.
- Improving transit service – 2003 grand with 2005 study – public transportation options service, 94/95 period
- 220 space justification – welfare to work program (percentage owning cars); Wauregan Hotel (low to moderate income apartments located on Broadway and Main); Viaduct parking; Casino patrons and employees (both Foxwoods and Mohegan are expanding); future ferry parking; future rail user parking; future Norwich State Hospital development (instead of Utopia, Preston has no provision for on-site housing, 22,500 employees forecast); Bradley Shuttle; Backus employee shuttle may have need; College expansion
- Run #7 – Norwich only – 106% increase in 4 years to Mohegan Sun – will be moving closer
- Garage is being designed to be expandable
- "Transit" = Changing Modes
- No parking allowed on site – 20,000 people not allowed to park on site except for some employee designated. Foxwoods lots are full.

Items #3 & 4 – Potential Benefits and Impact on SEAT Operations, SEAT Rider Outreach

- Previous letter from Mark dated 11-16-05 and 10-30-00 letter from SEAT
- 6-21-05 Public Meeting
- Minimal effect on riders will occur if SEAT plans ahead
- Info – signs are posted in busses, public announcements in paper, newspaper articles, advertisements in newspapers
- Viaduct will either remain a stop or adjust other stops through the City
- Safety – grade level railroad crossing
- Pick up in city to bring to island – will add ± 10 minutes to some routes, will cut time on others – need to completely adjust schedule and operations
- Benefits of island – western run is highest productive run with worst overtime performance. New location will improve.
- From New London will add ± 5 minutes
- Will need to readjust -- ripple effect similar to Lisbon Landing and other developments
- Benefits – covered parking, safety, driver rest room area, vending machines, patron and passenger comfort with amenities, security cameras, vehicular safety of patrons, predictability of bus location, increased tourism, increased ridership
- Traffic safety – signaled intersection, availability of parking, handicapped accessibility
- Marked bus stops in Central Business District in lieu of Viaduct
- City will work with SEAD – Viaduct is not convenient and people complain about the walking distance. This would be an improvement. Would be unacceptable otherwise.
- More than one bus will go through downtown (#9, #7, #2) in both directions. Employees of Foxwoods, Mohegan, Wal-Mart.
- The Viaduct is within the CBD, but so is the island.
- Washington to Burnham Square. Harbor is the heart of Norwich
- Appendix E, Add new subsections – 3.5.8 and 4.5.8
- SEAT brings a hands-on understanding of the needs and locale of their riders, complaints received on a regular basis. 1,000,000 annual ridership on SEAD with an 8% increase per year.
- SEAT routinely surveys its ridership.



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Landscape Architecture
and Environmental Science

December 19, 2006

Mr. Edgar T. Hurlle, Transportation Planning Director
Bureau of Policy and Planning
Connecticut Department of Transportation
2800 Berlin Turnpike, P.O. Box 317546
Newington, CT 06131-7546

RE: Norwich Intermodal Transportation Center
NEPA Environmental Assessment/CEPA Environmental Impact Evaluation
Norwich, Connecticut
MMI #2674-01

Dear Mr. Hurlle:

On behalf of the Norwich Community Development Corporation (NCDC), we are pleased to provide the following responses to the November 17, 2006 comment letter to you from Richard Doyle, Regional Administrator of the Federal Transit Administration (FTA) with regard to the above-referenced project. Modifications have been made to the October 2006 proposed Environmental Assessment (EA) to address each of the FTA's comments. Two copies of the revised EA (dated December 2006) are included with this submission. In an effort to expedite the review of modifications to the document, text modifications have been made in blue.

Taking each of Mr. Doyle's numbered comments in order, our responses are detailed below.

Comment #1 – Single Preferred Alternative

Recognizing that the FTA can only put forth a single preferred alternative, the reference to a secondary alternative has been deleted on page 2-43 of the October 2006 EA draft. That fall-back option was identified in the event that the full preferred alternative was not funded. However, that is no longer an issue since the NCDC has received the necessary funding for preferred Alternative #5.

Comment #2 – Documentation of Transit and Parking Needs

For several decades, regional transit needs in southeastern Connecticut have been a focal point of the City of Norwich as well as the Connecticut Department of Transportation and the Southeastern Connecticut Council of Governments (SECCOG). During this time, the SECCOG has generated a significant amount of data and analysis that documents the transit need in the region. Copies of previous correspondence and analysis are attached hereto. Additionally, Mr. S. Richard Guggenheim, Assistant Director of the SECCOG, has provided an updated analysis dated December 14, 2006, a copy of which is also attached. Utilizing this body of documentation, Section 1.2.3 of the EA has been expanded to provide the requested documentation of transit need as well as the projected parking demand associated with transit riders. Relevant correspondence and documentation has also been included in Appendix D of the EA.

John M. Milone, P.E.
James G. MacBroom, P.E.
Vincent C. McDermott, FASLA, AICP
Robert A. Jackson, L.S.
John F. Giunore, P.E.
Edward A. Hart, P.E.
Thomas R. Sheit, L.A.
Stephen R. Dietzka, P.E.
Jeanine A. Bonn, P.E.

David W. Dickson, L.A.
Thomas I. Daly, P.E.
W. Andrew Greene, P.E.
Dawn L. Overton, P.E.
Anthony A. Ciridello, P.E.
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Kishor Patel, P.E.
James F. Kutpa, P.E.
Ted G. Cravatore, P.E.
Steven D. George, P.E.
Ryan R. Cimielowski, L.A.
Reuben S. Jones, III, P.E.

Mr. Edgar T. Hurle
December 19, 2006
Page 2

It is important to note that parking projections for the Intermodal Transportation Center (ITC) are solely for transit riders. No reserve has been allocated for local downtown parking nor is that type of demand anticipated at this location. As described under the response to FTA Comment #5, the location of the proposed Norwich ITC is regionally proximal to the geographic centroid of downtown Norwich at Franklin Square but is located at the western edge of the business district in an area that is not expected to draw local business patron parking.

The FTA raised a related concern relative to the appearance that the alternative site analysis may have excluded sites that could not accommodate the parking garage but that may in fact be appropriately sized for the other components of the ITC. The alternative site selection analysis did not consider nor did it dismiss sites based upon the ability to accommodate a parking garage. In fact, the parking garage for the preferred alternative will occur *above* the footprint of the active transit portion of the facility and, therefore, no long-term surface parking is proposed that would require additional space on the site. Only one site (Site E) was eliminated from consideration in part due to its size at only one-half acre. By comparison, the proposed ITC site on Hollyhock Island is 1.4 acres in size with a station footprint of slightly more than 0.9 acres.

Comment #3 – Potential Benefits and Impact on SEAT Operations

The benefits to South East Area Transit (SEAT) operations were, perhaps, so clear in the minds of the document preparers and draft document reviewers that we failed to clearly articulate them in the EA. Additional narrative has been provided in numerous sections of the EA to document both the benefits to SEAT operations as well as the lack of impact as a result of construction and operation of the proposed ITC.

While the ITC site is technically located within downtown Norwich, it is somewhat less centrally located as compared to the existing SEAT hub near the Route 12 viaduct. To mitigate for the location change, SEAT will run regular shuttle service between downtown bus stops and the new ITC such that residents who currently walk to the Route 12 site will be able to take a shuttle to the new ITC. The City of Norwich has committed to working with SEAT to locate additional, suitable bus stops such that riders will not be significantly impacted by this change. More than one bus route would incorporate the new downtown stops. At this time, it is anticipated that SEAT bus routes 2, 9, and 7 would provide expanded downtown service. Interestingly, the relocation of the SEAT hub to Hollyhock Island will provide a more convenient location for some SEAT patrons who have previously complained about the walking distance to the existing SEAT hub. Additionally, the proposed site on Hollyhock Island will provide a marked improvement relative to pedestrian access and safety as compared to the existing viaduct site, which is physically isolated by the rail line and extensive roadway network.

Safety has long been one of SEAT's concerns relative to its current location and is one of the most significant benefits of the proposed ITC. The new facility will enable passenger loading and unloading in one location with clearly marked bus and pedestrian accessways. This will greatly diminish the risk of accidents or injury to SEAT patrons. The new facility will also operate in a more

orderly and organized fashion, resulting in less confusion and fewer missed busses. The predictability of bus locations is also expected to improve passenger efficiency and user-friendliness.

Traffic patterns and bus ingress and egress at the proposed ITC are superior to existing operations at the Route 12 viaduct. Traffic flow at the existing Route 12 facility is cumbersome. Ingress and egress to and from the site occurs via a two-lane roadway. When the 40-foot long busses pull into traffic, they cause a bottleneck in traffic flow. The signaled intersection at Falls Avenue and West Main Street will allow for safer, more controlled traffic patterns.

The proposed facilities will also offer numerous added amenities. The new facility will provide covered parking, driver restrooms, and vending machines, all of which will add to the comfort and safety of bus drivers and passengers. The new facility will be equipped with security cameras that will also improve the safety aspects of operations. Finally, the proposed ITC will expand operations up to 11 bus berths whereas the existing facility is limited with no room for expansion.

Additional documentation has been included in the EA under existing conditions (Section 3.3), impact analysis (Section 4.3) and mitigation (Section 5.4) under the general heading of Community Facilities and Services to document anticipated benefits and impacts to SEAT operations and SEAT patrons.

Comment #4 – SEAT and SEAT Rider Outreach

The FTA is correct in highlighting the need for SEAT outreach. SEAT representatives have been consulted prior to and throughout the CEPA/NEPA process. They have regularly attended consultation meetings with the CEPA/NEPA team. They provided input relative to the alternatives analysis as well as the evaluation of potential impacts. They were provided a working draft copy of the EA prior to its submittal to the DOT and the FTA whereupon they provided valuable input and direction relative to existing and future SEAT operations. Relevant SEAT correspondence that documents the consultation process has been included in Appendix D of the EA.

The SEAT ridership is a diverse and transient population. Through regular surveys and driver contact with the riders, SEAT representatives have been able to relay rider needs and concerns to the CEPA/NEPA team, all of which were considered in the alternatives and impact analyses. Additionally, direct SEAT rider input opportunities have been provided in several open public forums, including a public meeting held on June 21, 2005 and public scoping process that commenced on August 2, 2005. No concerns were raised by SEAT riders in either of these public forums. We agree with the FTA that both SEAT and SEAT riders will be active participants in the review of the EA. Additionally, SEAT riders will be actively engaged prior to and during the implementation of the transition as documented in the revised EA.

Comment #5 – Alternatives Site Analysis and Scoring

The FTA accurately notes that "proximity to downtown Norwich" is defined more broadly in the EA than the traditional quarter-mile catchment area that is typically used for busses. The proposed facility is intended to serve as the hub of SEAT, the regional bus provider, servicing nine cities and

towns and covering nearly 500 square miles in area. The alternatives site analysis compared seven locations in Norwich with proximity to the existing state highway network, two established rail lines, Norwich Harbor and the recently completed large vessel pier, and to a lesser extent the downtown area. The one-half mile between the existing viaduct lot site and the proposed Hollyhock Island location is relatively insignificant in the scale of regional geography, service area, and superior transportation connectivity. Therefore, proximity to downtown is in a regional context. Additional narrative has been provided in the project purpose and need to clarify this point. Table 2-3 reflects this context relative to proximity and was intended to provide a snapshot summary of a fairly lengthy discussion on alternative sites rather than an "all or nothing" (Y/N) analysis.

Two copies of the site relocation justification report are included with this submission as received and approved by the FTA in Richard Doyle's letter dated February 2, 2001. This information is being provided to aid in the FTA's internal review and is not intended for inclusion in the EA itself.

The intent of the alternatives site analysis was not to dismiss out-of-hand those sites that are located off Hollyhock Island. Rather, the project seeks to access to a waterway that is navigable by ferry watercraft. As documented in EA Section 1.2.2., a basic element of the project purpose is to incorporate water transportation into the ITC operations. Maintaining proximity to the existing city ferry pier is listed as a locational objective of the project but not fundamental to the project purpose.

Review of the EA in light of the FTA's comment revealed numerous opportunities to clarify the objective of water transportation in the context of the alternatives analysis. Changes have been made throughout Section 2.2 to present this element of the review in a more balanced fashion.

Comment #6 – Expected Time Frames

Section 2.4 of the EA describes the preferred alternative. Additional narrative has been added to the end of this section describing expected time frames of all project components.

Comment #7 – Section 106 Determination and Section 4(f) Finding

The Connecticut State Historic Preservation Office (SHPO) reviewed the Phase 1A Archaeological Assessment Survey (dated December 2005) for the ITC and generally concluded with its findings (1) that the project area is of low archaeological sensitivity; (2) that the Mahoney Block (Thayer Block) at 71-73 West Main Street is a National Register-eligible resource adjacent to the project area but will not be affected as the project is currently planned; and (3) that the railroad station abutments, timber bulkhead, and other features of historic interest are adequately and appropriately documented by the Phase 1B report.

In a letter dated December 13, 2006, SHPO states that it "*believes that the proposed Intermodal Transportation Center will constitute no adverse effect upon Connecticut's cultural resources.*" The SHPO's finding of No Adverse Effect is contingent upon the Connecticut DOT conducting additional investigation, once plans are finalized and specific impact areas are known, to determine if the fill that was used to create Hollyhock Island in the 1830s included one or more hulls of wooden sailing vessels as were found elsewhere along the Norwich waterfront and to make recommendations for

Mr. Edgar T. Hurle
December 19, 2006
Page 5

their recovery, preservation, or documentation, as appropriate. This additional consultation with the SHPO will take place prior to construction.

With these understandings, the Section 106 and 4(f) requirements are met for this stage of the planning process. Additional discussion is included in the EA in Sections 4.6 (impact analysis) and 5.7 (mitigation opportunities) to document Section 106 and 4(f) requirements and findings.

Comment #8 – Funding Table

Table 1-1 has been modified to reflect that FY01 Section 5309 Bus Discretionary Earmark in the amount of \$990,315 has lapsed. A note has been added to reflect the extension status on the FY03 earmark in the amount of \$2,606,748. Additionally, \$7.2M was added to the city contribution column as a result of an allocation contained in the State of Connecticut Transportation Bill of 2006.

Summary

We trust that the changes to the draft EA along with the additional documentation and clarifications provided herein address the FTA's comments. It is NCDC's hope that the final review can be expedited such that the EA can be published in mid-January. As always, should you have any questions or require additional clarification, please do not hesitate to contact me.

Very truly yours,

MILONE & MACBROOM, INC.



Jeanine Armstrong Bonin, P.E.
Vice President

Enclosures

2674-01-c1906-ltr.doc



STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION



2800 BERLIN TURNPIKE, P.O. BOX 317546
NEWINGTON, CONNECTICUT 06131-7546

Phone:

TO: Interested Parties

FROM: Edgar T. Hurlburt
Transportation Planning Director
Office of Intermodal and Environmental Planning
Bureau of Policy & Planning

DATE: February 20, 2007

SUBJECT: Federal Environmental Assessment -- Draft Connecticut Environmental Impact
Evaluation
Norwich, Connecticut
State Project No. 103-245

Enclosed for your information is a copy of a Federal Environmental Assessment/Draft Connecticut Environmental Impact Evaluation (EA/DEIE) for the subject project. Written comments on the document may be submitted to me at the letterhead address, or faxed to (860) 594-3377, on or before April 9, 2007.

A Public hearing on this project has been scheduled for Monday March 26, 2007 at 7:00 p.m. at the Norwich City Hall, 100 Broadway - Third Floor, Norwich, CT. Notice of availability of the document and of the public hearing was published in the Norwich Bulletin, the New London Day and in the Connecticut Council on Environmental Quality Environmental Monitor.

This EA/EIE was prepared pursuant to 23 CFR 771.119 and the Regulations of Connecticut State Agencies, Sections 22a-1a-1 to 12, inclusive.

Enclosure

cc: The Honorable Benjamin P. Lathrop, Mayor, City of Norwich
Mr. Joseph Loyacaro, Public Works Department, City of Norwich
Mr. William Mansfield, City Engineer, City of Norwich
Mr. Peter Davis, Director, Planning and Development, City of Norwich
Mr. Robert Zarnetsky, City Manager, City of Norwich
Ms. Paulette Craig, Zoning Enforcement Officer, City of Norwich
The Honorable Christopher J. Dodd, U.S. Senator
The Honorable Joseph I. Lieberman, U.S. Senator
The Honorable Joseph Courtney, U.S. Representative, Second Congressional District
The Honorable Edith Prague, State Senator, 19th District
The Honorable Ellisa T. Write, State Representative, 41st District
The Honorable Jack Malone, State Representative, 47th District
The Honorable Melissa Olson, State Representative, 46th District
Hon. Gina McCarthy, Commissioner, Department of Environmental Protection
Mr. Thomas Morrissey, Bureau Chief, Bureau of Outdoor Recreation, DEP
Ms. Denise Ruzicka, Director, Inland Water Resources Division, DEP
Mr. Brian Emerick, Department of Environmental Protection
Hon. Ronald Angelo, Dep. Commissioner, Dept. of Economic and Comm. Development
Mr. Karl J. Wagener, Council on Environmental Quality
Mr. Greg Mannesto, U.S. Fish and Wildlife Services
Hon. Robert M. Ward, Commissioner, Conn. Dept. of Motor Vehicles
Hon. J. Robert Galvin, M.D., M.P.H., Commissioner, Conn. Dept. of Public Health
Mr. James Okrongly, Assistant Chief of Planning, Conn. Dept. of Public Health
Ms. Elizabeth Higgins, U.S. Environmental Protection Agency, Region 1
Mr. Willie Taylor, U.S. Department of the Interior
Ms. Sara Williams, U.S. Fish and Wildlife Services, Region 5
Ms. Jeannine L. Dube, U.S. Fish and Wildlife Services
Ms. Christine Godfrey, Chief, Regulatory Branch, U.S. Army Corps of Engineers
Mr. Wayne Bogovich, State Conservation Engineer, U.S. Department of Agriculture
Mr. Richard Doyle, Regional Administrator, Federal Transit Administration, Region I
Mr. Bradley Keazer, Division Administrator, Federal Highway Administration
Mr. James S. Butler, AICP, Executive Director, S.E. CT. Regional Council of Governments

Keith T. Hall/kth

bcc: Comr. Carpenter -- Dep. Comr. Boice -- Dep. Comr. Curtis
Judd Everhart
Charles S. Barone -- Edgar T. Hurle
Peter Richter -- Mark D. Neri
Michael Lonergan -- Richard T. Jankovich
James H. Norman, Acting Engineering Administrator
Manager of State Design
Cynthia S. Holden -- Keith T. Hall

S:\Po\plan\4802\kth\norwich\Interested Parties Ltr 11-13-07

22). Partners and family seem to make it getting angry and frustrated isn't necessarily directed appropriately. Use your love as

we're not crazy. The fact that others don't see it isn't there. Believe your own perception. Relax by asking for help.

22). Superficially, a task seems easy, but an meets the eye. Add the missing layers of a destination, and thus your reward, soon

21). Improve your environment. After all, it's spherically and actually. You don't have to be to a masterpiece. All you have to be is creative.

21). A loved one is afraid that if you have a need her anymore. Don't buy into this fear. Help others is to shine your light as big and

20). Life on hold? Still at the mercy of a reason you should feel honored by scraps. Place your energies where you'll get

19). You're the rock of your group. Others are strong enough to share. It's rewarding to dig in. Get your hands dirty.

18). You're at an intersection. Down one way and a glorious, but very distant oasis. Suddenly you can't see a thing. How advert

20). It seems like everyone wants your really getting for it? Wait until you know that you love, joy, joy. It's not what you have; it's

CRYPTOQUOTE

WBXWKB KSUB

STI SE EX YB RT

ALP ALBOSTQ XA

GRLK LBSTBL

cryptoquote: I NEVER WORRY THE ONLY CARROTS THAT E THE NUMBER YOU GET IN A B WEST

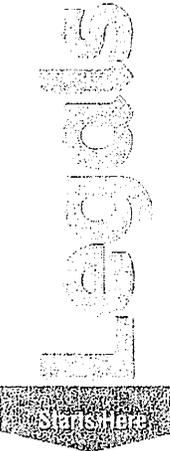
THAT SCRAMBLED WORD GAME by Henri Arnold and Mike Argentin



Now arrange the circled letters to form the surprise answer, as

Used Auto Parts
133 Corning Rd Norwich
860-887-0100

CASH PAID
For Junk Cars
Trucks, Large
Trucks, Farm
equipment,
FREE REMOVAL
24 hr towing
KLEEMANN
TOWING SERVICE
(860)899-0045



Legal Notices

February 14, 2007

NOTICE OF SALE
RESPECTING ESTATE MATTER

By order of the above-captioned court, notice is hereby given by Christopher Felton ("Plaintiff") to Mrs. Carl Gilliland of New York City, New York, her heirs, successors and assigns, and any and all unknown persons, claiming or who may claim any rights, title, interest or estate in or lien or encumbrance upon certain real property located in the Town of Sterling, County of Putnam, State of Connecticut, consisting of the south half of the portion of Tax Lot 20 in the Town of Sterling located east of the Quandoc River, more fully described in the complaint filed in the above-captioned action, of an action to quiet title in Plaintiff's name to the described property. Anyone having or believing they have an interest in this property may file an appearance in the above-captioned lawsuit within two days of the above return date.

David S. Rintoul
Brown, Paindiris & Scott, LLP
2252 Main Street
Glastonbury, CT 06032
(860) 659-0700



NORWICH COMMUNITY DEVELOPMENT CORPORATION ANNOUNCEMENT

The City of Norwich, acting through the Norwich Community Development Corporation (NCDC) and in cooperation with the Connecticut Department of Transportation will hold a public hearing on the environmental document for a proposed intermodal transportation center on Hollyhock Island in Norwich. The meeting will be held on Monday, March 26, 2007 at 7:00 p.m. at City Hall (3rd Floor) at 100 Broadway, Norwich, Connecticut. The project is identified as State Project No. 103-238.

The proposed intermodal transportation center will include a new multi-level parking structure with 220 spaces; a new bus station; accommodations for shuttle and limousine service to nearby attractions; water access to pedestrians; linkage to water transportation; and services compatible with the activation of passenger rail service. The project will also include related site improvements and utility relocation to support the new development.

A Draft Federal Environmental Assessment/Draft Connecticut Environmental Impact Evaluation has been prepared for this project in accordance with 23 CFR 771.119 and pursuant to the Regulations of Connecticut State Agencies Sections 22a-1a-1 through 12, inclusive. This document is available for public inspection at the Connecticut Department of Transportation, Bureau of Policy and Planning, 2800 Berlin Turnpike, Newington, CT; the Federal Highway Administration Region 1 office, 55 Broadway, Suite 920, Cambridge, MA; Norwich Community Development Corporation, 77 Main Street, Norwich, CT; City Clerk's Office, 100 Broadway, Norwich, CT; the Otis Library, 2-6 Cliff Street, Norwich, CT; and the Southeastern Connecticut Council of Governments, 5 Connecticut Avenue, Norwich, CT.

Personnel from the City of Norwich and the Connecticut Department of Transportation will be available at the meeting to answer any questions the public may have. A copy of the environmental document for the project will also be available for public inspection.

All persons interested in this matter are welcome to attend the public hearing. Deaf and hearing impaired persons wishing to attend this meeting and requiring an interpreter may make arrangements by contacting the Department of Transportation's Office of Communications at (860) 594-3052 (voice only) at least five working days prior to the meeting.

The name can first price Aver Rand Joly

Susanne A. Lambert, Chairman

The Arc of Quinebaug Valley Public Notice to Bus and Taxi Operations

The Arc of Quinebaug Valley, Inc. is applying for a capital grant under Section 5310 of the Federal Transit Act, as amended, to replace a vehicle to be used in meeting the special transportation needs of the elderly and/or disabled in the 13 town area of Northeastern Connecticut.

Any interested transit or paratransit operator in the proposed service area may review the proposed application by contacting Linda R. Lamoureux, 667 Cook Hill Road, Danielson, CT 06239. Phone: 860-774-2827.

A public hearing will be held if requested by interested parties.

Any comments should then be sent to The Arc of Quinebaug Valley, Inc. with a copy to the Northeast Connecticut Transit District, 125 Putnam Pike, P.O. Box 759, Dayville, CT 06241.

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Interested application Ernest Jon nue, Dani (860) 774-

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Date:

lein.com



PUBLIC HEARING

Federal EA / Connecticut EIE Intermodal Transportation Center Norwich, Connecticut

Presented By:

Mark E. Block, Esq. – Legal Counsel
Jeanine Armstrong Bonin, P.E. – CEPA/NEPA Engineer
Michael MacDonald – Program Manager
Mickey Krockmalnic – Project Architect

March 26, 2007



PURPOSE OF TONIC'S MEMORANDUM

1. Provide background information.
2. Present the project purpose and objectives.
3. Provide a forum for gathering input from the public.
4. Understand public's interests and concerns.
5. Identify questions to be answered.
6. To meet CEPA and NEPA public hearing requirements.



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MEETING AGENDA

Opening Remarks – Mark Block, Esq.
O'Brien, Shafner, Stuart, Kelly & Morris, P.C., Norwich, CT

CEPA/NEPA Assessment – Jeanine Armstrong Bonin, P.E.
Milone & MacBroom, Inc., Cheshire, CT

Project Status – Michael MacDonald, Program Manager
The Downes Group, New Britain, CT

Project Design – Mickey Krockmalnic, Architect
Dominick, Hicks & Krockmalnic, P.C., Boston, MA

Public Comments – Open

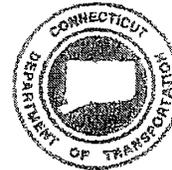
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PROCEDURAL QUESTIONS

Questions regarding the CEPA/NEPA process may be directed to:

Keith T. Hall
Transportation Supervising Planner
State of Connecticut
Department of Transportation
2800 Berlin Turnpike
Newington, CT 06051
860-594-2926
Keith.Hall@po.state.ct.us



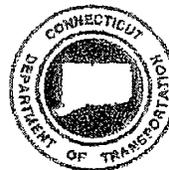
MILONE & MACBROOM, INC.



WRITTEN COMMENTS

Written comments may be submitted until April 9, 2007 to the following address:

Edgar T. Hurlle
Transportation Planning Director
State of Connecticut
Department of Transportation
2800 Berlin Turnpike
Newington, CT 06051



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RULES OF ORDER

- Use speaker Sign-in Sheet. 
- Speakers will be called in order of sign-in.
- Keep comments to 3 minutes or less. 
- No verbal responses will be provided tonight.
- Formal written response to public comments to follow. 
- All comments are being recorded and a written transcript will be generated for the record.

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WHAT ARE CEPA AND NEPA?

1. State and Federal acts that apply to certain publicly funded projects.
2. A mechanism for early planning and coordination among interested parties, including the public at large.
3. A process of evaluating environmental impacts such that they can be avoided, minimized, and mitigated.



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WHAT CEPA AND NEPA ARE NOT

- A final sign-off. Local, state and federal permitting follow the CEPA/NEPA process, with additional opportunity for public input.
- A final project design. Design will be ongoing over the next several months.

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CEQA / NEPA COMPONENTS

1. Define Project Purpose and Need
2. Evaluate Alternatives
3. Define Affected Environment
4. Evaluate Potential Impacts
5. Identify Mitigation for Unavoidable Impacts
6. Incorporate Public Input Throughout

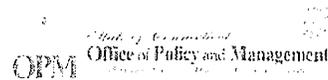


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CEQA / NEPA PROCESS & TIMELINE

1. Public Notice of Document Availability
(February 20, 2007)
2. Public Hearing (March 26, 2007)
3. Close of Public Comment Period (April 9, 2007)
4. Response to Public Comments
5. Record of Decision
6. Decision by the Connecticut
Office of Policy and
Management



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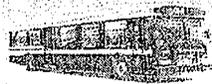
PROJECT PURPOSE

- Reduce traffic congestion through alternative transportation.
- Combine rail, automobile, bus, and water transportation with pedestrian traffic.
- Gain better access to highways.
- Create improved public access to the waterfront.
- Foster attraction to tourist oriented businesses.
- Provide a safer environment for pedestrian and vehicular traffic.

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PROPOSED ACTION

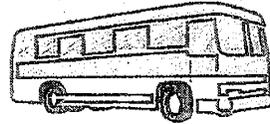
1. Construct a new bus transit station.
2. Provide accommodations for shuttle and limousine services. 
3. Construct a new multi-level parking structure.
4. Provide pedestrian access to the waterfront.
5. Provide future link to water transportation.
6. Provide future link to commuter rail. 
7. Construct utility and roadway improvements.

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OPERATIONAL OBJECTIVES

- Safety and security of bus riders and parking garage users.
- Ease of riding public's access to buses.
- Efficiency of bus operations (easy in/easy out).
- Project a regional transportation image.



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ALTERNATIVE SITES EVALUATED

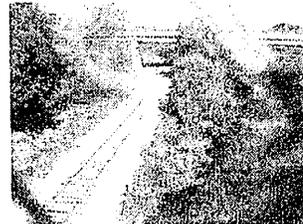
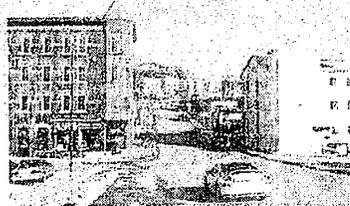
- Site A – Route 12 Viaduct Lot
- Site B – Hollyhock West
- Site C – Hollyhock Central
- Site D – 74 West Main Street
- Site E – Police Station
- Site F – Ferry Landing
- Site G – South of Police Station

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DESIRABLE SITE FEATURES

- Maintains proximity to regional roadways.
- Maintains proximity to existing SEAT bus routes.
- Maintains proximity to future commuter rail.



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DESIRABLE SITE FEATURES (Cont)

- Maintains proximity to navigable waters.
- Maintains proximity to downtown Norwich.
- Facilitates pedestrian access to transportation center.
- Maintains a high degree of visibility.

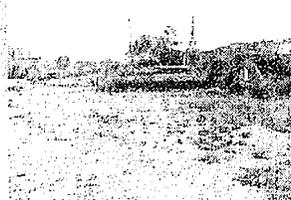


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PREFERRED ALTERNATIVE

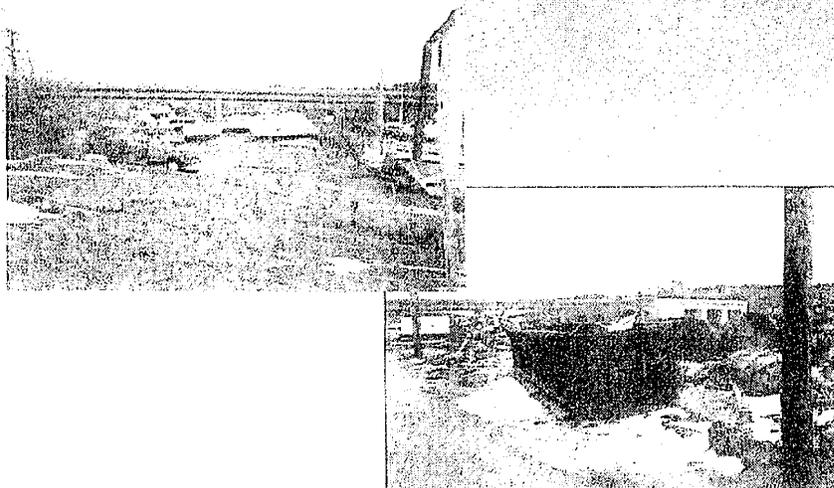
- Project to be located on northwest corner of West Main and Falls Ave.
- Project to occur on ± 1.4 acres.
- Thayer Retail Building (Beit Building) to Remain.
- Falls Avenue to be relocated to the northeast.



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EXISTING SITE CONDITIONS



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PROJECT COMPONENTS

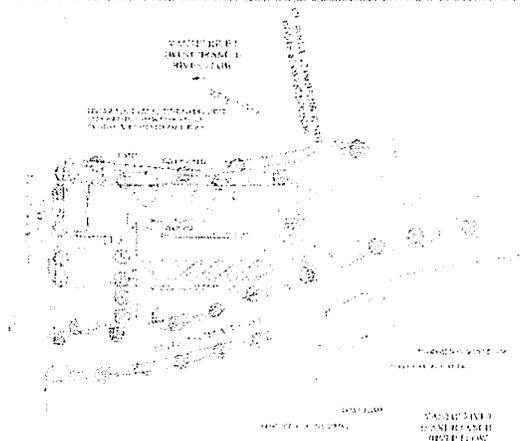
- Surface Level Transportation Terminal
- Elevated Parking Structure
- Enclosed Vending and Ticket Area
- 45' x 75' Public Plaza Area
- Riverwalk
- Fishing Area



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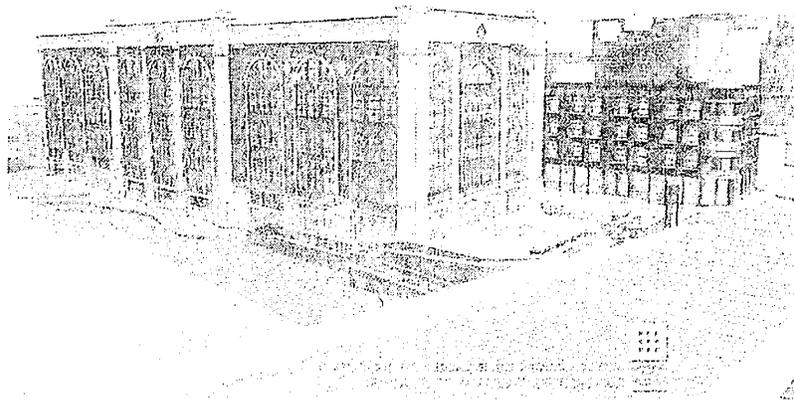
PROPOSED SITE LAYOUT



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DIGITAL SIMULATION

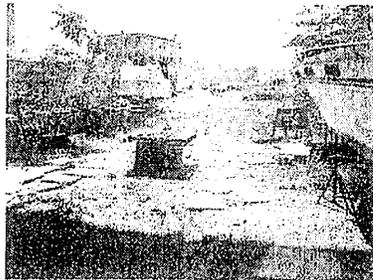


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IMPACT EVALUATION

- State Policy, Land Use, Zoning – Project is consistent with surrounding land uses and current zoning.

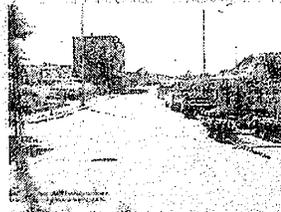


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IMPACT EVALUATION (Cont.)

- Relocation and Displacement – Several parcels will be affected. Relocation assistance will be implemented.
- Socioeconomics – Positive impacts on regional tourism and resident population.

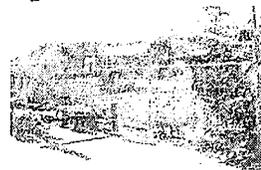


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IMPACT EVALUATION (Cont.)

- Community Facilities and Services – Positive benefits on public safety, recreational opportunities, and public transit services.
- Aesthetic/Visual Resources – Improved aesthetics.
- Public Utility and Services – Improved stormwater management practices.
- Cultural Resources – No adverse effect.

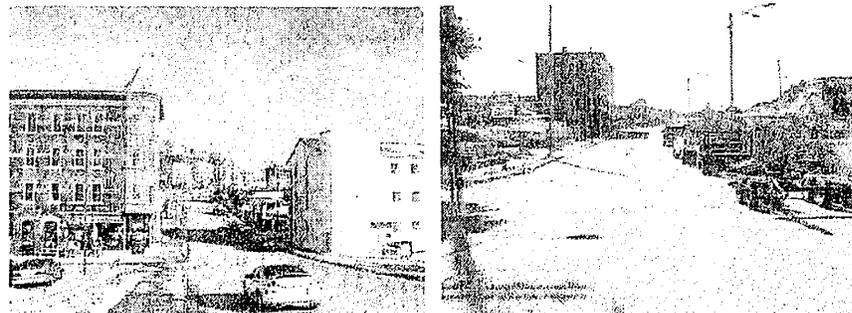


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IMPACT EVALUATION (Cont.)

- Traffic, Transportation, and Parking – No adverse impacts to traffic are predicted. Improved transportation and parking.



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IMPACT EVALUATION (Cont.)

- Water Resources – No wastewater discharge impacts. Improved stormwater management.
- Flood Hazard Potential – Flood protection has been built into project layout/function.
- Biological Resources – All work to be done on previously disturbed lands.

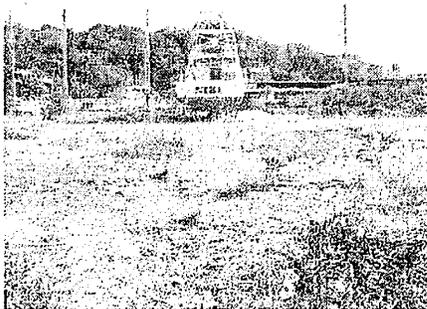


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IMPACT EVALUATION (Cont'd)

- Physical Environment – No significant modifications to topography/physical environment.



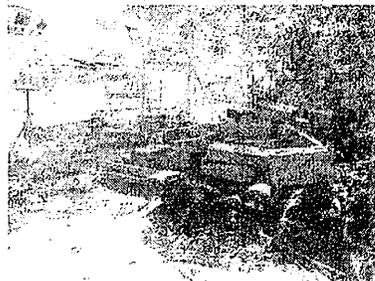
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IMPACT EVALUATION (Cont'd)

- Air Quality – No substantial change in emission sources or quantities.

- Noise Quality – No nearby sensitive receptors and no adverse impacts are forecast.



- Solid/Hazardous Materials – Site renovation.

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MITIGATION OPPORTUNITIES

- Traffic flow and site line improvements.
- Recreation and public access.
- Aesthetic improvements.
- Further cultural resource assessment.
- Relocation assistance to affected properties.
- Construction phase mitigation through proper construction operations.

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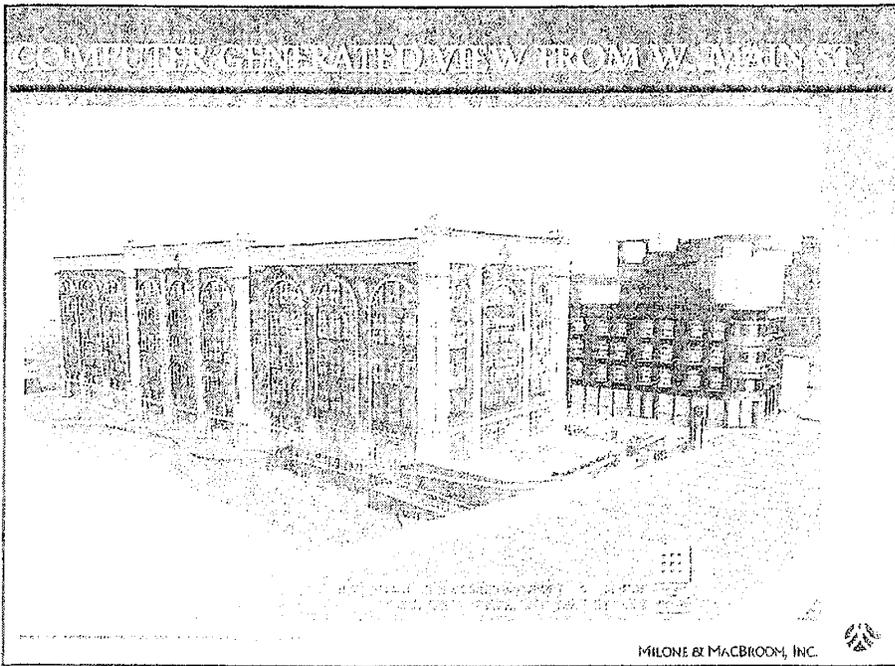
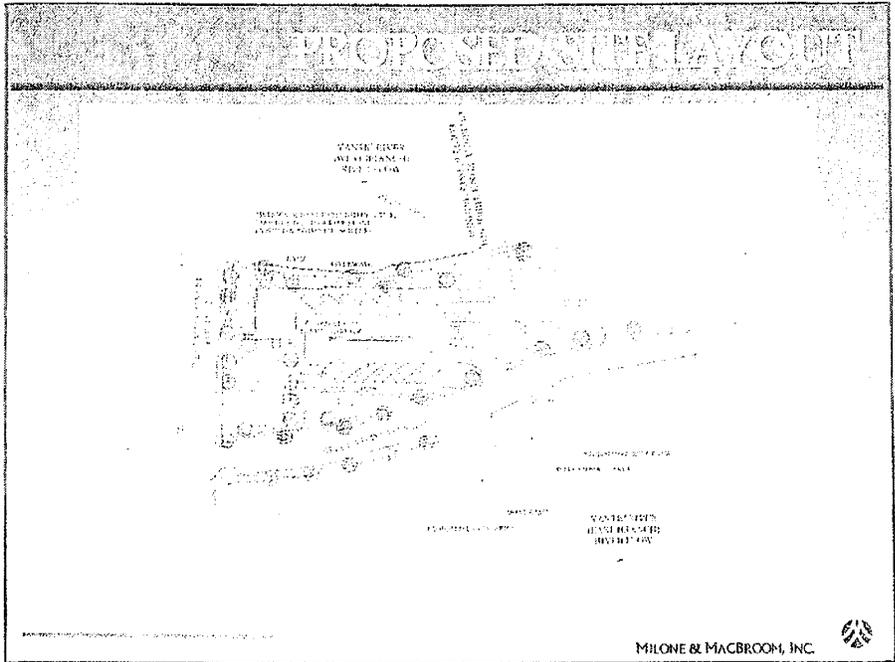


DEVELOPMENT PROGRESS

- Land Surveys
- Environmental & Structural Investigations
- Traffic Analysis
- Property Appraisals
- Preliminary Design
- Construction Cost Estimate - \$15 M

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Public Comments are Welcome!

Section IX
Bus System-Wide Service
Standards and Policies

CT TRANSIT

SERVICE

GUIDELINES

June 2009



CTTRANSIT is a public service of
the State of Connecticut Department of Transportation

Planning & Scheduling Department

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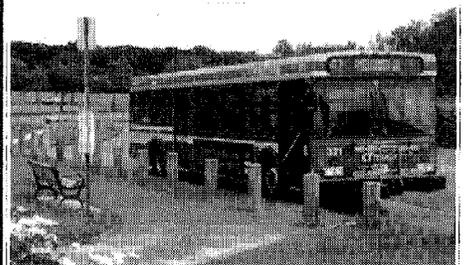


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I. INTRODUCTION

Public transportation is an essential public service, contributing to the prosperity and growth of metropolitan areas. Good transit service supports a wide variety of public policy initiatives, including: energy conservation, improved air quality, access to jobs, traffic congestion relief and promotes smart growth.

Because much of the cost of CTTRANSIT's operations are covered with public funding, CTTRANSIT has an obligation to operate to the maximum public benefit in the most efficient manner that is practical. More important, to be effective in fulfilling its role in the community, the amount and quality of transit service offered must be sufficient to retain existing customers, and encourage new customers to consider public transportation opposed to other travel options.

CTTRANSIT recognizes the need for balance between the level and quality of service provided and efficiently utilizing fare revenue and public subsidy dollars. For this reason, it is essential that the subsequent guidelines are utilized and adhered to as closely as practical throughout the service analysis and design process. The objective of these guidelines is to provide a tool to guide those responsible for service planning and development with a standard for evaluating existing service as well as a mechanism for evaluating proposals for service changes and the establishment of new services.

This edition of CTTRANSIT's Service Guidelines has been updated to reflect changes throughout the statewide bus system since April 2000, including:

- The replacement of CTTRANSIT's high-floor bus fleet with a fleet of low-floor buses, the addition of 45-foot over-the-road coaches to the Hartford Division's commuter bus fleet, and the approval of the purchase of 60-foot articulated buses for the Hartford, New Haven and Stamford Divisions.
- Increasing traffic volume statewide resulting in service reliability issues.
- Increasing ridership due to rising fuel prices and fewer available seats on low-floor buses causing capacity issues.
- The transition to Trapeze integrated transit scheduling software.
- Compliance with federal Title VI guidelines.

II. OBJECTIVES AND CONSTRAINTS

CTTRANSIT seeks to provide the best public transportation service possible within the limits of its budget. To meet this goal requires simultaneous attention to the following objectives.

The public transit system should be designed, operated and maintained so that it will attract customers in such numbers as to assure its continuing viability as a reasonable alternative to the private automobile and to meet the mobility needs of the region.

Efforts should be made to attract customers with:

- High-quality service
- A system that is easy to navigate and understand
- Smooth transitions between CTTRANSIT routes, and connection with other transit systems and transportation modes
- Responsive customer service
- Convenient scheduling
- Affordable pricing
- The optimum use of improved streets and highways
- Vigorous marketing and public outreach

The transportation system should be designed to consider the following:

- Existing and future land use patterns
- Access to major employment centers
- Non-traditional commuting patterns, including off-peak and reverse-commute
- Access to educational, medical, social/recreational, and other key destinations
- Mobility for people who do not have access to private transportation, including: senior citizens, persons with disabilities, youths, and low income residents
- Seamless connectivity with other transportation modes (e.g. bus, rail, air, ferry)
- Equitable distribution of publicly-funded transit resources throughout the community

Service improvements and extensions should not be solely evaluated based on economic considerations. Transit service is a necessary public service. The need to provide mobility for the community at large sometimes outweighs the otherwise prohibitive cost of providing service. This is particularly true during off-peak periods and in suburban or rural areas of the system where the return on investment in transit service is less than desirable.

Service should be designed to minimize door-to-door travel time for customers. This can be achieved by more direct routing from origin to destination, realigning bus stops, examining congestion patterns and considering roadway configurations among others.

In instances where one-seat service is not available, provisions should be made for customers to transfer between routes with protection from weather. Walk and wait

portions of the trip should be minimized by provision of service frequencies and route spacing. Route spacing should be as close as possible under the service guidelines with consideration to economic constraints, reasonable walking distances and population density.

Ad hoc transit system improvements should be designed so that initial measures for alleviating urgent problems of congestion or social disruption will conform to the system as a whole. For example, if an urgent need for service to a new area is necessary outside of the normal service change process, the temporary or interim service to be established should be designed in order to be easily assimilated into the system with the next regular service change cycle without unduly burdening new or existing customers.

A. Title VI Compliance

CTTRANSIT will design, plan and operate transit services that do not discriminate on the basis of race, color or national origin. We are committed to full compliance with the requirements of Title VI of the Civil Rights Act and all other relevant laws and regulations.

To comply with Title VI, CTTRANSIT embraces the objectives and guidelines expressed by the Federal Transit Administration in FTA Circular C 4702.1A to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority and low-income populations
- Promote the full and fair participation of all affected populations in transportation decision-making
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations
- Ensure that meaningful access to programs and activities by persons with limited English proficiency

Members of the public who wish to receive additional information about CTTRANSIT's non-discrimination policy and our obligations under Title VI, or who wish to file a discrimination complaint against CTTRANSIT, should contact the General Manager at P.O. Box 66, 100 Leibert Road, Hartford, CT 06141. Requests for information or complaints may also be posted through the CTTRANSIT web site at www.cttransit.com.

III. GENERAL SERVICE GUIDELINES

All service operated by CTTRANSIT is subject to the same general guidelines. However, it is important to bear in mind that these guidelines do not constitute a hard and fast service policy. Factors beyond CTTRANSIT's immediate control (e.g. fuel prices, budget limitations, fleet availability, etc.) will often influence the service that CTTRANSIT provides and therefore require these guidelines to be interpreted and applied depending on the individual circumstances.

A. Routing

Routing is one of the most important influences on the quality and cost of service. Routing is affected by several factors, including: street configuration, customer demand, travel patterns and travel time.

1. Types of Routes

Different types of routes serve different purposes. Currently, CTTRANSIT operates four types of routes: Local, Express, Flyer and Commuter Connection.

Local Routes

Local routes comprise the majority of the routes in the CTTRANSIT system. Local routes operate along primary and secondary roadways and make frequent stops to board or alight customers. Although most local routes operate to and from the downtown hub, local routes may also operate in a crosstown fashion, linking radial bus routes and major generators outside of the urban core.

Some local routes may also operate in a limited-stop capacity. Limited-stop routes either run over an expressway for part of the route, operate pick up only or drop off only along stretches of the route, or operate in a skip-stop fashion in areas that are already well-served by other routes. Limited-stop service is often used during peak service periods as a method of speeding-up service, particularly on longer routes.

Express Routes

Express routes operate non-stop over long stretches of their alignment, usually over expressways, HOV lanes, busways or other limited-access roadways. Most express routes operate during the weekday AM and PM peak periods, linking suburban park and ride facilities with the urban hub. Some express routes also offer limited midday or weekend service. Other express routes, such as the I-BUS Express, are designed to link two transportation hubs (in this case, CTTRANSIT Stamford and Metro-North Railroad's New Haven Line on the east end and Westchester County's Bee-Line System and Metro-North Railroad's Harlem Line on the west end).

Express bus routes make few stops, although they may make local stops along short stretches of their alignment. Because they make few stops and often use restricted commuter lanes, express bus routes can provide customers with shorter travel times and are best-equipped to compete with the personal auto. Many express bus routes serve park and ride lots which offer free parking for bus, carpool and vanpool riders. Park and ride lots are established by ConnDOT and are either state-owned facilities or leased by ConnDOT from private entities (e.g. churches, shopping centers, etc.). Express routes vary greatly in length and may cover very long distances. For this reason, express bus fares are distance-based from the downtown hub:

Table 1
Express Route Fare Zones

Approximate Distance from Downtown Hub	Fare Zone
Less than 10 Miles	Zone 2
10 to 20 Miles	Zone 3
20 to 30 Miles	Zone 4
30 Miles or More	Zone 5

Flyer Routes

Flyer routes are a hybrid route type which combines elements of local and express routes. Flyer routes generally evolve as a result of a limited-stop route being expanded to such a degree that it makes sense to brand the service as a separate service entity. Flyer routes share many of the design characteristics of express routes, however they are usually designed to complement local routes. Unlike express routes, flyer routes charge local fares. Flyer routes also generally operate during all service periods while express routes operate predominantly during peak periods only.

Commuter Connection Routes

Commuter Connection routes are local routes which provide feeder service, usually between commuter rail stations and major employment centers or residential areas. Commuter Connection routes usually operate in a limited-stop fashion and are timed to meet certain trains at stations.

2. Route Spacing

Routes should be designed to get as close to the user as possible. Inherent in this goal is the assumption that the customer will be expected to walk an acceptable distance to a bus stop. The maximum distance that a typical person can be expected to walk is normally considered 0.25 miles on each side of the route. Therefore, to minimize the overlaps in the route network and to maximize coverage in the service area, routes should ideally be spaced 0.50 miles apart.

While having two routes operate on streets one block apart rather than over the same street may be the ideal situation, several factors may require closer spacing of routes, including:

- Population density in particular corridors
- Roadway configurations
- Need for transfer opportunities
- Ridership patterns
- Locations of major trip generators

3. Through-Routing

Through-routing is desirable when possible. Routes should be joined on the basis of ridership patterns and balancing of vehicle requirements. Reducing vehicle

requirements, reducing the need for transfers, avoiding unnecessary overlaps or turnarounds in the central hub, and reducing extremely long layovers are some of the goals of through-routing. However, consideration must be given to the headways of routes which are paired for the purpose of through-routing; routes with mismatched headways will require vehicles to layover between trips, an unproductive practice which is an inconvenience to customers. Interlining of individual trips between routes on an ad hoc basis to minimize layovers in the central hub, although a good cost-saving measure, can cause customer confusion if used to excess and should be used sparingly.

4. Route Design

Most CTRANSPORT routes converge at a central hub located in a downtown area. Directness of service can often be significantly improved through the addition of crosstown links between major destinations outside of the central hub and by providing transfer hubs near major ridership generators in suburban locales.

Dedicated bus lanes and HOV lanes should be utilized where available in order to reduce customer travel time. Bus lanes are currently available in some areas of Hartford and HOV lanes are currently available on I-84 and I-91 east and north of Hartford.

Bus wye turnarounds, use of bus slips or other situations which require a vehicle to back up or otherwise complete an unsafe maneuver should be avoided. In establishing route terminals and layover points, safety, impedence to traffic flow and unobtrusiveness in residential areas should be considered. For the convenience of bus operators, the availability of restroom facilities at or near the endpoints of routes are desirable.

A number of cost-saving devices are available, including turn-backs, route branching, and part-time route deviations. However, these practices, if used to excess, have a tendency to over-complicate the bus system for the customer. While branching results in significant cost savings, consideration should be given to changing the route name and number for the branch to avoid confusion. Turn-back operations (turning a bus around short of the normal terminus, usually along the trunk of the route) should be scheduled where they can significantly increase service frequency for a large portion of riders. This is particularly helpful during peak travel periods.

5. Directness of Service

Directness of service is a prime goal in routing policy. While fixed-route transit service cannot match the automobile in terms of directness of travel between a multitude of origins and destinations, some route deviation is normal and essential to serve the potential transit customers along a given route. However, too much deviation can make the trip time differential between transit and the private automobile so great that those persons who might consider using public transit will turn to other modes of travel. Individual deviations should not inconvenience more riders than they serve. Therefore deviations should only be made if good justification for them exists.

A fairly popular standard, coefficient of directness, dictates that transit routes between major traffic generators (e.g., the downtown CBD and a shopping center, large residential area, or outlying employment center) should not exceed twice the travel time for automobile travel between the same points for local service and one-third more travel time when compared to commuter express service.

Figure 1
Coefficient of Directness for Local Routes

$$\frac{T_b}{T_a} = < 2.0$$

T_b Point to Point Travel Time by Bus
T_a Point to Point Travel Time by Private Auto

Figure 2
Coefficient of Directness for Express Routes

$$\frac{T_b}{T_a} = < 1.33$$

T_b Point to Point Travel Time by Bus
T_a Point to Point Travel Time by Private Auto

CTTRANSIT should seek to adhere to the coefficient of directness standard in areas where load factors are consistently greater than 0.10. In areas such as route termini, route branches and loops, where load factors are typically lower, it is not practical to adhere to this standard.

The coefficient of directness by itself is only an indicator of potential problems; other standards must be examined in connection with this standard. For instance, close examination of revenue/cost ratios may indicate that a route deviation is indeed productive despite exceeding the coefficient of directness standard. While the coefficient of directness is not a hard-and-fast standard by itself, it often supports the need for modification when other standards are not met.

6. Route Deviations

Route deviations are sometimes necessary to serve certain areas which only need to be served at particular times of day and would not benefit from or meet the standards to justify full-time service.

For any route deviation, the walking time saved by customers who board and alight along the deviation must be greater than the increased travel time for through-customers who will be riding the added section. This is measured using the adjusted deviation factor (ADF). An ADF of less than 1.0 is necessary to meet this criterion and justify the deviation.

Low population density areas may not be able to support regular scheduled local service although ridership patterns exhibit a high degree of work trips to a central area. In these cases, express service from a commuter express parking lot may be desirable. Express routes should be designed to minimize travel time. To improve productivity and to provide employment opportunities for inner-city residents at suburban employment centers, express routes should be designed to provide reverse-commute service where practical.

Figure 3
Adjusted Deviation Factor (ADF)

$$\frac{(Pt \times Tt)}{(Pd \times Wd) - (Pa \times Wa)} = < 1.0$$

- Pt** Through-Riders
- Tt** Added Travel Time for Through Riders
- Pd** Customers Served by Deviation
- Wd** Walking Time Saved for Deviation Customers
- Pa** Customers Left Unserved by Deviation
- Wa** Walking Time Added for Unserved Customers

B. Scheduling

1. Service Periods

Operating period time limits shall be determined at the central hub. For crosstown routes, operating time period limits shall be determined at the major destination point on the route. At all other route points requiring time, headway and customer load considerations, the operating periods will be directly related to and an extension of the time limits determined at the central hub or major destination point. In most cases, changes in operating headway and running time will closely mirror these periods, although headway or running time variation within a service period may be necessary to match trends in traffic or ridership conditions (e.g. work shift changes at major employers, class start or end times at colleges or public schools, etc.).

Table 2
Service Periods

Weekdays	Early AM	Before 6:29AM
	AM Peak	6:30AM – 8:59AM
	Midday	9:00AM – 1:59PM
	Midday School	2:00PM – 3:59PM
	PM Peak	4:00PM – 6:29PM
	Evening	6:30PM – 9:59PM
	Night	10:00PM & After
	Saturdays	Morning
Daytime		9:00AM – 5:59PM
Evening		6:00PM – 9:59PM
Night		10:00PM & After
Sundays	Morning	Before 9:59AM
	Daytime	10:00AM – 5:59PM
	Evening	6:00PM – 9:59PM
	Night	10:00PM & After

The total peak period shall be defined as the sum of the AM and PM Peak periods (i.e. weekdays 6:30AM to 8:59AM and 4:00PM to 6:29PM). The maximum peak period shall be defined as the 60-minute span within the total peak period during which the maximum number of customers are carried. The transition period shall be defined as the period within the total peak period that immediately precedes or follows the maximum peak period.

The non-peak or base period shall be defined as the period between the AM and PM Peak periods (i.e. weekdays from 9:00AM to 3:59PM) and all day on Saturdays. The off-peak period shall be defined as all service after 6:30PM on weekdays, after 6:00PM on Saturdays and all day on Sundays.

Special periods (e.g. extra service for the holiday shopping season, extra service for special events, etc.) not defined herein should be subject to individual consideration.

2. Service Span

The span of service on a particular route is the hours during which service on that particular route operates. Guidelines for minimum service spans are designed to ensure that routes are available to meet the travel needs of the communities they serve throughout the day.

Service span is a function of service demand, which is influenced by such factors as population density, commuting patterns, and retail operating hours. As a result, primary bus routes which serve the most heavily-traveled corridors in the region and the denser neighborhoods generally operate at a wider service span. Examples of primary routes include Hartford routes 31/33, 42, 47, 50/52/54 & 60/63/64/66, New Haven routes B & D and Stamford routes 11 & 41.

Table 3
Minimum Service Spans

Service Type	Day	Minimum Service Span
Primary Local Routes	Weekday	6:00 AM to 11:00 PM
	Saturday	6:00 AM to 11:00 PM
	Sunday	7:00 AM to 8:00 PM
Flyer Routes & All Other Local Routes	Weekday	7:00 AM to 6:00 PM
	Saturday	7:00 AM to 6:00 PM
	Sunday	10:00 AM to 6:00 PM
Express Routes & Commuter Connection Routes	Weekdays	7:00 AM to 9:00 AM & 4:00 PM to 6:00 PM

3. Running Time & Operating Speed

Cycle time is defined as the round-trip running time on a route plus any recovery or layover time.

**Figure 4
Cycle Time**

$$R_o + L + R_i = C$$

- R_o Running Time (Outbound)
- R_i Running Time (Inbound)
- L Layover Time
- C Cycle Time

Simply stated, running time is defined as the travel time between two points on a route, including time spent boarding and alighting customers along the way. Each route has a series of timepoints, one at each end of the route and usually one or more intermediate timepoints along the route. The total travel time from the first timepoint to the last timepoint is the one-way running time; the total travel time from the first timepoint to the last timepoint then back to the first, excluding layover time, is the round-trip running time.

Since buses make frequent stops to board and alight customers, they travel at a much slower speed than other traffic. The actual operating speed along a route, however, will vary based on many factors, such as: traffic conditions, ridership levels, roadway configurations and the number and spacing of bus stops. It is therefore useful to position timepoints with these factors in mind. CTTRANSIT has no standards or requirements with regard to operating speed. However, other factors such as coefficient of directness are often good indicators that a particular route or route segment is operating too slowly to provide effective service.

**Figure 5
Operating Speed**

$$\frac{L}{C} \times 60$$

- L Route Length (Round-Trip)
- C Cycle Time

4. Recovery Time (Layovers)

CTTRANSIT has no requirement to provide layovers or recovery time, although the collective bargaining agreements provides that reasonable layovers will be provided when practicable. Recovery time is the leftover time between trips, necessitated by maintaining a specified headway on a particular route or branch. Although some transit systems have contractual provisions that require layovers to be built into schedules (e.g. as a percentage of the round-trip running time on a route), the establishment of a hard-and-fast standard can negatively impact service efficiency by requiring additional buses

to be placed in service or negatively impact service coverage by requiring routes to be cut short.

Figure 6
Effect of Headways on Recovery Time

*Bus Route A operates between Hartford and West Hartford.
The round trip running time on Route A is 34 minutes.*

Headway: 20 Minutes

$$\frac{34 \text{ (running time)}}{20 \text{ (headway)}} = 1.7 \text{ (buses)}$$

$$\begin{aligned} 2 \text{ (buses)} \times 20 \text{ (headway)} &= 40 \text{ (cycle time)} \\ 40 \text{ (cycle time)} - 34 \text{ (running time)} &= 6 \text{ (recovery time)} \end{aligned}$$

Headway: 15 Minutes

$$\frac{34 \text{ (running time)}}{15 \text{ (headway)}} = 2.27 \text{ (buses)}$$

$$\begin{aligned} 3 \text{ (buses)} \times 15 \text{ (headway)} &= 45 \text{ (cycle time)} \\ 45 \text{ (cycle time)} - 34 \text{ (running time)} &= 11 \text{ (recovery time)} \end{aligned}$$

In the central hub, a two-minute layover is highly desirable. This ensures, particularly during peak hours and on high-volume routes, that buses are able to discharge customers from their inbound trips and board customers for their outbound trips without negatively affecting on-time performance. Layovers of more than two minutes on through-routed trips should be avoided so as to minimize customer inconvenience.

5. Frequency of Service (Headways)

Ridership should determine the frequency of service on each route, although financial or equipment limitations may sometimes limit the level of service that can be provided. Headway is the interval of time between two buses running in the same direction on the same route or along the same route corridor (e.g. Routes 60, 62, 64 & 66 along Farmington Avenue in Hartford and West Hartford). Headways for routes with multiple branches are measured along the trunk of the route, with headways along the individual branches standardized to the extent that is practical. Headways are generally based on load factors (i.e. the ratio of customers to seating capacity).

Headways should conform as much as possible to regular intervals to make it easier for customers to understand. Intervals of 5, 10, 15, 20, 30, 40 or 60 minutes are considered ideal, although other headways may be used when better suited to a particular situation. For example, a 12-minute headway might be established on a route which is too heavily used to operate at a 15-minute headway, but for which a 10-minute headway would be too costly or would simply be excessive.

Loading standards, which are discussed in detail in subsequent sections, are generally used to determine minimum headways. However, for certain service periods and on certain routes, minimum headways should be set by policy. For example, during the base or off-peak periods, ridership may be so light that using the loading standards

would result in excessively wide headways. Therefore, in order to provide service in a manner that meets the community's needs, it is necessary to establish policy headways.

CTTRANSIT's goal is to provide headways during the base and off-peak periods not exceeding 60 minutes. An exception to this policy would in rural areas or at night or on weekends, where financial considerations must be balanced against demand (e.g. Route 96 serving the US 5 corridor in South Windsor). These guidelines do not apply to headways for commuter express routes; express routes normally only operate during peak periods to accommodate work trips.

**Table 4
Minimum Headways**

Service Type	Service Period	Minimum Headway
Local Routes	Weekday Peak Period	30 Minutes
	All Other Service Periods	60 Minutes
Flyer Routes	All Service Periods	60 Minutes
Express Routes & Commuter Connection Routes	Weekday Peak Period	3 trips in peak direction in each peak

6. On-Time Performance

Several elements contribute to the on-time performance of transit vehicles:

- Ridership
- General traffic conditions
- Schedule construction
- Service monitoring
- Accidents and mechanical failures
- Operator training and driving habits
- Inclement weather
- Detours for construction, emergency services, etc.

CTTRANSIT has no control over many of these factors. However, it does have the ability to adapt to certain circumstances through schedule construction, the management of mechanical failures, and the training, supervision and monitoring of bus operators.

Although traffic congestion is beyond CTTRANSIT's immediate control, schedules should be constructed so that sufficient time is available under normal traffic conditions to complete the trip on time. Intermediate timepoints should be established to closely match typical travel times so that mid-route layovers, which are an inconvenience to customers, are avoided.

Where street traffic varies by day of the week, hour of the day, or from season to season, schedules should be adjusted accordingly. In instances where schedule adherence becomes difficult in the peak period because of general traffic congestion, steps should be taken to modify the schedules for that particular situation or to work with traffic officials to address the traffic problems causing the congestion.

Disruptions due to mechanical failure of equipment cannot be eliminated, but should be minimized within the financial limits of sound maintenance practices. Helper buses (extra buses that fill in for buses that are unable to make scheduled trips) should be positioned at the downtown hub during the peak period in order to minimize missed trips and quickly respond to service disruptions.

CTRANSPORT defines “on-time” as a bus departing a timepoint zero to five minutes later than scheduled. Under no circumstances should buses depart any timepoint ahead of schedule, unless the timepoint for the particular trip has been flagged as “drop off only” and the bus operator given explicit permission to continue on if early. Late operation is defined as any trip leaving a time point in excess of five minutes beyond the scheduled time. To maintain efficient operation, schedules should be constructed in such a manner so that no bus arrives at the downtown hub more than two minutes early or at any other timepoint more than one minute early.

**Table 5
On-Time Performance Measures**

Performance Indicator	Downtown Hub	All Other Locations
Early Arrival	> 2 minutes	> 1 minute
Late Arrival	> 5 minutes	> 5 minutes
Early Departure	> 0 minutes	> 0 minutes
Late Departure	> 5 minutes	> 5 minutes

Schedule adherence guidelines vary with the quantity of service provided. Peak period service with short headways is less likely to adhere specifically to schedules than longer headway “off peak” service. For instance, on routes or along corridors where headways are 10 minutes or less, it is acceptable to have 90% of the service “on-time”, while it is our goal that 95% of service runs “on-time” on routes that operate at wider headways or during off-peak periods.

**Table 6
Schedule Adherence Guidelines**

Service Period	Headway		
	Less than 10 Minutes	10 to 29 Minutes	30 Minutes or More
Weekday Peak	90%	90%	95%
Weekday Off-Peak	90%	95%	95%
Saturday & Sunday	90%	95%	95%

On-time performance information is collected on the street by Transportation Supervisors and Traffic Specialists. In the future it is anticipated that much of this data collection can be done utilizing a Automated Vehicle Locator (AVL) System such as the one which is currently under development in the Stamford Division.

C. Route Performance

Each route in the transit system is viewed as a separate service entity. However, individual routes need to be evaluated with an understanding that routes are interrelated with respect to the common corridors they serve, transfer connections, and the success of the system as a whole.

Route ridership is an important component in the evaluation of a route's performance. Since there are a variety of fare classifications, revenue alone does not accurately reflect a route's performance. Ridership, measured in unlinked passenger trips, passenger trips per service hour and load factor (passengers per seat) therefore must all be gauged in order to evaluate each route properly. The relative importance of each of these measures will also vary between service periods and across different types of routes.

1. Ridership

Ridership, or, more accurately, unlinked passenger trips, is the total number of passengers boarded on a route or trip. Ridership is the most important performance measure because it is used to calculate the other performance measures for a route. It is therefore necessary to have a firm method for determining the ridership on each route.

Ridership data for every route is collected by the electronic fareboxes on the buses each day on a trip-level basis. Farebox ridership is collected based on the number and type of fares collected by the bus operator. The integrity of this data is heavily reliant on bus operators properly updating their farebox settings for each trip, collecting and accounting for all fares, and verifying transfers, tickets and passes.

Traffic Specialists collect bus stop-level ridership data on every route at least once every nine months as part of CTTTRANSIT's on-going ridechecking program. Traffic Specialists ride each trip on each route and conduct a visual count of the number of customers who board and alight at each stop along the route. This data is then entered into a central ridership database where it can be accessed by planning and scheduling staff.

2. Route Productivity

The relative productivity of each route can be measured by determining the number of unlinked passenger trips per route service hour (running time plus recovery time).

Figure 7
Passengers per Hour (PpH)

$$\frac{P}{H} = \text{PpH}$$

P Passenger Trips (Unlinked)
H Hours of Service

Each route in the system can then be ranked in order of productivity, from most productive to least productive, and an average level of productivity for all routes can also be calculated. Using this information, approximate headways on the trunk section of each route can be determined based on the productivity of each route in comparison to the average level of productivity for the entire division.

Table 7
Trunk Section Route Performance Guidelines
Passengers per Hour
Based on Division Average

Headway	Service Period	
	Weekday Peak Period	All Other Service Periods
Less than 10 Minutes	200%	200%
10 to 14 Minutes	165%	165%
15 to 19 Minutes	125%	125%
20 to 29 Minutes	100%	100%
30 to 59 Minutes	75%	75%
60 Minutes or More	75%	50%

The table is weighted so that the most frequent routes should be top performers and justify their superior service.

The evaluation should be completed as a sequential review of four major elements:

- If the customer per hour figure meets or exceeds the Percentage of the Division Average as outlined in the table, then the route and/or segment will be deemed worthy of continuation.
- If the customer per hour or load factor falls between 80% and 99% of the percent of the Division Average as outlined on the chart, the route should be reviewed by Planning staff to determine if there are any segments of service included in the route for which corrective action should be taken. Major changes in routing or schedules must be approved by ConnDOT before being implemented.
- If the customer per hour or load factor falls between 60% and 79% of the Division Average as outlined on the table, the route should be studied and a Comprehensive Operational Analysis (COA) report produced. The COA report will recommend possible actions either to improve the route's performance or to discontinue service.
- If the customer per hour or load factor falls below 60% of the Division Average as outlined on the table, two actions can be considered. If it is judged that the particular service requires minimal resources and that the overall system can "carry" the sub-standard ridership, then it may be continued in six (6) month intervals through a policy directive of ConnDOT. If continuation would require a significant allocation of the system's resources to continue the route, then the route should be terminated with the approval of ConnDOT.

The above performance criteria indicate a route's overall performance, the various segments of service on a route having been averaged together. Planning and scheduling staff should also review individual route segments when necessary to ensure that the average performance measures provide an accurate reflection of the entire route.

These criteria apply equally to existing service and planned new routes or extensions. For existing routes, the performance statistics can be calculated from actual data, while for planned routes they would have to be estimated. Because of the unique nature of express routes, a special evaluation procedure is required. Express routes have a relatively high allocation of operating hours per rider. For example, a long express route may have low ridership in terms of passengers per hour, but may have seated loads on many trips. When evaluating express routes, passengers per trip is the preferred performance measure.

3. Load Factor

CTTRANSIT buses used for local service are designed to accommodate standees and service is scheduled with the expectation that most trips during peak hours will operate with standees over all or part of their alignment. Some off-peak trips may also carry standees, although ideally there will be a seat for most customers during off-peak hours. Thus, the loading guidelines outlined in Table 8 are not a hard-and-fast standard. CTTRANSIT will consider adding buses to increase capacity on local routes when the loading guidelines are exceeded to a significant degree, when crush loads regularly preclude customers from boarding the bus, or when load factors hinder on-time performance.

Table 8
Maximum & Minimum Loading Guidelines

Service Period	Maximum Load Factor	Minimum Load Factor
Weekday Peak	1.33	0.33
Weekday Midday	1.00	0.25
Evening	1.00	0.15
Nights (after 10:00PM)	1.00	0.15
Weekends	1.00	0.20

Load Factor is calculated by dividing the total number of seats passing the maximum load point into the number of customers traveling past that point during the operating period considered.

Figure 8
Load Factor

$$\frac{P}{S} = < 1.33$$

P Passengers On Board
S Seated Capacity of Bus

It is important to differentiate loading guidelines by type of service. Due to trip length, operating speed and highway travel, commuter express service should be scheduled in such a manner so as to minimize situations in which standees occur. The customer load

on any bus, however, shall never exceed the safe or legal limit for that vehicle. The recommended loading guidelines expressed are within these safety limits.

Generally, routes which operate at frequent headways should have higher load factors, particularly during the peak period, to justify their more frequent service. Local routes that travel only a small percentage of their total route on an expressway should still be classified as "local service" and thus adhere to the loading guidelines under that service category.

**Table 9
Route Performance Guidelines
Load Factor**

Headway	Service Period	
	Weekday Peak Period	All Other Service Periods
Less than 10 Minutes	100%	85%
10 to 14 Minutes	90%	70%
15 to 19 Minutes	80%	60%
20 to 29 Minutes	75%	50%
30 to 59 Minutes	65%	35%
60 Minutes or More	65%	25%

IV. EVALUATION GUIDELINES FOR EXISTING SERVICE

A. The Comprehensive Operational Analysis (COA) Process

Each CTTTRANSIT bus route should be evaluated periodically with regard to its efficiency and effectiveness both independently and as part of the system as a whole. The COA process allows for the identification of routes needing modification to better meet the needs of the communities served. Identification of ineffective service will allow appropriate actions to be taken to insure optimum effectiveness relative to needs and resources. Periodic monitoring of the total system will not only identify unproductive services, but also enable CTTTRANSIT to judge the effectiveness and performance on individual routes. Changes in ridership between evaluation periods may signal the need for careful attention to other service standards in succeeding periods. A new route, route segment, or trip, should be allowed to mature for one year before being held to CTTTRANSIT's service evaluation criteria.

In order to provide a consistent framework for evaluating routes or groups of routes, each operational analysis report should contain the following information:

Figure 9 COA Report Structure

- I. Introduction
- II. Existing Conditions
 - A. Each Route
 1. Route Alignment
 2. Service Span & Frequency
 3. Ridership & Load Factor
 4. Running Time & On-Time Performance
 5. Overall Performance Summary
- III. Recommendations

1. Introduction

The first section of each COA report is the report introduction. This brief section will introduce the route(s) and neighborhood(s) being studied, provide a brief history of the route(s) being studied and outline the goals and objectives of the report.

2. Existing Conditions

Section two of the COA report outlines the existing conditions on each route in the scope of the study and consists of several subsections. The route alignment subsection should include a map and a detailed description of the route, including all route branches and part-time deviations. This subsection also should address connecting services along the route's alignment, through-routing arrangements with other routes, and provide basic demographic data about the neighborhoods the route serves.

The second subsection describes the service span and frequency of the route, both in general terms and in specific terms with regard to individual branches or deviations.

Tables summarizing service span and frequency information should be included in this subsection and headway reports for the route should be included in Appendix A of the report.

Subsection three deals with ridership and load factor. Historical ridership on the route can be derived from farebox counts, however current trip-level data should be derived from ridecheck data collected by traffic specialists. In order for the data to be as reliable as possible, data for the COA report should be collected in the shortest timeframe that is practical, with the understanding that data collection will take longer to complete on high-volume routes. Data should be summarized in this section in tables and charts, with complete route profile reports and trip summary reports contained in Appendices B and C of the report, respectively. As part of the analysis of each route, any trip carrying less than 5 customers should be considered for termination unless the continuation of the under-performing trip can be justified. For example, a trip which carries less than 5 customers may occur between two highly productive trips and it would be impractical to discontinue the middle trip without adversely affecting the more productive trips. On longer trips (more than 45 minutes one-way running time), more than 5 customers are required to keep the trip operating.

The fourth subsection of the existing conditions section evaluates the running time and on-time performance of the route being studied. On-time performance data should be derived from either ridechecks or point checks. Both outbound departures from the central hub as well as inbound arrivals at the central hub should be examined. On some routes, particularly regional routes with strong ridership in both directions, additional on-time performance data should be included as appropriate. Running time data should be calculated for each service period and a comparison made between scheduled and actual travel times along each route segment. Data for this section should also be summarized in tables and complete node to node running time reports should be included in Appendix D.

Subsection five ties together the data collected in subsections one through four and compares this body of data to CTTTRANSIT's Service Guidelines. Areas where the guidelines are met or missed should be summarized concisely and objectively. The data collected should also be correlated to any relevant survey findings when such information is available.

3. Recommendations

The third and final section of the COA report contains specific recommendations to improve the efficiency of the route(s) being examined. All recommendations should be carefully constructed to conform to CTTTRANSIT's Service Guidelines. In instances where conformity to the service guidelines is either not possible or practical, a detailed justification should be included. In most cases, there are five possible management actions that can be applied to routes which are found to underperform or to be underutilized:

- Service adjustment (headways, on-time performance, etc.)
- Route restructuring (improving route design)
- Route or route branch/segment elimination
- Revenue source adjustments
- Increased route-specific marketing

Recommendations should be based on net costs added or subtracted and on net ridership/revenue gained or lost. Therefore, a detailed cost recap for each service proposal should be included in Appendix E of the report and summarized in table form in this section along with maps and/or proposed schedules as appropriate.

V. SERVICE REVIEW PROCESS

Policy Bulletin VII (see Appendix A) outlines procedures for reviewing and approving service changes, including changes that may be approved by the Service Review Committee for each CTTTRANSIT division and changes that require formal approval by ConnDOT.

VI. DEVELOPMENT GUIDELINES FOR NEW SERVICES

The guidelines and criteria in Sections III & IV apply equally to proposed new services with few exceptions. The only difference is that analysis of loading standards, headways, bus stop spacing, schedules, ridership and financial information are all completed on an estimated pro forma basis rather than on actual experience.

A. New Service Performance Guidelines

A liberal growth period should be provided during which less than normal ridership is to be expected while the market builds up. After six months of service:

- If a new route meets performance guidelines, it will be made permanent and monitored through the normal COA and service review processes.
- If a new route does not meet performance guidelines, but has exhibited a gradual increase in ridership, it should continued for another six months and marketing and promotion of the new route should be stepped-up. At the end of this time a review should be undertaken.
- If a new route falls below guidelines and does not show growth, it should be recommended either for major changes or elimination.

An exception to this rule would be made when a third party (e.g. the jobs access program, a private employer or state agency, etc.) is willing to participate in cost sharing of experimental proposals. In the case of these experimental services, CTTRANSIT should provide service for as long as the community, employer or third party group is willing to participate in the sharing.

B. Service Reductions

While CTTRANSIT's goal is always to improve and expand service, we recognize that situations may arise in which public funding is not sufficient to continue the existing level of service. These are different from situations in which the ongoing service review process identifies underutilized services to be trimmed or opportunities to make existing service more efficient and cost-effective.

Some CTTRANSIT service is funded for specific programs from specific sources (e.g. jobs access transportation). The continuation of these services is dependent upon continued funding by the sponsoring agency or agencies based upon program-specific criteria.

When it is necessary to reduce CTTRANSIT service due to a budget shortfall, priority will be given to preserving service to low-income commuters and transit-dependent communities. The following general guidelines will apply:

- Target the least utilized and least cost-effective services that can be reduced without eliminating service altogether in a corridor.
- Target routes for which there is alternative service on another route.
- Consider opportunities to widen headways on a route before reducing span of service.
- Consider opportunities to reduce off-peak service before reducing peak hour service.
- Preserve "policy" service to the extent possible.

- Preserve existing service where changes would create intolerable overload conditions or on-time performance problems.
- Consider opportunities to reduce service or branch lines before reducing service on trunk lines.
- Target services which are operating on a provisional or experimental basis.

VII. CUSTOMER CONSIDERATIONS

Customer convenience, comfort and satisfaction must be a constant consideration of CTRTRANSIT. From the experience at the bus stop, to the experience aboard the bus, to the experience when contacting the company to obtain information or report a problem, customer satisfaction is of the utmost importance.

A. Bus Stops

Bus stops are more than a place to wait for a bus to arrive. Bus stops are a gateway to the bus system and are often the first contact the public has with the bus company.

1. Types of Bus Stops

There are two main types of bus stops: on-street and off-street. On-street bus stops are most common and usually placed every one to three blocks along a route. Bus stops may be positioned closer together in urban areas or further apart in more sparsely populated areas.

Off-street bus stops are generally located at shopping centers, park and ride facilities and transportation hubs. When possible, off-street stops should be located at a curbed area, such as a storefront, so that customers are not forced to board or alight the bus directly into a parking lot or other undesirable area. In all cases, bus stops must comply with ADA regulations. Bus stops must be established so that they are fully accessible to disabled customers, with enough space for the bus to square-up its front and rear doors to the curb and to fully deploy the bus ramp or lift.

There are three types of on-street bus stops: near-side, far-side and mid-block. Near-side bus stops are positioned before an intersection, while far-side bus stops are positioned just beyond an intersection; mid-block bus stops are not positioned near intersections. Table 9, on the following page, adapted from "Location and Design of Bus Stops – Final Report" (Texas Transportation Institute, July 1996), lists some of the advantages and disadvantages of various types of on-street bus stops. This is only a partial list of some of the more common situations that may be encountered.

Each individual bus stop must be reviewed on a case-by-case basis based on a variety of factors such as traffic flow, traffic rate, position and type of traffic control devices, pedestrian crossings, etc. On single-lane roads for instance, with little or no shoulder, near-side stops are generally preferred so that stopped transit vehicles will not cause traffic to block the intersection. On multi-lane roads, or roads with wide shoulders, near-side bus stops can result in traffic passing the transit vehicle and turning right in front of the vehicle causing a hazardous condition, therefore making far-side bus stops more desirable, provided enough room is available for the transit vehicle to clear the intersection and to stop safely. There can be no universal standard for establishing bus stops; therefore it is important to use general guidelines to evaluate the conditions at each bus stop on a case-by-case basis.

Table 10
Types of On-Street Bus Stops

Bus Stop Type	Advantages	Disadvantages
Near-Side	<ul style="list-style-type: none"> • Minimizes interference when traffic is heavy on far side of intersection • Front (entry) door opens closest to crosswalk • Intersection can assist bus pulling away from curb • Eliminates double-stopping • Passengers can be serviced while stopped at a red light • Provides operator with clear view of intersection and any connecting buses approaching with transfer passengers 	<ul style="list-style-type: none"> • Conflicts created with right-turning vehicles • Stopped bus may obscure traffic control devices from other vehicles • Stopped bus blocks other vehicles view of crossing pedestrians • Stopped bus blocks view of approaching traffic for crossing pedestrians • Through lane may become blocked by queuing buses • Traffic pattern exceptions may be needed to allow buses continuing straight ahead to stop in a right-turn only lane
Far-Side	<ul style="list-style-type: none"> • Minimizes conflicts with right-turning vehicles • Provides additional right-turn capacity by freeing-up curb lane for traffic • Minimizes sight problems for vehicles approaching intersection • Encourages passengers to cross street behind the bus and provides customers with clearer view of approaching traffic • Intersection can assist bus with decelerating into bus stop • Signalized intersections create gaps in traffic flow to assist buses with re-entering traffic • Buses can clear green light before stopping to service passengers 	<ul style="list-style-type: none"> • Queuing buses may block intersection • Stopped bus may obscure view of approaching traffic for vehicles approaching from cross street • Stopping far side after stopping for red light increases travel time and reduces operating speed • May increase number of rear-end accidents because traffic may not anticipate bus stopping again after clearing red light
Mid-Block	<ul style="list-style-type: none"> • Minimizes sight problems for other vehicles and pedestrians • Less pedestrian congestion in passenger waiting areas 	<ul style="list-style-type: none"> • Requires larger bus stop zone, ergo reduces available on-street parking • Encourages jaywalking and increases walking distance for passengers crossing at intersections

2. Bus Stop Amenities

Generally, in the State of Connecticut, individual municipalities are responsible for the provision, monitoring and maintenance of bus stop signs, shelters, benches and other amenities for the bus service operated in its locality. ConnDOT installs and maintains shelters at park and ride lots and maintains bus stop signage on state roads and U.S. highways throughout the state. Bus stops and related amenities are considered part of the "local share" and thus are usually determined on by the municipality in which they are located. CTTRANSIT takes a proactive role by performing the installation and maintenance of bus stop signs in some communities.

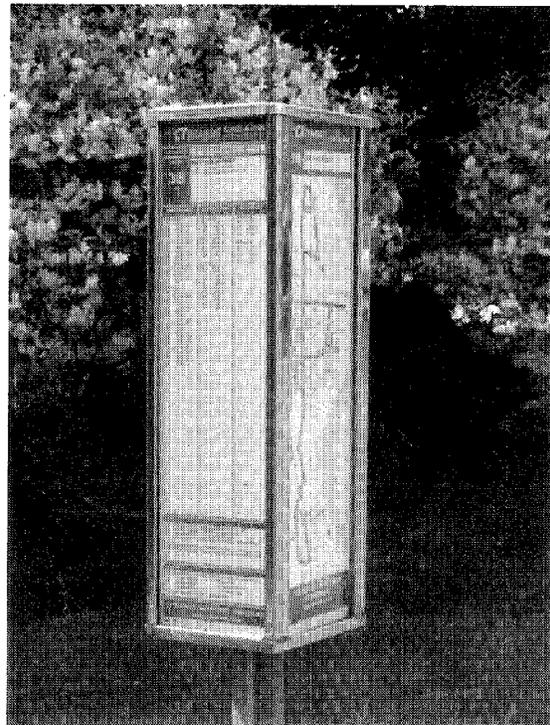
Bus Stop Signs

All bus stops should be identified by a CTTRANSIT bus stop sign. The number or letter designations for the routes serving each stop should be identified and the Customer Service Center telephone number should be posted. When funding is available, these signs are provided to municipalities at no charge and can be installed by CTTRANSIT at no cost to the municipality.

Figure 10
CTTRANSIT Bus Stop Sign



Figure 11
CTTRANSIT Guide-A-Ride



At stops which record high numbers of customer boardings or are located at major transfer points, Guide-A-Ride schedule boxes should be installed with stop-specific route and schedule information.

Shelters

When placing shelters and identifying priority locations, two major factors should be considered: the number of boarding and/or transferring customers at a specific stop and the frequency of service at the stop. Shelters should be lighted and include route and schedule information posted and maintained by CTTRANSIT. Shelters should be provided at all stops which serve 100 or more boarding riders during the course of a typical weekday, at all park and ride locations and at all major downtown stop locations and major transfer points in accordance with existing physical conditions and volume of customers served. Table 8 provides a guide for establishing priorities in the placement of customer shelters on the basis of customer demand and service frequency.

Table 11
Bus Shelter Priority Guide

Daily Customer Boardings at Location	Headway		
	30 Minutes or More	10 to 29 Minutes	Less than 10 Minutes
300 or More	1	1	2
200 to 299	1	2	3
100 to 199	2	3	4
50 to 99	2	3	4
25 to 49	3	4	4

The following criteria should be used as a guide in the placement of customer shelters:

- Shelters should be placed at all established park and ride lots.
- A shelter should “aesthetically fit” its surroundings where economically feasible.
- Shelters can be standardized to some degree for possible cost effectiveness via quantity purchase prices, for maintenance purposes or to maintain aesthetic continuity.
- Shelters should afford protection and safety to waiting customers. Four-sided shelters should have at least two panels open for ease of entry and exit. All shelters must meet ADA compliance requirements.
- Shelter maintenance is the responsibility of the community in which it is located or the advertising agency which rents or owns them. It should be emphasized that a clean image is extremely important.
- Shelters should be installed at major transfer points between routes.
- Shelters should include amenities such as display space for route maps and schedules, benches, trash receptacles and lighting.

Figure 13
Sample Bus Shelter #1
Windsor Avenue, Windsor, CT

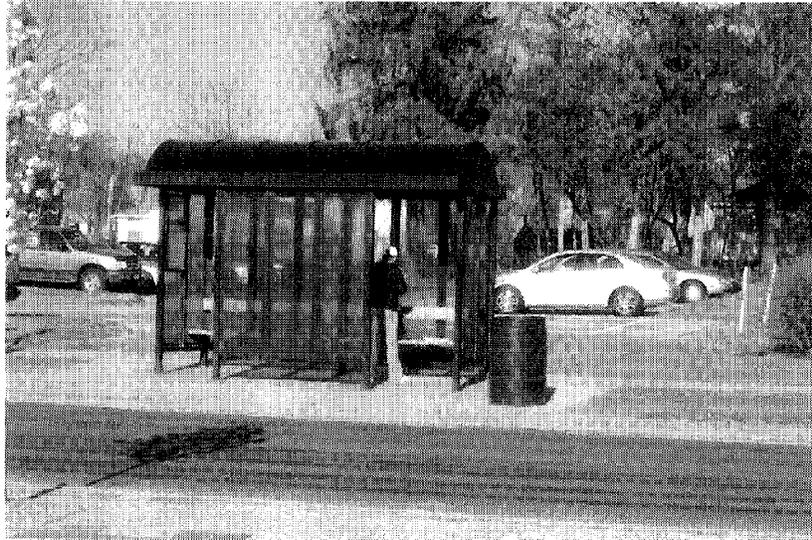


Figure 14
Sample Bus Shelter #2
Farmington Avenue, West Hartford, CT

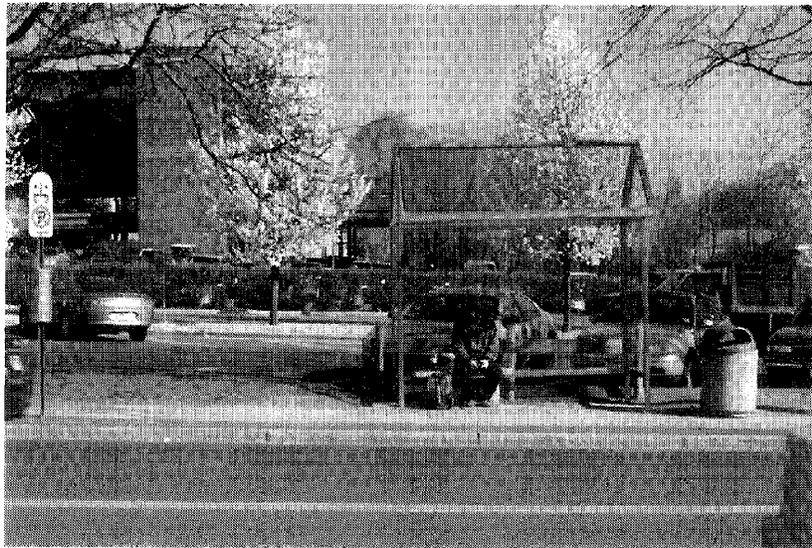


Figure 15
Sample Bus Shelter #3
Farmington Avenue, Unionville, CT

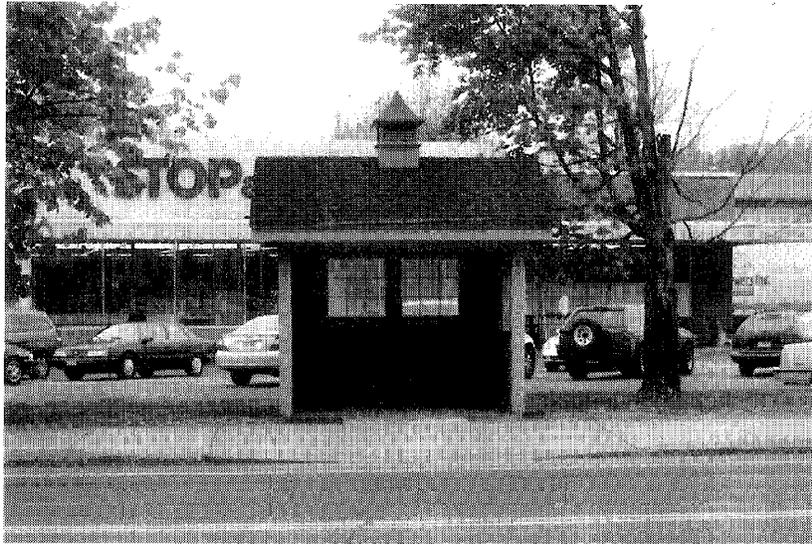


Figure 16
Sample Bus Shelter #4
Silver Lane, East Hartford, CT



As noted earlier, CTTRANSIT does not own or maintain any of the bus shelters along our routes. The decision to install a shelter at any given bus stop is at the discretion of local municipalities. CTTRANSIT endeavors to work with regional agencies and individual towns to encourage shelter installation that meet the preceding guidelines and to encourage that shelters are cleaned and maintained, including snow removal, on a regular basis.

3. Bus Stop Spacing

Location of bus stops along local routes is a function of balancing customer convenience against speed of operations. Obviously, stops at every intersection provide the shortest walking distance to the bus stop. However, vehicle speed and trip time for customers already on the bus are affected significantly. Aside from pure spacing considerations, stops should be located to optimize convenience for concentrations of customers along the route.

Another consideration for bus stop spacing is that for the most part, bus stops are under the jurisdiction of the town in which they are located. While CTTTRANSIT can act in an advisory capacity with regard to bus stop spacing, the final decision is usually made by the town or municipality where the stop is located. As a result, many stops may not conform to space requirements necessary for efficient operations. CTTTRANSIT works with individual municipalities to establish and maintain bus stops by identifying stops which do not conform to minimum spacing or design guidelines and submitting suggestions for changes or improvements.

In general, bus stop spacing should not be less than 0.125 miles (700 feet). In urban areas, bus stops should not be positioned more than 0.250 miles (1400 feet) apart. Stops may be more widely spaced in low-density rural areas, on special limited service routes, or in commercial or industrial areas. In these cases the number and locations of bus stops should be based on the concentration of potential customers rather than by strict spacing standards. In addition, in heavily traveled urban corridors, bus stop spacing may be modified in order to increase operating speed and reduce travel time.

Table 12
Bus Stop Spacing Guidelines

Spacing Standard	Distance
Minimum Distance Between Bus Stops	0.125 miles
Maximum Distance Between Bus Stops	0.250 miles

4. Bus Stop Design

Stops should be located at street intersections where possible so that customers are provided with safe, obstruction-free access to the bus. They should not block cross-traffic on intersecting streets and the bus must be able to re-enter the traffic stream with minimal conflict.

The curb area devoted to a bus stop, particularly in heavily traveled corridors and where large numbers of customers board daily, is of critical importance. The objective must be to promote optimum safety for the boarding and alighting customers and also to promote the maximum speed of the transit vehicle without seriously affecting the flow of other vehicles.

For safety of customers, the length of the bus stop should allow the operator to pull both doors of the bus to the curb. For the safety of pedestrians and other vehicles, the nearside bus stop should allow adequate set-back from a crosswalk to facilitate vehicular right turn movements and a clear sight path and walkway for pedestrians. For far-side stops, the length must be adequate for the bus to clear the cross street and crosswalk and yet give adequate space for the bus to allow it to re-enter traffic without excessive maneuvering.

The Institute of Traffic engineers has established a Recommended Practice for Bus Stop Location distance of 105 feet between the front of the stopped bus and the end of the first parking stall. A mid-block bus stop for a single bus should be 140 feet in length, allowing 40 feet forward and 60 feet to the rear of the bus. It should be noted that the preceding criteria apply only to standard 40-foot transit buses. Other vehicle types (e.g. 45-foot over-the-road coaches, 60-foot articulated transit buses, etc.) require additional accommodation.

The following table, adapted from TCRP Report 19, "Guidelines for the Location and Design of Bus Stops" (Transportation Research Board), outlines some of the advantages and disadvantages of various bus stop designs. As with bus stop locations, the designs of individual bus stops are dependent on the unique conditions at each location and therefore must be evaluated on a case-by-case basis.

**Table 13
Typical Bus Stop Designs**

Bus Stop Design	Advantages	Disadvantages
Curb-Side	<ul style="list-style-type: none"> • Easy access for bus operators • Minimal service delay • Simple, inexpensive design • Easy to establish or relocate 	<ul style="list-style-type: none"> • May cause traffic to queue behind stopped bus • May cause other traffic to make unsafe maneuvers around stopped buses
Bus Bay, Open Bus Bay, Queue-Jumper Bus Bay	<ul style="list-style-type: none"> • Allows bus to stop out of travel lane without inhibiting traffic flow • Provides protected area for stopped bus to pick up and drop off passengers 	<ul style="list-style-type: none"> • May cause difficulty for bus operators re-entering traffic • Expensive to install, requires additional maintenance (snow removal, etc.) • Difficult and costly to relocate

B. Customer Service

The task of making public transit more attractive as an alternative mode of travel in CTTTRANSIT's three service areas requires that high-quality, easy-to-understand information about how to use the service is readily available to present to potential riders.

1. Telephone Customer Service

An information system is maintained in the Customer Service Center at each CTTTRANSIT division to answer all inquiries in a competent and courteous manner. Adequate staffing and call capacity should be provided so that callers seldom get a busy signal and hold time is kept to a minimum.

The Customer Service Centers should be staffed on every day that service is scheduled to operate, with an adequate number of personnel available to handle calls in a timely and satisfactory manner. Hours of operation should correspond to the core of the service day and should be publicized to customers on buses, timetables and the company web site.

All information regarding routes or schedules, including new schedules, route changes, detours, bus breakdowns and other pertinent general information, should be transmitted to the Customer Service Center in a timely fashion. It is the policy of CTTRANSIT to provide information in Spanish and by special TTY/TDD equipment to people who have a hearing or speech impairment.

2. Customer Service Outlets

CTTRANSIT operates a Customer Service/Sales Outlet in downtown Hartford at State House Square, in downtown New Haven at the New Haven Green and in Stamford at the Stamford Transportation Center. Each outlet is staffed by Customer Service Sales Specialists who assist riders with route and schedule information as well as selling bus passes and tickets.

Fare media is also available for purchase by mail, on-line at CTTRANSIT's web site, and at select retailers including Stop & Shop supermarkets.

3. Internet Service

CTTRANSIT's web site should provide both current and potential customers with self-service information about the bus system, including route maps and schedules, fare information, information about upcoming and recent service changes and links to connecting transportation providers. Customers should also have the ability to submit feedback, purchase bus tickets and passes, and to plan a trip on-line. CTTRANSIT should also endeavor to make its route and schedule information available to reputable third-party trip planners, including Trips123 and Google Transit.

4. Timetables, Maps and Brochures

All CTTRANSIT timetables are printed in a standard format which includes a route map, schedule, clear identification of major destinations or traffic generators, fare zone information (for express service), transfer information, effective date, how-to-ride instructions, and accessibility information for disabled customers. The timetables should continue to be sized to fit in a coat pocket or purse and distributed free of charge as follows:

- On buses in specially provided holders.
- In schedule racks placed at major employers, transportation centers, community service agencies and other or points of interest.
- At Customer Service/Sales Outlets.
- On-line at www.cttransit.com.
- Mailed free, upon request.
- Provided to ConnDOT and neighboring transit providers.

Full-color, scale-drawn system maps showing the scope of each CTTRANSIT division's area of operation shall be available to the public and updated periodically or as needed. These maps should be easy to read and contain general route, schedule, fare, transfer, points-of-interest and how-to-ride information in English and Spanish.

Other public information brochures are provided as appropriate, including: seat drops, "Riders' Digest" pamphlets detailing upcoming route and schedule adjustments and special notice signs posted on buses.

5. Public Outreach

Extensive promotional efforts should be made to reach the general public to encourage them to utilize the services offered. Transit fairs at area employers, colleges and universities and participation in community events should be coordinated in order to bolster CTTRANSIT's community presence. A range of communication techniques should be utilized to reach the desired market segment. All new services and service changes should receive special promotion.

CTTRANSIT will utilize the following measures to communicate upcoming service changes and to announce public hearings, if necessary, on proposed service changes:

- Notices posted on buses
- Seat drops
- Postings at CTTRANSIT website
- Press releases to local news media
- Email notices to local and community organizations

Notices posted on buses will normally be available in both English and Spanish and the CTTRANSIT website will have Spanish-language translation available for limited English proficiency (LEP) populations.

C. Safety and Perceived Security

CTTRANSIT should continue to take a proactive approach to safety and security, including participation in National Safety Council programs. Special efforts should be made to continue to upgrade operator training and retraining programs.

CTTRANSIT will continue to maintain an aggressive security program to assure the safety of customers and employees and the perceived security of the system as viewed by existing and potential customers and employees. Users and employees of the system should be secure from acts of violence or terrorism, and CTTRANSIT property should be secure from vandalism and theft. Customers should be encouraged, through programs such as TransitWatch, to report suspicious activities to CTTRANSIT personnel or the police. It should be noted that drivers, however, are not police officers and should not attempt an aggressive security program personally.

All buses are equipped with a two-way radio system and silent alarm allowing contact with a division command center that is able to contact local law enforcement agencies for immediate assistance. All buses are also equipped with a video surveillance system to provide customers an added sense of security and to protect CTTRANSIT from frivolous litigation.

D. Vehicles and Vehicle Maintenance

Buses will be assigned to service without regard to race, color or national origin of riders or the communities they serve. The only exception is for buses dedicated to commuter express, bus rapid transit, commuter connection or shuttle service (e.g. the Star Shuttle). At such time as CTTRANSIT begins operating articulated buses, these high-capacity vehicles will be assigned to high-ridership routes where additional seating will alleviate overcrowding conditions. Newer buses will be distributed among all routes and newer buses will be used on weekends and holidays instead of older equipment.

Buses should be maintained in a high state of operational readiness through effective correctional and preventive maintenance programs. Each coach shall undergo preventative maintenance at regular intervals that comply or exceed Federal Transit Administration requirements.

The coach interior should be cleaned of rubbish and dirt daily, and all graffiti and interior vandalism should be removed or repaired as soon as possible upon discovery. All coaches should undergo exterior washing on as frequent a basis as is practical as well as have periodic complete interior wash downs including ceiling, walls, upholstery and floor cleaning.

It is CTTTRANSIT's goal that 100% of the fleet be heated and air-conditioned, with a minimum of 95% of heating or air-conditioning systems in proper working condition during the respective cold and warm weather seasons. Lighting on coaches should be ample for reading by seated customers, but designed to minimize glare in order to aid visibility for bus operators at night.

CTTRANSIT operates a bus fleet that is 100% accessible to persons with disabilities. Every high-floor bus in service should have a functioning wheelchair lift; every low-floor bus in service will have functioning ramp access. All buses will conform to Americans with Disabilities Act (ADA) requirements, including, but not necessarily limited to, kneeling features, audible/visual stop request, public address system and electronic destination signs. Destination signs should be provided at the front of the bus above the windshield supplemented by a side sign adjacent to the front entrance door. A route identification sign should be provided on the rear of the bus. The route number and/or letter should be displayed at all times and no sign should scroll more than three messages.

APPENDIX A

H.N.S MANAGEMENT COMPANY, INC.



100 Leibert Road, P.O. Box 66
Hartford, CT 06141

POLICY BULLETIN

Bulletin Number: VII
ROUTE AND SCHEDULE CHANGES

Original Date of Issue: May 23, 1984
Revised: November 21, 1996
September 10, 1997
April 19, 2000
July 18, 2001
June 2, 2009

Distributed To: Assistant General Managers, Division Managers, Department Heads

Reviewed By: _____
David A. Lee, General Manager

ROUTE AND SCHEDULE CHANGES

As a general policy, CTTRANSIT will implement changes from time to time in the routes, schedules, bus stops, and other service-related features of the system in order to improve productivity, cost-effectiveness, and performance to increase ridership and/or to respond to changing conditions.

A Service Review Committee in each division will evaluate all proposed service changes except as otherwise provided in this Policy Bulletin. At a minimum, each Service Review Committee shall include the following members: General Manager, Assistant General Manager for Planning & Marketing, Assistant General Manager for Transit Services, Director of Planning & Scheduling, Planning & Scheduling Supervisory Staff, Marketing Administrator, Division Manager, and a representative from ConnDOT appointed by the Transit and Ridesharing Administrator. Other CTTRANSIT and ConnDOT staff (e.g., Transportation Planners, Schememakers, etc.) are also expected to attend and participate in the Service Review meetings as appropriate.

The Director of Planning and Scheduling will chair the Service Review Committee meetings in each division. The chair will distribute a written agenda and any available information about proposed service changes to all attendees at least one week in

advance of each meeting. Written minutes of the meetings will be kept and forwarded to all members following each meeting. It is intended that meetings of the Service Review Committees will be scheduled on a timely basis in conjunction with preparations for operator bid-ins that occur three times per year in each division.

Proposed new services and changes from any source will be considered by the Service Review Committee, including changes proposed by employees, customers, and the general public. The committee will also review route and corridor evaluations performed by Planning and Scheduling Department staff, development plans that affect transit service, major long-term detours, fare policy, running time analyses, performance measures, transfer connection, connections to other bus and rail systems, underutilized service to be eliminated, and other service-related issues.

The following service changes do not require consideration by the Service Review Committee:

- Minor running time adjustments implemented after the bid-in that involve less than 20 minutes added platform time;
- Individual bus stop and layover changes;
- Temporary detours;
- Special services (e.g., operation of ad hoc fill-in service for a commuter railroad);
- Emergency service changes and unscheduled diversions;
- Temporary service adjustments to address overcrowding or safety concerns, and;
- Other service changes implemented outside the service review process at the direction or with the approval of ConnDOT.

All changes to CTTRANSIT “system” approved by the Service Review Committee will be reported in writing to the Transit and Ridesharing Administrator, including the following information for each change:

- a) Route(s) affected;
- b) Nature of change (e.g., schedule change, headway change, routing change, add trip, delete trip, extend route, deviate route, etc.);
- c) Reason for change (e.g., improve schedule adherence, reduce overloading, respond to complaint, service new generator, eliminate underutilized service, etc.);
- d) Effect of change of peak bus requirement, if any;
- e) Effect of change on ADA paratransit requirement, if any;
- f) Estimated net annual operating cost impact (amount of increase or decrease), and;
- g) Any other relevant information or comments.

As a general policy, certain service changes require ConnDOT approval before implementation. These include the following:

- a) Establishment or elimination of an entire route;
- b) Changes that increase the maximum peak vehicle requirement in a division by more than two percent;
- c) Changes estimated to have a net annual operating cost impact of \$75,000 or more;

- d) Changes that impact connections with other publicly funded transportation providers;
- e) A package of changes to be implemented as part of a major corridor study; or
- f) Other changes that may be deemed to require advance approval by the General Manager.

In addition, pursuant to FTA regulation and statutory requirements for public comment, the following are considered “major service reductions” that would require a public hearing prior to approval by ConnDOT:

- a) Systemwide changes resulting in an overall decrease of 20% or more of the service hours in any division;
- b) Elimination of all transit service within a corridor (e.g., elimination of one route would not require a public hearing if there is alternative transit service available within the corridor);
- c) Elimination of a key intermodal connection (e.g., elimination of service to the principal railroad station in Hartford, New Haven, or Stamford);
- d) Elimination or substantial relocation of the downtown transfer hub, and;
- e) Any other change for which ConnDOT wishes to solicit public comment, whether or not required by the FTA.

As a general policy, it is intended that all non-major changes approved by the Service Review Committee will be implemented with the next bid-in, unless the Transit and Ridesharing Administrator specifically directs otherwise. A signature line will be included in the report of Service Review Committee approved changes for the Transit and Ridesharing Administrator to indicate acknowledgement.

Section X
Rail System-Wide Standards and
Policies

RAIL SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

The Connecticut Department of Transportation has adopted Service Policies and Standards for the operation of the New Haven Line (NHL) and the operation of the Shore Line East (SLE) commuter rail service. These standards are consistent with those employed by Metro-North for their commuter rail system, and are adopted in their Title VI submission.

The NHL is operated primarily with electric multiple units (EMU) cars and the SLE is operated with diesel pulled standard coaches.

The Service Standards and Policies for Vehicle Load, Vehicle Headway, On Time Performance, Service Availability, Quality of Service Evaluation of Service and Fare Changes and Vehicle Assignment as follows:

Vehicle Load

The vehicle loading standard for maximum recommended occupancy for lengthening trains is as follows:

<u>Lengthening Trains</u>	
Peak/Reverse Peak	95%
Off-Peak Weekday	85%
Weekend	75%

This policy is utilized on both the NHL and SLE services.

Vehicle Headway

The Vehicle Headway standard is as follows:

<u>Vehicle Headways</u>	
Peak – 6 AM to 10 AM	
Inner New Haven	- 20 minutes
Outer New haven	– 30 Minutes
Off Peak – 10 AM – 4 PM	
Inner New Haven	- 30 minutes
Outer New haven	– 60 Minutes

The SLE service currently has limited ridership and is a maturing route. The off-peak period currently does not have hourly service due to low demand. The SLE follows the MNR service standard for vehicle headways (Outer New Haven) within the constraints of its current ridership demand.

On-Time Performance

The On-Time Performance standard is as follows:

On-Time Performance (OTP)

Definition: OTP is calculated by the final arrival time of trains at their terminal points within 5 minutes and 59 seconds of their scheduled arrival time

Trains that are cancelled (annulled) and do not operate and trains that are terminated prior to their final destination are counted as late trains. Delays to SLE trains due to late NHL train connections are not counted in the OTP.

Both MNR and SLE set annual goals for OTP.

Service Availability

The Service Availability standard is as follows:

Service Availability

Service availability is a measure of the distance (distribution of stations) that a person must travel to gain access to rail stations.

Quality of Service

Service quality is monitored through customer surveys. MNR performs customer service surveys on the NHL. A periodic SLE customer survey is performed by the Department of Transportation that is used to review the quality of SLE service provided.

Transit Amenities

Amenities refer to items of comfort and convenience available to the general riding public. The Office of Rail has used the surveys conducted of the rail service to understand the amenities important to its customers. The American with Disabilities Act (ADA) was created to improve access for people with disabilities. The ADA requires certain design changes to rail cars and stations that have improved the comfort of the riding public. These changes have brought about many improvements and amenities to the rail cars and stations.

Transit Security

Providing a safe and secure environment on Connecticut's commuter rail system is a priority of the Department. The Department develops security projects and initiatives based primarily on the potential to reduce risk.

Developing security projects for the hardening of critical transportation infrastructure will be based on several factors including threat vulnerability assessments, ridership, historic crime rates, criticality to the operation of the system, and economies of scale that may be achieved by scheduling multiple projects within a service area. Security projects have been distributed equitably with respect to minority/income status at the rail stations and yards.

The Department receives most of its funding for security projects for the commuter rail system from the U.S. Department of Homeland Security (DHS) Transit Security Grant Program (TSGP). The types of projects funded must meet DHS security priorities and a scoring system is used to select projects from qualifying transit agencies within the

Connecticut, New York, and New Jersey region. The projects selected are those with the greatest potential for risk reduction in the region.

The Department conducts public awareness campaigns for the commuter rail system to encourage employees and the public to report suspicious activity. Suspicious activity is defined by where people are and what they are doing without regard to race, gender, or ethnicity. These campaigns will be conducted in compliance with Title VI requirements, including outreach to persons with Limited English Proficiency.

Section XI
Equity and Evaluation of Service
and Fare Changes

Milestone 2.3a

EQUITY AND EVALUATION OF SERVICE AND FARE CHANGES

The Department plans service changes to meet customer needs based on information received from surveys, comments from the public and advisory committees. The Department coordinates with local officials, elected officials, and the public on proposed service and fare changes. The Department solicits public comment at multiple forums when a fare change is proposed.

The Department will evaluate significant system-wide service and fare changes at the planning and programming stages to determine whether the changes will have a disparate impact on minorities and low-income persons.

Major service impacts and all fare increases are presented at public hearings to solicit feedback from the public prior to adoption and enactment of any such changes.

Service Changes

As a general policy, the Department, in conjunction with operating partners, will implement changes from time to time in the schedules of bus and rail service and in the routes, bus stops, and other service-related features of the system to address market needs, productivity, cost-effectiveness and performance, and to increase transit ridership.

All changes to the current service include a review of the following information:

- Route or line affected
- Nature of change (schedule change, headway change, addition of service, reduction of service, etc.)
- Reason for change (improved schedule adherence, reduction in crowding, responding to complaints, serving new markets, addressing underutilized service, etc.)
- Effect of change on vehicle requirements
- Particular attention is paid to the effect of the change on ADA paratransit service (urban fixed-route bus service only)
- Particular attention is paid to the assessment of the impact of the change on Title VI and environmental justice populations
- Estimated budget impact
- Any other relevant information or comments.

The proposed changes must be approved by the Department before implementation. As part of the implementation, a communication plan is developed to impacted customers. Particular attention is given to address LEP populations, and materials and other service change publicity are printed in other languages, as appropriate.

See the attached form from a recent CTTTransit service review that shows route changes proposed and an impact assessment on Title VI populations.



Major Service Changes

The Department has developed the following guidelines for what is considered a “major” change. Major service changes require a public hearing prior to implementation actions. Comments from the hearings are addressed and proposals modified when indicated because of the hearings. An assessment of impact on Title VI and environmental justice populations is performed as part of the review process.

Major changes to rail and bus service are defined as follows:

1. When there is a proposal to abandon all service on an entire bus route or rail line;
2. When there is a proposal to eliminate service on a portion of a bus route or rail line that represents more than 25 percent of the route miles of the particular route or line. (No public hearing is necessary if alternative transit service is available on existing duplicative service provided by CTTransit or another transit provider or by transfer to another route);
3. When there is a proposal to substantially reduce service on a bus route or rail line, specifically where reduction of service increases the headway on the peak period service by more than 50 percent or more than doubles the off-peak headway.

Fare Increases

All rail, bus and ADA paratransit fare increase proposals require a public hearing. The Department’s public participation and LEP guidelines are followed for this process. An assessment of impacts on Title VI and environmental justice communities are performed as part of the process. The results of the public hearings are documented and modifications made to the fare proposals based on public input when indicated.

Before the initiation of fare adjustments the Department and its contractors conduct an analysis of public fare purchasing habits including the breakdown of fares purchased and utilized by type. Determinations are then made of usage patterns by demographic groups including, to the extent reasonable and possible, racial and ethnic groups as well as income level and English proficiency level. Finally the Department incorporates into its analysis whether final fare adjustments will have disparate effects on differing population groups.

Once arriving at a draft fare proposal, preparations are made to conduct public hearings at which the public may present its opinions of the proposed fare

adjustment. Accessible hearing sites are obtained in all affected service areas and hearings are scheduled to be held during the hours of transit service. Hearings are publicized on board buses and trains, in applicable newspapers, at transit hubs in all appropriate languages common to the hearing areas, etc. Upon request, foreign and sign language interpreters are provided for those in attendance at hearings.

The Department then finalizes a fare proposal package for review by policy makers. This analysis incorporates an assessment of whether final fare adjustments will have disparate effects on differing population groups.



SERVICE REVIEW COMMITTEE

DIVISION: H N S

PROPOSAL NAME: H12-03 Multiple Routes: Snow Detours

PROPOSED EFFECTIVE DATE: July 17, 2011

LEAD PLANNER: Brian McLaughlin

ORIGIN OF REQUEST: Planning Dept. Observations

SUPPORTING DOCUMENTS ATTACHED:

Current Schedule Proposed Schedule Map Cost Summary Ridership Summary Other

BACKGROUND / EXISTING CONDITIONS:

The record snowfall impacting the state during the months of January and February 2011 resulted in a number of bus routes operating on detour routes for an extended period of time due to impassable roadways. Many of these detours become necessary every winter due to poor road conditions. The Planning and Marketing Departments managed to keep customers apprised of these detours. However, it is generally felt that some of the more common snow detours could be publicized to customers in advance or, in some cases, made the permanent route. It is felt that making some of our more common snow routes permanent would improve customer service, simplify operations and may also reduce road calls during future snow emergencies.

OVERVIEW OF PROPOSAL:

Chandler & Dart Streets

Routes 37 & 63A operate via Chandler and Dart Streets in both directions. During inclement weather conditions, these streets are inaccessible and buses detour via Stone Street. If buses were to operate via Stone Street on a permanent basis, customers who currently board or alight along Chandler and Dart Streets (31 weekdays, 14 Saturdays and 14 Sundays) would have to board or alight along Stone Street or New Britain Avenue. These customers would be displaced by no more than 0.21 miles, and would continue to be considered served by Routes 37 & 63A under CTTRANSIT's service guidelines. Therefore, it is projected that less than 10% of customers would stop riding if this routing change were implemented.

Haddam & Storrs Streets

Route 63M terminates in a loop comprised of Haddam, Storrs & Mountain Streets. During inclement weather conditions, these streets are inaccessible and buses turn short at Mountain & Princeton Streets. If buses were to terminate at Mountain & Princeton Streets on a permanent basis, customers who currently board or alight along Haddam Street, Storrs Street and the southern end of Mountain Street (18 weekdays and 11 Saturdays) would have to board or alight at Mountain & Princeton Streets instead. These customers would be displaced by no more than 0.26 miles, and would continue to be considered served by Route 63M under CTTRANSIT's service guidelines. Therefore, it is projected that less than 10% of customers would stop riding if this routing change were implemented.

Waverly Street & Love Lane

Route 44 terminates in a loop comprised of Charlotte Street, Waverly Place & Love Lane. These streets are often inaccessible even during fair weather and buses use one of several alternate turnarounds. During January and February 2011, buses used Westland, Martin & Charlotte Street as a turnaround. Under this proposal, outbound buses would turn right on Charlotte Street, right on Barbour Street and layover at Unity Plaza. From Barbour Street, buses would turn right on Westland Street then left on Garden Street and resume the regular inbound route. If buses were to terminate at Unity Plaza, customers who currently board or alight along the western end of Charlotte Street, Waverly Place and Love Lane (33 weekdays and 10 Saturdays) would have to board or alight along Garden

ACTION TAKEN: Approved Approved with modifications Tabled for further study Not Approved

Street instead. These customers would be displaced by no more than 0.24 miles, and would continue to be considered served by Route 44 under CTTRANSIT's service guidelines. Therefore, it is projected that less than 10% of customers would stop riding if this routing change were implemented.

Cleveland & Hampton Streets

Route 42 terminates in a loop comprised of Cleveland Street, Hampton Street & Tower Avenue. During inclement weather conditions, Cleveland Street is frequently inaccessible and buses must seek an alternate route. Parked vehicles also often obstruct the intersection making it difficult for buses to turn right from Barbour Street to Cleveland Street year-round. Under this proposal, buses on Route 42 would resume using the turnaround which was discontinued in 1995, utilizing Kensington Street to access Hampton Street. Customers who currently board or alight along Cleveland Street (12 weekday, 3 Saturday and 1 Sunday) would continue to have access to Route 42 along Barbour and Hampton Streets. These customers would be displaced by no more than 0.13 miles, and would continue to be considered served by Route 42 under CTTRANSIT's service guidelines. Therefore, it is projected that less than 10% of customers would stop riding if this routing change were implemented.

Millbrook Park

Route 95 operates through the Millbrook Park neighborhood of East Hartford via Sutton Avenue, Cambridge Drive, Evans Avenue and Handel Road in both directions. During inclement weather conditions, these streets are inaccessible and buses detour via Maple Street. If buses were to operate via Maple Street on a permanent basis, customers who currently board or alight in the Millbrook Park area (41 weekdays and 25 Saturdays) would have to board or alight along Main or Maple Streets. Some of these customers (22 weekdays and 6 Saturdays) would be displaced by less than 0.25 miles and would continue to be considered served by Route 95 under CTTRANSIT's service guidelines. However, 19 weekday customers and 19 Saturday customers would be displaced by more than 0.25 miles, the majority of whom would likely stop riding if the route were changed. It is projected that approximately 50% of all Millbrook Park customers would stop riding if this routing change were implemented.

As an alternative, the Planning Department recommends maintaining weekday AM and PM peak service to Millbrook Park on the 95A - O'Connell Drive branch and diverting the 95C & 95H - Glastonbury branches to operate via Maple Street. This would maintain service to Millbrook Park for the bulk of the riders who would otherwise be displaced and result in less than a 10% drop in ridership in the Millbrook Park area. Timetable maps would be flagged to indicate to customers that 95A buses would detour via Maple Street during snow emergencies.

Welles Village

Route 95 operates through the Welles Village neighborhood of Glastonbury via Harris and Welles Streets in the inbound direction only; outbound buses were diverted to operate via Prospect and Griswold Streets in 19XX after reconstruction work at the intersection of Harris and Griswold Streets precluded buses from safely making the right turn from Harris Street southbound to Griswold Street westbound. During inclement weather conditions, Harris and Welles Streets are inaccessible and buses detour via Griswold and Prospect Streets. If buses were to operate via Griswold and Prospect Streets on a permanent basis, customers who currently board or alight along Harris and Welles Streets (11 weekdays and 5 Saturdays) would have to board or alight along Griswold or Prospect Streets. These customers would be displaced by no more than 0.15 miles, and would continue to be considered served by Route 95 under CTTRANSIT's service guidelines. Therefore, it is projected that less than 10% of customers would stop riding if this routing change were implemented.

ACTION TAKEN: Approved Approved with modifications Tabled for further study Not Approved

COST & REVENUE RECAP:

	TEMP Chandler & Dart	63M SOCIALLY Haddam & Storrs	PEEM Waverly & Love	PEEM Cleveland & Hampton	(DEFOUL TO COA) Millbrook Park (A)	Millbrook Park (B)	PEEM Welles Village
Annual Miles	3,289	(4,534)	921	1,634	(6,686)	(4,302)	261
Annual Hours	0	0	0	0	0	0	0
Annual Cost	\$9,440	(\$13,013)	\$2,643	(\$4,688)	(\$19,188)	(\$12,345)	\$748
Annual Revenue	(\$834)	(\$1,058)	(\$735)	(\$230)	(\$3,316)	(\$1,939)	(\$230)
Annual Subsidy	\$10,274	(\$11,955)	\$3,378	(\$4,459)	(\$15,873)	(\$10,407)	\$978

ACTION RECOMMENDED BY PLANNING DEPARTMENT:

The Planning Department recommends implementing these routing changes, including Millbrook Park Option B, with the July 17 bid.

IMPACT ON ADA COMPLEMENTARY PARATRANSIT SERVICE:

If implemented...

- This proposal would increase service hours for ADA paratransit.
- This proposal would increase ADA the paratransit geographic service area.
- This proposal would reduce service hours for ADA paratransit.
- This proposal would reduce ADA the paratransit geographic service area.
- This proposal would have no impact on ADA paratransit.
- This proposal is exempt from ADA paratransit requirements.

IMPACT ON TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 (Minority, Low Income, Limited English Proficiency (LEP) Populations):

The proposed routing changes would affect minority, low income and LEP populations. However, with the exception of some off-peak customers in the Millbrook Park area, all customers would continue to have access to service within 0.25 miles of their current bus stop, in accordance with CTRANSIT's service guidelines.

COMMENTS:

ACTION TAKEN: Approved Approved with modifications Tabled for further study Not Approved

Section XII
Demographic and Service Profile
Maps and Charts

Demographic and Service Profile Maps and Charts

The Department has prepared Minority, Limited English Proficiency (LEP) and Poverty demographic maps and charts using the latest available data from the decennial census and 2005 American Community Survey. The base mapping by census tract and associated data charts were compiled using the Department's Geographic Information System (GIS) using statewide, bus and rail service areas aggregates.

The rail service area for MNR, NHL, SLE, and Amtrak were defined as a 2.5-mile radius around each rail station.

The bus service area was defined as a ¼-mile band along each bus route, a 2.5 mile buffer around each express bus stop for CTTransit and the area contained by the towns served by the rural transit districts.

Additionally mapping supporting the 5310 and 5316 (Job Access) programs were produced with low income/poverty and minority concerns. (See Section XII)

The maps can be accessed by the link below:

<http://www.ct.gov/dot/cwp/view.asp?a=3529&q=305564&dotNav=>

Title VI

Map Preparation Background

March 2, 2011

1.0 Purpose

Per requirement of the Department's Title VI Compliance review and submission, several maps were prepared to present Connecticut's Public Transportation rail and bus systems and services against various demographic and socio-economic data for future use in analysis of Title Six impacts and project concerns.

2.0 Data and Sources Used

To develop the base layers used within the Title Six Mapping, several data were retrieved from the US Census, from the American Fact Finder, from existing Department sources including the Bureau of Policy and Planning Census Modeling and GIS Development Sections and the Bureau of Public Transportation along with Bus System data from Connecticut Transit.

The data developed is listed below with their source below:

Figure 2a – Title VI Data and Source

Data	Source
Rail Information	
Passenger Rail System Network	CTDOT- GIS Development Section
Rail Stations	CTDOT- GIS Development Section
Rail Service Buffers	
2.5 Mile Station Buffer	GIS Development
Transit Information	
Local Intercity Bus Lines	CT Transit
Express Lines	CT Transit
Express Bus Stops	CT Transit, Public Transportation
Transit District Boundaries	Public Transportation
Bus Facilities	Public Transportation
Job Access Routes	Public Transportation

Data	Source
New Britain Hartford Busway	Public Transportation
Bus Service Buffers	
¾ Mile ADA Buffer – Local Bus System	GIS Development
2.5 Mile Buffer - Express Bus Stops	GIS Development
Base Map Layers	
Town Boundaries	GIS Development
County Boundaries	GIS Development
Highway System	GIS Development
Regional Planning Organizations Boundaries	GIS Development
Census Tract Boundaries	GIS Development, US Census
Demographic & Socio-Economic Data	
Low Income Data	US Census, American Fact Finder, Census Modeling Section
Poverty Data	US Census, American Fact Finder, Census Modeling Section
Limited English Proficiency (LEP) Data	US Census, American Fact Finder, Census Modeling Section
Minority Data	US Census, American Fact Finder, Census Modeling Section
Persons of Interest (Race)	US Census, American Fact Finder, Census Modeling Section

3.0 Methods Used

Various Maps were prepared to present the various data layers with respect to both Transit and Rail Systems and Services by the GIS Development Section of the Bureau of Policy and Planning.

- Rail System Mapping**
 The Rail System Mapping was compiled by first added the various base layers including geographic boundary information. Rail System Information was then added to the mapping including both Passenger Rail and Station features. A 2.5 mile service buffer was then added around each of the Rail Stations.
- Transit (Bus) Mapping**
 The Bus System Mapping was compiled by first added the various base layers including geographic boundary information. Bus System Information was then added to the mapping including Local Intercity Bus and Express Bus Service along with the Express Stop locations. Additionally the Rural Transit District boundaries

were added along with other Bus Facilities. A 3/4 mile service buffer was then added to the Local Intercity Bus Service and Job Access Routes and a 2.5 mile service area buffer was established around each of the Express Bus Stops.

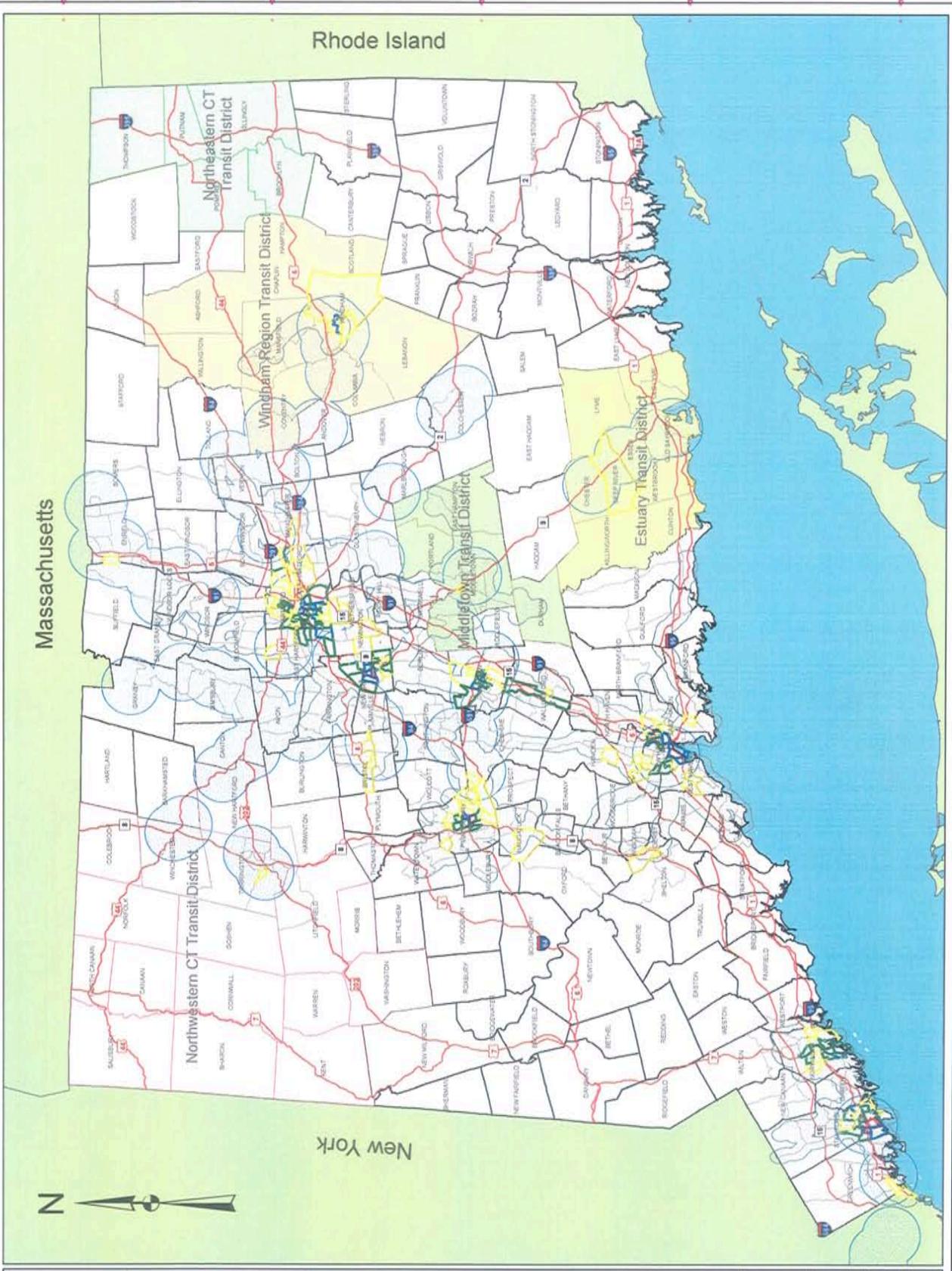
- **Demographic & Socio-Economic Data**

Various demographic and socio-economic data layers were then developed as required for Title VI from their original US Census and American Fact Finder Sources including Low Income, Poverty, Limited English Proficiency, Minority and Race data as follows:

The Low Income Data Map Layer was developed on Low Income being defined as the total number of individuals whose income falls equal to or less than 150% of the US Census Poverty Level.

Poverty, Limited English Proficiency, Minority and Race data were used directly from their original source US Census and American Fact Finder information.

The original source Demographic and Socio-Economic data were then intersected geospatially with the Bus and Rail Service Buffers to determine areas of Title VI concern and interest and were then placed on the respective Bus and Rail Service Mapping for review.



State of Connecticut
 Department of Transportation




Connecticut Limited English Proficiency (LEP) Map for Bus Service Area
 18 years and older
 by American Community Survey
 ACS 2005-2009

Legend

Percent LEP by ACS 2005-2009
0.00 - 5.00
5.00 - 10.00
10.01 - 20.00
20.01 - 30.00
30.01 - 40.00
40.01 - 48.85

Local Bus Routes 0.75 Mile ADA Service Area Buffer
 Express Bus Stops 2.5 Mile Service Area Buffer

Rural Transit Districts

- Esletary Transit District
- Middletown Transit District
- Northeastern CT Transit District
- Northwestern CT Transit District
- Wingham Region Transit District

Town Boundaries

The average percentage LEP for bus service area is 5.02%.



Developed August 2011

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**Connecticut
Minority
Map for
Bus Service Area**
by U.S. Census 2010

Legend



Local Bus Routes 0.75 Mile ADA Service Area Buffer
Express Bus Stops 2.5 Mile Service Area Buffer

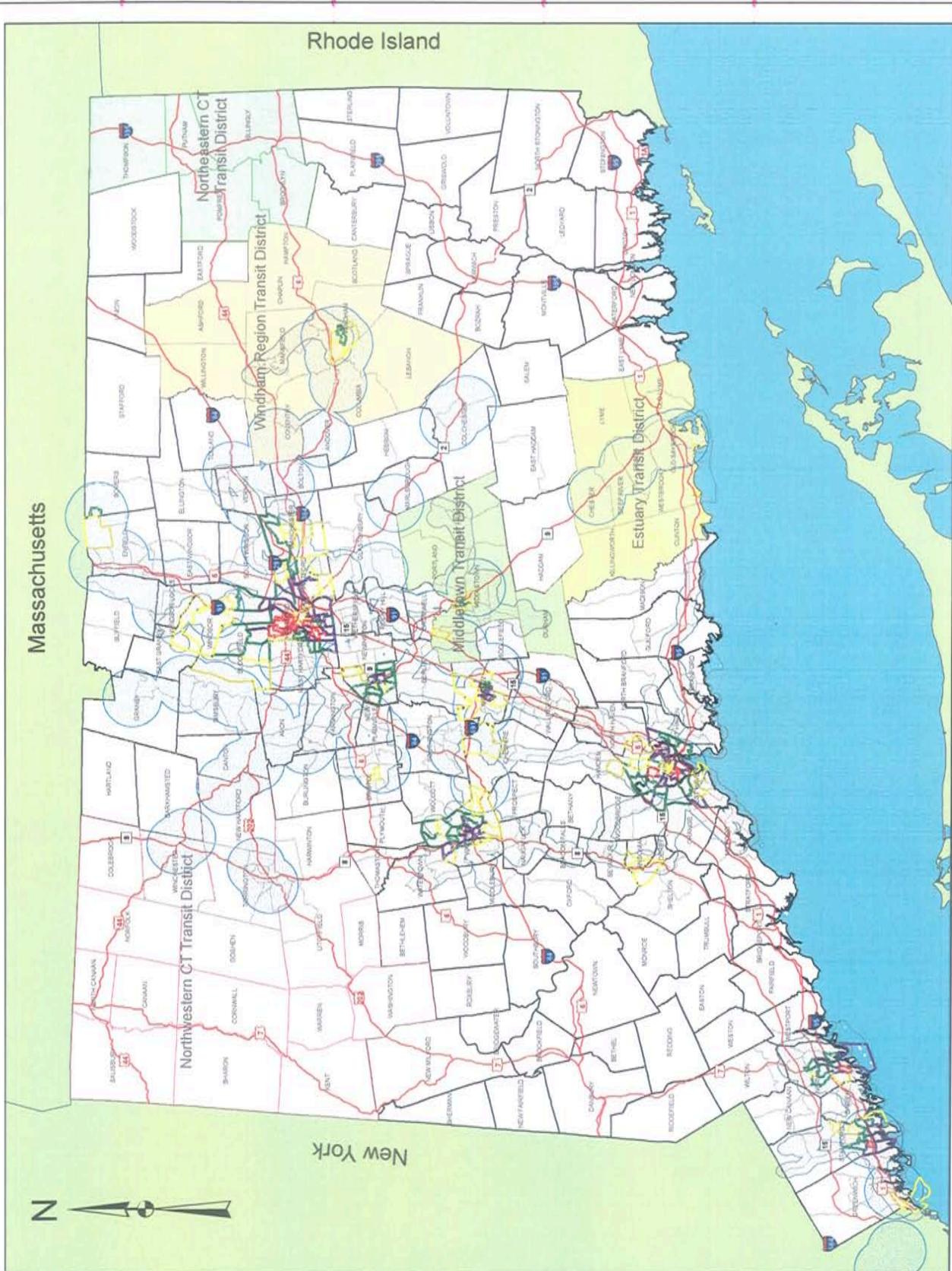
- Rural Transit Districts**
- Estuary Transit District
 - Middletown Transit District
 - Northeastern CT Transit District
 - Northwestern CT Transit District
 - Windham Region Transit District
- Town Boundaries

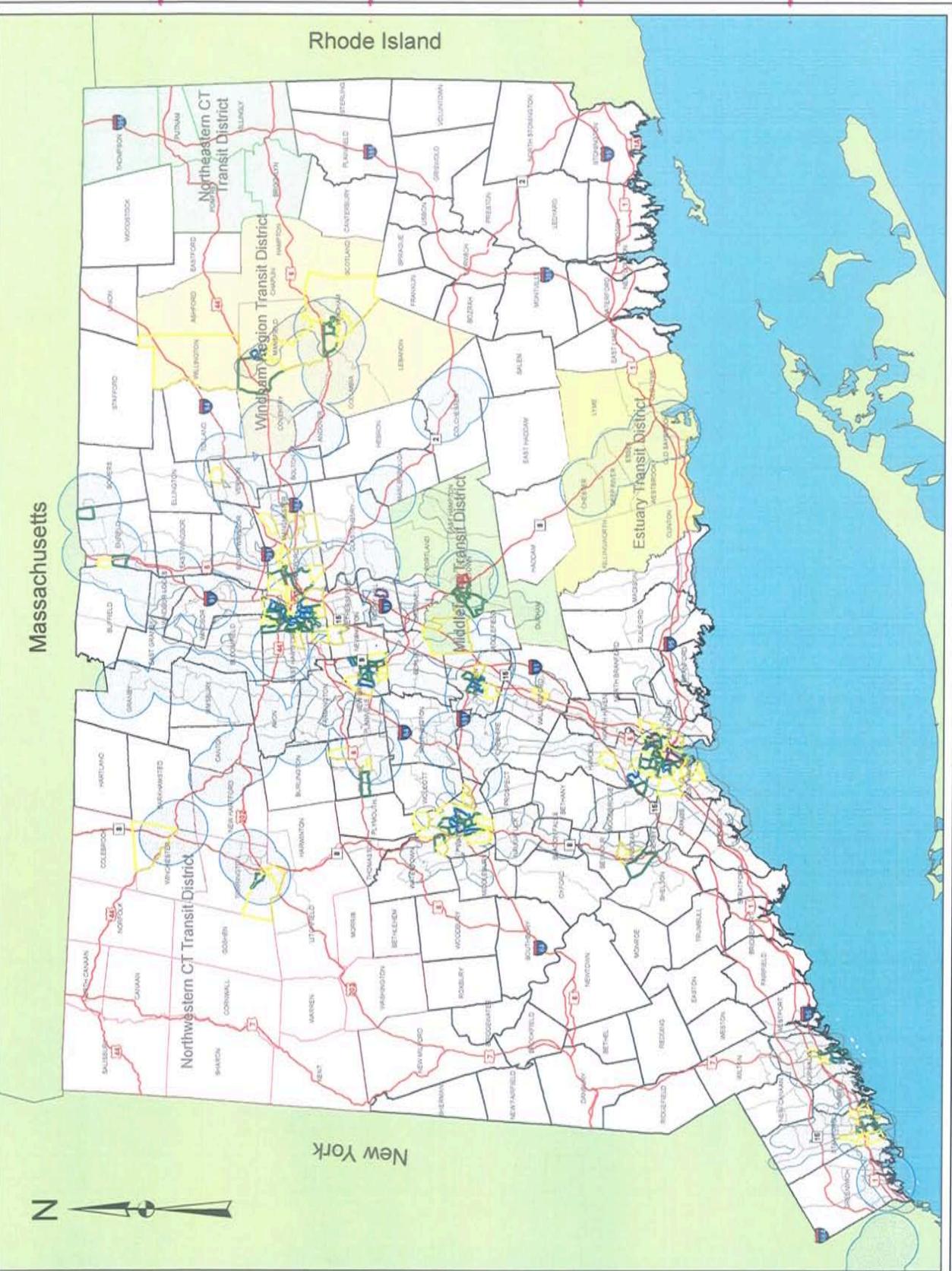
The average percentage minority population for bus service area is 32.76%.



**Developed
August 2011**

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**Connecticut
Poverty
Map for
Bus Service Area**
by American Community Survey
ACS 2005-2009

Legend

Percent Below Poverty by ACS 2005-2009

0.00 - 11.41	11.42 - 20.00	20.01 - 40.00	40.01 - 60.00	60.01 - 80.00	80.01 - 93.33
--------------	---------------	---------------	---------------	---------------	---------------

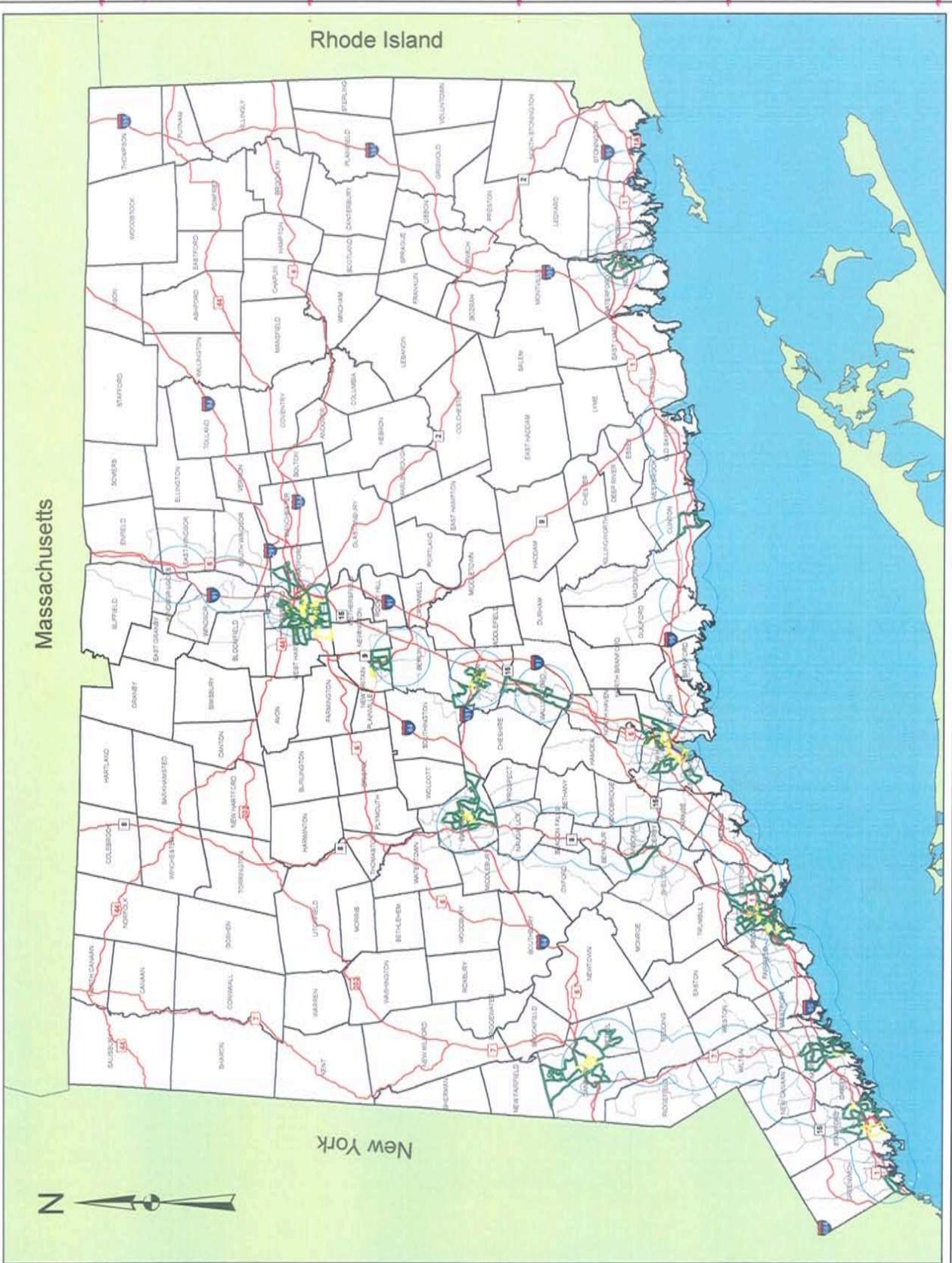
Local Bus Routes 0.75 Mile ADA Service Area Buffer
Express Bus Stops 2.5 Mile Service Area Buffer

- Rural Transit Districts**
- Estuary Transit District
 - Middlesex Transit District
 - Northeastern CT Transit District
 - Northwestern CT Transit District
 - Windham Region Transit District
- Town Boundaries



**Developed
August 2011**

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State of Connecticut
 Department of Transportation




Connecticut Limited English Proficiency (LEP) Map for Rail Service Area
 18 years and older
 by American Community Survey
 ACS 2005-2009

Legend

Percent LEP by ACS 2005-2009

- 0.00 - 6.75
- 6.76 - 20.00
- 20.01 - 40.00
- 40.01 - 48.85

Rail Stations 2.5 Mile Service Area Buffer
 Town Boundaries

The average percentage LEP for rail service area is 6.75%.

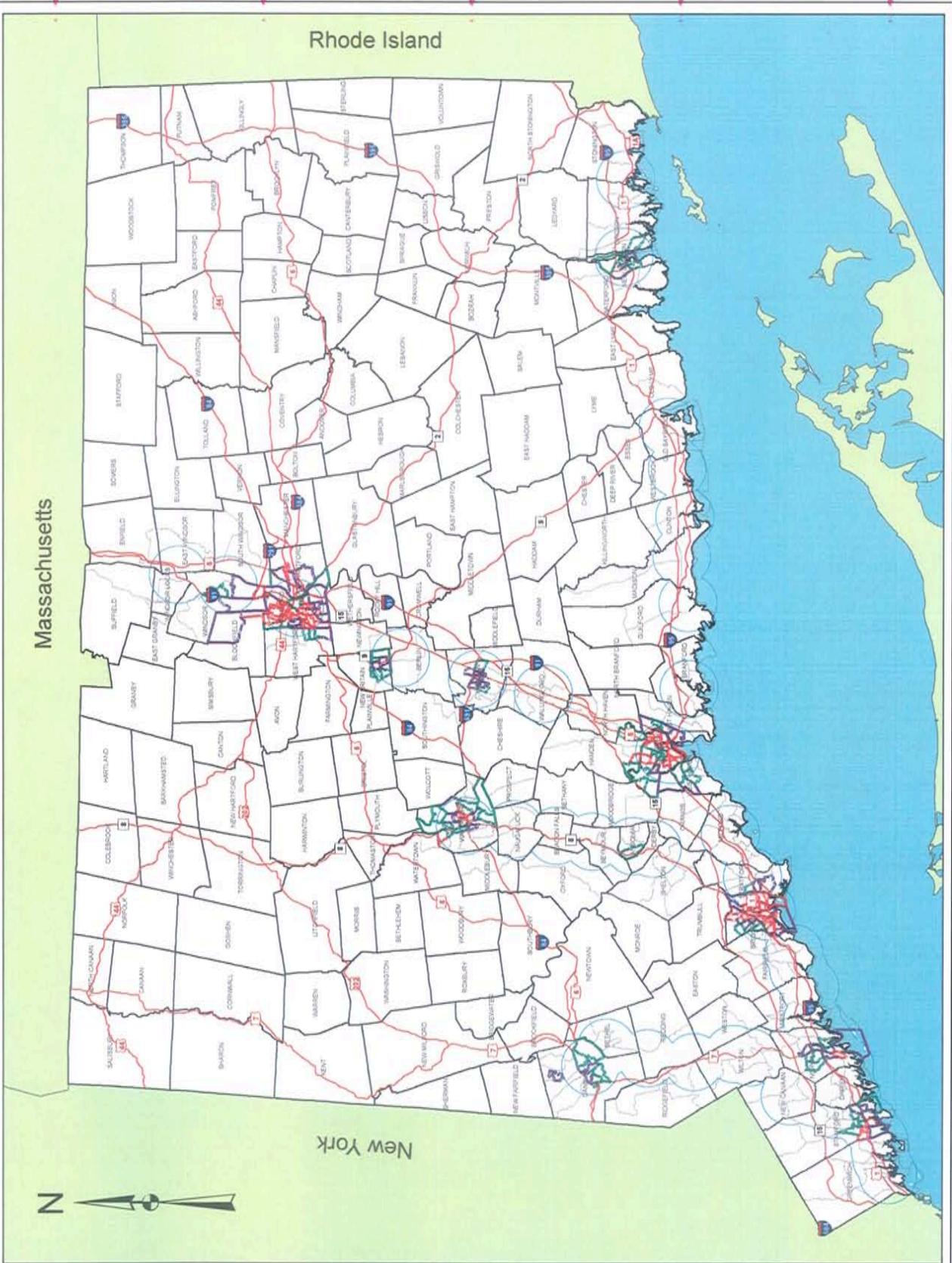
Map Scale



0 3 6 9 12 Miles

Developed August 2011

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State of Connecticut
Department of Transportation




**Connecticut
Minority
Map for
Rail Service Area**

by U.S. Census 2010

Legend

Percent Minority Population

- 0.00 - 41.81
- 41.82 - 60.00
- 60.01 - 80.00
- 80.01 - 99.20

Rail Stations 2.5 Mile Service Area Buffer

Town Boundaries

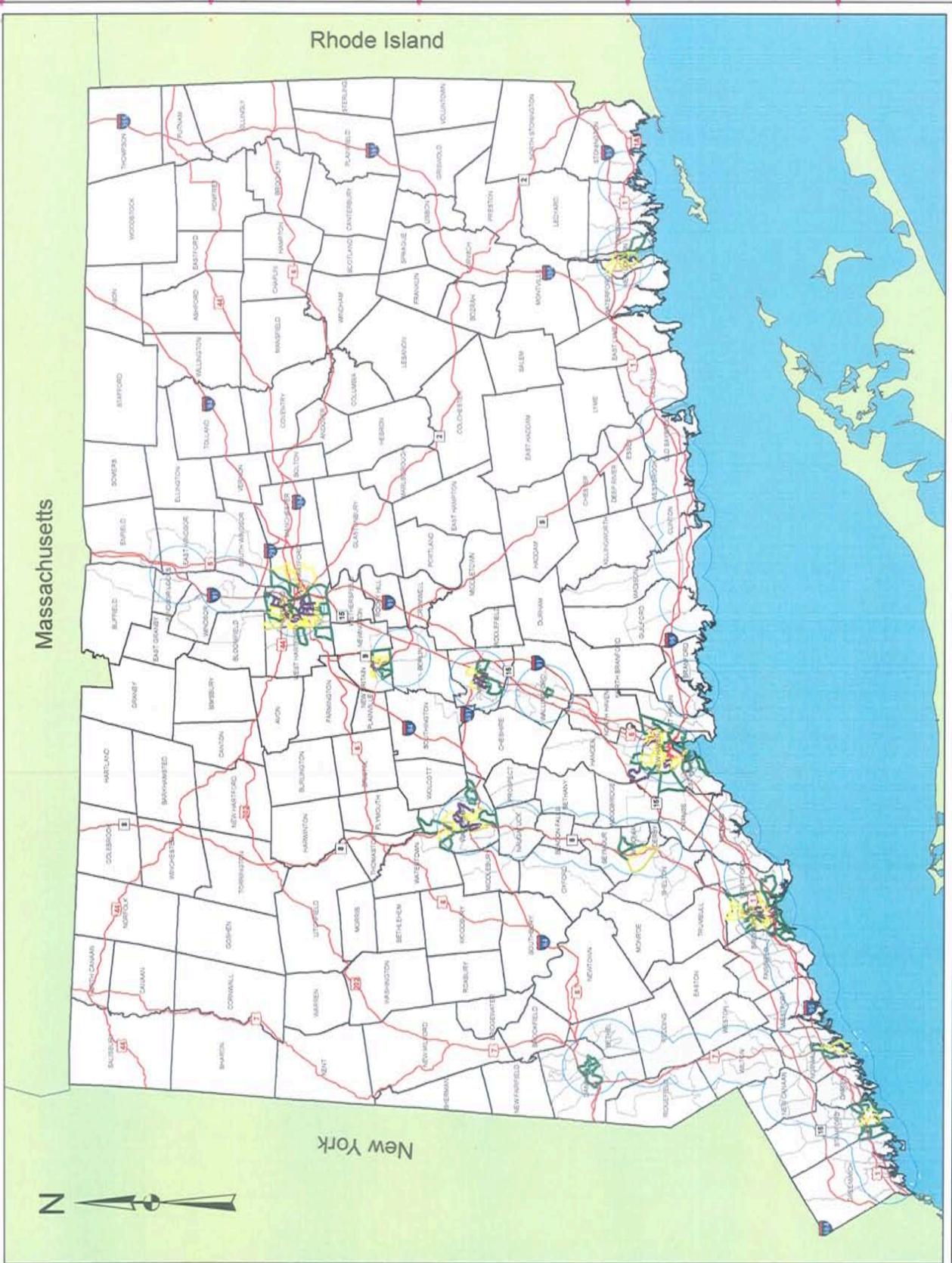
The average percentage minority population for the rail service area is 41.81%.

Map Scale



**Developed
August 2011**

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State of Connecticut
Department of Transportation




**Connecticut
Poverty
Map for
Rail Service Area**

by American Community Survey
ACS 2005-2009

Legend

Percent Below Poverty by ACS 2005-2009

- 0.00 - 12.98
- 12.99 - 20.00
- 20.01 - 40.00
- 40.01 - 60.00
- 60.00 - 71.12

Rail Stations 2.5 Mile Service Area Buffer

Town Boundaries

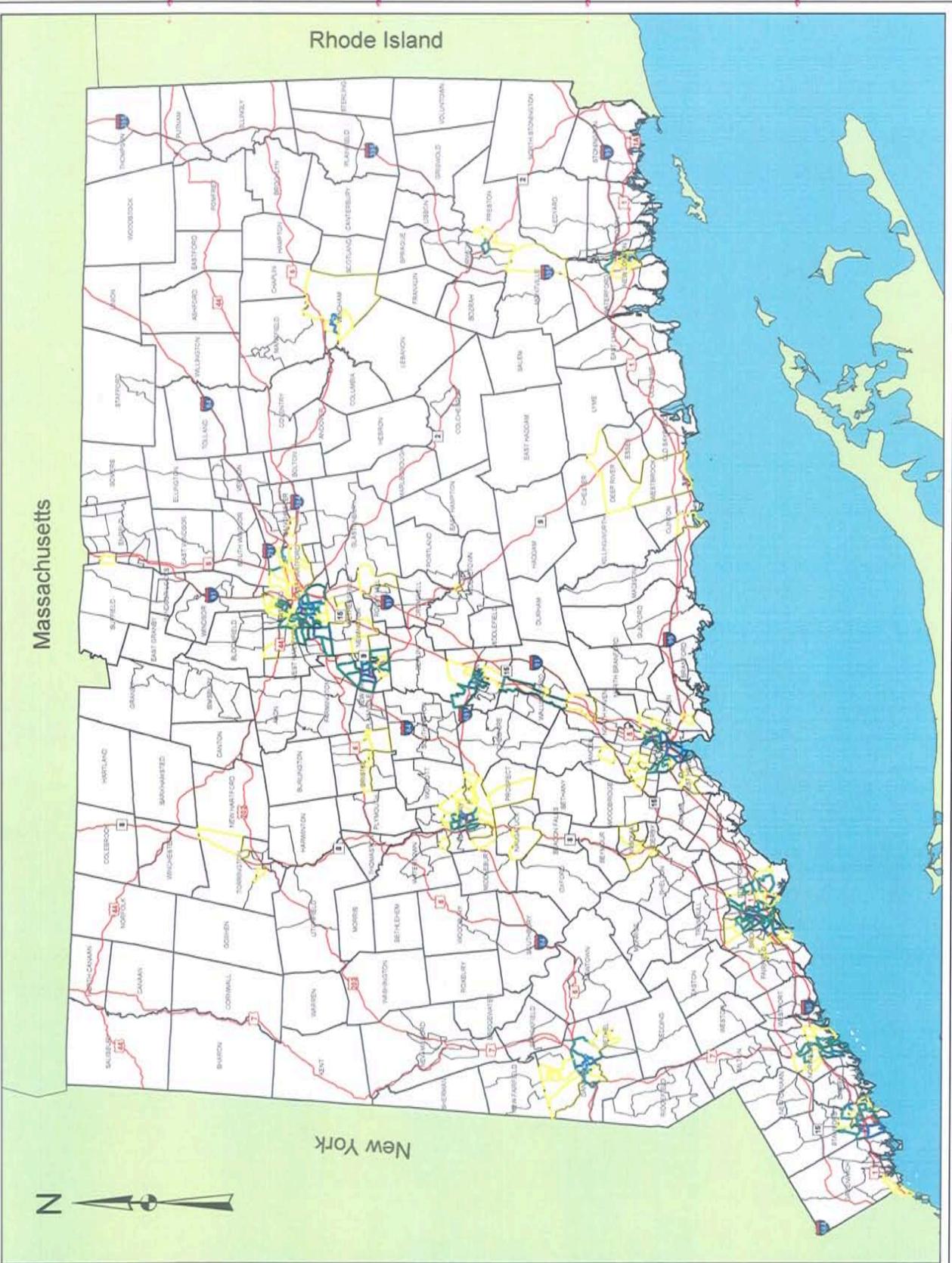
The average percentage below poverty for the rail service area is 12.88%.

Map Scale



**Developed
August 2011**

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State of Connecticut
 Department of Transportation




**Connecticut
 Statewide
 Limited English
 Proficiency (LEP)
 Map**

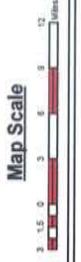
18 years and older
 by American Community Survey
 ACS 2005-2009

Legend

Percent LEP by ACS 2005-2009
0.00 - 4.74
4.75 - 10.00
10.01 - 20.00
20.01 - 30.00
30.01 - 40.00
40.01 - 48.85
Town Boundaries

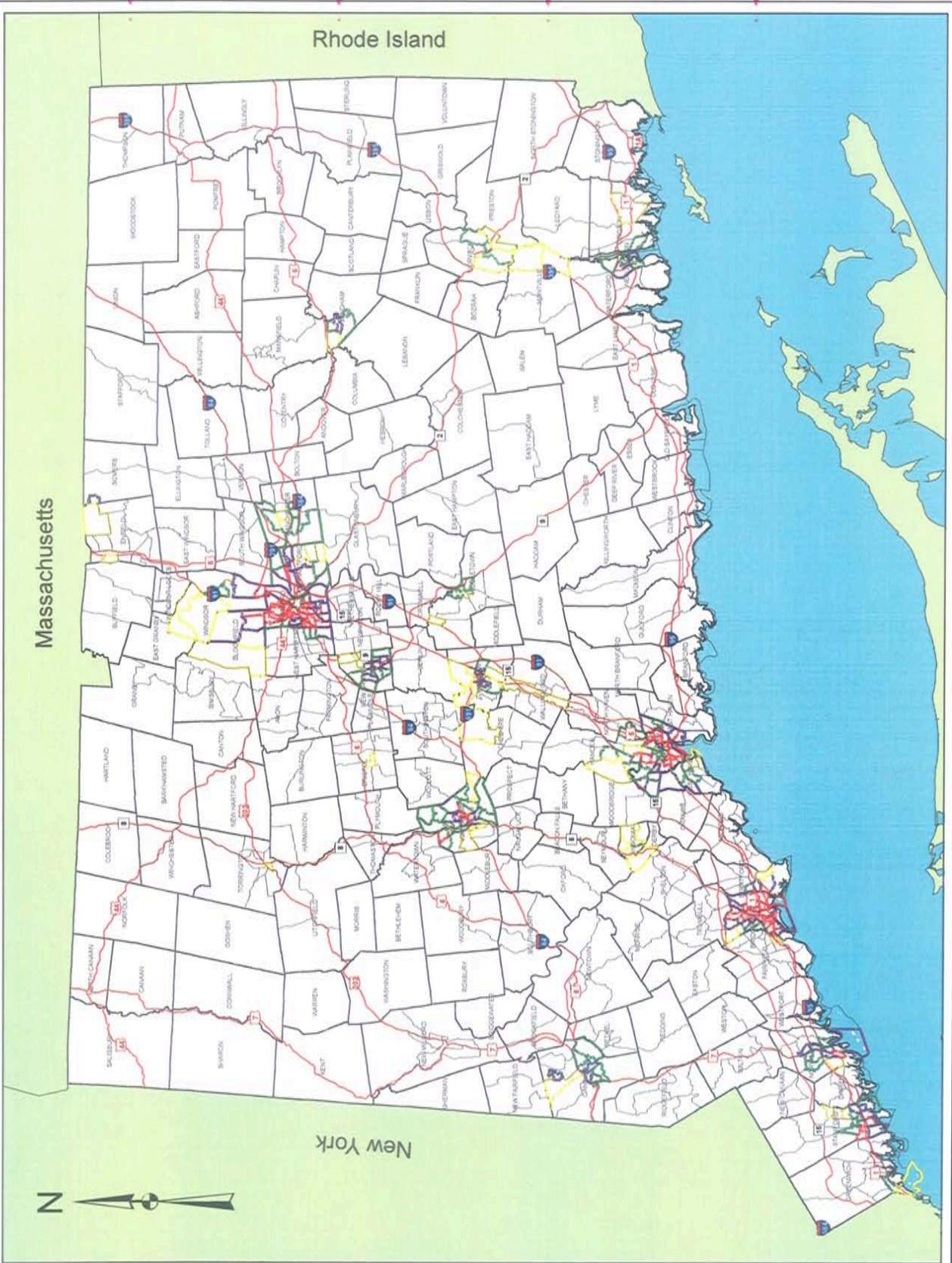
The statewide average percentage
 LEP is 4.74%.

Map Scale



**Developed
 August 2011**

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State of Connecticut
Department of Transportation

Connecticut Statewide Minority Map

by U.S. Census 2010

Legend

Percent Minority Population

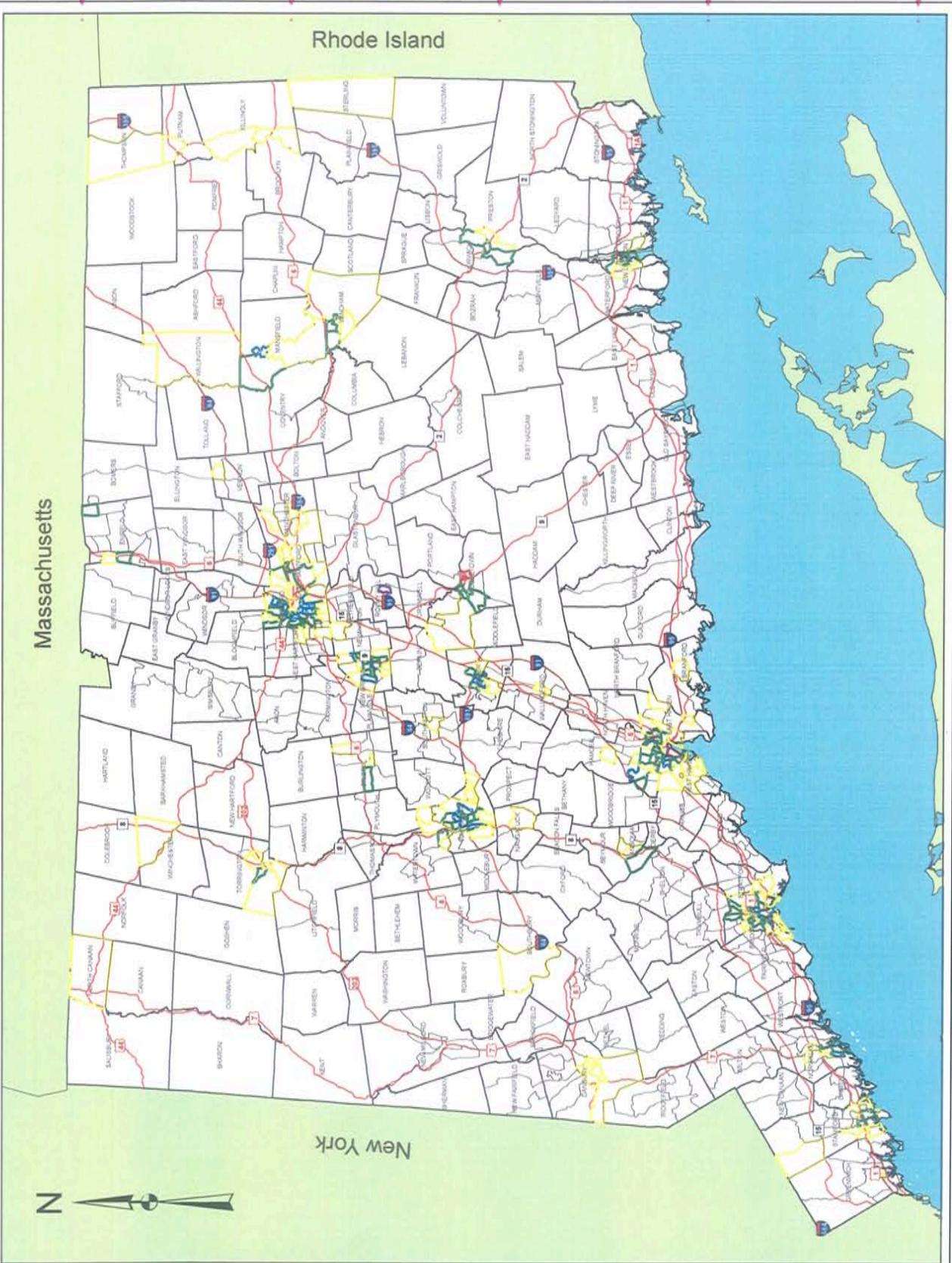
- 0.00 - 30.53
- 30.54 - 40.00
- 40.01 - 60.00
- 60.01 - 80.00
- 80.01 - 99.20
- Town Boundaries

The statewide average percentage minority population is 30.53%.

Map Scale

**Developed
August 2011**

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**Connecticut
Statewide
Poverty
Map**

by American Community Survey
ACS 2005-2009

Legend

Percent Below Poverty by ACS 2005-2009

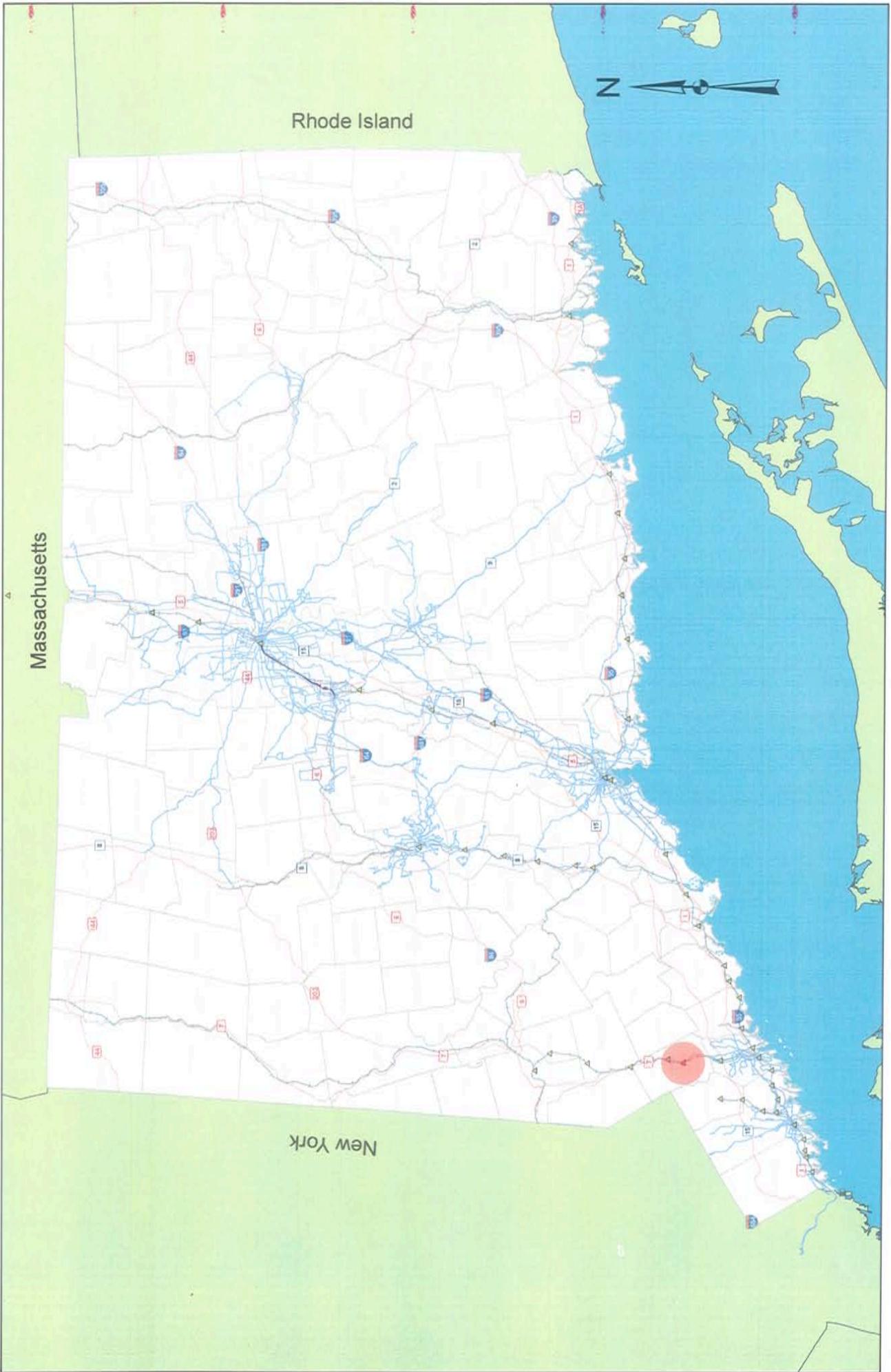
0.00 - 10.31
10.32 - 20.00
20.01 - 40.00
40.01 - 60.00
60.01 - 80.00
80.01 - 93.33
Town Boundaries

The statewide average percentage below poverty is 10.31%.



**Developed
August 2011**

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Rhode Island

Massachusetts

New York

Section XIII
Monitoring Transit and Rail
Service

MONITORING TRANSIT SERVICE

REQUIREMENT TO MONITOR TRANSIT SERVICE. In order to comply with 49 CFR Section 21.5(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, recipients to which this chapter applies shall monitor the transit service provided throughout the recipient's service area. Periodic service monitoring activities shall be undertaken to compare the level and quality of service provided to predominantly minority areas with service provided in other areas to ensure that the end result of policies and decision making is equitable service. Monitoring shall be conducted at minimum once every three years. If a recipient's monitoring determines that prior decisions have resulted in disparate impacts, agencies shall take corrective action to remedy the disparities.

In 2009, the Department performed an assessment of rail and bus services as required by the Federal Transit Administration's Title VI regulation. This assessment compared the levels of bus and rail transit service provided by the Connecticut Department of Transportation to the minority and non-minority communities against overall system standards and compared both the levels and quality of service provided to the minority community to service provided to the non-minority community to: (1) determine the realization of standards and the application of policies and (2) determine the equity of service provided to the minority community in comparison with the non-minority community.

For the 2011 monitoring effort, the Department is proposing to move away from the Level of Service approach. Because of the diversity of the services and unique relationship between the State and its operating divisions, the agency is suggesting that it move toward a methodology that combines "quality of service" and customer survey analyses, also outlined in the FTA circular. This is supplemented with a review of service policies/standards and practices to ensure non-discrimination.

BACKGROUND RELATING TO MONITORING PLAN

As described below, the Department operates commuter rail, express and local buses, and ADA complementary paratransit. The monitoring approach being proposed varies by mode.

Commuter Rail

The commuter rail network in Connecticut includes the New Haven Line (NHL) and Shore Line East (SLE) services. The NHL is a commuter rail service, owned by Connecticut, which operates between New Haven, Connecticut, and

Grand Central Terminal in New York City. In 1985, the Department entered into a three-party service agreement with New York Metropolitan Transportation Authority (MTA) and Metro-North Railroad (MNR) that provides for operation of NHL service by MNR. The MTA, specifically MNR, submits a Title VI report to the FTA, which includes the NHL service in Connecticut. The Department reviews the contents of MTA MNR's portion of their current Title VI program that reports on the NHL service in Connecticut and monitors their activities in Connecticut.

The NHL is primarily a four-track main line railroad and includes the Main Line and three branch lines. The NHL operates between New Haven, Connecticut and Grand Central Terminal, New York and includes 19 Main Line stations in Connecticut. The Waterbury Branch Line operates between Waterbury and Devon (Milford) and has six stations. The Danbury Branch Line operates between Danbury and Norwalk and has seven stations. The New Canaan Branch Line operates between New Canaan and Stamford and has four stations. The service in 2011 on the NHL (Main Line and branch lines) consisted of 287 weekday trains, 178 Saturday trains, and 148 Sunday and holiday trains with the majority of the ridership heading to Stamford or further west into New York City.

Shore Line East is a commuter rail service between New London and New Haven that is owned by Connecticut and operated by Amtrak under a service agreement with the Department. The SLE service consists of 23 daily weekday trains as well as through service to Bridgeport and Stamford on the NHL. SLE also operates weekend and holiday service that consists of 16 trains on Saturdays, Sundays, and holidays. There are nine stations on SLE. The Department also owns or leases parking at most of the stations.

Bus/Paratransit Service

Urban Fixed Route Bus Services

The State-owned bus services are labeled as Connecticut Transit (CTTransit) and consist of eight operating divisions operated under contract by four separate entities. In all divisions, the bus fleets are State-owned and the services are subject to State control, with oversight provided by the Office of Transit and Ridesharing (OTR) within the Bureau of Public Transportation.

CTTransit fixed route services include:

The Hartford Division consists of 30 fixed routes, four limited stop “flyers” and 12 express commuter routes consisting of 237 buses serving 27 towns. The division also includes 9 express bus routes operated by four private companies under contract to the Department.

The New Haven Division consists of 17 fixed bus routes and 2 shuttles and uses 110 buses serving 19 towns

The Stamford Division consists of 14 local bus routes, 4 rail shuttles and one express commuter route using 54 buses and serving four Connecticut towns.

The Waterbury Division consists of 22 fixed routes as well as Access to Jobs and several industrial tripper routes. The Division uses 36 buses and serves five towns.

The New Britain Division consists of 11 fixed routes, plus one route jointly operated by the Hartford and New Britain divisions. The New Britain division has a total of 20 buses serving four towns.

The Meriden Division consists of three fixed routes utilizing three buses.

The Bristol Division consists of one fixed route utilizing one bus.

The Wallingford Division consists of one route utilizing one bus.

ADA Complementary Paratransit

Each urban Division also provides ADA Complementary Paratransit within their fixed route service area.

Rural Transit Services

The OTR also oversees the funding and operations of five subrecipient Rural Transit Districts under the Section 5311 Program.

Estuary Transit District (ETD) provides Shoreline Shuttle service, Riverside Shuttle service and Transit-on-Call service. Some services provided by the ETD are operated in the New Haven urbanized area (with its population over 200,000).

Middletown Area Transit District (MAT) provides transit service on two rural routes, five fixed routes within the city of Middletown, Dial-a-Ride and ADA services to the towns of Middletown, Durham, Middlefield, Portland and East Hampton. Some services provided by MAT are provided in the Hartford urbanized area (which has a population over 200,000). MAT is also a direct recipient of Section 5307 funds from FTA.

Northeastern Connecticut Transit District (NECTD) serves the towns of Brooklyn, Killingly, Putnam, and Thompson with deviated fixed route service. Dial-a-Ride service is provided to the towns of Eastford, Woodstock, and Pomfret.

Northwestern Connecticut Transit District (NWCTD) provides services to a sixteen-town region and includes a Local Deviated Flexible Route service and a Rural Transit Dial-A-Ride service.

Windham Region Transit District (WRTD) operates two rural fixed route bus services, a demand response service and ADA service.

MONITORING METHODOLOGY

The Department is proposing a monitoring methodology that combines “quality of service” and customer survey analyses, as outlined in the FTA Circular. Methodologies vary by mode. The process begins with a comparison of the quality of service and then considers the equity service policies/standards and practices associated with the distribution of amenities, vehicles and security.

If differences exist in any of these factors along the trips to any of the destinations analyzed, the Department will determine whether the differences are significant – maybe using the “4/5 rule of thumb”. If significant disparities in one or more quality of service indicators are confirmed, the Department will determine why the disparity exists and take corrective action to correct the disparity.

The Department defines its service area as the census tracts within a $\frac{3}{4}$ mile band around each bus route and within a 2 $\frac{1}{2}$ mile radius of each train station or express bus park and ride facility. Minority Census Tracts are identified as those tracts having a minority population of 32.76% or more. Low income (LI) census tract are identified as those having more than 11.41% of the population below the poverty level. Rail stations are the unit of analysis for rail data and a minority/LI rail station is defined as a station that is located in

and/or surrounded by census tracts with either 41.81% or more of minority population in the area or 12.98% or more low income population in the area.

Data Available

- Fixed Route bus survey data
- SLE rail survey
- ACS data showing location of low income and minority populations
- Google Transit
- Fleet Age and composition by Division
- ADA paratransit service quality measures

Quality of Service Analysis

Commuter Rail

The approach to monitoring the relative quality of service on rail services would involve the following steps:

- (1) Classify stations into three categories by whether they serve areas with higher than average minority, low income populations or neither (see list)
- (2) Compare the passenger amenities (parking, etc.) at stations in each category
- (3) Compare security measures in place or crime statistics at the stations in each category
- (4) Compare the frequency, travel time and cost of trips from stations in each category to Stamford and New York City on the NHL and into New Haven on the SLE. Look at weekday peak and off-peak, Saturday and Sunday/holidays
- (5) Compare rider satisfaction for SLE rail riders from survey
- (6) Determine if significant differences exist (using 4/5 rule¹)

Fixed Route Bus Service

The Department will take a multi-faceted approach to compare the quality of service provided to the minority and low-income populations in relation to service provided to the non-minority and non-low income populations in the

¹ This analysis will look at whether the travel times, cost, and transfers are “substantially” higher in low income/minority census tracts. The threshold would be if the percentage in the minority/low income tracts is less than 4/5ths or eighty percent (80%) of rate for riders as a whole (or non-minority/non-low income riders?).

area. The approach to monitoring the relative quality of bus services would involve the following steps:

- (1) Identify an appropriate number of Census tracts in each operating Division and chose a sample of census tracts as origins. Determine minority and income characteristics associated with that tract so that a portion of the sample includes Census tracts where minority and/or low-income residents predominate. Stratify the sample by the distance to major public transit trip generators.
- (2) Concurrently, identify three of the most frequently traveled destinations for riders in each Division – this would include the City Center, maybe a rail station, and other (university, hospital, major employer) depending on the Division.
- (3) For each of the three destinations, we would use Google Transit or the Trapeze Trip Planner and fare tables to compare the average weekday peak hour travel time to the destination, average weekday non-peak hour travel time to each destination, number of transfers required to reach the destination, total cost of trip to the destination, and cost per mile of trip to the destination for people beginning the trip in the selected Census tracts. The total travel times, costs (fares) and number of transfers for trips made from non-minority/non-low income addresses to each of the three destinations will be compared to trips from minority addresses and from low-income addresses to the same destinations. In all, approximately 20 unique origin trips will be run each to three destinations at two time periods – peak and off-peak).
- (4) To supplement this analysis, the Department will use the response from the up-coming passenger survey to compare the responses from individuals who identified themselves as members of minority groups and/or in low-income brackets with responses of those who identified themselves as white and/or in middle and upper-income brackets
- (5) Determine if significant differences exist.

ADA Complementary Paratransit

The methodology for ADA paratransit would continue to be based on the relative quality of service provided to low income/minorities when compared to the rest of the ADA riders (or compare both to standards):

- (1) Randomly select ADA paratransit trips and categorize them as minority/low income and non minority/low income based on the demographic characteristics of their origin census tract.
- (2) Compare on-time performance, missed trips.

Analysis of Equity in Service Policies/Standards/Practices

Service Availability - Headways

This is a possible option for analysis,, though since the Department will be doing a thorough travel time analysis, the headway factor should be neutralized by the travel time analysis. However, if this analysis needs to be done, the methodology would be as follows:

1. Bus Headway Standards - Have standard for headways on bus. The goal is to provide headways during the peak and off-peak periods not exceeding 60 minutes. These guidelines do not apply to commuter express routes. Express routes normally only operate during peak periods to accommodate work trips. For local routes, the minimum weekday peak headway is 30 minutes, and 60 minutes for all other times. For express and commuter routes, the weekday peak headway is 3 trips in the peak direction in each peak.

Minimum Headways

Service Type	Service Period	Minimum Headway
Local Routes	Weekday Peak Period	30 Minutes
	All Other Service Periods	60 Minutes
Flyer Routes	All Service Periods	60 Minutes
Express Routes & Commuter Connection Routes	Weekday Peak Period	3 trips in peak direction in each peak

2. Rail Headway Standard -- The vehicle headway standard for peak period NHL is 20 minutes for the inner section of the line (west of Stamford) and 30 minutes for the outer section of the line (between New Haven and Stamford). The off-peak standard for the NHL is 30 minutes in the inner section of the line and 60 minutes for the outer section. The SLE service currently has limited ridership and is a maturing service. The SLE standards for the peak are the same as the outer section of the NHL, 30 minutes. Due to limited ridership, SLE does not maintain the standard for hourly off-peak service.

Transit Amenities

1. Bus Standard - Generally, in the State of Connecticut, individual municipalities are responsible for the provision, monitoring and maintenance of bus stop signs, shelters, benches and other amenities for the bus service operated in its locality. ConnDOT installs and maintains shelters at park and ride lots and maintains bus stop signage on state roads and U.S. highways throughout the state. Generally, local shelters are placed at stops that serve 100 or more riders, at all park and ride locations and at all major downtown stop locations and transfer points. However, shelters are not owned or maintained by the Department or its operators. The decision to install a shelter at any given bus stop on the local bus system is at the discretion of local municipalities. The Department endeavors to work with regional agencies and towns to have shelters placed in appropriate locations and to encourage towns to clean and maintain the shelters on a regular basis. Within the sample of minority census tracts, we will look at major terminal/pulse point bus locations to determine whether these major boarding and transfer locations have a sufficient number of shelters to meet the guidelines for installation of shelters.
2. Rail Standard - Rail stations are the access points to the rail system and offer a range of amenities to address the comfort and convenience of riders. The Department goal is to have stations that provide essential lighting, shelter from the elements, passenger communication and ticketing systems. Station amenities are related primarily to the size and function of train stations.

Vehicle Assignment

1. Bus Standard - Buses are assigned to service without regard to race, religion, color, national origin or the communities they serve. The assignment of buses is solely a function of the type of service operated. Local services use a combination of 35- and 40-foot transit coaches, while commuter express services utilize cruiser bus coaches. Buses are also assigned without regard to age of vehicle. All vehicles are programmed to be replaced when they reach the end of their 12 year useful life. Buses are not assigned to specific routes so we will look at the age of the fleet by Division to determine whether they are distributed equitably across the state.
2. Rail Standard - Rail cars are assigned based primarily on whether the service is electric or diesel. The Main Line and New Canaan Branch

Line on the NHL between New Haven and Grand Central Terminal is electric service, with M2, M4, M6 and M8 Electric Multiple Unit coaches operating. This is a pooled fleet that operates on both the inner and outer portions of the NHL. The Danbury Branch and the Waterbury Branch are operated with diesel locomotives and a fleet of Bombardier coaches. The SLE is operated with diesel locomotives and a fleet of Mafersa coaches. The assignment of the fleet is based solely on the type of propulsion, not the station or area served.

Transit Security

1. Bus Standard - CTTRANSIT continues to take a proactive approach to safety and security, including participation in National Safety Council programs. Special efforts should be made to continue to upgrade operator training and retraining programs.

CTTRANSIT will continue to maintain an aggressive security program to assure the safety of customers and employees and the perceived security of the system as viewed by existing and potential customers and employees. Users and employees of the system should be secure from acts of violence or terrorism, and CTTRANSIT property should be secure from vandalism and theft. Customers should be encouraged, through programs such as TransitWatch, to report suspicious activities to CTTRANSIT personnel or the police. It should be noted that drivers, however, are not police officers and should not attempt an aggressive security program personally.

All buses are equipped with a two-way radio system and silent alarm allowing contact with a division command center that is able to contact local law enforcement agencies for immediate assistance. All buses are also equipped with a video surveillance system to provide customers an added sense of security and to protect CTTRANSIT from frivolous litigation.

2. Rail Standard - The Department relies on MTA Metro-North and Amtrak who supply security as part of the operating contract.

CTTransit - Local and Express Bus Services

Division	Services				Number of Census Tracts Sampled	Common Destinations		
	Local Routes	Commuter Bus Services		Shuttles				
		Express Routes	Limited Stop "Flyer Services"					
Hartford Division	30	21	4		6	Harford City Center	Rail Station	Other
New Haven Division	17			2	4	New Haven City Center	Rail Station	Other
Stamford Division	14	1		4	4	Stamford City Center	Norwalk City Center	Rail Stations
Waterbury Division	22				4	Waterbury City Center	Rail Station	Other
New Britain Division	11				4	Harford City Center	Rail Station	Other
Meriden Division	3				2	New Haven City Center	Rail Station	Other
Bristol Division	1				2	Harford City Center	Rail Station	Other
Wallingford Division	1				2	New Haven City Center	Rail Station	Other
Middletown?	7				4	Middletown City Center		
Estuary?				2	2	Train Station		

Rail Station	Has Above Average Percentage of Minorities	Has Above Average Percentage of Persons Living Below the Poverty Level
Ansonia	x	x
Beacon Falls		
Berlin	x	x
Bethel	x	
Branchville		
Branford		
Bridgeport	x	x
Cannondale		
Clinton		
Cos Cob		
Danbury	x	x
Darien		
Derby/Shelton		x
East Norwalk	x	x
Fairfield		x
Glenbrook	x	x
Green's Farms		
Greenwich		
Guilford		
Hartford Union	x	x
Madison		
Meriden	x	x
Merritt	x	
Milford		
Naugatuck		
New Canaan		
New London	x	x
Noroton Heights		
Old Greenwich	x	x
Old Saybrook		
Redding		
Riverside		
Rowayton		
Seymour		
South Norwalk	x	x
Southport		
Springdale		
Stamford	x	x
State Street (New Haven)	x	x
Stonington		
Stratford	x	x
Talmadge Hill		
Union Station (New Haven)	x	x
Wallingford		x
Waterbury	x	x
Westbrook		
Westport		
Wilton		
Windsor	x	
Windsor Lock		

Section XIV
Statewide Transportation
Planning

Statewide Transportation Planning

The Bureau of Policy and Planning (the Bureau) within the Connecticut Department of Transportation (the Department) is responsible for the development and update of the Statewide Long-Range Planning Process, as well as coordinating with the Regional Planning Organizations (RPOs) to prepare the Transportation Improvement Programs (TIPs) and the Statewide Transportation Improvement Program (STIP).

The Bureau is also responsible to assure compliance with the National Environmental Policy Act of 1969 (NEPA) which includes, but is not limited to the preparation of NEPA documents that study the potential impacts to the natural and human environment, as the result of federally funded transportation improvement projects. Collectively, this is known as potential social, economic, and environmental impacts, otherwise known as SEE.

The Department follows the Federal Highway Administration's (FHWA) guidance to assure Environmental Justice is adequately addressed in NEPA documents. The format provided in the Federal Transit Administration (FTA) Circular (FTA C 4702.1A) is the process that is followed when the Bureau prepares these documents.

A) The Statewide Long-Range Planning Process

Under the 23 CFR 450 & 49 CFR 613 is a joint FTA/FHWA regulation: "Planning Assistance and Standards" (October 28, 1993, unless otherwise noted).

FTA and FHWA jointly oversee the transportation planning process. Federal regulations indicate that a key element for addressing Title VI during the Planning Process is an effective Public Involvement Process (PIP). The PIP must be proactive and provide complete information, timely public notice, full public access to key decision-making points, and an opportunity for early and continuing involvement. The PIP will also include a process for identifying and addressing the needs of the populations that are traditionally ignored or underserved by the existing transportation systems. Each Regional Planning Organization (RPO) as well as the Department is required to have updated and approved Public Participation Plans.

Under the Planning Process, there are two major sub-elements:

Statewide Transportation Planning Process:

Under this sub-element, the Department is required to prepare the following documents:

- **Statewide Transportation Plan (Long-Range Plan):** Considers a range of transportation options designed to meet the transportation needs (for both passenger and freight) of the State including all modes and their connections. Long-range plans frame the State's long-range transportation goals and objectives for the State and/or region. Projects should be identified and programmed in the STIP and implemented. The projects implemented from the STIP should reflect the goals and objectives identified in the long-range plan; and
- **Public Involvement Process (PIP):** Must be proactive and provide complete information, timely public notice, full public access to key decision-making points, and an opportunity for early and continuing involvement.
- **Statewide Transportation Improvement Program (STIP):** This document contains

the sum of the total urban RPOs' Transportation Improvement Programs (TIPs) and the Department's programmed projects for the STIP duration. The STIP contains line-item projects, funding committed to the projects, and the year of funding authorization during the life of the STIP

Metropolitan (Regional) Planning Process: The following eight planning factors must be considered during this Process:

- Support the economic vitality of the United States, the States, non-metropolitan and metropolitan areas, especially by enabling global competitiveness, productivity, and efficiency;
- Increase the safety of the transportation system for motorized and non-motorized users;
- Increase the security of the transportation system for motorized and non-motorized users;
- Increase the accessibility and mobility of people and for freight;
- Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
- Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
- Promote efficient system management and operation; and,
- Emphasize the preservation of the existing transportation system.

Plans and programs have the potential of being created and implemented in a discriminatory manner. The major impact that plans/programs have is through decisions, which identify one or more planned improvements to the exclusion of other alternatives. The implementing procedures and processes for plans/programs may be applied in a manner that prevents a group from participating or may prevent the consideration of impacts of various transportation system alternatives upon one or more identified groups. To the degree that plans/programs include proposed improvements with disproportionate beneficial impacts or reflect decision making processes that exclude certain groups, the long-range plan may be biased. This could lead to project implementation that is inconsistent with nondiscrimination requirements. The actual impacts may only be experienced as projects are implemented. The planning process represents a comprehensive perspective from which to assess the potential consequences of developing and operating the transportation system.

The following questions may be utilized to evaluate the Planning Process:

- Is there effective public involvement/participation within the Planning Process?
- Is input from affected groups/persons adequately considered within the Planning Process?
- Is there coordination with Native American tribal governments in statewide metropolitan transportation planning?
- Are the data collection/data analysis processes sufficiently inclusive to identify community boundaries, and to effectively assess demographic groups, income levels/property taxes, and community services/schools/hospitals/shopping areas?
- Are Social, Economic, and Environmental (SEE) effects and impacts identified, described, and analyzed?
- Are contracting opportunities for planning studies, corridor studies, and other technical work available to all groups/persons?

For each of these questions, processes/procedures should be identified and evaluated with a narrative justification to support the response.

Statewide Transportation Long-Range Plan Process

The Department updates the State of Connecticut's (LRP) every three to five years. The Department undertakes a public outreach effort to solicit public input when updating this plan. The process for soliciting public input consists of the following phases:

Solicitation of Public Input Prior to the Development of a Draft LRP

The Department announces a public comment period and holds listening sessions in various locations throughout the state to solicit public input on transportation issues and concerns in Connecticut. The public comment period is at least 45 days in length and listening sessions are held in the middle of this period. At each listening session, the Department's staff delivers a visual presentation that explains the purpose of the LRP, outlines the process and mandates for developing it, identifies key factors and issues that influence transportation-related decisions and investments in Connecticut, and identifies opportunities for providing public input into the updating of the plan. Following the presentation, the public may provide input and ask questions. Representatives from appropriate Department offices attend the listening sessions to hear the public's comments and questions with respect to modes or components of the transportation system for which their bureau or office is responsible and, if there is sufficient time, respond to people's questions. Copies of the following documents are made available for public perusal at the listening sessions: a copy of the current LRP, the current Master Transportation Plan and other pertinent documents. Copies of various handouts are also provided; such material may include the following: brochures that provide information on the LRP, the process and schedule for updating it and opportunities to provide input; a list of the titles and web site addresses of documents referenced in the visual presentation; a list of major planned and ongoing studies and projects; copies of maps showing the locations of the studies and projects; and forms ("Input, Ideas, and Comments" sheet) that the public can use to submit their written comments at the meeting or to mail in their comments at a later date during the comment period.

Input is sought from the staff of Connecticut's Regional Planning Organizations (RPOs) when determining the dates, times, and locations of the LRP listening sessions. The facilities at which the listening sessions are held must be handicapped accessible. In areas of the state where public transportation is provided, the listening sessions are held at facilities and at times to enable people to use public transportation to attend the sessions. Up to one week in advance of the date of a listening session, people may request that the Department make special accommodations for them. Assistance for the deaf and hearing impaired is arranged upon request; requests for other special accommodations, including the provision of language assistance for individuals with limited English proficiency, are considered and granted, if reasonable and possible.

The dates, times and locations of the meetings are posted on the Department's web site calendar, which includes an option to request special accommodations at a public meeting. The event postings include a link to the Department's LRP web page, which includes more detailed information on the LRP and the process for updating it. The dates, times and locations of the listening sessions are published at least once, in display ads in newspapers with regional and state coverage, including two with

distributions to minority populations in Connecticut and Massachusetts. The display ads also include information on the LRP, the Department's process for updating it, contact information for submitting comments, and a telephone number and e-mail address for requesting special accommodations at a listening session. This information is also included in press releases that are issued by the Department's Office of Communications to newspapers, radio stations and television stations, before, during and just before the end of the public comment period and in brochures that are mailed and/or e-mailed to various interested parties prior to the beginning of the public comment period. LRP staff and other Department staff also notify interested parties by making the LRP brochures available at various meetings and events they attend and making announcements about the LRP listening sessions and public comment period at such events. Regional planning organizations and other appropriate organizations in Connecticut are asked to assist in notifying people of the opportunities to provide input into the updating of the LRP by posting information on their web sites and in their newsletters and providing links to the Department's LRP web page.

The interested parties to which LRP informational brochures are sent include RPOs; federal transportation agencies, transit districts, representatives of federally recognized Indian tribes in Connecticut, transit operators, freight shippers, and other groups and individuals that are identified in federal laws, regulations and executive orders pertaining to statewide transportation planning; heads of appropriate State agencies, boards and commissions; first elected officials in all Connecticut municipalities; State legislators, members of Connecticut's Congressional Delegation, public and academic libraries in Connecticut, centers for senior/disabled persons, representatives of bicycle and pedestrian advocacy groups, environmental organizations, chairpersons of Neighborhood Revitalization Zones in Connecticut, individuals that have asked to be added to the Department's LRP mailing list and other appropriate individuals and groups that the LRP staff members become aware of.

The Department will continue to explore and consider the use of additional means to solicit input from the identified special interest groups and the general public as new means of communication (such as Facebook, Twitter and electronic surveys) to solicit public input are developed, purchased and/or authorized for Department's use.

Solicitation of Public Input on the Draft LRP

The Draft LRP is posted on the Department's web site and interested parties are notified of the availability of the document and informed of the timeframe and ways in which they can provide input on the document. If possible, a streaming media presentation that provides an overview of the contents of the document and the process used to develop it is created and posted on the Department's web site. Hard copies of the draft document are made available for public review at the Department's headquarters in Newington, Connecticut and at the offices of each of the RPOs. Comments on the draft document are accepted during a public review and comment period of at least 45 days. During the comment period, at least two public information meetings are held in the middle of the comment period to provide the public with an overview of the contents of and the process used to develop the draft document and to provide an opportunity for interested parties to ask questions and provide input on the document. At the public information meetings a visual presentation is used to provide an overview of the contents of the draft document and the process used to develop it. One meeting is scheduled during the day; another meeting is held in the evening. Representatives of appropriate Department offices attend both meetings and are available to answer questions. An interpreter for

the deaf and hearing impaired is provided if such accommodation is requested in advance of the meeting date. Other special accommodations, including language assistance, may be requested, in advance of the meeting via telephone or e-mail or via a "request special accommodations link" that has been built into the public events calendar on the Department's web page; such requests are considered and granted if reasonable and possible. Written comments on the Draft LRP may be submitted at the public information meetings or via e-mail or mail during the public comment period.

Interested parties are contacted and updated on the LRP update process via electronic mail; announcements at monthly/quarterly meetings of various organizations; publication of announcements in the electronic newsletters of interest groups and organizations and associations involved in transportation and/or land use planning; and direct mailings, including an extensive mailing of informational brochures. The brochures provide information on the purpose of the LRP, the process for updating it, opportunities to review the draft document and comment on it, and the anticipated publication dates of the draft and final documents. The brochures are printed in a format suitable for posting on community boards, are posted at selected rail and bus stations, are distributed to municipalities, public and academic libraries, and various regional, State and federal personnel, as well as other interested parties including, but not limited to, transit operators, federally recognized Indian tribes in Connecticut, airport managers, bicycle enthusiasts, and motor transport representatives, and are forwarded in a large print version to senior/disabled centers throughout the state.

Legal notices announcing the availability of the Draft LRP for public review and comment, opportunities to review and provide input on the draft document, and contact information for submitting comments are published in media publications with regional and state coverage, including two publications with distributions to minority populations in Connecticut and Massachusetts.

The Department issues press releases to newspaper, television, and radio organizations, including organizations serving minority and low-income populations before, during and just before the end of the public review and comment period on the Draft LRP. The press releases announce the availability of the Draft LRP for public review and comment; provide information on opportunities to learn about, review and comment on the draft document; provide contact information for requesting special accommodations, including language assistance, at public information meetings; promote attendance; and provide reminders of the deadline for submitting comments on the Draft document.

After the final document is published, it is posted on the Department's web site, hard copies are sent to the Department's library and hard and/or electronic copies are sent to the State Library. . A press release that includes the Department's LRP web page address is issued to inform the general public of the availability of the final LRP. Organizations and individuals that are listed on the Department's LRP Distribution List are notified via e-mail or U.S. mail of the availability of the final document.

Posting of Information on LRP Web Page

Throughout the public outreach process for the LRP, the following items, which are pertinent to the development of the LRP, are posted on the Department's web site on a dedicated LRP web page: the current LRP, informational brochures, display ads, legal

notices, press releases, material distributed during the listening sessions and public meetings on the Draft LRP, and contact information. The presentations provided at the listening sessions and the public information meetings on the Draft LRP are posted on the Department's web site in several formats, including a version with audio and a version with speaker's notes to accommodate persons with sight or hearing disabilities. Whenever possible, press releases are posted on the State of Connecticut's master web site and on the various individual web sites maintained by the RPOs in Connecticut. The final LRP is posted on the Department's web site.

Statewide Transportation Improvement Program Process

The Statewide Transportation Improvement Program (STIP), which is required by Title 23 USC, Section 134 (h) as amended by SAFETEA-LU, is a four-year financial document that lists all projects expected to be funded in that four-year period. This document must be updated at least every four years, however, the Department strives to update it every two years. The Department's public outreach process for the STIP is as follows:

A public involvement process is followed to ensure an opportunity for all to participate. The draft STIP is developed in cooperation with MPOs and the rural RPOs in the State and made available for public review. The draft STIP is placed on the Department's web page for review. A legal notice is placed in all of Connecticut's major daily newspapers. This notice states in detail that the STIP will be available for public review, public informational meetings will be held, and that the Department will receive comments. A press release is also prepared containing detailed information found in the legal notice, background information on the STIP, and examples of projects included in STIP. This press release is issued to all Connecticut newspapers, radio stations and television stations. A brochure detailing the availability of the STIP and announcing the Public Informational Meeting is sent to all individuals and businesses that have expressed interest in the transportation planning process. This Interested Parties list may include, but is not limited to, local citizens, affected public agencies, affected federal agencies, representatives of public transportation employees, freight shippers, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, and federally recognized Indian tribes in Connecticut. Mentioned in the legal notice is the Department's willingness and ability to accommodate any citizen with special needs such as language, hearing and speech impaired. The dates, times and locations of the meetings are posted on the Department's web site calendar, which also includes an option to request special accommodations at a public meeting.

Each MPO is asked to coordinate a public review of its Transportation Improvement Program (TIP) including the Department's STIP during that review. The Department's staff attends all MPO informational meetings on the TIP/STIP and is available to receive comments and answer questions. The MPOs are also required to publish in their local newspapers, information about their meeting and the availability of the STIP at their respective regions for public review and comments. Two informational meetings on the STIP are held at the Department's headquarters ground floor. One meeting is scheduled during the day with the second meeting is scheduled at night to accommodate individuals with day jobs or different schedules. The Department's

headquarters is situated on a bus route and is handicapped-accessible. A visual presentation is given to explain the process for developing the STIP and to highlight major projects in the STIP. Time is allotted for questions and comments. Steps are taken to accommodate members of the public with English as their second language. A list of names of Department staff members who are proficient in different foreign languages and are willing to function as interpreters when necessary has been compiled

The draft STIP is made available for public review and comment for a period of at least 30 days. After the 30 day review and comment period, all public comments will be reviewed and given due consideration. After all the public comments are reviewed and consideration, final version of the STIP is prepared and submitted to the FHWA and the FTA for approval. Explicit consideration and response is given to public input, and all who submit written comments are notified of the availability of the final approved document. The approved STIP document is made available to the public via the following avenues; it is placed on the Department's web page, at the Department of Transportation headquarter and at all the MPOs office.

Public Involvement Procedures of MPOs

The Department recognizes the important role that MPOs play in transportation planning for Connecticut. The Department participates in the cooperative transportation planning process within the MPO's jurisdiction. An effective metropolitan planning process must incorporate input from both local and state jurisdictions as well as the public. When developing their Transportation Plan and TIP, the MPOs are more in sync with the socio-economic dynamics of their respective constituents therefore they have good resources for their public involvement process. Based on these facts, the Department relies on MPOs to seek public involvement in the development of their comprehensive regional long-range transportation plans (LRP) and TIPs. To assure compliance with the requirements of Title VI and Title 23 CFR 450.316, the Department has a procedure in place that reviews each MPO's public involvement process. .

Each MPO has developed procedures to provide opportunities for the public to provide input on its regional LRP (which must cover a period of at least 20 years), TIP, STIP and major transportation planning studies that are undertaken. The Department utilizes the MPO public involvement process as an important vehicle for soliciting public comments on Connecticut's STIP. The Department acknowledges the unique nature of each metropolitan area and has determined that the endorsed MPO public participation plans meet the planning public involvement requirements of 23 CFR 450.316 for transportation projects within the MPO area.

The MPO procedures include mechanisms for the public to express their views and to obtain information. The MPO procedures also provide a general approach for involving the public in transportation planning studies.

The MPO procedures detail how the transportation needs of persons and groups who are "traditionally underserved by existing transportation systems" are identified and addressed per Executive Order 12898 (12/11/94) on "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations." For example, some MPOs may institute advisory committees to represent transportation-disadvantaged groups and communities such as transit patrons, the elderly, handicapped, low income and minorities.

When substantial written and oral comments are received on an MPO's draft LRP or TIP as a result of the public involvement process or the interagency consultation process, or public input is sought on the Air Quality Conformity analysis as required by the conformity regulations, a summary, analysis, and a report on the disposition of the comments shall be made part of the draft LRP and TIP. The Department will assist the MPO in responding to comments and questions.

The Department and the MPOs will coordinate the development of MPOs' plans and the statewide LRP through the cooperative transportation planning process that the Department and the MPOs conduct. The Department's participation in the MPO planning process ensures that statewide issues are considered in the MPOs' planning process. The Department will review and consider the contents of the each MPO's LRP as part of the process of developing the statewide LRP.

Amendments to the TIPs and STIP Process Public involvement for amendments to the TIP will be facilitated by the MPO. All amendments to the TIP need to be included on the MPOs agenda for endorsement by the MPO's Policy Board. This agenda is sent to all interested parties and made available to the public. Each MPO and Rural RPO board provides an opportunity for the public to deliver comments at its meeting. Department staff attends these meetings and are available for questions and comments. Any comments received on TIP and STIP amendments will be included with CTDOT's transmittal of the amendment to the FHWA and the FTA when requesting approval. Once approved by the FHWA and the FTA, the updated STIP is available to the public via the Department's web page and at the Department of Transportation headquarter. Examples of revisions that are not considered significant and, therefore, do not require that the Department provide an additional opportunity for the public to comment, include minor changes in project cost and moving projects among the first four years of the STIP/TIP.

B) THE PROJECT DEVELOPMENT (ENVIRONMENTAL) PROCESS

The term "Project Development" refers to the environmental study performed to satisfy the requirements of the National Environmental Policy Act of 1969 (NEPA), as amended, for a transportation project. NEPA is the foundation of the project development process and is described in 23 CFR Part 771, which is the FTA/FHWA joint environmental regulation. NEPA requires all federal agencies to examine and disclose the possible and likely effects of their actions on the human environment. FTA interprets the term "human environment" to include neighborhoods, communities, and natural ecosystems. Effects on the human environment include a broad array of impacts such as direct physical effects to air/water/land, as well as less quantifiable effects such as impacts to cultural resources/community life/land use patterns.

For all federal-aid FTA projects, the Department is required to prepare the appropriate level of environmental documentation that includes mitigation measures and measures to minimize harm in order to satisfy NEPA. Since there is no stewardship agreement between the Department and FTA as there is between the Department and FHWA, FTA's involvement in the process mirrors that of the Department/FHWA Stewardship Agreement which can be found on the web at:www.ct.gov/environmentaldocuments

Environmental compliance requires consideration of all possible social, economic, and environmental effects of a proposed project and seeks to ensure that the decisions made are in the public's best interest. During this process, project alternatives data,

information, and all related environmental effects are identified, collected, and analyzed. This is done during the development of the NEPA document. The goal of this process is to develop a complete understanding of the existing and future environmental conditions and the possible effects of a proposed project to make the best project decision to meet the intended transportation need, the goals of an area or community, and for the protection and enhancement of the environment. Project alternatives may be modified to avoid or minimize impacts to sensitive resources identified during the environmental studies and based upon public input. It is FTA's policy to seek opportunities to transcend traditional mitigation and to implement innovative enhancement measures to minimize the impact upon the affected community and the natural environs. Public outreach during the development of the NEPA document will assist FTA and the Department in the determination of these innovative measures. These measures will be determined on a project by project basis.

Project Preliminary Environmental Review

During the preliminary stages of project development, each proposed transportation project undergoes an internal environmental review process to determine the appropriate level of environmental documentation required for the project. The type of NEPA documentation required is determined by the overall level of potential impact to the environment as a result of the proposed project. This preliminary review encompasses all aspects of potential environmental impacts including a review for potential impacts to Environmental Justice and Limited English Proficiency populations.

Environmental Justice

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin. Executive Order 12898 states that to the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States and its territories.

The environmental review process utilizes Geographic Information Systems (GIS) and U.S. Census maps to determine if minority and/or low-income populations may be adversely affected by the project.

If it is determined that a low income or minority population area is within the project area, the Department undertakes the responsibility of employing the appropriate measures to assure requirements are met throughout the development of the project to accommodate this population. These measures are determined on a case by case basis and include the assurance that any public outreach conducted by the Department accommodates low income and minority populations.

Limited English Proficiency

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access

consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

The Department's Bureau of Policy and Planning has developed a series of maps depicting population areas of LEP within the state of Connecticut. The environmental review process utilizes this mapping and GIS to identify LEP populations within the proposed project area.

If it is determined that an LEP population area is within the project area, the Department undertakes the responsibility of employing the appropriate measures to assure LEP requirements are met throughout the development of the project. These measures are determined on a case by case basis and include the assurance that any public outreach conducted by the Department accommodates LEP populations.

Levels of NEPA Documentation

NEPA defines three levels of documentation, the applicability of which is dependent upon the potential significance of the environmental impacts (direct or indirect) as a result of a proposed project. Documentation and processing options are referred to as "classes of actions" and include Environmental Impact Statement (EIS, Class I), Categorical Exclusion (CE, Class II), and Environmental Assessment (EA, Class III). For projects requiring an EIS or EA, the Department's Office of Environmental Planning will coordinate with the Department's Title VI Coordinator to ensure that Title VI requirements are satisfied. A description of each class of documentation is as follows:

- EIS (Class I) -An EIS is required when it is determined through environmental studies, public involvement, and coordination with other Federal, State, and local agencies that the proposed project will have a significant impact on the environment. The EIS process is the most involved, detailed, demanding, and formal and is the least frequently utilized. It requires a detailed and thorough consideration of all reasonable alternatives, including the following: the no-build alternative; in-depth analysis of the SEE effects that are associated with the alternatives; involvement of the public and other Federal, State, and local agencies in the process and the decisions related to the selection of a preferred alternative. Significant public outreach efforts and participation is involved, including initial public and agency scoping meetings, as well as a public hearing on the Draft EIS. Public comment periods of 30 days follow both the scoping meeting and the public hearing, and the Draft EIS must be made available to the public for a minimum of 15 days prior to the public hearing. The Department publishes a legal notice that may also be in languages other than English (if it is determined that the project will affect LEP populations) in area newspapers to inform the public of the public hearing and where the document is available for inspection. The EIS process requires the preparation of a Notice Of Intent (NOI), a Coordination Plan, a Draft Environmental Impact Statement (DEIS), a Final Environmental Impact Statement (FEIS), and a Record of Decision (ROD);
- CE (Class II) - The CE is the most commonly utilized environmental processing option. The CE is not an environmental document, but is a determination that a project will have no significant individual or cumulative SEE impacts. The following are applicable: the project will not have significant impacts upon

planned growth or land use for the affected area; the project does not require the relocation of significant numbers of persons; the project will not involve significant air, noise, or water quality impacts; the project will not have significant impacts on travel patterns; and the project does not otherwise either individually or cumulatively have any significant environmental impacts. Therefore, there is no requirement for the preparation of an environmental document (EIS or EA), although environmental studies may be undertaken to support that the CE determination is proper. Additionally, informing the public of the anticipated project can be accomplished through the municipality and various media strategies, such as posting information on the Department's web site, and publishing notices of anticipated projects in local media. Information posted on the Department's web site and in local media shall include a description of the proposed project, an anticipated schedule for construction, and a Department contact for additional information. Notices may also be published in languages other than English, if it is determined that the project will affect LEP populations. A list of project types that have been determined to meet the CE criteria is provided in 23 CFR 771.117 (c) and (d); and

- EA (Class III) - The EA is prepared for proposed projects for which the significance of the impacts is unknown or not clearly established. Proposed projects that are not CEs and do not obviously require an EIS will require the preparation of an EA to determine the significance of the impacts and whether or not an EIS will need to be prepared. The amount of information and degree of analysis that is required for inclusion in an EA will depend upon the proposed project's size, type, location, and number of reasonable alternatives, potential for significant impacts, and other factors of the project. The EA will identify the location of the project, the population demographics, and other affected neighborhood and community characteristics, the estimated number of residences and businesses that will be affected, and other potential/probable impacts for each alternative being considered. The EA may only require that one or two alternatives be considered, including the no-build alternative. It is the practice of the Department to hold a public hearing for every project for which an EA is prepared. When a public hearing is held, the EA must be made available to the public at the hearing and for a minimum of 15 days in advance of the public hearing. The Department will publish a legal notice that may also be in languages other than English (if it is determined that the project will affect LEP populations) in area newspapers to inform the public of the public hearing and where the document is available for inspection. Comments must be submitted to the Department within 30 days of the availability of the EA. If the SEE impacts, along with the appropriate interagency coordination and public involvement, indicate that the action will not have any significant direct/indirect/cumulative impacts, a Finding of No Significant Impact (FONSI) is prepared. The FONSI will finalize the EA process, document the decisions, and detail why the impacts are not considered significant. However, if it appears that there will be significant impacts, a NOI will be published in the Federal Register and a DEIS will be prepared.

The potential for avoiding and minimizing SEE impacts likely to result from the implementation of a given project alternative must be considered for any proposed alternative regardless of the ability to satisfy the purpose and need or meet the transportation goals of a given area. Approval of the FEIS and subsequent ROD or

preparation of a FONSI by FTA constitutes acceptance of the general project location and major design elements as described in the environmental documents. After completion of the project development process, FTA may authorize the Department to proceed with the development of final engineering design plans and specifications, acquire rights-of-way, and advertise the project for receipt of construction bids.

When a CE or EA is prepared in cooperation with FTA, the document will address environmental impacts of a range of alternatives during the site selection process. The CE or EA will go forward with one alternative based on that process. When a DEIS is prepared, a preferred alternative will be selected from the range of alternatives presented in the document. The decision and selection of a preferred alternative will be based upon how well the alternative will address the transportation problems and meet the document's stated purpose and need.

The environmental study of project alternatives and impacts must include the consideration of mitigation measures for unavoidable impacts. Mitigation measures and other agreements that are made as part of the decision-making process must be documented and implemented. All proposed projects and environmental studies, whether a CE, EA, or EIS, must include appropriate measures to mitigate for adverse environmental impacts regardless of significance. Environmental commitments, such as sound barriers, joint-use facilities, rights-of-way replacement housing, and others should be monitored to assure that these mitigation measures are included in the design plans and are constructed as part of the project.

The following questions may be utilized to evaluate the Project Development Process:

- Is public involvement adequately solicited, considered, and documented during the Project Development Process?
- Are SEE impacts adequately identified?
- Is the potential for disproportionate or discriminatory impacts adequately addressed?
- For each of these questions, processes/procedures should be identified and evaluated with a narrative justification to support the response.

Public Outreach and Accommodating LEP Populations

Each project must incorporate public outreach; the level of outreach required is determined by the significance of the project and the level of documentation required. According to 23 CFR 771.111, public involvement/public hearing procedures must provide for:

1. Coordination of public involvement activities and public hearings with the entire NEPA process.
2. Early and continuing opportunities during project development for the public to be involved.
3. One or more public hearings or the opportunity for hearing(s) to be held by the Department at a convenient time and place for any Federal-aid project that may have a significant affect on the environment.
4. Reasonable notice to the public of either a public hearing or the opportunity for a public hearing.
5. Explanation at the public hearing of the following information as appropriate:

- a. The project's purpose, need, and consistency with the goals and objectives of any local urban planning,
- b. The project's alternatives and major design features,
- c. The social, economic, environmental, and other impacts to the project,
- d. The relocation assistance program and right-of-way acquisition process; and
- e. The Department's procedures for receiving both oral and written comments from the public.

C) CONDUCTING PUBLIC INFORMATION MEETINGS AND HEARINGS

The Department's project manager will hold public information meetings and hearings at a place and time generally convenient for persons affected by or interested in the proposed undertaking and at a facility that is accessible to the handicapped. The Department's project manager will also be responsible for assuring all public involvement requirements are satisfied.

If, during the entire project development stage, it is determined that the project impacts a LEP population, local media used by that particular LEP population will be utilized to advertise public hearings/informational meeting notices, advertisements, legal notices, and all pertinent information to that particular population.

Representatives of the Department, when appropriate, will explain the following information:

- The project's purpose, need, and consistency with the goals and objectives of any local urban planning.
- The project's alternatives, and major design features.
- The social, economic, environmental, and other impacts of the project.
- The relocation assistance program and the right of way acquisition process.
- Department procedures for receiving both oral and written statements from the public.
- The Department will ensure that engineers, planners or other qualified personnel are present to explain the project and answer questions that may arise.

At the public information meeting or hearing it shall be announced that, at any time after the hearing, and before final approval is obtained, information developed, relating to the project will be available upon request during normal working hours for public inspection and copying. If the proposal requires the acquisition of property, the Department's right of way procedures, including the relocation assistance program when applicable, will be explained. In the case of a hearing, the availability of the appropriate environmental document will be announced at the hearing.

The Department's project manager should be prepared to receive oral comments delivered in front of those in attendance, and should be prepared to transcribe or record these accurately. The Department's project manager should also be prepared to receive written comments, either hand-delivered at the meeting or hearing, by mail, or electronically, via the internet. When necessary and appropriate, the Department's project manager should make accommodation for those with LEP or physical disability.

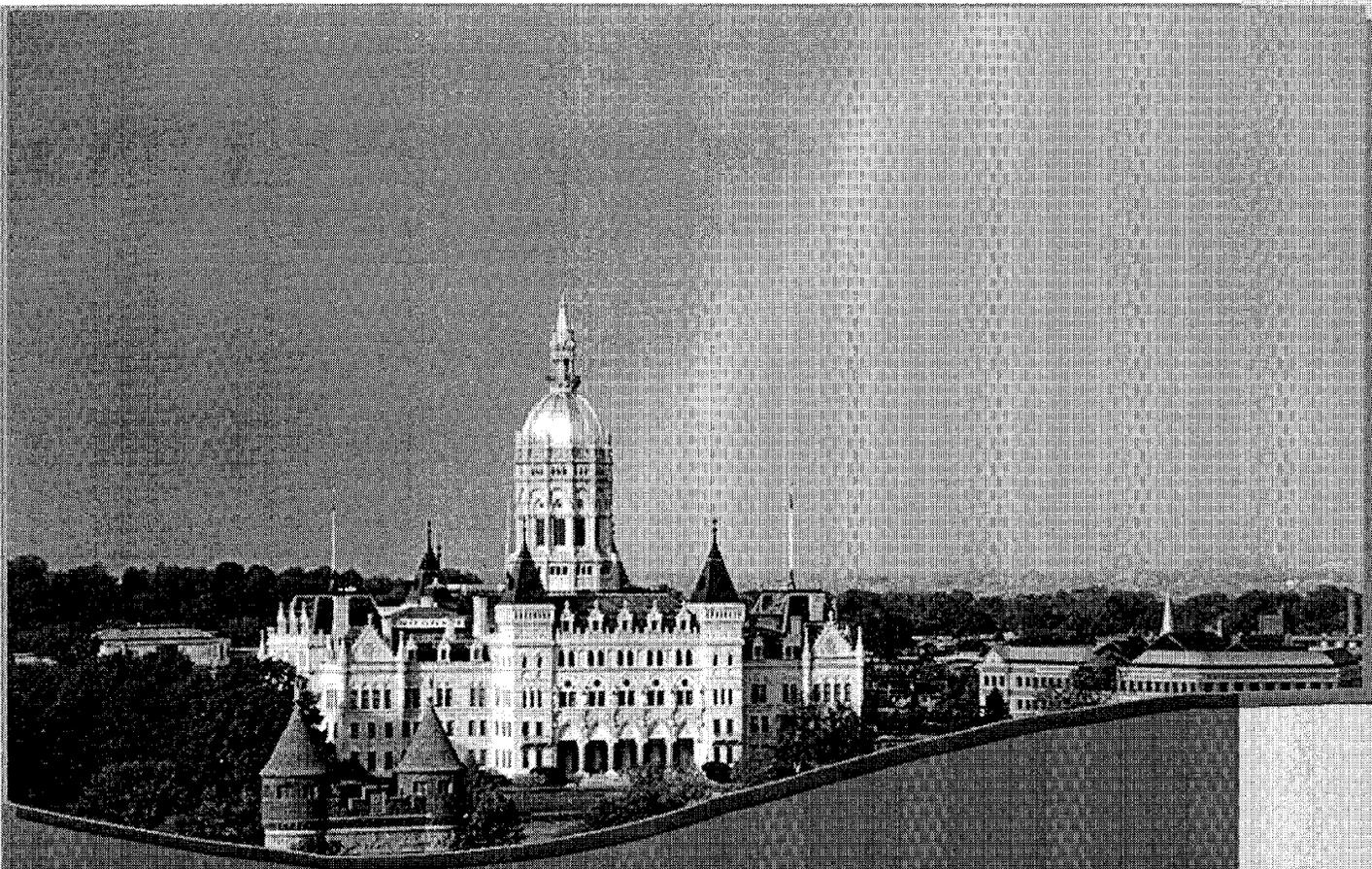
The Department is also implementing a service on its website that would allow the public to request reasonable accommodations or language assistance for public hearings and

meetings. These requests include, but are not limited to, multi-language translation, interpreting services, and ADA accommodations including assistance for the hearing and visually impaired.

The website will be designed to allow the public to "click" the events calendar where a series of drop down menus will allow the public to select and request the desired accommodation.



**State of Transportation
Department of Transportation**



Title VI Process Review:

"An Examination Of Title VI Compliance In The Metropolitan Planning Organizations And Rural Planning Organizations Of Connecticut"

September 2011

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I. Introduction: The purpose of this update is to monitor the Title VI, Limited English Proficiency (LEP) and Environmental Justice (EJ) programs and activities of the Metropolitan Planning Organizations (MPOs). The review will be a follow-up to the program review conducted by the Connecticut Department of Transportation in 2004.

MPOs serve as the primary forum where State Department of Transportations (DOT), transit providers, local agencies, and the public develop local transportation plans and programs that address a metropolitan area's needs. Additionally, the Rural Planning Agencies play a similar role for the rural areas of the State. MPOs can assist local public officials understand the requirements and responsibilities under Title VI and assist them with understanding how Title VI, LEP and EJ compliance improve the planning and decision making process.

To certify compliance with Title VI and address Environmental Justice (EJ), MPOs need to:

- Enhance their analytical capabilities to ensure that the long-range transportation plan and the transportation improvement program (TIP) comply with the obligations under Title VI, LEP and EJ.
- Identify the residential, employment, and transportation patterns of low-income and minority populations so that their needs can be identified and addressed and the benefits and burdens of transportation investments can be fairly distributed.
- Evaluate and – where necessary – improve their public involvement processes to eliminate participation barriers and engage minority, low-income and LEP populations in the transportation decision-making process.

II. The Update Review Panel

Below is the list of the 2011 Title VI Update Review Panel.

Connecticut Department of Transportation

Debra Goss, Department of Transportation Title VI Coordinator

Maribeth Wojenski, Transportation Assistant Planning Director

Irma Reyes, EEO Specialist/Title VI Officer

Rose Etuka, Bureau of Policy & Planning Title VI Coordinator, Supervising Transportation Planner

Patrick Zapatka, Transportation Planner II

Federal Highway Administration and Federal Transit Administration Staff

III. The Process

To update the Title VI Process Review Report produced in 2004, the Department sent out a memorandum to each Regional Planning Organizations (RPO) located in the State of Connecticut requesting the following:

1. An update on how the Region has addressed, is addressing or plans to address the 2004 identified areas of concern. These are identified Title VI, LEP and EJ areas of deficiencies that affected MPO committed to provide resources and staff time to.
2. Answers to the Regional Planning Organization Questionnaire sent to all RPOs. These questions were designed to provide the department with information on how the MPOs are currently meeting the federally mandates regarding Title VI, LEP and EJ.
3. The Region's public involvement process.
4. The Region's Limited English Proficiency Plan.
5. The Region's Title VI Complaint process (if available).

The responses received were reviewed and used for this 2011 Title VI Review Process Update. Based on this review, the Department also identified each region's areas of deficiencies. The Department and available FTA and FHWA staff will visit each MPO in the beginning of 2012 to discuss these deficiencies.

IV. Title VI, Environmental Justice, & Limited English Proficiency: Relationship and Application

Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that no person in the United States shall, on the ground 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. Areas of emphasis include the following:

- No person in the United States—The word “person” includes citizens as well as persons not lawfully present in the United States (illegal aliens). The phrase “in the United States” refers specifically to the fifty states of the Union. However, due to Title VI's relationship to the 5th and 14th Amendments to the Constitution (one amendment applies to the states and one applies to the states and the territories), Title VI is broadly interpreted to apply to the states and the territories.
- Program or Activity—The Civil Rights Restoration Act of 1987 amended Title VI and

related statutes by adding an expansive definition of “program or activity”. Therefore, the term “program or activity” applies to (1) a department, agency, special purpose district, or other instrumentality of a State or of a local government; or (2) the entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local government. A Regional Planning Organization receiving federal assistance satisfies this definition.

- Receiving federal financial assistance through the State—Federal financial assistance is the award or grant of money. In addition, Federal financial assistance may be in non-monetary form. Federal financial assistance may include the following: use or rent of Federal land or property at below market value, Federal training, a loan of Federal personnel, subsidies, and other arrangements with the intention of providing assistance. Federal financial assistance **does not** include the following: contracts of guarantee or insurance, regulated programs, licenses, procurement contracts by the Federal government at market value, or programs that provide direct benefits.

Title VI applies directly to race, color, and national origin. There are three additional “cross-cutting” nondiscrimination statutes that prohibit discrimination on other grounds in federally assisted programs or activities. These include the following: Title IX (prohibits discrimination in education programs on the basis of sex), Section 504 (prohibits discrimination on the basis of disability), and the Age Discrimination Act (prohibits discrimination on the basis of age). Congress modeled these statutes after Title VI. Therefore, when Title VI/Nondiscrimination is referenced, sex, age and disability are generally linked with race, color and national origin.

Environmental Justice

Executive Order 12898 (“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”) required each federal agency to develop a written strategy to identify and address disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income communities. This can be realized through the development and implementation of an integrated approach towards Environmental Justice (EJ) through the collection, analysis, and dissemination of understandable and useful information on the adverse environmental and health impacts on protected populations. Through the National Environmental Policy Act of 1969 (NEPA) process, the EJ analysis is included as an individual section of the environmental document and is thereby disseminated to the public. For a Regional Planning Organization (RPO), the EJ analysis is included as another area of study under Title VI during the Planning process for transportation projects, plans and programs. Additionally, RPOs should analyze the impact of benefits provided by the RPO upon low-income and minority communities within the RPO’s boundaries. This should include providing LEP populations and minority and low-income communities’ access to public information and the opportunity for public participation in the planning process.

There are three fundamental EJ principles. These principles are as follows:

- 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; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Environmental Justice is applicable to persons belonging to any of the following groups:

- **Black**—a person having origins in any of the black racial groups of Africa.
- **Hispanic**—a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- **Asian**—a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- **American Indian and Alaskan Native**—a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.
- **Native Hawaiian or Other Pacific Islander**—a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **Low-Income**—a person whose household income (or in the case of a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines.

Limited English Proficiency

Executive Order 13166 (“Limited English Proficiency”) affirmed the obligation to eliminate limited English proficiency (LEP) as an artificial barrier to full and meaningful participation in all federally assisted programs and activities. In addition, the Executive Order expanded the obligation to address the language needs of LEP persons beyond federally assisted programs and activities to include federally conducted programs and activities. A recipient is required to evaluate how a LEP person’s inability to understand oral and written information provided by and about a federally assisted program or activity might adversely impact his or her ability to fully participate in or benefit from that program or activity. The guiding principle of the LEP Guidance is a four-factor analysis of “reasonableness”. The four-factors are as follows:

- Number or proportion of LEP persons in the eligible service population;
- The frequency with which LEP individuals come in contact with the program;
- The importance of the service provided by the program; and
- The resources available to the recipient.

Utilizing these four-factors, a RPO should determine what, if any, language mitigation measures are reasonably necessary to eliminate or minimize LEP as a barrier to participation in or receipt of the benefits of a federally assisted program or activity.

The USDOT published policy guidance on Title VI’s prohibition against national origin discrimination as it affects LEP persons. A synopsis of the USDOT guidance can be found in Appendix B; this synopsis was provided to each MPO and Rural Region in the State.

Coordinated Relationship

Title VI, being a portion of a Congressional statute, is the area of emphasis. Within the Planning process, each RPO should have a Title VI area of analysis for all federally assisted transportation projects as well as programs and activities (eg. Long Range Plan and Transportation Improvement Program). As a part of this Title VI analysis, a study should be

performed to ensure that development and urban renewal benefiting a community, as a whole, should not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the targeted communities (low-income and minority communities). This should include providing minority and low-income communities' access to public information on, and an opportunity for public participation in, matters relating to human health or the environment as it is affected by transportation projects and programs.

Four strategies that may be pursued to implement this analysis are as follows:

- Promote enforcement of all health and environmental statutes in areas with minority and low-income populations;
- Ensure greater public participation;
- Improve research and data collection relating to the health of and environment of minority and low-income populations; and
- Identify differential patterns of consumption of natural resources among minority and low-income populations.

As a portion of this analysis, a study of impacts relating to outreach to LEP persons should be performed. LEP populations (if any) should be identified and a "reasonableness" decision made as to the need to provide additional resources to promote participation in the public process.

Regarding a benefits analysis, if a RPO is offering public transportation, studies involving possible impacts to minority/low-income communities and LEP persons should be performed as part of the Title VI analysis.

V. Guidance to Achieve Compliance with Title VI, Environmental Justice, and Limited English Proficiency

Below is a list of basic guidance to assist the Regional Planning Organizations to achieve compliance with the many aspects of Title VI, EJ and LEP legislative requirements. This guidance as well as the legal requirements discussed above should be reviewed and where applicable implemented by the Regional Planning Organizations. The guidance is grouped into two categories: Planning Processes and Products, and Public Outreach.

Planning Processes and Products

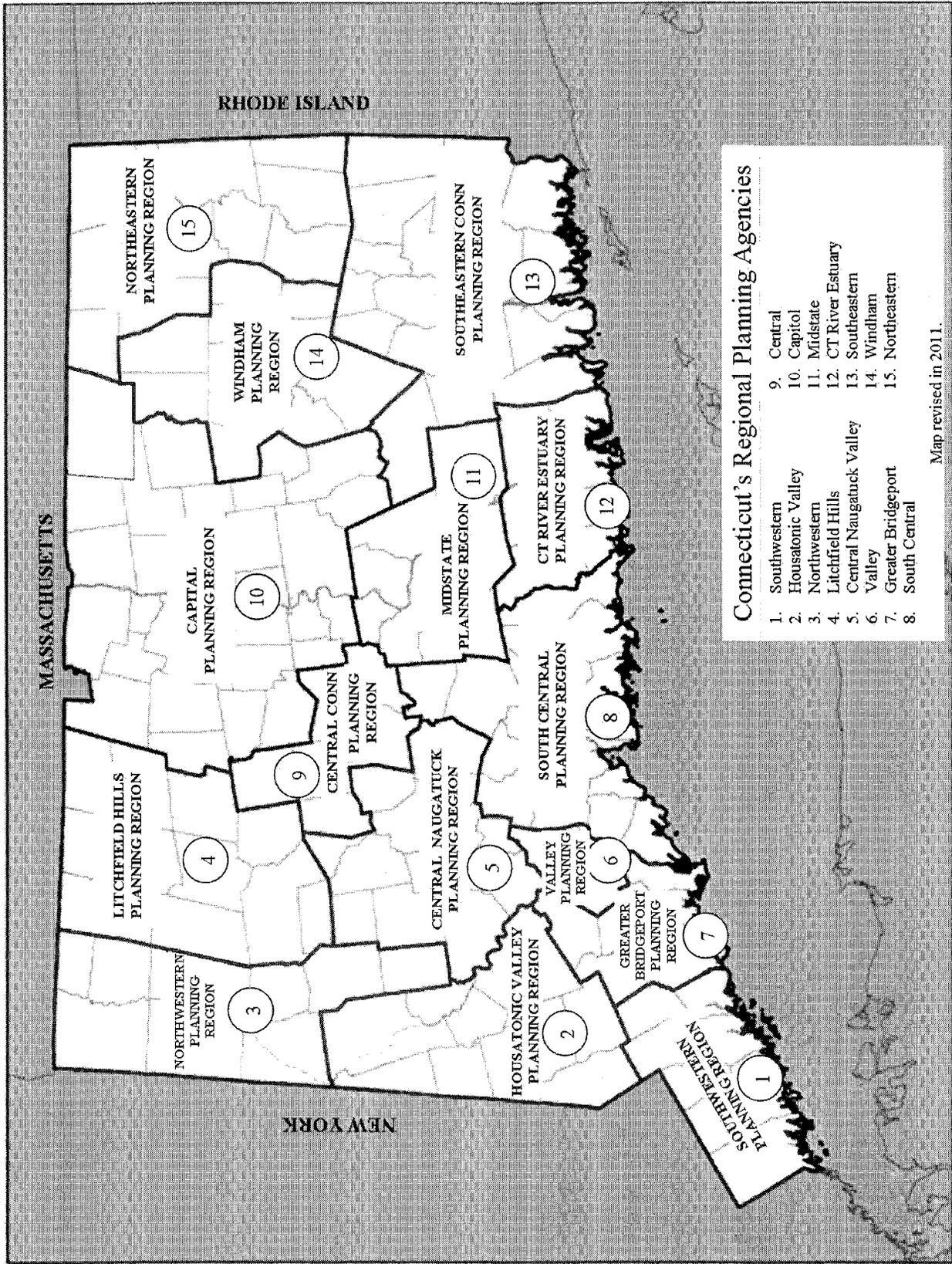
- Integrate the EJ process into the Title VI Process.
- Emphasize Title VI in the Planning Process.
- Produce a Title VI Action Plan.
- Expand the identification process for LEP groups.
- Incorporate LEP procedures in the Public Participation Plan, including identification procedures.
- Examine the use of Block Groups as opposed to Census Tracts to identify the location of the targeted groups.
- Update the targeted group locations using the 2010 Census Data
- Publish Public Participation Plan electronically
- Review and expand the project selection criteria to include Title VI elements, in particular the STP Urban Program and the FTA 5310 vehicle selection process.
- Identify and analyze the benefits and burdens of the planning process and products, as well as projects, and implement the recommended changes.

Public Outreach

- Identify Community Based Organizations, and expand public outreach to the targeted community groups during TIP adoption and LRP update
- Evaluate public outreach efforts, including a review of the effectiveness of the process to identify what is working and opportunities for improvement
- Indicate access to LEP documentation on RPO websites, agendas, and other means, including an indication of availability of documentation in the alternative language.
- Consider the translation of brochures, pamphlets, and documents where practical.
- Expand the mailing list to include alternative language newspapers.
- Participation of representatives from targeted communities on RPO boards.
- Ensure that public meetings are conducted at convenient and accessible locations at convenient times
- Establish a Title VI/EJ Advisory Committee.
- Examine and update website to include alternative language information.

VI. Map of the fifteen Regional Planning Organizations in Connecticut.

The map below depicts the boundaries for the fifteen Regional Planning Organizations in Connecticut.



- ### Connecticut's Regional Planning Agencies
- | | |
|-----------------------------|----------------------|
| 1. Southwestern | 9. Central |
| 2. Housatonic Valley | 10. Capitol |
| 3. Northwestern | 11. Midstate |
| 4. Litchfield Hills | 12. CT River Estuary |
| 5. Central Naugatuck Valley | 13. Southeastern |
| 6. Valley | 14. Windham |
| 7. Greater Bridgeport | 15. Northeastern |
| 8. South Central | |

Map revised in 2011.

VII. A synopsis of actions taken for reviewing and updating the RPOs Title VI process.

All local governments and Metropolitan Planning Organizations (MPOs) that receive federal funds through CTDOT are required to develop a Title VI Process Plan for their transportation projects. The Department has developed fifteen (15) questions to determine how the Metropolitan Planning Organizations (MPOs) are currently meeting the federally mandated Title VI requirements, including how Title VI, LEP and EJ are incorporated into transportation projects and if other analytical tools are currently being used. This set of 15 CTDOT identified questions to RPOs are listed below.

Following these questions are segments on each Regional Planning Organization (RPO). Under each Region's section are:

- Brief history on their Title VI practices.
- Regional responses to their identified areas of concern included in the February 2004 Title VI Process Review Document.
- Regional responses to the 15 CTDOT identified questions and website addresses (if provided) where the region's completed document is posted.

Attachments provided by the regions are voluminous. They will be made available upon request.

Fifteen (15) QUESTIONS TO ALL REGIONAL PLANNING ORGANIZATIONS

1. Have the MPO's updated their demographic profile of the metropolitan planning area that includes identification of the locations of socio-economic groups, including low-income and minority populations as addressed by the Executive Order on Environmental Justice and Title VI provisions? If so, how does the demographic profile identify the locations of the socio-economic groups? Please submit a sample.
2. Does the MPOs' Planning process seek to identify the needs of low-income and minority populations? If so, how does the Planning process identify these needs? In addition, does the Planning process seek to utilize demographic information to examine the distributions across these groups of the benefits and burdens of the transportation investments included in the TIP? Finally, what methods are used to identify imbalances?
3. Does the MPOs' public involvement process have an identified strategy for engaging minority and low-income populations in transportation decision-making? Secondly, what mechanisms exist to ensure that the public's issues and concerns are addressed? Also, what strategies, if any, have been implemented to reduce participation barriers for such populations? Finally, has their effectiveness been evaluated?
4. Has public involvement in the MPOs' Planning process been routinely evaluated as required by regulation? In addition, have efforts been undertaken to improve performance, especially with respect to low-income and minority populations? Also, have organizations representing low-income and minority populations been consulted as part of this evaluation? Finally, have their concerns been considered?
5. Does the MPOs' public outreach effort utilize media (such as print, television, radio, etc.) targeted to low-income or minority populations? If so, what media vehicle is utilized? Please provide listing of media vendors used and a sample.
6. How has the MPO included Title VI and Environmental Justice in the following:
 - a. The Long-range Transportation Plan?
 - b. The Transportation Improvement Program?
 - c. The Unified Planning Work Program?
 - d. The Public Involvement Plan?
7. Has the MPO reviewed its decision-making process or developed written policies or criteria that address consideration of all populations served by the RPO? Please provide policy.
8. How does the MPO provide access to public comments or other types of public input for decision-making?
9. Is the region following your Limited-English Proficiency plan?
10. What manner of Transit monitoring does the region perform as it relates to Title VI, LEP and E.J.?
11. Does the region have a Title VI Complaint process? If so, please provide a copy.

- 12.** Has your Title VI Policy and Title VI Complaint process been added to your RPO website? If yes, please provide a link to that website.
- 13.** Does the region coordinate with Native American Tribal Governments?
- 14.** Are contracting opportunities for planning studies, corridor studies and other technical work available to all groups/persons? How are these contract opportunities advertised?
- 15.** How does the region ensure that the required Title VI requirements are incorporated into subcontracts and agreements initiated by their RPO?

Capitol Region Council of Governments

The Capitol Region Council of Governments (CRCOG) was established as the Capitol Region Planning Agency in 1959 to serve the greater Hartford area. It has served as the Metropolitan Planning Organization for this portion of Connecticut since 1973 as the Capitol Region Council of Governments. The Capitol Region is also part of the larger Hartford Transportation Management Area, which includes the Central Connecticut Regional Planning Agency and the Midstate Regional Planning Agency. The Council board consists of mayors and first selectmen from the 30 municipalities in the Greater Hartford area.

The population of the Region is approximately 769,598. At the municipal level the cities of Hartford, East Hartford, Windsor, Bloomfield, Manchester, and West Hartford demonstrate the highest degree of ethnic diversity and/or economic disparity. In general, the Region can be described as consisting of a mix of many different ethnicities and income levels.

Following the February 2003 meeting with CTDOT (and its committee) CRCOG started incorporating Title VI, EJ, and LEP in the Region's planning process.

The following are CRCOG's responses to their 2004 identified areas of concern. (*Italics*)

Continue to analyze the distribution of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- Benefits and burdens of transportation investments in the TIP have been analyzed four times since the last review. Benefits and burdens of transportation investments in the LRP have been analyzed two times since the last review.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- LEP groups have been analyzed and mapped using the 2000 Census information. All significant languages have been incorporated into the Public Participation Plan (first in 2005 plan and again in 2007 update).

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- Alternate language documents have been posted on CRCOG's website. They are accessed from the Transportation Publications page. A statement in the appropriate language (in this case Spanish) will be posted on the Home Page as soon as we have the proper translation.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- A statement has been added to all Transportation Committee meetings; all notices of opportunities to comment on major transportation plans: TIP, LRP; and when considered appropriate, agendas for special study meetings. An analysis of the study area is done before every special study to determine which alternate languages, if any, should be

added to meeting notices. The statement is listed in the appropriate language. In the Capitol Region this is most often, but not always, Spanish.

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- CRCOG always assesses the effectiveness of its public outreach efforts after each event. This assessment has been compiled and documented in an annual public outreach analysis since FY2004.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- Title VI is a part of the UPWP for CRCOG (previously Task 10, now Task 5) and quarterly reports include updates on Title VI, EJ and LEP activities.

The following are CRCOG's answers to the 15 CTDOT questions to all RPOs.

1. CRCOG's work on an Environmental Justice grant in 2002 resulted in the development of a demographic profile of the Capitol Region that included locations of low-income and minority populations (copy enclosed.¹) African-American and Hispanic are the most populous minority groups living in the Capitol Region. This work was developed using 2000 Census block group data.

The percentage of each minority group living in each Census block group was color-coded and plotted on a map of the Region.

Regarding the distribution of low-income populations, the percentage of persons living below the poverty level as defined by the census and the percentage of persons living below 150% of the poverty level were color-coded and plotted on separate maps of the Region.

Target areas were identified for each group (page 25-30 of the Environmental Justice and CRCOG's Transportation Planning Program Final Report, copy enclosed.)

This report has not been updated, but will be as soon as the Census information is reviewed in combination with available information from the American Community Survey.

2. CRCOG does seek to identify the needs of low-income and minority populations through our planning process.
 - o Since the adoption of a revised Public Involvement Policy in 2005 (subsequently revised in 2007 and renamed Public Participation Plan, copy enclosed), CRCOG has conducted assessments of the demographics (low-income, minority and LEP) of the study areas for seven corridor studies conducted by CRCOG and one corridor study conducted by CTDOT. The public outreach effort for each of those studies has been customized to respond to the findings of those assessments. A representative copy of one assessment is enclosed.

¹ All "enclosures" mentioned can be found at following CRCOG webpage:
<http://www.crcog.org/transportation/TitleVI.html>

- CRCOG also meets when needed with members of the Hartford Environmental Justice Network (the Hartford branch of the CT Coalition for Environmental Justice) to review our planning efforts and to discuss matters of concern to low-income and minority populations.

Our planning process also uses demographic information to examine the distribution of transportation benefits and burdens across low-income and minority groups.

- *TIP* –We have conducted four such assessments since the adoption of the report. A copy of the Equity Assessment for the FFY2010-2013 TIP is enclosed.
- *LRP* –We have conducted two such assessments, using methods outlined in the Final Report. The assessments form the majority of the Environmental Justice chapter of the Plan. A copy of *Chapter 9 Environmental Justice* of the 2011 RTP is enclosed.

The process and methods we have used to identify imbalances are detailed in the Environmental Justice and CRCOG's Transportation Planning Program Final Report. (See Chapter 4, Task 3 of the Final Report.)

We concluded that there were no imbalances in the TIP or in the LRP.

3. CRCOG adopted an Environmental Justice Action Plan (copy enclosed), which identifies (and formalizes) its strategy for engaging minority and low-income populations in the transportation decision-making process. CRCOG's Public Involvement Policy, adopted June 2000 (updated in both 2005 and 2007), details the outreach efforts that are made to the public to insure that their issues and concerns are identified and addressed.

Public information meetings are held whenever possible at times and at places that are accessible by public transportation.

The effectiveness of our efforts is evaluated after every attempt to engage the public. Particular evidence of this is described in the EJ report cited above in which a series of workshops were held with modifications made to outreach efforts as each subsequent meeting was held. Lessons learned from these efforts will be applied to subsequent outreach efforts.

One important mechanism we use to insure that the public's issues and concerns are addressed is to involve them early and often in our major studies. Local Advisory Committees (LACs) are key methods for involving community members in our corridor studies. Community representatives are involved in all decision-making in these studies and recommendations are not forwarded to CRCOG's Transportation Committee until they are approved by the LAC.

CRCOG further involves the low-income and minority populations through its Jobs Access Task Force. This committee is made up of public agencies that serve the low-income and minority population. The Task Force was created to help these agencies and individuals with job-related transportation issues.

CRCOG initiated an annual analysis of its outreach program in July 2004 and has conducted an annual analysis ever since. The findings continue to support a flexible, customized and targeted approach to public outreach, with the involvement of the impacted community in designing the effort. A copy of the most recent assessment (FY2010) is enclosed.

4. Public involvement in CRCOG's planning process is, as stated above, evaluated following each outreach effort that is made. Also, as stated above for the past seven years, CRCOG has conducted an annual analysis of its entire public involvement program.

In addition, CRCOG continues to build on the vigorous analysis of its public involvement process as it relates to low-income and minority populations (conducted with the assistance of an EJ grant in 2002). Organizations representing low-income and minority populations were significantly involved in that analysis. An EJ Action Plan was adopted as the result of lessons learned through that undertaking.

The EJ Plan addressed the involvement of organizations representing low-income and minority populations in the planning process, and has been used as a guide in designing the customized outreach programs for special transportation studies.

Specific concerns expressed by low-income and minority representatives at our EJ workshops and subsequent meetings to discuss the Long Range Transportation Plan have included access to jobs, support for clean fuel buses, more emphasis on better bus services (including the provision of amenities such as "next bus" signs in bus shelters) and support for bicycle/pedestrian projects. These issues have been addressed our Long Range Transportation Plan, and are being addressed at the project level.

5. CRCOG regularly publishes legal notices in the local newspaper with general circulation in the region (The Hartford Courant) and in the local newspaper with primary circulation in the minority community (The Hartford News: both in English and in Spanish).

Suggestions for reaching more of the minority and low-income communities have been developed over the last several years, and include outreach through local cable access media and through local community groups. These media outlets have been used for various special transportation studies as well as publicizing the availability of opportunities to comment on the draft TIP and the draft LRP.

CRCOG has an extensive media mailing list that is updated on a regular basis.

6. CRCOG has included Title VI and Environmental Justice in the following:

- o *The Long-range Transportation Plan*: Chapter 9 of the Long-range Plan provides an in-depth discussion of Title VI and Environmental Justice issues, including an equity analysis and sections on issues important to low-income and minority communities: support for access to jobs, clean fuel buses, better transit, and bicycle/pedestrian projects.
- o *The Transportation Improvement Program*: Equity analyses were completed for the FFY 2005-2009, the FFY2007-2010 and the FFY2010-2013 TIPs. These analyses were reviewed and commented upon by the EJ Advisory Board (or the Hartford Environmental Justice Network²) and the Transportation Committee members (including the EJ representatives to that committee.)

² Experience has taught us that one of the best ways to reach out to any group or community is through existing organizations. Therefore, our outreach to the low-income and minority communities most recently has been through the Hartford Environmental Justice Network (the Hartford branch of the Connecticut Coalition for Environmental Justice) rather than through the EJAB. Asking for a place on the agenda of a HEJN monthly meetings assures good attendance and participation in reviewing our plans and programs. In the next update of our PPP, we will analyze this assessment and make a formal proposal regarding these organizations.

- *The Unified Planning Work Program*: Title VI and Environmental Justice issues are addressed in CRCOG's UPWP under Task 5.
 - *The Public Involvement Plan*: Paragraph 2D of CRCOG's Public Participation Plan addresses EJ issues. This Plan incorporates the recommendations of the EJ Action Plan, adopted June 2002, which was devoted exclusively to Title VI and EJ outreach efforts, and includes that Plan as Appendix A.
7. CRCOG adopted a Public Information Policy in June 2000, which addresses outreach to all populations in the Capitol Region. This Policy was updated in May 2005 and again in February 2007, when it was renamed Public Participation Plan, in accordance with the requirements of SAFETEA-LU.

The EJ Action Plan, referenced and incorporated in the Plan, insures that we reach "hard-to-reach" populations in the Capitol Region.

CRCOG's decision-making process was revised to include two significant elements: 1) the formation of an EJ Advisory Board which has had the opportunity to review and comment on the Long-range Plan, the TIP, and relevant individual planning studies prior to any action being undertaken by CRCOG; and 2) the addition of an EJ representative to CRCOG's Transportation Committee to insure that all members of the committee have an opportunity to hear any EJ concerns before every decision is made.

8. CRCOG holds public information meetings for specific planning efforts, and has an item for public comments on the agenda of every Transportation Committee meeting.

Transportation Committee members hear public comments made at the committee meetings and a summary is included in the minutes for those unable to attend.

In addition, copies of all written correspondence received (including email) are made available to committee members before they vote on any issue.

Local project planning studies have always included a Local Advisory Committee that follows, comments on, and finally determines the results of those studies. Draft planning documents are not presented to CRCOG's Transportation Committee and subsequently to CRCOG's Policy Board until the Local Advisory Committee has approved the draft. Local Advisory Committees are made up of persons usually appointed by the Chief Elected Official in participating towns and include members of the general public in addition to town staff and elected officials. As a result of the analysis of some of our previous planning efforts and suggestions made during our EJ workshops, we will include representatives of neighborhood groups in future studies where possible.

Finally, and more importantly, CRCOG includes representatives of Title VI populations directly in its decision-making process. An EJ Advisory Board was formed and has had opportunities to review and comment on the Long-range Plan, the TIP, and relevant individual planning studies. More recently, these opportunities have been afforded to the existing Hartford Environmental Justice Network (see footnote, page 3). A representative of the EJ community has been appointed to the Transportation Committee, where they have a direct opportunity to comment on and influence decisions made by the Transportation Committee.

9. CRCOG adopted its LEP plan in May 2005 (copy enclosed). Recommendations were incorporated by reference in the Public Participation Plan (Section 2E) adopted at the same time.

CRCOG has been following its LEP plan. Examples of our efforts in this regard include:

- o LEP analyses and recommended outreach efforts have been developed prior to initiating seven special transportation studies.
- o Spanish language notice regarding availability of an interpreter for meetings has been added to Transportation Committee meeting agendas and public comment meeting notices for TIP and LRP.
- o Alternate language notice regarding availability of interpreter for meetings has been added to agendas for special studies when LEP populations are present in the study area.
- o Summaries of important planning documents (TIP, LRP) have been translated into Spanish.
- o Additional documents have been translated into Spanish: "Share the Road" flyer, MPO descriptive flyer. Flyers are made available at appropriate meetings.

In addition, in our Jobs Access program, some members of the Jobs Access Task Force work with persons of LEP to insure that they are aware of the services offered through the Jobs Access program. An information document about the program was published in both English and Spanish.

10. CRCOG established a Jobs Access Task Force that meets on a regular basis to help identify the transportation needs of low-income and minority individuals in the region.

CRCOG sits on the Service Review Committee of CT Transit, at which modifications to bus service are discussed and decided.

CRCOG undertook a planning effort with CT Transit to establish a bus stop site, sign and shelter policy that identifies responsibilities for improving the transit "service" at the bus stop. CRCOG worked with CT Transit to design a bus stop sign that provides more information to the potential and existing passenger. These signs have been installed throughout the Region. In addition, CRCOG continues to work with CT Transit to develop a bus shelter program that will allow for more shelters to be installed and maintained on a regular basis.

CRCOG was instrumental in establishing a Bus Users Forum that allows bus passengers and potential bus passengers a more formal opportunity to suggest improvements in the local bus service. CT Transit has since taken over this effort.

11. We do not have a Title VI Complaint process. We are, however, interested in obtaining a copy of a sample Title VI complaint process so that we might begin the development of such a document for CRCOG.
12. In entering into any contract with CTDOT for planning or special study funds, CRCOG signs off on a statement assuring its compliance with Title VI and on "Title VI Contractor Assurances". Copies of both assurances are enclosed. Contracts are typically not posted to our website.

Our Public Participation Plan is available on the CRCOG website: <http://www.crcog.org/publications/transportation.html> Scroll to **Public Involvement and Environmental Justice** header.

13. There are no Native American Tribal Governments in the Capitol Region.
14. Contracting opportunities for all CRCOG studies are made available to all groups and persons through a Quality Based Selection process. These opportunities are advertised through: a legal notice published in the Hartford Courant (a newspaper with statewide circulation) announcing a Request for Qualifications; publication of the detailed RFQ on the CRCOG website; mailing of the detailed RFQ to the CT DOT pre-approved list of CT consultants.
15. Most of our consulting contracts include a Disadvantaged Business Enterprise (DBE) requirement with a minimum percentage goal. Contract language requires the consultant to cooperate with CRCOG and CTDOT in commitments and goals regarding the maximum utilization of DBEs and to assure that DBEs have the maximum practicable opportunity to compete for subcontract work.

The agreement with the consultant also references the CRCOG-CTDOT contract and all of its applicable provisions and conditions, including U.S. DOT clauses and Appendix CR.

The agreement with the consultant includes a statement that the consultant will not discriminate or permit discrimination on the grounds of "race, color, . . . [or] national origin, . . ."

Consultants are required to submit with each invoice a statement of payments to DBEs and other sub-consultants.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by CRCOG and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with CRCOG to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the latest Census Data which is the 2010 information.
- DOT requires the region to provide a sample/example of how they conducted their public outreach through media vehicles such as but not limited to: Press, Newspapers, Internet, Television, Radio, & Social networking.
- DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. All these materials should be readily available on your website.
- DOT recommends that CRCOG streamlines their website to make the Title VI Policy and the Complaint process more accessible, such as creating a link on their homepage that navigates to Title VI.

Central Connecticut Regional Planning Agency

The Central Connecticut Regional Planning Agency (CCRPA) represents seven municipalities. It was founded in 1966 and designated as a Metropolitan Planning Organization in 1973. The Agency's Board consists of a representative appointed by the mayor or first selectmen of each municipality and a representative appointed by the planning and zoning commission of each municipality. Municipalities with larger populations are entitled to an additional Board representative, appointed by the respective municipal council, for each additional 25,000 residents (or fraction thereof).

The population of the Region is 235,878 residents as of Census 2010. At the municipal level the Cities of New Britain and Bristol are the main municipalities which demonstrate any substantial ethnic diversity or economic disparity. In general, the Region can be described as consisting of a mix of rural and suburban towns along with small cities that have significant minority populations.

Following the February 2003 meeting with CTDOT (and its committee) CCRPA started incorporating Title VI, EJ, and LEP in the Region's planning process.

The following are CCRPA's answers to their 2004 identified areas of concern, (*Italics*).

Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.

- Completed in the Long-Range Transportation Plan. The analysis is expected to be updated once data from the 2010 Census is available.

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- Not applicable for most TIP projects due to a shift in focus to operational efficiency and infrastructure maintenance. The Long-Range Transportation Plan was rewritten from scratch to integrate Title VI and Environmental Justice from the ground up, rather than as an after-thought. Most infrastructure upgrades proposed in the Plan *specifically* benefit Title VI and Environmental Justice groups.

Begin efforts to develop a Title VI/EJ Committee.

- Nearly complete. The Agency's MPO Appeals Process, which is under revision but should be released shortly, establishes a Special Concerns Committee.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- Complete. Limited English Proficiency activities have been incorporated into the Agency's Public Participation Plan. CCRPA offers interpreters for all public meetings; MPO documents, including public notices, have been and continue to be translated into secondary languages. CCRPA accepts comments in secondary languages.

Continue to update the Region's website, to include a notice regarding availability, where

practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- Complete. In addition to as noted above, MPO notices and meeting agendas include offers of interpretation. Notices for major MPO activities are translated and feature links to translated documents when available.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- Did not provide response

Complete. Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- Complete. Existing efforts were reviewed and found to be satisfactory. The volume of public complaints (zero) was insufficient to undertake a statistically valid analysis of the Agency's strategies.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- Complete. A copy of the valid UPWP and last quarterly report are attached.

The following are CCRPA's answers to the 15 CTDOT questions to all RPOs.

1. CCRPA has consolidated demographic information for the region into its Long-Range Transportation Plan. A copy of the Plan, including the relevant chapter People, is attached. Locations for groups of interest are mapped by Census block group. While the presentation and analysis are new for 2011, most of the underlying data date to 2000, the most recent date for which comprehensive and reliable data are available. It is expected the People chapter will be updated once 2010 Census data are re-released.
2. CCRPA seeks to incorporate all of the region's members, including low-income and minority groups, into its planning process. Needs are primarily addressed proactively through project development, with the Agency soliciting and developing projects that provide for modal choice and investment across all member communities. The focus of the region in recent years on operational efficiency and maintenance rather than expansion has limited the potential for large externalities. Simply put, nobody is proposing demolishing urban cores to build new highways. That said, CCRPA does review the distribution of benefits among the region's communities for the modest transportation projects it pursues. The Agency's Social Impact Reports and Long-Range Transportation Plan (see the chapter Finances) give examples of this. Through analysis and public outreach, staff has identified needs and desires with regards to the region's transportation system. Some of these differ by municipality. Many of these differences reflect the tangible physical differences that distinguish the region's municipalities, which range from very rural to decidedly urban. Others reflect funding and feasibility limits. CCRPA supports diversity- the Agency does not find it productive to term the natural differences among communities' imbalances. CCRPA has not identified nor received any complaints of inequitable distribution of benefits or burdens for ongoing transportation projects.

3. CCRPA's Public Participation Plan includes sections on special groups, including minority, low-income, and limited English proficiency populations. The Public Participation Plan ensures that CCRPA informs the public of its actions and seeks its input. A copy of this Plan is attached. The Agency furthermore responds to all public concerns, questions, and comments. No complaints about the Agency's public involvement process have been raised in at least a decade. CCRPA has undertaken strategies to reduce barriers. These include:
 - o Having handicapped-and transit-accessible offices
 - o Providing telephone and e-mail contact information for all staff on the Agency's web site
 - o Maintaining and distributing notices and materials to mailing lists of stakeholders and interested parties
 - o Offering interpretation for Agency meetings
 - o Translating MPO materials into secondary languages
 - o Holding meetings, events, and activities in local communities
 - o Using social media
 - o Soliciting projects from stakeholders and interested parties. The extent to which members of the public respond to these overtures depends on their motivation; however, CCRPA has been successful in reducing barriers over which it has control.
4. CCRPA staff discusses public involvement before, during, and after every major planning activity. Efforts to engage all stakeholder groups are an ongoing part of CCRPA's planning process. Agency staff solicits comments on its public involvement process and opportunities for improvement. No comments to this effect have been received. Should staff receive such comments in the future, the Agency will address them.
5. Not applicable. No such media exist in the region.
6.
 - a) Title VI and Environmental Justice concerns are integrated into the Long-Range Transportation Plan from the ground up, including project selection, rather than as an afterthought. There is no separate 'disadvantaged' section.
 - b) Transportation Improvement Program projects were selected according to a competitive process that weighted projects that respond to Title VI and Environmental Justice concerns with additional points.
 - c) The Unified Planning Work Program includes a section that obliges the Agency to pursue a host of Title VI and Environmental Justice activities. A copy of this document is attached. In addition, data collection and special project activities were designed with Title VI and Environmental Justice concerns in mind.
 - d) The Public Participation Plan includes a section laying out CCRPA's procedures for Title VI, Environmental Justice, and Limited English Proficiency concerns. This document is attached.
7. MPO decisions are made by the Agency Board, frequently in consultation with its Transportation Improvement Committee (TIC). Board members are appointed by the Chief Elected Officials, Planning and Zoning Commissions, and Town Councils of each CCRPA member jurisdiction. As such, they are accountable to the voters— including special needs populations—of each municipality. A copy of the Board's and TIC's by-laws is included. Responsibilities of Agency staff vis-a-vis the public is governed by the Public Participation Plan, which is attached.

8. Access to documents, including public comments received, is governed by the Agency's Public Participation Plan, which is attached. Comments are presented to relevant committees, including the Agency Board and, where relevant, the TIC.
9. Yes.
10. Not applicable. CCRPA does not provide customer service for the transit system. Agency staff is involved in several projects to enhance the transit system to better serve the public, including Title VI, Environmental Justice, and Limited English Proficiency concerns. The Long-Range Transportation Plan and Unified Planning Work Program (attached) describe these activities.
11. The Agency's MPO Appeals Process is undergoing revision. A final description of the process should be available shortly.
12. The Agency's Title VI Policy is integrated into its Public Participation Plan, which is available on its web site at <http://ccrpa.org>. Once revision of the Appeals Process is complete, that document will also be posted online.
13. Not applicable. No tribal governments exist within or near the region.
14. Not applicable. CCRPA generally does not retain consultants for transportation work.
15. Not applicable. CCRPA does not engage in subcontracts and agreements as part of its MPO activities.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by CCRPA and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with CCRPA to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the 2010 Census Data.
- DOT requires the region to respond to the questions developed by the Department describing the region's process/or mechanisms in place to ensure that the public's issues and concerns are addressed. Additionally, the region has undertaken strategies to reduce barriers, however, the region did not describe how they evaluate the effectiveness of these strategies the region have developed.
- DOT requires the region to provide a sample/example of how they conveyed there public outreach through media vehicles such as but not limited to: Press, Newspapers, Internet, Television, Radio, & Social networking. The Department recommends that the Central Connecticut Regional Planning Agency identifies media targeted to low-income or minority populations as part of their public outreach efforts.
- DOT requires the region to respond to the questions developed by the Department. How has the MPO included Title VI and Environmental Justice in the following:
 - The Long-range Transportation Plan?
 - The Transportation Improvement Program?
 - The Unified Planning Work Program?
 - The Public Involvement Plan?
- It is required that the region submit only the documents that have been requested. The region referenced links to find the documents due to the file size.
- The region did not provide their Limited English Proficiency Plan as requested by DOT.
- DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. DOT also required the region to submit sample copies of the policy and complaint form. All these required materials are not be readily available on your website.

Connecticut River Estuary Regional Planning Agency

The Connecticut River Estuary Regional Planning Agency (CRERPA) was established as the Regional Planning Agency for the Connecticut River Estuary region in 1967. However, it was not until 1968 that this area had full geographic representation of all nine towns. The CRERPA board is comprised of 18 town representatives, two appointed from each town. The transportation policy board, the Connecticut River Estuary Metropolitan Planning Organization (CREMPO) consists of the Mayors and First Selectmen from the nine municipalities in the lower Connecticut River valley, one representative from CRERPA, and one representative from the Estuary Transit District. The population of the Region is approximately 62,280. In general, the Region can be described as suburban

Following the April 2003 meeting with CTDOT (and its committee), CRERPA started incorporating Title VI, EJ, and LEP in the Region's planning process.

The following are CRERPA's answers to their 2004 identified areas of concern. (*Italics*)

Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.

- After the 2003 Title VI/EJ review at CRERPA, the agency hired on GIS/Data analyst who researched Title VI/EJ guidelines, and review existing census data on a block group level. The result was a series of maps and associated data in 2005-2006 which identified key areas for disadvantaged populations: total population, age, Spanish speaking, disability identified, and income. From 2006 to 2008, CRERPA worked with emergency management officials in the CRERPA region on identify targeted population groups in support of services and evacuation. In addition, in 2010 – 2010, CRERPA is heading a DEMHS Region2 geospatial project that will looked to work with the ESF 19- (Functional Needs) group to identify areas of targeted populations. The work will continue as 2010 Census data is released.

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- As CRERPA moved forward from 2003, the projects within the TIP became less focused on pavement renovation or reclamation. This was a major transition for the member towns. The primary goals for CRERPA was to focus a new long range planning process on ways to reallocate the TIP toward projects that had more impact on intermodal access (sidewalks and road safety) to transportation modes that provided services to targeted Title VI/EJ groups. The research noted above showed that the town centers were the primary locations for the targeted groups. With that in mind, TIP projects, transit planning and projects, and long range plans are starting to focus more on methods for improving fixed bus route service and shelters in these village cores and designated routes, connecting targeted populations to accessible transportation modes, and a new focus on Transit Oriented Development in the village centers which coincidentally provide commercial, health, and other related services. Also, a new focus on increased buy-in from member towns at a long range planning level; is working; both in the regional plan and local plans. CRERPA has been instrumental in the development and writing of 5 town plans of conservation and development and has included Title VI/EJ within the transportation planning for those towns.

Consider efforts to develop a Title VI/EJ Committee, or explore methods by which the relevant populations can be brought into the planning process.

- As of 2009, CRERPA (CREMPO) formed a long range planning subcommittee for the 2011 Long Range Plan. Part of the mission of this committee of professional planners within the region, was to look toward Title VI/EJ target groups in addition to the overall process for long range transportation planning. In March 2011, just prior to the adoption of the 2011- 2040 LRP, the committee was reformed as the regional intermodal committee. The mission of this group is to look at intermodal transportation options within the region. In its infancy, it is expected that the group will invite representatives of relevant populations to join as members. That said, CRERPA still is exploring ways to receive comment and buy in from Title VI/EJ target populations. One newer outreach process is through CRERPA participation in transportation for emergency planning for DEMHS Region 2 which also in progress.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- This continues to be a work in progress and a difficult one due to the demographic characteristics of the region and sporadic location of LEP groups. CRERPA through evaluation of the 2000 block group data and subsequent mapping has identified certain major LEP groups which are small in relative size to overall regional population. The primary methodology at this point includes notifications, the largest LEP group in the region, in the Hispanic newspaper of major transportation policies and plans.

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- CRERPA still continues to update the Region's website.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- A statement, as noted above, was added the CREMPO agendas immediately after the 2003 Title VI/EJ Review and has been in place since. This statement has also been translated into regional (TMA) Hispanic newspaper when there have been major policy documents for public comment. That said, in deference to other equally prominent, if small, LEP groups in the region, CRERPA is still trying to correctly designate one language for the agenda.

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- CRERPA is still working a method to systematically review effectiveness of public outreach. The region's population is still getting use to the idea that there is a transportation planning process in the state and CRERPA region. Meetings of the CREPA, CREMPO, and ETD boards are rarely attended by the public for regular adoption of plans and projects despite public outreach. This would either mean that the public is disinterested or uninformed as to the availability of public meetings. CRERPA has been meeting with member towns and the public on various long range planning and transportation documents, both town and regional with rare public involvement. The

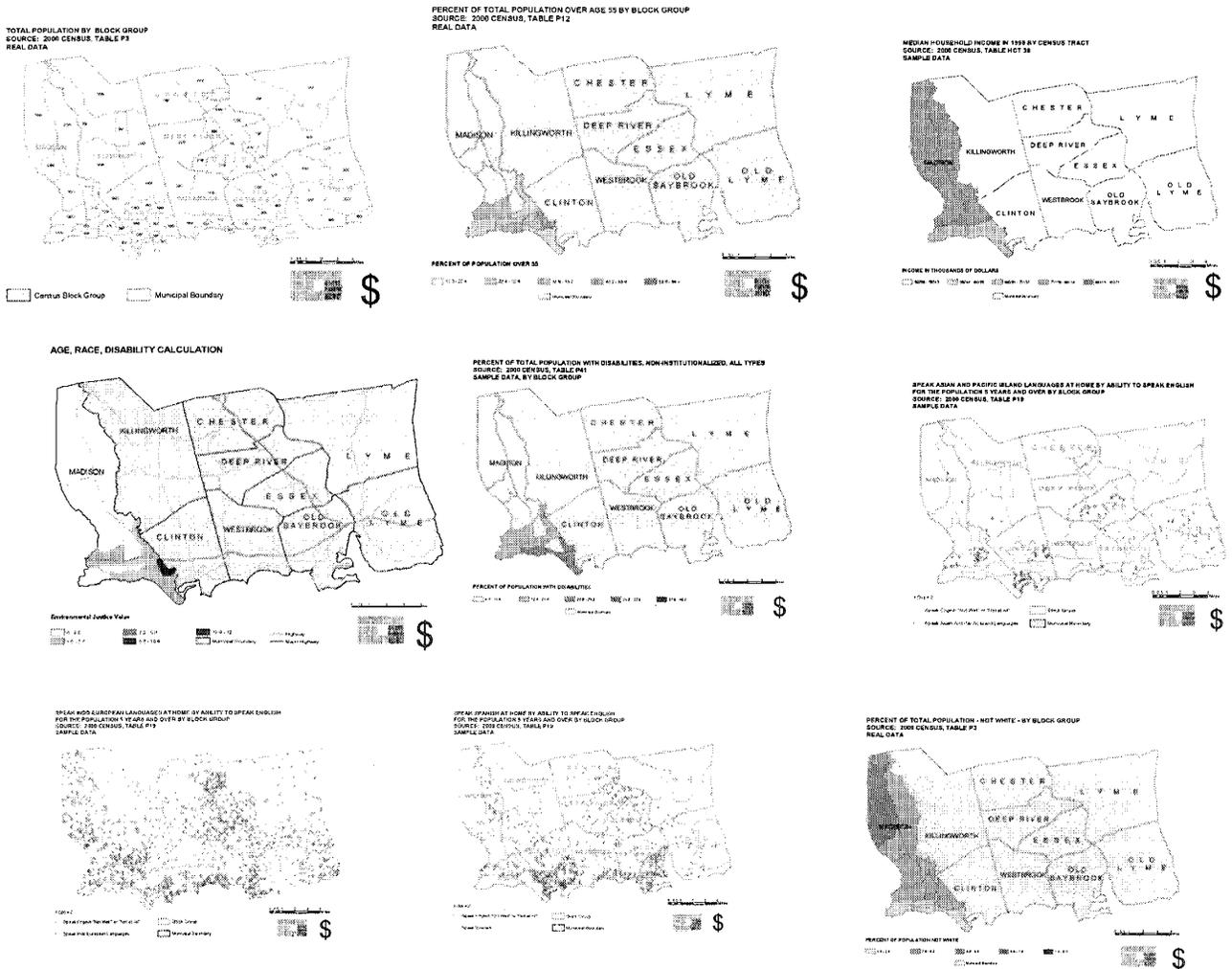
public notice process does seem to work, as the few controversial issues in front of the CREMPO board have resulted in numerous emails and several persons at the CREMPO meeting. CRERPA will continue to refine this process with the CREMPO board in the update to the public participation guidelines.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- Title VI/EJ has been included in all UPWP and quarterly reports subsequent to the 2003 Title VI/EJ CREMPO review.

The following are CRERPA's answers to the 15 CTDOT questions to all RPOs.

1. CRERPA hired a GIS/Data analyst who researched Title VI/EJ guidelines, review existing census data on a block group level, and produced data for targeted population from the 2000 Census Block Group. The result was a series of maps and associated data in 2005-2006 which identified key areas for disadvantaged populations: total population, age, Spanish speaking, disability identified, and income. (see below)



2. As CRERPA moved forward from 2003, the projects within the TIP became less focused on pavement renovation or reclamation. This was a major transition for the member towns. The primary goals for CRERPA was to focus a new long range planning process on ways to reallocate the TIP toward projects that had more impact on intermodal access (sidewalks and road safety) to transportation modes that provided services to targeted Title VI/EJ groups. The research noted above showed that the town centers were the primary locations for the targeted groups. With that in mind, TIP projects, transit planning and projects, and long range plans are starting to focus more on methods for improving fixed bus route service and shelters in these village cores and designated routes, connecting targeted populations to accessible transportation modes, and a new focus on Transit Oriented Development in the village centers which coincidentally provide commercial, health, and other related services. Also, a new focus on increased buy-in from member towns at a long range planning level; is working; both in the regional plan and local plans. CRERPA has been instrumental in the development and writing of 5 town plans of conservation and development and has included Title VI/EJ within the transportation planning for those towns.
3. Yes, although still under review for next update in 2011. CRERPA has a public participation policy which addresses outreach to underserved populations and target groups. The methodology for reaching those target groups is still being determined in a region where population sector densities are small and LEP groups are small and numerous. Some concepts explored during the 2005 and 2007 iteration of the CREMPO LRP were posting of the notices in target gathering locations such as laundry centers, the public bus or train stations, or reaching out to Asian restaurants in the region to disseminate information. The other challenge is finding translators in the appropriate dialect.
4. CRERPA is in the middle of a third update to the public participation policies, including draft language for including a mechanism for feedback on the policy itself. (Draft attached). While the public participation policy public comment period has been posted a regional Hispanic newspaper in the other iterations, CRERPA plans to put out notices on the public bus and in other key locations during this update.
5. Current Hispanic regional newspapers have been used for all public comment sessions for documents and major policy updates.
6.
 - a. The Long-range Transportation Plan? 2005, 2007, 2011 LRPs
 - b. The Transportation Improvement Program? 2005, 2007, 2011 TIPs
 - c. The Unified Planning Work Program? 2004 through 2012
 - d. The Public Involvement Plan? 2005, 2008, and current update draft
7. Yes, see attached
8. The public is invited through notices in the newspaper with supporting notice and documents on the CRERPA website to provide comment, either written (email and mail), phone call, or attendance at public meeting.
9. CRERPA at present is still working on identifying which LEP groups are the major groups, in addition to Spanish, for which to provide translation. In formative stages.
10. Work with transit provider, but still in formative stage.
11. Draft in progress as part of update to public participation policy. Estuary Transit District, as service provider, has complaint process posted on website.
12. Public participation policies are posted on website, including Title VI policy. Title VI complaint process will be posted as part of update to Public Participation Policy.

<http://www.crerpa.org/transportation.php>

13. None in region
14. These would be available to all groups/persons. At this point in time, CRERPA does not contract out for planning studies.
15. Once CRERPA contracts out for planning study, Title VI requirements will be incorporated.

2011 Identified Areas of Deficiencies

- The Department has reviewed the information provided by CRERPA and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with CRERPA to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.
- The region did not provide their Public Involvement Plan
- The region did not provide their LEP
- This region is currently updating their manual on Transit Monitor and has not submitted a copy nor provided sufficient information.
- The region did provide a link on information about Title VI complaint process however the information was deemed insufficient

Council of Governments of the Central Naugatuck Valley

The Council of Governments of the Central Naugatuck Valley (COGCNV) was established as the Regional Planning Organization for the Central Naugatuck Valley in 1960 and has served as the Metropolitan Planning Organization for the Naugatuck Valley since 1983. The Council board consists of the Mayors and First Selectmen of the thirteen municipalities in the greater Waterbury area. The 2010 Census population of the Region is 287,768. Waterbury is the region's central city, which demonstrates substantial ethnic and economic diversity. Naugatuck and Cheshire are the region's two largest suburban. In general, the Region can be described as consisting of a mid-sized central city surrounded by suburban and rural towns.

Following the March of 2003 meeting with CTDOT (and its committee), COGCNV started incorporating Title VI, EJ, and LEP in the Region's planning process.

The following are COGCNV's answers to their 2004 identified areas of concern. (*Italics*)

Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.

- The Transportation Plan Maps in Appendix F are done by Census Block Groups as in the previous plan, Staff has noted that since the last plan, poverty has worsened and block groups in poverty have increased in the region, See attachment C.

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- Staff examines the distributions of benefits and burdens of transportation investments through the use of its GIS mapping, attachment C

Begin efforts to develop a Title VI/EJ Committee.

- COGCNV does not have a Title VI/EJ Committee. We have never received any complaints.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

A recent analysis of limited English proficiency households (LEP), based on the 2005-2009 was done.

- American Community Survey, identified Spanish speaking households as 55% of the total
- Linguistically-isolated households, another 38% spoke other Indo-European languages. Only 7%
- Were comprised of Asian, Pacific or other language speakers. See attachments C and D.

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- Our website has offered translation on request for some time now. Staff is in the process of adding to the site Spanish translations of three sections (About Us, Publications, and Services) in Spanish and offering Google Translate for other LEP households, our recent routing study of the Naugatuck River Greenway had a Spanish language press release and comment sheet. These were distributed at public workshops and on the project website. They are attachments E and F.

- COGCNV is in the process of adding Spanish translations on our website of pertinent material, such as a general description of our services and publications and brief summary of our publications. Translation into other Indo-European languages spoken by a significant percentage of regional residents might also be considered, but is currently limited to Google Translate.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- We are considering adding a statement to our COGCNV agendas stating that, with five days' notice, translators can be made available for our meetings.

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- Our decision making process is attached; The Plan is updated as comments are received and revised until approved by the Council of Governments. To date, we have not developed a systematic way to review the effectiveness of our public outreach process and citizen involvement for the plan nor written policies or criteria. Staff currently holds discussions following public meetings on attendance and effectiveness of "advertising" this topic. See attachment G taken from Appendix F on page 73

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- Title VI activities are included in COGCNV's UPWP. After public meetings, staff discusses effectiveness of public outreach process such as meeting location, handouts, etc. Attached is a list of items generally discussed.

The following are COGCNV's answers to the 15 CTDOT questions to all RPOs.

1. The regional demographic profile has been updated and is mapped using GIS in Appendix F, attachment C. See attachment H for sample.
2. The Planning process disseminates Appendix F as part of the plan review process. A series of GIS maps highlight the demographic distribution of needs and locates them in relation to project locations. See attachment I.
3. Public hearing notices are sent to a wide variety of groups including the NAACP and Greater Waterbury Transit Advisory Board. The notices are also available at the municipal libraries and town clerks. See attachment A and B. There is a public comment prior to each Regional Planning Commission meeting and the public did attend a public meeting on the Naugatuck River Greenway at the September Regional Planning Commission meeting to comment on the plan. See attachment J.
4. Public involvement is evaluated on an ad hoc basis and adjustments made. COGCNV is increasing its website foreign language offerings, for example. As noted in 3, the NAACP and the Greater Waterbury Transit Advisory Board were both including in mailing, and the public notice of the plan was translated and sent to a Spanish newspaper. See the newspaper notices as part of Attachment B. No comments were received.

5. COGCNV's outreach efforts use only print media and the web. See #4 above. Vendors used are Voices (Woodbury/Southbury/Bethlehem), Republican-American, Thomaston Express, the Citizen News (Naugatuck/Beacon Falls), Town Times (Watertown), the Bee Intelligencer, and La Voz.
6. Title VI and Environmental Justice are contained in Appendix F of the Long Range Transportation Plan which is distributed as per attachment B. It is not included in the Transportation Improvement Plan or Unified Work Plan.
7. See attachment A.
8. Comments are reviewed at Regional Planning Commission meetings and monthly COG meetings and prior to any plan adoption.
9. We have instituted translations in Spanish of the COGCNV home page and certain subsections of our website. We have provided translations and comment documents in Spanish at public meetings on major projects. See Attachment J.
10. We have raised serious concerns over a proposed multi-modal passenger terminal which would move the bus system's transfer point from the downtown to the train station, increasing travel times for many bus passengers and reducing bus operation efficiency.
11. We have no formal Title VI Complaint process, but have received no complaints.
12. The Transportation Plan is on our website with the Title VI analysis in Appendix F. The website is www.cogcnv.org
13. We have no known Native American Tribal Governments in our region.
14. Contracting opportunities are advertised in the newspaper with the largest circulation in our region, the Waterbury Republican-American. In addition, we keep a list of consultants to notify and consult with the Connecticut Department of Transportation (CTDOT). In our most recent major study, the Naugatuck River Greenway, a woman owned business, Fitzgerald and Halliday, was a subcontractor.
15. We incorporate CTDOT requirements into our agreements.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by COGCVN and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with COGCVN to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the 2010 Census Data.
- Respond to “Have efforts been undertaken to improve performance, especially with respect to low-income and minority populations? Have organizations representing low-income and minority populations been consulted as part of this evaluation? Have their concerns been considered?”
- Respond to “Has the MPO reviewed its decision-making process or developed a written policies or criteria that address consideration of all populations served by the RPO”?
- Provide listing of media vendors used and a sample.
- Please provide a copy of the Region’s Public Participation Plan
- Please provide a copy of the Region’s Limited English Proficiency (LEP) Plan
- DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. Please submit sample copies of the policy and complaint form. All these materials should be readily available on your website.

Greater Bridgeport Regional Planning Agency

The Greater Bridgeport Regional Planning Agency (GBRPA) was created in 1960. In 1981 the Greater Bridgeport Regional Planning Agency and the Valley Regional Planning Agency were designated by the Governor as a Metropolitan Planning Organization.

The 2000 Census redefined the urban area boundaries for the Region, and created the new Bridgeport-Stamford Urbanized Area, and an expanded Transportation Management Area (TMA). The expanded TMA now includes the following regional planning organizations: Greater Bridgeport Regional Planning Agency, South Western Regional Planning Agency, and Valley Council of Governments.

The population of the Region is approximately 318,004. At the municipal level the Cities of Bridgeport and Stratford are the two municipalities that demonstrate any substantial ethnic diversity or economic disparity.

Following the June 9th, 2003 meeting with CTDOT (and its committee), GBRPA started incorporating Title VI, EJ, and LEP in the Region's planning process.

The following are GBRPA's answers to their 2004 identified areas of concern. (*Italics*)

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- The location of LRP and TIP projects overlaid on the map showing critical or sensitive neighborhoods. Estimates were calculated for transportation investments in each of the critical areas, by type of transportation enhancement.

Begin efforts to develop a Title VI/EJ Committee.

- No activity to date; consider a topic of discussion by the TTAC.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- Review of 2000 Census data indicated Spanish as the most common non-English speaking groups. Furthermore, data also indicated that the majority of households where another language is spoken were not linguistically isolated. The GBRPA has translated legal notices and news releases into Spanish and posted and distributed to Spanish language newspaper and other media outlets.

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- At this time only legal notices and news releases have been translated; the ability to translate major reports into a second language is cost prohibited. The GBRPA will investigate the feasibility of translate plan summaries. The GBRPA has engaged a consultant for web design services. It will include a translate toolbar for multiple languages, adhere to Section 108 (ADA) principles, and provide opportunities for interactive submission of project comments.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- The GBRPA has initiated reconstruction of our website to provide automated notices of upcoming meetings. It will include a Google translator service, and utilize Facebook and twitter for additional noticing.

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- Response: The review and evaluation of the effectiveness of public outreach efforts is included as a task in the FY 2011-2012 UPWP. We are investigating a process to integrate social media and interactive GIS mapping applications in our outreach process.

Consider alternative techniques other than newspapers to get out information regarding meetings.

- The GBRPA has convened advisory committees to guide the preparation of transportation plans. The committee structure is used to provide a link with interested stakeholders and for publicizing a planning effort. Advocacy group newsletters and email group lists are used to summarize planning studies and inform interested person of on-going activities. Example: The Fairfield bike/walk coalition has been informed and kept up-to-date and efforts to develop/prepare a bicycle and pedestrian plan for the town through participating members and email notices. In addition, the new website will be more dynamic in informing the public about meeting and will provide a calendar of planning activities. Our website will also serve as the clearinghouse for project information and related data.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- Title VI activities are included in the FY 2011-2012 UPWP and activities are included in quarterly progress reports.

The following are GBRPA's answers to the 15 CTDOT questions to all RPOs.

1. Have the MPO's updated their demographic profile of the metropolitan planning area that includes identification of the locations of socio-economic groups, including low-income and minority populations as addressed by the Executive Order on Environmental Justice and Title VI provisions? If so, how does the demographic profile identify the locations of the socio-economic groups? Please submit a sample.

The GBRPA completed a demographic profile of the region to identify sensitive areas and to address Environmental Justice – *Demographic Profile & Environmental Justice Evaluation: Minority, Low Income & Transit Dependent Populations in the Greater Bridgeport Planning Region*, April 2003. The identification of critical or sensitive areas was based on the following variables:

- Minority Population
- Hispanic or Latino Race
- Per Capita Income
- Households Below Poverty Level

- Households Receiving Public Assistance Income
- Workers who Drove Alone to Work
- Workers who Use the Bus to Work
- Households with Zero Vehicles Available

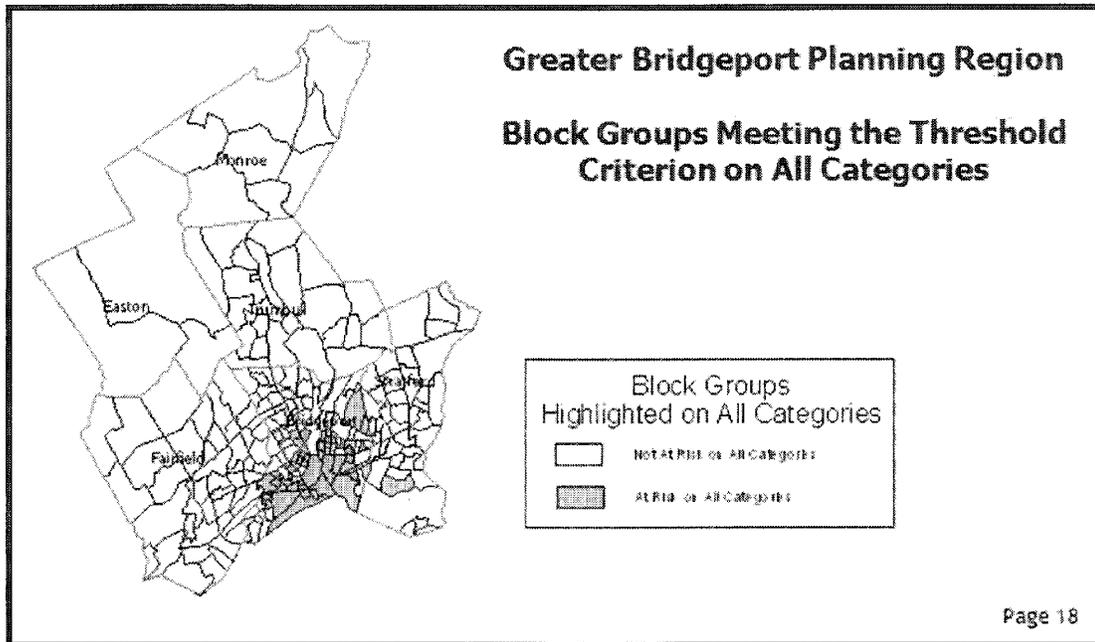
The data were mapped on a block group basis and a sensitive area was determined based on its value on a variable having a variance at least 25% from the regional mean. The following is an extract from the EJ report. It includes a table showing the number of block groups meeting the criterion for EJ consideration on each of the seven variables and a map highlighting the block groups that met the thresholds on all criteria.

The maps presented in the previous sections highlight the distribution of block groups that meet the criterion threshold for the various categories. As can be seen, many areas show up on a number of maps, predominately in Bridgeport.

There are 233 block groups in the Region, with just about half (49%) comprising Bridgeport. Based on the spatial assessment of the demographic data, 53 block groups met the threshold criterion on all seven categories. The highest number of block groups was for the Hispanic population category. The above regional average was met in 121 block groups or about 52% of the total. Only 75 block groups met the threshold on the “Public Assistance” factor, while 77 block groups reached the transit dependency criteria.

All but one of the block groups highlighted on each category is located in Bridgeport. The one exception is located in the south end of Stratford.

	Number of Block Groups	Percent of Total Block Groups
Minority Population	100	42.9%
Hispanic or Latino of any Race	121	51.9%
Per Capita Income	102	43.8%
Households Below Poverty Level	77	33.0%
Households with Public Assistance Income	75	32.2%
Workers who Use Bus to work	77	33.0%
Households with Zero Vehicles Available for	77	33.0%
Meet Threshold Criterion on All Categories	53	22.7%



2. The GBRPA's planning process identifies the needs of low income and minority populations through its contact and assistance to member municipalities and their elected officials. The GBRPA participates on various advisory committees that include low income and minority representation, including the People-to-Jobs Working Group, LOCHSTP, Bridgeport's BGreen 2020 committees, and CEDS. A list of neighborhood associations and advocacy groups is maintained and direct mailings are sent to these groups.

The distribution of benefits and burdens is assessed based on spatial evaluation that overlays project location on the EJ map. This allows for the determination of where projects are occurring and the financial investments made throughout the region.

3. The GBVMPPO's public involvement process includes actions to engage the public and proactively involve them in the planning process. Strategies used depend on the nature of the proposed/planned action. For planning studies, the GBRPA convenes an advisory committee made up affected and interested stakeholders. The committee provides input and direction to the study. The previous public involvement process was evaluated and led to an updated of the process 2008.
4. The GBRPA's UPWP includes a task for the on-going review and evaluation of the public involvement process. Based on past reviews, the GBRPA has implemented changes to improve performance. The GBRPA has also initiated reconstruction of its website to provide automated notices of upcoming meetings. It will include a Google translator service, and utilize Facebook and twitter for additional noticing. The GBRPA has relied on contact with municipal elected officials, including aldermen and council members to provide input and inform the Agency of low income and minority needs.
5. Does the MPOs' public outreach effort utilize media (such as print, television, radio, etc.) targeted to low-income or minority populations? If so, what media vehicle is utilized? Please provide listing of media vendors used and a sample.

The GBRPA distributes legal notices and news releases to all media in the region, including Spanish language newspapers and other media outlets. Efforts are made to translate these notices into Spanish.

The Connecticut Post 410 State Street Bridgeport, CT 06604	WMNR Fine Arts Radio 1014 Monroe Turnpike Monroe, CT 06468
The Fairfield Citizen News 220 Carter Henry Drive Fairfield, CT 06430	WEZN-FM99.9 10 Middle Street Bridgeport, CT 06604
The Fairfield Minuteman 1300 Post Road Fairfield, CT 06430	WCUM Radio Cumbre 1862 State Street Extension Bridgeport, CT 06605
Stratford Bard 2742 Main Street Stratford, CT 0649	WPKN 244 University Avenue Bridgeport, Connecticut 06604
Trumbull Times 6515 Main Street Trumbull, CT 06611	WSHU 5229 Park Avenue Fairfield, Connecticut 06432
WICC Radio - 60 350 Fairfield Avenue Bridgeport, CT 06604	WDJZ 757 Madison Avenue Bridgeport, CT 06604

6. The GBRPA's incorporates Title VI and Environmental Justice in all aspects of the transportation planning process. The adopted public involvement policy guides the activities and strategies used to engage the public and ensure sensitive areas are not over burdened by transportation investments. As described above, the GBRPA employs the following strategies:
 - Post notices on the Agency's website
 - Holding public information meetings
 - Inviting the public to attend and participate in MPO meetings
 - Publishing legal notices and preparing and distributing news releases
 - Preparing summaries of plans, programs and projects and making them available in an electronic form on the website
 - Translating notices into Spanish
 - Convening advisory committees
 - Preparing and distributing responsiveness surveys
 - For project level actions, holding public information meetings at project initiation and during design
 - Following a Context Sensitive Solutions approach on concept development

7. The GBVMPO includes a public involvement agenda item at meetings and considers public comment and input before making a final decision on a plan or project. The policy

for ensuring minority and low income needs and issues and concerns are addressed in the decision-making process is contained in the public involvement policy (attached).

8. The GBRPA's maintains a website for informing the public about plans, projects and programs and encourages comments and suggestions. Public information meetings are held to inform and solicit input. Comment/response surveys and forms are provided. These are reviewed and the GBRPA responds to comments. The comments and suggestions are presented to the GBVMPO for consideration before final action.
9. The review of household with limited English proficiency indicated the most prevalent non-English language is Spanish. To engage these household, notices and news releases are translated into Spanish. The update of the Agency's website will include a Google translator function.
10. The GBRPA works closely with the Greater Bridgeport transit and prepares the Title VI mapping for the GBT, including maps that overlay the GBT route system on various demographic thematic maps.
11. Not at this time. No complaints have been made and the need for a formal process has not been demonstrated.
12. Not applicable; see Question 11. However, the process can be added to the Agency's new, reconstructed website that is currently being developed.
13. Not applicable
14. The GBRPA is an equal opportunity employer and does not discriminate based on race, income or any other factor. Opportunities for contract services are advertised through publishing of a Request for Proposal or Request for Qualifications in area newspapers and appropriate professional publications. The RFP or RFQ are also placed on DAS system and direct mailings of the notices are sent to consultants included on the CTDOT list of pre-approved consultants. The selection of consultants follows the qualifications based selection process and adheres to the Title 23 requirements.
15. The GBRPA's UPWP includes a task for the on-going review and evaluation of the public involvement process. Based

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by GBRPA and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with GBRPA to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the 2010 Census Data.
- DOT requires the region to have multiple means of translation services. The GBRPA indicated it will include Google Translator Service. Utilizing electronic translation should not be the only means of translation services, as electronic translations can be very literal, and may not communicate information in the context of the document.
- The GBRPA “relied on contact with municipal elected officials, including alderman and council member to provide input and inform the Agency of low income and minority needs”. DOT recommends that the region evaluate and/or expand their process to improve their performance to obtain input from low-income and minority populations. Assess whether or not your current process provides the region with a representation of low-income and minority populations. If so, please indicate how their concerns have been considered, and/or mitigated.
- DOT requires the region to list all the newspapers used for their public outreach. The GBRPA stated that their listing includes Spanish Language newspapers. However, the Spanish Language newspaper is not included in the listing provided.
- DOT requires the region to translate notices into foreign languages. The GBRPA indicated that they have translated notices in Spanish. Have other languages been considered for translation? Based on the 2000 Census Data, Bridgeport has Portuguese Speaking and Indo European LEP of 5% or more.
- DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. All these materials should be readily available on your website. Currently, the region do not have a copy of your formal Complaint documents. It is not necessary for a complaint to be made to the GBRPA in order to initiate a complaint process. The Title VI Complaint process must be developed in order to ensure that there is a process is in place that should be followed; this process should also include the procedures that will be used for handling Title VI Complaints.

Housatonic Valley Council of Elected Officials

The Housatonic Valley Council of Elected Officials was established as the regional planning organization for the Housatonic Valley in 1968 and has served as the Metropolitan Planning Organization (MPO) for the Housatonic Valley since 1975.

The Region's policy board consists of the chief elected officials of the ten municipalities in the Greater Danbury Area, two mayors and eight first selectmen. The 2010 census population of the Region was 224,616.

At the local level the City of Danbury is the only municipality which demonstrates substantial ethnic diversity or economic disparity. In general much of the Region can be described as suburban.

Following a March 4, 2003 meeting with CT DOT HVCEO started incorporating Title VI, EJ, and LEP into the Region's planning process. These features have been updated periodically since that time.

The Region has developed a PowerPoint show which describes the Regions transportation planning program. The HVCEO staff has presented this at the meetings of various civic organizations, where it is tailored to the municipality most involved.

The Region is also a leader in making its transportation plans available on, and easily indexed on, the internet. These are effective ways to provide information regarding transportation planning to a wider audience than just at MPO meetings.

The following are HVCEO's answers to their 2004 identified areas of concern. (*Italics*)

Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.

- Yes, we can do this, once that information is available for 2010, expected during 2011.

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- See data under 28 for current "distribution of benefits and burdens" discussion. In addition the 5/2011 Regional Transportation Plan states:
- *Specifically concerning Environmental Justice and the Regional Transportation Plan (RTP), Environmental Justice mandates will be met by determining that the population groups of concern will benefit from a project in the same manner as will the general population, rather than be singled out for inadvertent receipt of negative impacts of a proposed project.*
- *Methods for these determinations can be project specific. If homes are removed for a transportation project the determination as to this being "good" or "bad" could be complex. And then some planned projects are still in the conceptual stage and until property impacts are estimated, there is not definitive delineation of the project right of way to review against census criteria.*
- *It is prudent to leave room for Environmental Justice evaluation methods to remain*

flexible such that they can evolve in consultation with the community and officials if and when a transportation idea is flushed out enough such that possible benefits and burdens can be discussed.

Consider efforts to develop a Title VI/EJ Committee, or explore methods by which the relevant populations can be brought into the planning process.

- We have sent our materials to the known VI and EJ groups, but there has been no interest shown. Given the limited EJ eligible community in this MPO area, and the limited resources of the MPO, expansion to the committee approach does not seem warranted.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- It does not appear from data available to us that there are additional language groups other than the Spanish Language group.

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- We will provide translation services but given zero requests thus far and the small size of this region do not see the demand for translation of documents.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- At this point in time the organization's agenda distribution procedure is almost entirely electronic. There are some statistics on this.
- For a sample week on hvceo.org, the week of March 29 thru April 28, data as to access to the web site by "popularity of page" is available. The "HVCEO Meetings" page was quite popular, ranking 11 the most popular of all pages and accessed 148 times during the sample week.
- This makes it a good candidate to amend to bolster the limited English proficiency plan. Accordingly, the statement "Como discutir la transportacion en Espanol" can be prominently added. This was recently accomplished.
- Note also that a statement in Spanish as to translator availability has recently been added to paper copies of the Council's monthly agenda. A pdf version of this paper copy also appears in the web site agenda section.

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

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- prominently added. This was recently accomplished.
- Note also that a statement in Spanish as to translator availability has recently been added to paper copies of the Council's monthly agenda. A pdf version of this paper copy also appears in the web site agenda section.

Consider media options other than newspapers to disseminate information regarding meetings.

- The HVCEO web site won a Connecticut Chapter of the American Planning Association award in 2010 for its comprehensiveness.
- As noted above, a great deal of transportation information is made available in this way. See sample electronic notice for 2010 corridor study meeting as ATTACHMENT E.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities

- Yes, Title VI is part of the UPWP and any activities are recorded in the quarterly reports.

The following are HVCEO's answers to the 15 CTDOT questions to all RPOs.

1. The demographic profile is dated at this point. Originally developed based upon 2000 census data, the 2010 data has now just started to arrive. However, we did receive black, Hispanic or Latino categories at the municipal level early on, and have posted this information to our web site, as shown on ATTACHMENT A.

Note however, the information is for municipalities in total. Spatial data for 2010 for geographic subsets of municipalities such as census tracts is not yet available. Once this more detailed information is released, HVCEO staff plans to analyze it using this methodology:

For a spatial mapping methodology to determine an "Environmental Justice Evaluation Area" data from the 2010 census regarding 1) Black population, 2) Hispanic and Latino population, and 3) median household income by census tract and block group (if block group data is available for all three variables) will be used. These are the primary data sets traditionally used for identifying lower income and minority populations.

The Black and Hispanic and Latino populations are to be calculated as a percentage of total persons in the analysis area. The median household incomes for census tracts are to be calculated as a percentage of statewide median household income.

A threshold level of minority percentage is needed in order to determine "concentration." For the minority populations, the regional averages will be used. Similarly, a threshold level for median household income is needed in order to determine "concentration." The statewide average is used; a broader and more conservative measure than regional average, as incomes are relatively high in this area.

Continuing with use of the income figures, a threshold level of 80% of median will be used to determine low and moderate income, as this is the same percentage used for many years by moderate income state housing programs in Connecticut.

The resulting calculations will set the geographic boundaries for an "Environmental Justice Evaluation Area." Federally funded transportation projects within that area are then subject to a more intensive review for Environmental Justice considerations.

For the Housatonic Valley Planning Region, the demographic data sets described above worked well for 2004-2010. The review area became a large part of the City of Danbury. As a point of good practice, the review area was then "rounded out" to fill the Danbury City Limits.

Thus as Danbury transportation projects are developed, in cooperation with CTDOT, special attention will be paid to determine if there are any adverse impacts to the defined populations. The 2012 update (assumed to be when data is available) will see if the Environmental Justice review area should be expanded beyond Danbury.

By using the above methodology we expect the HVCEO's Regional Transportation Plan, TIP and Public Participation Plan to comply with Title VI of the Civil Rights Act of 1964, 1994 Executive Order 12898 on Environmental Justice and related U.S. DOT orders. As an example of related 200 census derived work see relative income map as ATTACHMENT B.

Note also ATTACHMENT C, federal and state funded bus routes superimposed over income patterns, this to help determine service gaps to lower income areas. This map was prepared by HART and added to the HVCEO web site in 2009.

2. HVCEO takes the view that access to draft transportation documents and all other transportation program components is the right of every citizen. Below are methods in place to facilitate such broad access:

Legal Notice in News Times. Concerning pending adoption of HVCEO's Regional Transportation Plan and Transportation Improvement Program, to alert citizens and advocacy groups in advance, a legal notice regarding upcoming adoption of these documents will be placed in the area's major newspaper in Danbury, the News Times. Citizens groups commonly review notices in this newspaper in order to alert themselves to growth, transportation and development issues. The notice will be written in clear and welcoming language.

Direct Mailing to Environmental Justice Groups. Interested public agencies, private providers of transportation, and other parties may elect to receive the Regional Transportation Plan and Transportation Improvement Program directly by mail. A mailing list for this outreach process is maintained at HVCEO. The list meets federal Environmental Justice rules by including minority membership organizations and institutions serving low income populations. See ATTACHMENT D.

Public Access to Documents. Public access to documents is available at the HVCEO office 8:30 AM to 4:30 PM Monday thru Friday, evenings by appointment, or through direct mail from HVCEO. Internet access is also available.

Length of Comment Periods. Mailing and notice dates will be scheduled such that the public comment period will be at least 30 days for the Regional Transportation Plan and at least 30 days for the TIP and major TIP amendments.

Public Information Meetings. For the draft TIP and draft Plan, in addition to the other participation mechanisms HVCEO will hold public information meetings. The HVCEO will advertise the public information meetings as legal notices in the News Times at least 30 days in advance of the information meeting.

Changes to Documents After Draft Reviewed. Also, if the final RTP or TIP either differs significantly from the ones which were first made available for public comment, or if they raise new material issues which interested parties could not reasonably have foreseen, an additional opportunity for public comment on the revised draft RTP or draft TIP will be made available. Summary of Comments. When written or oral comments are received on the draft RTP or TIP as a result of the public involvement process, a summary, analysis, and report on the disposition of each comment shall be made part of the final RTP and TIP.

Direct Inquiries. All comments regarding HVCEO transportation planning should be directed to
HVCEO Executive Director Jonathan Chew at HVCEO, 162 Whisconier Road, Old Town Hall,
Route 25, Brookfield, CT 06804, 203-775-2656, or email at jchew@hvceo.org.

The current examination below will be updated once the detailed 2010 data is available.

1. ROUTE 6. Conn DOT Project in Danbury No. 34-288: Widening of Route 6 from Kenosia Avenue easterly to just past 1-84 Exit 4. This project is large enough such that it has a separate environmental report prepared by Conn DOT, a "Final Environmental Assessment" approved by FHWA on 9/25/2002.

That report concluded that "Any potential for direct impacts to minority, elderly or low income populations are extremely limited." Also, the project "will not target an economically disadvantaged area." Specifically from the perspective of Environmental Justice, the report concludes that "the proposed reconstruction of Route 6 would not result in a disproportionately high and adverse impact on a minority or low income population."

2. MAIN STREET NORTH. Conn DOT Project in Danbury No. 34-302: Main Street North Streetscape Enhancement Plan. No right of way activities are associated with this project. This is beautification only, involving sidewalk redesign and pedestrian improvement, plantings and landscaping. No impact due to diversion of traffic to another roadway is involved.

3. ROUTE 37 AT STACEY ROAD. Conn DOT Project in Danbury No. 34-305: Realignment and signalization of Route 37 at its intersection with Stacey Road, most work involving the Stacey Road approach. Only very minor right of way land takes involved, no buildings moved, no diversion of traffic to another roadway.

4. ROUTE 806. Conn DOT Project in Danbury No. 34-H050: Widen Route 806 to provide for a west bound left turn lane at old Shelter Rock Road and signalize the intersection. Minor safety improvement, no diversion of traffic to another roadway.

5. 1-84 INTERCHANGES. Conn DOT Project in Danbury No. 34-308: Design for minor modifications to 1-84 Interchanges 2, 4, 5, and 6. Only Interchange 6 has a commitment for funding of its minor modifications. None of these involve changes to road with or takings of properties. The other interchange improvements are yet to be designed. By way of background, the initial planning for these projects appear in a Conn DOT report dated June 2000 and entitled "1-84 Corridor Deficiencies and Needs Study Final

Report." This report includes an Environmental Justice evaluation as required of an FHWA report of this nature (Executive Order 12898 is cited). The findings are below:

Interchange 2: Scope is to extend eastbound off ramp deceleration lane, extend eastbound on ramp merge area, and widen Old Ridgebury Road approaching Route 6. The EJ finding is that there is "virtually no adverse environmental impact" and "no business or residential displacements would occur."

No Interchange 4: Extend deceleration lanes, new right turn lane on Segar Street. No EJ impacts cited from this minor work.

Interchange 5: Extend westbound and eastbound on ramp acceleration lanes, extend westbound and eastbound off ramp deceleration lanes, and revise signal timing. No EJ impacts cited from this minor work.

Interchange 6: Extend eastbound acceleration lane, extend westbound deceleration lane, restripe under bridge, signalize intersection of Route 37 with eastbound on ramp. No EJ impacts cited from this minor work.

6. ROUTE 37. A proposed Conn DOT Project in Danbury but no project number yet assigned, widening of Route 37 from Main Street north to Stacey Road: Very initial and conceptual improvement plan being developed by Conn DOT Project Concept Unit, no detailed strategy ready for first concept hearing.

7. ROUTE 806. Concept Plan for widening Newtown Road from 2 to 4 lanes from Old Shelter Rock Road easterly to Plumtrees Road: This project has not yet reached the stage where property impacts are known. This is a major commercial corridor, and the concept of the project does not relocate any traffic into any residential areas.

8. ROUTE 53. Concept Plan for creating a full four lane cross section on Route 53 from South Street northerly to Boughton Street: The right of way of Route 53 here is already wide enough for four lanes. The project would be to reorganize traffic such that the pavement width available could be better utilized. Thus no property impacts are anticipated. Also, no rerouting of traffic to residential areas is involved.

9. KENOSIA AVENUE. Widening of Kenosia Avenue from 2 to 4 lanes from Backus Avenue northerly to the vicinity of Lake Kenosia. Preliminary 2003 cost estimate by City is \$3.0 million. This is a commercial corridor, and the concept of the project does not relocate any traffic into any residential areas.

10. BACKUS AVENUE. Backus Avenue Corridor improvements, including signal coordination on Backus Avenue near the Danbury Fair Mall, and widening from 2 to 4 lanes from Kenosia Avenue westerly to Miry Brook Road. Preliminary 2003 cost estimate by City for widening is \$3.0 million, signal coordination cost estimate pending. This is a major commercial corridor, and the concept of the project does not relocate any traffic into any residential areas.

11. BUS SERVICE. Public Bus Transit in Danbury: It should also be noted in this section that within the City of Danbury and the wider metropolitan area, the Housatonic Area Regional Transit District submits a report regarding compliance with Title VI.

This compliance report is a review of the provision of public bus service level of quality with Title VI equity requirements, the "Transit Monitoring Report." This relates detailed demographic criteria to FTA supported bus routes. Thus this HART document can also be considered an Environmental Justice monitoring tool for the area. In addition to specific route analyses in its Transit Monitoring Report, HART periodically makes assurances to the Federal Transit Agency, which support Environmental Justice concerns with the planning and operation of the regional bus system. These assurances, also hereby endorsed by HVCEO, are as follows:

A. No person on the basis of race, color, or national origin will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

B. The HART will compile, maintain, and submit in a timely manner Title VI information required by the FTA under Circular 4702.1 and in compliance with the Department of Transportation's Title VI regulation, 49 CFR Part 21.9.

C. HART will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit -related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation. We do not have a project or EJ investigation that has reached this stage.

3. Yes, see ATTACHMENT D. These groups are offered special input opportunities. We have not had any EJ concerns raised by the public in this transportation planning program (but staff has raised a concern).
4. The latest plan was forwarded to low income and minority groups in March of 2011. No responses as to the adequacy of the public participation policies therein have been received as of this writing. See list of organizations in ATTACHMENT D.
5. We know of no such specialized media in our area.
6. a. Yes, these topics have their own Plan Chapter. This way they are not "file items only" and get automatically reviewed when the Regional Transportation Plan is reviewed.
b. Yes, the process is transparent and guided by the long range plan policies. Also, see process described in 2A. Note also that TIP access and description has its own web page that includes public input information.
c. On this aspect the current two year UPWP states: "A citizen participation process as required by Section S40.316(b) of federal regulations for metropolitan transportation planning is conducted. This is in accordance with HVCEO's citizen participation guidelines. The process will consider potential impacts of proposed transportation projects upon minority and low income communities."

Continuing, "The HVCEO Affirmative Action Plan will be updated in accordance with CTDOT's Contract Compliance Section guidelines. For the HVCEO transportation planning program, and in cooperation with CT DOT, it has been determined that Spanish is the appropriate alternative language for this MPO to focus its energies on with respect to persons with limited English proficiency. HVCEO will maintain a Spanish language

page on the hvceo.org web site. This page provides basics about the transportation planning program and how Spanish speaking persons can contact HVCEO in their own language. As specified in the annual HART - HVCEO contract, HART staff will provide the Spanish translation as needed.

Note also that posting of transportation related materials to the web is a high priority of this RPO. Reviewers of this work program can see for themselves at hvceo.org. Reports on web site usage by page document that users are indeed accessing transportation related files."

d. The Public Involvement Plan, including Environmental Justice and Title VI, is encapsulated in full in the Regional Transportation Plan.

And as noted in that Plan, in its planning and project development HVCEO is committed to FHWA guidance "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, and to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low income populations."

As also stated in the Plan, "Specifically concerning the Regional Transportation Plan, Environmental Justice mandates will be met by requiring that HVCEO studies determine impacts and benefits upon the population groups of concern. It must be ascertained that they will benefit from a project in the same manner as will the general population, rather than be singled out for receipt of negative impacts of proposed projects."

Considering activities between 2004 and 2011, in 2009 a significant potential project was flagged by HVCEO staff as in need of analysis specifically concerning Environmental Justice. This was part of a 2009 staff report on the impacts of potential tolls on 1-84 in Danbury which included an Environmental Justice evaluation.

7. The regional planning organization excludes no population.
8. At monthly meetings, citizens may speak at the beginning. What they said then becomes part of the record of the meeting as recorded in the minutes. So, other people can see what was said.

Also, for the Plan update, a record of public comments is kept. At the beginning of that list of comments the following explanatory paragraph appears: "When written or oral comments are received on the draft Regional Transportation Plan as a result of the public involvement process, a summary, analysis, and report on the disposition of each comment shall be made part of the final Plan." Also, as for corridor studies, public involvement is written into the consultant's work scope. See ATTACHMENT E.

9. Yes. As agreed back in 2004 Spanish is the appropriate alternative language for this MPO to focus its energies on as access by persons with "limited English proficiency" is enhanced. See ATTACHMENT F.

As agreed HVCEO developed a Spanish language page on the hvceo.org web site. This indicates some basics about the transportation planning program and how Spanish speaking persons can contract HVCEO in their own language.

This is linked from the main transportation related pages, where a short Spanish text appears as a hyperlink to this main Spanish language page.

The web page above gives a phone number to HVCEO and we will then engage a bilingual person who is familiar with the MPO program. Note that in each annual services contract between the HVCEO and the Housatonic Area Regional Transit District (HART), it is specified that HART staff will provide the Spanish translation needed to meet HVCEO's obligation.

The translator and the MPO Director may also meet with callers at a location convenient to them. Any resulting input to the program will then be handled in accordance with the regular public participation rules. The time expended, second meetings, additional persons, etc., will be relative to the complexity of the issues raised.

Further, if inquires reach the point of a meeting with the translator and the MPO Director, and the inquiring party wishes to personally address the MPO in Spanish, then the MPO should fund the translator to attend the MPO meeting and make this possible, the most aggressive Environmental Justice strategy practicable given the limited HVCEO transportation planning budget.

The practicality of this translation service arrangement will be enhanced by the fact that the translator will be an employee of the Housatonic Area Regional Transit District, a nearby organization which has a permanent long term relationship with the MPO.

10. The staff emailed R. Etuka of CT DOT on 4/20 to state: Question: not quite sure about number 10: "What manner of Transit monitoring do you perform as it relates to Title VI, LEP and E.J.?" This MPO does not actually operate any transit services. Is this question really meant for us, or is it for federally funded transit operators? A response to this question was received that we do not need to address this question as we operate no transit.
11. Complaint Procedure: The Council has established this procedure in order to address complaints regarding race, color, religion, age, sex, marital status, physical disability (including but not limited to blindness), criminal record, national origin or ancestry, or mental disorder (or history thereof) from both current and prospective employees. These individuals have the right to make utilization of HVCEO's Complaint Procedure without in any way jeopardizing their current or prospective employment status. The components of the HVCEO Complaint Procedure are the following:
 - (a) The Equal Opportunity Employment Officer will receive all written complaints of discrimination. These may be direct from the employee or upon referral from a supervisor who has received a complaint from an employee.
 - (b) All discrimination complaints filed under this procedure will be accepted for investigation up to and including thirty (30) days after the date of the alleged discriminatory act.
 - (c) All complaints will be recorded on the "Notice of Discrimination Complaint" form and signed by the complainant. At this time, the complainant will be counseled as to the other avenues of redress open to him or her; i.e., the complaint procedure of the

Commission on Human Rights and Opportunities and for the Connecticut Department of Transportation Office of Contract Compliance.

(d) The Office of Contract Compliance and the Transportation Commissioner will be notified simultaneously of all complaints and of the complaint's ultimate resolution.

(e) All complaints will be investigated and processed by the Council's Equal Opportunity Officer within thirty (30) days after their receipt.

(f) The complainant will be notified, in writing, by the Equal Employment Opportunity Officer regarding the results of the investigation and the final disposition of the complaint, including any proposed remedial action.

(g) Should the complainant disagree with the Equal Opportunity Employment Officer's decision, he or she can still avail himself or herself of any, or all, of the other avenues or redress previously explained (see Item c).

(h) In the event of a complaint against the Equal Opportunity Employment Officer, complainants will be advised to utilize the Commission on Human Rights and Opportunities complaint procedure.

(i) The Equal Employment Opportunity Officer will take the necessary steps to ensure the confidentiality of all Title VII complaint records and of any counseling done in the course of the complaint procedure.

(j) Anti-Discrimination: It is the policy and practice of the HVCEO not to discriminate against any individual because of the individual's race, color, religious creed, sex, marital status, national origin, ancestry, present or past history of mental disorder, mental retardation, learning disability or physical disability, including but not limited to blindness, except where any of the above is a bona fide occupational qualification or need.

12. No, they are in the Personnel Policies.

13. No Tribal Government units in this Region.

14. Yes, they are all placed in the Hartford Courant for wide viewing. They are also posted to the HVCEO web site.

15. Yes. Each contract includes the following clause:

The Consultant agrees and warrants that in the performance of this contract it will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, sex, mental retardation or physical disability, including, but not limited to, blindness, unless it is shown by such contractor that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the State of Connecticut. As a further check submit all contract language to CT DOT for approval in each contracting instance. CT DOT checks all legalities of contract wording, and the MPO cannot proceed to subcontract without that CT DOT approval.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by HVCEO and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with HVCEO to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the 2010 Census Data. (Using Census Block Groups)
- DOT requires the region to respond to the questions developed by the Department. In their process for identifying the needs of low-income and minority populations, who were the identified populations? How did the region examine the benefits and burdens of the transportation investments included in the TIP? What methods are used to identify imbalances? What will the region do as part of their planning process to identify any imbalances in the low-income and minority populations?
- It is not necessary to have an EJ investigation in process or previously raised concerns in order to establish mechanisms for the planning agency to ensure that the public's issues and concerns are (or will be) addressed.
- Strategies to reduce participation barriers are not solely based on barriers that have been previously identified, rather strategies that will prompt the region to look at their currently policies and procedures in various programs (i.e. funding programs) that may non-intentionally/intentionally have a participation barrier to the public. Also, if Limited English Proficiency Service is available, it is important to note that the region must provide a notice to the public informing them of the service in the language(s) identified.
- As the region did not receive any responses as to the adequacy of the public participation policies from the list of organizations listed in Attachment D, how will the region plan to act in response to this issue?

DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. All these materials should be readily available on their website.

Midstate Regional Planning Agency

The Midstate Regional Planning Agency (MRPA) was organized in 1962 after four of the seven municipalities voted to join the Region. By 1965 all eight municipalities were members. The Region was redefined in 1967 and included East Haddam, which joined the same year. The board consists of representatives who are appointed by the mayors, first selectmen, and appointees from the planning and zoning commissions.

The population of the Region is approximately 113,405. At the municipal level the City of Middletown is the main municipality that demonstrates any substantial ethnic diversity or economic disparity. In general, the Region can be described as consisting of combined racial minorities of about 11.1% percent of the region's population. The predominant minority groups in the Midstate Region are African Americans at 6.2%. The low-income population comprises of 5.1% of the Region.

Following the April 16th, 2003 meeting with CTDOT (and its committee), MRPA started incorporating Title VI, EJ, and LEP in the Region's planning process

The following are MRPA's answers to their 2004 identified areas of concern. (*Italics*)

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- Yes, Title VI is part of the UPWP and any activities are recorded in the quarterly reports.

Consider efforts to develop a Title VI/EJ Committee, or explore methods by which the relevant populations can be brought into the planning process.

- Title VI and EJ representative are on the advisory committees for special studies when performed.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- An LEP analysis was completed using Census 2000 statistics. Languages were identified and access to interpretation services added to the public participation plan.

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- The region's website is updated as needed, which is typically a few times per month. The LEP population of the regions is only about 1.5% of the total population and therefore it was determined that alternative language documents are not needed. Any fairly recent web browser and most word processing programs currently have built in translators. As a result, anyone with web access can translate whatever they want on the web and an agency or company does not need to post the same document in multiple languages on their webpage.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- The availability of interpretation services is noted on the website near the link page to the agendas and minutes.

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- The public participation document states that the process will be reviewed annually.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- Title VI and EJ is listed in the current UPWP and updated in quarterly reports where applicable.

The following are MRPA's answers to the 15 CTDOT questions to all RPOs.

1. A Demographic Profile of the region was produced in April 2003 using Census 2000 statistics. The profile identifies minority (White/Black/American Indian and Alaskan Native/Asian/Native Hawaiian and Pacific Islander/Other race/Two or more races/Hispanic Origin) and low income populations as defined by the 2000 Census for the entire region at the census block group level using both maps and statistical tables.

Also available are hard copy statistical reports based upon Census 2000 data from the Census Demographic Profiles (DP-1, DP-2, DP-3, and DP-4), Census Transportation Planning Package (CTPP), Summary File 1 (SF1) Town Profiles and Summary File 3 (SF3) Town Profiles for Connecticut, Middlesex County, and the Midstate Region Towns of Cromwell, Durham, East Haddam, East Hampton, Haddam, Middlefield, Middletown, and Portland.

All these profiles will be update using the 2010 Census statistics when they become available. Examples are provided.

2. Yes. The planning process identifies the needs of low income and minority populations using different methods. Needs are identified in the development of the long range plan for example, through discussions with local town departments, direct contact with community organizations such as the North End Action Team, Community Health Center and Cross Street A.M.E. Zion Church and through the Middletown Transit District. In other instances needs are identified at the corridor level or project level. This is typically done through the public outreach process for individual projects. For example, in a corridor study all abutting and adjacent property owners are notified of the study and how to participate in the study process at which time the specific needs of the low income and minority populations are identified.

Demographic data is also utilized in the TIP and Long Range Plan in a specific Environmental Justice (EJ) review section of both documents. The TIP's section discusses minority populations, low income populations, transit Title VI, LEP populations, and other factors combined into an EJ assessment for the region. The assessment looks at project locations and costs in relation to minority and low income block groups throughout the region as well as implementation and operation impact consideration. The LRP has a similar EJ section included in the document.

3. The Public Involvement Policy lists a few ways in which minority and low income populations are engaged in the transportation planning process. The MRPA offices are accessible from public transportation. Interpretation services for the hearing impaired and non-English speaking persons can be made available with five days' notice. Notification of TIP and LRP updates are sent to interested parties from the EJ mailing list. Representative from the minority and or low income populations are included in corridor study advisory committees.

The public's issues and concerns are addressed in the planning process at meetings or simply one on one discussion between MRPA staff and the interested persons. They are also addressed directly in the plans and studies through revisions. If the plan is not revised due to an issue or concern that is also noted in the plan or study with justifications for the reasons why the revision did or did not occur.

Other means to reduce participation barriers have been to meet in a location in the low income or minority neighborhood rather than Town Hall or similar office. Also, advertisements for public comment periods and meeting related to the TIP and LRP update have been placed in a Spanish Language newspaper with circulation in the region and also on the MRPA website.

4. Yes. The planning process and Public Involvement Policy is evaluated on an annual basis. The last update of the Public Involvement Policy was in 2006. In the past five years in which the policy was evaluated, there has only been two public information meetings (LRP in 2007 and a TIP in 2009) conducted by the region. There has not been a corridor study during this time other than the RT 9 Study managed by VHB through CTDOT. There have been many public meeting in the towns for state transportation projects such as culver/bridge repairs or roadway projects, but no other regional meetings.

Efforts to improve performance have been through update of MRPA's website and direct contact with community organizations. The minority population of the region is only about 10%, all race categories combined, and 5% low income, and less than 2% limited English Proficiency. As a result, there are few community minority/low income/LEP organizations in the region.

5. Public outreach in corridor studies was performed with newsletters sent out to abutting and adjacent property owners. A similar approach was taken with state initiated projects in the regions such as the Route 9 Corridor Study and Middletown Area River Crossing Study. In both studies minority and low income populations were mapped in relation to the study and persons notified of study events.

The bi-weekly Spanish language newspaper in the region Tiempo went out of business in early 2009. Prior to that time, ads were placed in the paper notifying people of the TIP and LRP updates.

6. The 2011-2040 Long Range plan has two sections on Title VI and EJ. The first section in the body of the document discussed Title VI and E.O. 12898 of 1994. This section describes title VI and E.O. 12898 and their relationship to transportation planning. It also discusses the current MTD Title VI report, which MRPA updates every three years, based on FTA Circular 4702.1

The next section is the Environmental Justice Review located in the plan as Appendix B.

This section discusses the minority and low income populations of the region and maps all the physical projects in the plan in relation to these populations. The projects are analyzed in relation to the percentage of projects and costs of projects in relation to minority and non-minority areas of the region.

The 2010-2013 TIP also has a section on Title VI and EJ with text and maps similar to the LRP but on a smaller scale since there are not nearly as many project in the TIP as the LRP.

The 2011-2012 UPWP lists community involvement as a regional priority. EJ and Title VI are specifically mentioned, as is reducing language barriers, and the annual review of the region's public involvement policy.

The Public Involvement Plan includes various Title VI and EJ factors as mentioned question #3.

The STP-Urban Project Selection Process and Project Rating Criteria, as revised January 6, 2011, lists Environmental Justice as rating criteria eight out of ten when reviewing STP-Urban projects for prioritization.

7. Access to public comments in the TIP and LRP are directly addressed in the appendix of both documents. Access to public comments received during regularly scheduled MRPA board meetings are noted in the minutes of the meeting. Oral and written comments are saved with the project or program files they go with and are public information.
8. Yes. The LEP population makes up only about 1.5% of the region. As a result, documents and information are only produced in English at the regional level. Personal interpretation services are available for all meetings with sufficient notice.
Technology has also been an aid in the LEP process. In the past an actual interpreter was needed for both the spoken and written word. Now it is easy to translate an entire written website quite accurately in seconds with add-ons in web browsers such as Explorer 9, Chrome 11, and Firefox 4. MS Word 07 and 10 also have built in translators to translate any document in part or in entirety. Therefore, translation of the written word can be performed on demand, rather than having to hire out for interpretation services which may take days to complete.
9. MRPA updates the Middletown Transit District Title VI Compliance Report every three years for the transit district. The first was completed in 1994 and a copy is attached of the most recent edition from 2009.
10. I am not aware of any single written document as Title VI and EJ are incorporated into the entire transportation planning process and products. Documentation of compliance reviews were performed in 1986, 1988, 1992, 2004 and now.
11. No, although the Minority and Low Income Demographic Profile, and Linguistic Analysis are posted. <http://www.midstaterpa.org/Publications/EJReport.pdf>
http://www.midstaterpa.org/Publications/LinguisticAnalysis_05.pdf
12. There are no Native American Tribal Governments within the regional boundaries.
13. Yes. Design professionals are hired using the QBS Process, although we have not done so since the Routes 17 and 66 Corridor Studies, completed in 1998.

14. We have not had any subcontracts and agreements as noted above. For a typical STP-Urban or Enhancement project, the agreements are between CTDOT and the municipalities and CTDOT's standard municipal agreements are used.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by MRPA and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with MRPA to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues. DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the 2010 Census Data.

- DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. All these materials should be readily available on your website. Currently, the region do not have a copy of their formal Complaint documents. The Title VI Complaint process must be developed in order to ensure that there is a process is in place that should be followed; this process should also include the procedures that will be used for handling Title VI Complaints.
- DOT requires that any contract or agreement for goods or services include the Title VI Assurances.
- DOT requires the region to have multiple means of translation services. Utilizing electronic translation should not be the only means of translation services, as electronic translations can be very literal, and may not communicate information in the context of the document.
- DOT requires that the LEP considerations be made for LEP population of 5% or 1,000 or more persons whichever is smaller.

South Central Regional Council of Governments

The South Central Regional Council of Governments (SCRCOG) is organized per Section 4-124i of the Connecticut General Statutes and was designated by the Governor as the Metropolitan Planning Organization for this Region on January 23, 1985. The Regional Policy Board serves as the board for the MPO. The Regional Transportation Committee is made up of Chief Elected Officials, appointed by the Council on an annual basis and the Transportation Technical Committee, consists of one municipal staff member from each municipality, appointed by the Chief Elected Official. Representatives of CT Transit, the Greater New Haven Transit District, and the Milford Transit District participate as nonvoting members of these committees. The South Central Region is also part of the larger New Haven Transportation Management Area, which includes the Connecticut River Estuary Regional Planning Agency.

The South Central Region has a total population of 570,001 (2000 Census), which is ethnically and economically diverse. The Region consists of fifteen municipalities in the greater New Haven area. All the municipalities are located on or near the I-91 and I-95 corridors.

Following the March 4th, 2003 meeting with CTDOT (and its committee), SCRCOG has continued to incorporate Title VI, EJ, and LEP in the Region's planning process.

The Region has demonstrated a commitment to developing a meaningful EJ process that will provide access to the planning process for all members of the community. In 2001 the Region attempted to reach out to the EJ communities and develop a committee to review the Region's overall planning process. While the initial outreach effort was not successful, the staff has since reexamined the outreach efforts and is now trying new avenues, such as working with the Connecticut EJ Coalition. They have been able to identify neighborhood groups that are interested in this process through their work with the Housing and Jobs Access studies.

The following are SCRCOG's answers to their 2004 identified areas of concern. (*Italics*)

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- We have met regularly with regional organizations such as the New Haven Environmental Justice Coalition to facilitate the identification process.

Provide the Region's pamphlet on "What is the TIP?" in alternative language as appropriate for the Region.

- The pamphlet was poorly, if at all, utilized by the public. As part of the ongoing effort to evaluate public participation, the information was transferred to the website and paper copies were discontinued. Alternate translations are available for the document through internet tools. The updated website will have the translation tool imbedded for ease of use.

Develop a pamphlet on the Long Range Plan process, similar to the "What is the TIP?", and provide it in alternative languages as well.

- As noted above, the evaluation determined that this was not the best method of communicating the information. The website information is much more effective.

Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.

- This activity will be undertaken as 2010 Census information becomes available.

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- Review of TIP and STIP actions include this review. Mailings and outreach solicit input on these actions for Council consideration.

Continue efforts to develop a Title VI/EJ Committee.

- Based upon previous discussion with the New Haven Environmental Justice Coalition, it was felt that they would serve this function (avoiding duplication and poorly attended meetings) and pass information they obtained to us.

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- The statement is currently in English on all Council notices. The updated website will allow for the translation function to be utilized easily.

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- The statement is currently in English on all Council notices. The updated website will allow for the translation function to be utilized easily.

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- SCRCOG staff meets with many regional organizations to exchange information and receive input. This outreach, together with monitoring of responses to other public participation efforts, is part of the ongoing review of the effectiveness of the efforts. Attendance at meetings is reviewed, along with changing technology, to help best involve the public.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- The UPWP includes Title VI activities and these are also summarized in the quarterly reports.

The following are SCRCOG's answers to the 15 CTDOT questions to all RPOs.

1. After the 2000 Census, the South Central Regional Council of Governments updated the region's demographic profile. The profile identified areas which contain populations with Environmental Justice and Title VI implications. These areas were outlined in a report prepared and reviewed by the Council. This report was published and shared with community organizations which represent these populations in the region.

As data from the 2010 Census is released, the South Central Regional Council of Governments will begin updating the region's demographic profile. This update will provide a current demographic profile of the region.

Based on the demographic profile update, the locations socio-economic groups will be identified geographically through GIS Mapping using ARCGIS Software. The updated mapping will identify low-income and minority and minority populations for compliance with the Executive Order on Environmental Justice and Title VI provisions.

2. SCRCOG's planning process takes a proactive approach to identify the needs of low-income and minority populations. Council staff, with Transportation Committee guidance, is responsible for continuously seeking to involve organizations and individuals with potential interests in transportation planning efforts. SCRCOG's goal is to inform and present information on transportation planning products and process to the public. SCRCOG, through its website and meeting agenda distribution, provides timely information on its role, technical capacity, and relationship to the Connecticut Department of Transportation, annual transportation planning work program development process, triennial transportation plan review process, and TIP development / amendment process.

SCRCOG staff encourages substantive interchange between members of the public and staff, members of the public with one another at public meetings, open houses, and other events where any public is present. In addition, interaction with members of the public and members of the Transportation Committee, Transportation Technical Committee, and Council is also encouraged along with broad public participation in all of these meetings.

The Council considers public input in its decision making. SCRCOG staff considers public input as it is drafting and refining documents, plans, and programs. Most importantly, proposals and viewpoints are considered in *advance* of decisions.

SCRCOG continuously works with our partners to identify potential communities, add them to the transportation mailing lists, and define methods to engage them in transportation programs and projects. Our staff makes use of demographic information to examine the distribution across these groups of the benefits and burdens of the transportation investments included in our region and to identify potentially underserved communities through maps that depict large proportions of these populations. This is accomplished as noted above. These efforts are in accordance with Executive Order 12898, "Federal Actions to Address Minority Populations and Low Income Populations" dated February 11, 1994, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" dated August 11, 2000.

3. SCRCOG's Public Participation Guidelines are continually reviewed to gauge their effectiveness and to ensure the highest possible level of public participation. The Council welcomes public input in its decision making.

The following table displays different public notifications and meeting types that are employed for the different transportation products and processes in the region.

Action	Minimum Notice Given (days prior to action) ⁽¹⁾	news release ⁽²⁾	direct mail ⁽⁴⁾	scrcog agenda	public meeting	public hearing	work session(s)	Action By(Involving)/Review By		
								transport tech committee meeting	transport committee meeting	council meeting
Public Participation Guidelines	45	yes	yes	yes	no	no	yes	yes	yes	yes
Unified Planning Work Program	30	yes	yes	yes	no	no	yes	yes	yes	yes
Regional Transportation Plan Review	45	yes	yes	yes	yes	no	yes	yes	yes	yes
First Cut Draft"										
Final Plan Review	45	yes	yes	yes	yes	no	if time	yes	yes	yes
Transportation Improvement Program (Major)	30	yes	yes	yes	yes	no	yes	yes	yes	yes
Transportation Improvement Program (Minor)	15	yes	yes	yes	no	no	if time	yes	yes	yes
SCRCOG or SCRCOG/ ConnDOT Corridor Study	30	yes	yes	yes	yes	no	yes	yes	yes	yes
Related Priorities	15	yes	yes	yes	no	no	if time	yes	yes	yes
Technical Memo	30	yes	no	no	no	if time	yes	no	no	
Special Study Minor	15	no	no	no	no	if time	yes	no	no	
Special Study	30	yes	yes	yes	no	yes	yes	yes	yes	
Consultant Selection	15	no	yes	no	no	no	yes	yes	yes	

SCRCOG has in place a policy designed to further address any barriers to participation of these groups. All of our meeting announcements suggest that closed audio loops and / or a sign language interpreter will be available upon request. SCRCOG requests two weeks' notice to secure a closed audio loop. SCRCOG requests two weeks' notice to secure a sign language interpreter, via the Connecticut Commission on the Deaf and Hearing Impaired. Foreign language translation currently is not provided at meetings, as, to date, this service has not been requested. Upon request, SCRCOG will make efforts to translate transportation planning-related information to other relevant languages.

In addition SCRCOG is currently updating its website to improve public access to information. Not only is there a page dedicated to our public participation guidelines but the site will offer a translation feature through Google translate.

The effectiveness of these strategies is continuously evaluated through the use of signup sheets and attendance monitoring, tracking website use, and input from the public.

4. The South Central Regional Council of Governments (SCRCOG) routinely evaluates public involvement through its planning process as required by the applicable regulations. SCRCOG strives to respond to changing needs for communication to the region's population on transportation issues. The updated website is a key component of this effort. Ongoing efforts include evaluating if further improvements are needed with respect to low-income and minority populations. Regular communication with organizations representing the low-income and minority populations is an important part of these efforts.
5. SCRCOG employs all types of media

Advertising – SCRCOG uses display advertisements in the New Haven Register, LaVoz, and Northeast Minority News for *TIP*, *Public Participation Guidelines*, and *Transportation Plan* notifications under the Public Participation Guidelines.

SCRCOG Web Site (www.scrco.org) – Reports, meeting notices, and links provide information and facilitate communications.

Memos and Reports – Memos and reports share Council proposals, analyses, plans, and programs. Monthly Transportation Committee and Transportation Technical Committee agendas and news releases announce publications which are posted on the website.

News Releases – Before major Transportation Committee and council actions, news releases are faxed to:

Regional newspapers (New Haven Register, Connecticut Post), Local newspapers (Meriden, Milford and community-scale), Public service cable television channels, Connecticut commercial television channels, and Connecticut radio stations. The faxes note SCRCOG's planning and programming role and provides a focus for broader inquiries. The complete media distribution list follows.

Meeting Notices – Direct email notifications and mailings for the Transportation Committee, Transportation Technical Committee, and Council provide interested persons meeting agendas and relevant background materials. Non-governmental parties are added to the mailing lists upon request.

Mailing List – Any member of the public requesting to be placed on the mailing list will receive a basic agenda for each of the above meetings. Upon request, they will receive detailed agendas and all related materials.

A list of media vendors who receive regular correspondence is provided below

The Advisor
Center for Disability Rights: M. Gallucci
Connecticut Post
Hamden Journal
Hartford Courant
Innercity News
LaVoz
Meriden Journal

New Haven Register: M. Zaretsky
Shore Publishing
Totokett Times
WVIT Channel 30 News
WTNH Channel 8 News
WTIC 1080 news
WRYM 840 AM La Gigante
WFSB Channel 3 News

6. SCRCOG has included references to the work undertaken to identify these populations in all these documents. The goals outlined below are either referenced or included in all the documents noted above.

7. SCRCOG has four policies related to public participation. They are:

Conduct proactive outreach.

Council staff, per Transportation Committee guidance, is responsible for continuously seeking to involve organization and individuals with potential interests in transportation planning efforts. In short, SCRCOG's goal is to inform and present information on transportation planning products and process to the public.

Proactive outreach must also include timely insight on processes, analyses, and decision points. SCRCOG will provide timely information on its role, technical capacity, relationship to the Connecticut Department of Transportation, annual transportation planning work program development process, triennial transportation plan review process, and TIP development / amendment process.

Conduct outreach to traditionally underserved individuals and communities, which include but are not limited to low income, minority, and Limited English Proficiency (LEP) persons.

SCRCOG will identify potential communities, add them to the transportation mailing lists, and define methods to engage them in transportation programs and projects. Staff will largely identify potentially underserved communities through maps that depict large proportions of these populations. Also, the New Haven environmental organization, composed of community representatives, will continue to assist in opening the channels of communication. These efforts will be in accordance with Executive Order 12898, "Federal Actions to Address Minority Populations and Low Income Populations" dated February 11, 1994, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" dated August 11, 2000.

Permit substantive interchange.

SCRCOG will encourage substantive interchange between: Members of the public and staff; Members of the public with one another at public meetings, open houses, and other events where any public is present; and Members of the public and members of the Transportation Committee, Transportation Technical Committee, and Council. In addition, SCRCOG will encourage broad public participation in all of these meetings.

Consider public input in decision making.

The Council will consider public input in its decision making. SCRCOG staff will consider public input as it is drafting and refining documents, plans, and programs. Most importantly, proposals and viewpoints will be considered in *advance* of decisions.

8. Public input is received in the following ways:
 - Written communications are encouraged through U.S. mail.
 - Email directed to the general website mailbox is reviewed and addressed by the appropriate staff.
 - Public comments are received monthly at both Transportation Committee Council meetings.
 - SCRCOG staff attends numerous meetings of governmental, civic and non-profit organizations to exchange information and input on transportation issues throughout the region.
 - SCRCOG's annual Unified Planning Work Program (UPWP) provides consultant supported projects which address transportation issues throughout the region. As part of this work, numerous public meetings are held to provide input to the individual project. SCRCOG staff attends and gathers input on not only the individual project, but broader transportation issues identified during the outreach process.
9. Yes. Please see answers to questions above.
10. Since 2004, SCRCOG has undertaken two transit studies to recommend improvements to transit in the region. These looked at region wide improvements, including the areas noted above. Improvements and service adjustments will be undertaken as funding permits. In addition, SCRCOG staff coordinates the regions LOCHSTP program, which reviews transit needs with operators and municipalities to prioritize service improvements and additions. Staff also participates in the New Haven division of CTTRANSIT service review meetings to help frame best utilization of transit resources for the region.
11. No formal document exists other than outlined herein.
12. The information contained herein is either part of the current website or will be enhanced in the website upgrade later this year. www.scrcoq.org
13. Not applicable to this region.
14. SCRCOG's annual UPWP provides for consultant supported projects. The consultants are selected annually through a Request for Qualifications (RFQ) process. This process

encourages all groups to submit their qualifications for review. Each RFQ outlines the requirement for a minimum 10% Disadvantaged Business Enterprise (DBE) participation is required for each project. DBE firms are strongly encouraged to respond as prime consultant or to play a significant role within the consultant team. The RFQ is publicized on the SCRCOG website and through legal advertising placed in the New Haven Register, LaVoz, and Northeast Minority News.

15. The items noted above are incorporated into agreements executed by SCRCOG. In addition, the scopes of services are specifically tailored, in consultation with the municipalities involved, to ensure maximum participation of populations impacted by the project. These are addressed not only at the initiation of the project, but during the project to encourage participation in and input from all impacted parties, leading to the best possible transportation solutions for the region and its citizens.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by SCRCOG and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with SCRCOG to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the 2010 Census Data.
- DOT requires the region to identify the needs of low-income and minority populations. What was their process? How was this information obtained?
- DOT suggests their Region should determine the benefits and burdens by utilizing the demographic information to examine if the transportation investments included in the TIP were equally distributed?
 - The DOT requires that the region not solely depend upon electronic translations, as electronic translations can be very literal, and may not communicate information in the context of the document.
- DOT requires the region to provide a sample/example of how they conveyed their public outreach through media vehicles such as but not limited to: Press, Newspapers, Internet, Television, Radio, & Social networking.
 - DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. All of these materials should be readily available on their website. The Title VI Complaint process must be developed in order to ensure that there are written procedures in place; this process should also include the procedures that will be used for investigating Title VI Complaints.
- DOT requires the region to provide a copy of their Region's Limited English Proficiency Plan (LEP)

Southeastern Connecticut Council of Governments

The Southeastern Regional Planning Agency was designated by the Governor as the Metropolitan Planning Organization for transportation planning in the Southeastern Connecticut Planning Region in 1973. The role of the MPO was officially transferred from the Regional Planning Agency to the Southeastern Connecticut Council of Governments (SECCOG also referred to as SECCOG) when the agency was reorganized in 1993. The Region's policy board consists of the Chief Elected Officials of the twenty municipalities in the southeast corner of Connecticut.

The population of the Region is approximately 256,738, according to the 2000 Census, and about 42% of the Region's population resides within the cities of Groton, New London and Norwich. There are major per capita income disparities between the cities and the suburban towns, which ranged from a high of \$69,000 in Salem to a low of \$34,000 in New London. The cities also demonstrate more diversity than their suburban counterparts.

The Region is home to two federally recognized sovereign Native American tribes, the Mashantucket Pequot Tribal Nation and the Mohegan Tribe. Both tribes operate casinos, and are the major employers in the region. The tribal nations, the US Coast Guard Academy, and the US Naval Sub Base are non-voting affiliate members of the COG.

Following the May 15th, 2003 meeting with CTDOT (and its committee), SECCOG is still trying to incorporate Title VI, EJ, and LEP in the Region's planning process.

SECCOG did not address any of the following 2004 identified areas of concern for their region. However their responses to the 15 questions asked by the Department addressed majority of their 2004 identified areas of concerns.

- *Update the COG meeting agenda to provide opportunity for public comment and input. Currently the agenda for the COG meeting does not provide the opportunity for public comment.*
- *Consider alternative techniques other than newspapers to get out information regarding meetings.*
- *Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.*
- *Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.*
- *Begin efforts to develop a Title VI/EJ Committee.*
- *Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.*
- *Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)*
- *Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)*

- *Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.*
- *Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.*

The following are SECCOG's answers to the 15 CTDOT questions to all RPOs.

1. The link between the location of low income/minority populations and transit service distribution goes back to the mid-1970's when the Southeastern Connecticut Regional Planning Agency (SCRPA), the predecessor of the Southeastern Connecticut Council of Governments (SECCOG), first became involved in transit development. Since its inception as the regional repository of Census data, the mining of Census for racial and income factors has been a mainstay of the program and updates are developed as new Census data becomes available. In the southeast region, low income and minority populations tend to live in neighborhoods with older housing stock with an abundance of rental property. In communities where low income housing has been built, these neighborhoods are easily identifiable. The point is, the MPO has ample data to document the location of low income and minority neighborhoods and this is where transit service has been targeted for the past 30 years. The most recent iteration of this exercise is shown on the accompanying maps, prepared in April, 2011 by SECCOG for the Southeast Area Transit (SEAT) district.
2. Since 1999, SCCOG staff has played a major role in developing programs to meet the transportation needs of the low and moderate income population of eastern Connecticut. SCCOG's Assistant Director serves on the Executive Board of the Jobs Access and Reverse Commute (JARC) Committee for eastern Connecticut which has met regularly since 1999 to develop and monitor transportation programs for this population. In addition, the Assistant Director was an incorporator of the Eastern Connecticut Transportation Consortium (ECTC), a private non-profit corporation established in 1992 to meet the transportation needs of the elderly, disabled and low income population that could not be met by the SouthEast Area Transit (SEAT) public transportation system. The populations which are subject of the JARC system are those people who are welfare recipients who have been referred by the Department of Social Services. The brokerage unit maintains a computer base of the location of all of the individuals. In the previous fiscal year, almost three hundred thousand passenger trips were made under the provisions of the JARC program to low income population.
3. SECCOG's Public Involvement Policy is virtually open-ended. Due to the public agency nature of the organization, efforts to be transparent originated with SCRPA, SECCOG's predecessor organization in the 1960's, long before it became fashionable and then a requirement. The relatively small area of the region, the long (50-year) history of the organization and the deep roots to other organizations in the region and state gives the MPO widespread contact advantages. Attached is the list of individuals and organizations that were directly contacted with respect to the most recent draft of the Long Range Regional Transportation Plan. Some of the organizations are in direct contact with the low income, minority and Native American populations in the region. An example of this interaction with low income and minority populations and SCCOG's

response concerned the issue of homelessness. Seeing a need, SECCOG responded to a request by a group of homeless people by investing its own funds to ensure that a homeless shelter remained opened until such time as it could secure a stable funding source. A condition of this assistance was that community agencies including transit coordinate services for this population.

SECCOG is confident that anyone who has an interest in any aspect of SECCOG's planning program has ample access to it. Conversely, in the 35 years of SECCOG's transportation planning program there has never been a recorded incidence of anyone complaining about a lack of access to our transportation program.

4. In 1994, SECCOG prepared a document entitled Public Involvement and Consultative Process for Transportation Planning. The preparation of the document gave the MPO an opportunity to catalogue its procedures in one place and identify new ways and new technologies to the transportation program more accessible. The document has since been revised, first in 1999 and then in 2007. Given the 35-year history of the program and the constantly changing technologies that create additional opportunities for outreach, it is the MPO's policy to always evaluate its performance in light of these new technologies and opportunities. Foremost among these is the SECCOG's own website, which has opened up virtually unlimited opportunity for dialogue with anyone wishing to participate in the transportation planning process.

Other noteworthy changes were the addition of public comment to the SECCOG's monthly meeting agenda. Additionally, SECCOG seeks regular reports from the Manager of the public transit system. Finally, although not part of the regular meeting agenda, SECCOG regularly receives updates and requests for assistance from the Executive Director of the Thames Valley Council for Community Action (TVCCA), the anti-poverty agency serving this region. SECCOG's relationship with the anti-poverty agency has recently led to the formation of a Regional Human Services Coordinating Council, a sub-committee of the SECCOG. The Council is widely representative of individuals and agencies serving low income, minority, and others in need in the southeast region. SECCOG hopes that this effort on behalf of low income and minority populations including Native Americans will become a model for other regions to follow.

5. With the advent of the Internet and the development of SECCOG's website, the primary day-to-day media focus of the program is the website. However, SECCOG has regular inter-action with newspapers, radio, and to some extent, public access television. Within the past year, the Executive Director was a guest on a local public access network. The guest appearance gave him an opportunity to describe the complexities of the SECCOG transportation planning program and how it works to meet the needs of all of its constituents. A the primary print medium which covers the activities of the SECCOG are The Day, serving the greater New London area, and The Bulletin, serving the greater Norwich area.

SECCOG has created a special section in the LRP to address Title VI and Environmental Justice. As a note on this issue, the lack of new Census data for the recent update of the LRP means that this section of the LRP will need to be re-visited as soon as the 2010 data becomes available. None of the projects presently in the TIP are of significant magnitude to warrant concern. The allocation of staff time in the UPWP includes an item to enable the detailed Census analysis to be undertaken.

There is no specific reference to Title VI or Environmental Justice in the Public Involvement Plan; however, the Public Involvement Plan itself is in place to further the goals of Title VI.

6. The MPO routinely considers policies that address the needs of all populations served. The best example of the use of this policy is the recent creation of the Regional Human Services Coordinating Council as a sub-committee of the SECCOG. (See question #4).
7. The public involvement and consultative process for transportation planning best addresses all the avenues that SECCOG utilizes to access public comments for decision-making. The most recent example of this is the 30-day comment period for the Draft Long Range Regional Transportation Plan in which the Governor's office and the local Congressmen took exception to the recommendation not to include Route 11 as an unfunded High Priority Project in the plan. After hearing these and other's concerns on this matter, SECCOG agreed to include the project in the 2011-2040 LRP. After the public hearing on the Plan, the minutes of the hearing were posted on the SECCOG website. All public comments received were provided to the SECCOG board, and are available for public review.
8. SECCOG has not yet had an opportunity to respond to LEP issues. However, when that occasion arises, it expects to turn to the Norwich Public Schools for assistance. In the attached spreadsheet entitled District Languages, Norwich Public Schools, it shows that 34 languages are spoken in the Norwich school district alone.
9. The attached maps, (Question 1) were recently prepared by SECCOG to begin the monitoring of transit service as it related to serving low income and minority populations. Adjunct to this are the regular ongoing reports and activities of the JARC Program sponsored by the SECCOG in conjunction with Connecticut Works. Regular on-board surveys are conducted under the program to ensure that low income and minority target populations are being adequately served.
10. SECCOG does not presently have a Title VI complaint process.
11. See above.
12. SECCOG has taken the lead, statewide, in coordinating with the only two, Federally recognized, Native American Tribes in Connecticut, both located in the southeastern region. Subsequent to the formation of the SECCOG in 1992, SECCOG lobbied the State legislature to allow Tribal representatives to serve as equal voting members with municipalities on Councils of Governments. The legislature rejected this request. Consequently, SECCOG created a special designation as Affiliate Members for Native American Tribal Representatives who attend all SECCOG meetings, provide reports and sit at the table with municipal representatives. However, they presently continue to lack voting rights due to State Statute. Coordination through the Indian Reservation Roads Program is emerging as an important aspect of the program. Recently, the Mashantucket Pequots repaired a road that suffered storm damage in the Town of Stonington using IRRP funding.
13. SECCOG follows all Federal and State requirements to ensure that technical planning contracts are offered to all groups/persons. SECCOG has adopted its own Consultant Selection Procurement Process which has been approved by CTDOT.

14. Most recently, the American Resource and Recovery Act program (ARRA) required numerous contracts for locally originated projects. All contracts entered into by municipalities had to follow Federal and State guidelines. Likewise, projects underwritten by STP-U funds are required to follow the same contracting format. All contracts entered into by SECCOG comply with Title VI requirements.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by SECCOG and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with SECCOG to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to respond to the questions developed by the Department “Does the Planning process seek to utilize demographic information to examine the distributions across these group of the benefits and burdens of the transportation investments included in the TIP?” Their current participation refers to the transportation needs of the elderly, disabled and low-income population. What about the minority populations?
- DOT requires the region to provide a sample/example of how they conveyed there public outreach through media vehicles such as but not limited to: Press, Newspapers, Internet, Television, Radio, & Social networking. The primary media focus should not solely be the website. If print media is used, expand their public outreach effort by using print media that is targeted to low-income and minority populations. Please provide a sample.
- DOT requires the region to update their Public Involvement plan to include Title VI and Environmental Justice.
- DOT requires the region to develop a Limited English Proficiency Plan that will incorporate the Planning process for addressing LEP issues.
- DOT requires the region to develop a Title VI Policy, a Title VI Complaint Process and a written guide or manual as to how to file a complaint. Please submit sample copies of the policy and complaint form. All of these materials should be readily available on their website.

South Western Regional Planning Agency

The Governor designated the South Western Region Metropolitan Planning Organization in 1981. The Region's policy board consists of the Directors of the Stamford, Norwalk and Westport Transit Districts, and the Chief Elected Officials of the eight municipalities in the southwestern corner of Connecticut. The Chief Elected Officials each have one full vote on the MPO, whereas the three transit districts share one vote. The Transportation Technical Advisory Group is a committee, which consists of professional staff from SWRPA, the three Transit Districts, Municipal Planning, Engineering and Traffic Engineering Departments. The committee reviews and evaluates proposals and submits recommendations to the MPO.

The South Western Region was incorporated into the expanded Bridgeport-Stamford Urbanized Area, and was designated as a Transportation Management Area as a result of the 2000 Census. According to the 2010 Census, there were 364,519 persons residing in the 212.3 square mile Region, resulting in a population density of approximately 1,717 persons per square mile. Minority populations, represented by all racial and ethnic groups except non-Hispanic Whites, represent 32% of the Region's total population (116,476 persons).

Although the median house hold income in the Region is substantially higher than the state as a whole, concentrated areas of poverty do exist. These areas tend also to be characterized by lower percentages of non-Hispanic Whites than the Region as a whole. Based on the demographic profiles completed by the South Western Regional Planning Agency in 2011, the largest concentrations of minority and persons living below the poverty level reside in the Cities of Norwalk and Stamford, and within a small section of Greenwich. These communities are generally located along the US 1 and I-95 corridors

Following the May 22nd, 2003 meeting with CTDOT (and its committee), SWRPA has continued to incorporate Title VI, EJ, and LEP in the Region's planning process.

The following are SWRPA's answers to their 2004 identified areas of concern. (*Italics*)

Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.

- SWRPA regularly reexamines the Region's demographic profile based on a number of criteria included Title VI and EJ populations. SWRPA is committed to developing demographic profiles, using the smallest geography for which reliable and accurate data are available. Beginning in 2006 the demographic profiles used by SWRPA to identify communities of concern/EJ populations were developed using Census Block Groups based on the data available from the 2000 Census. In May of 2011 demographic profiles for the region were updated using the U.S. Census Bureau, 2010 Redistricting Data Summary File, and 2005-2009 American Community Survey 5-Year Estimates. Unfortunately these data are only available at the Census Tract level. Because of this, demographic profiles were developed for Census tracts only. Future demographic profiles will be developed using the smallest geography for which data are available. Samples of the demographic profiles prepared for the region using Census Block Groups and Census tract are included in Attachment A.

Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.

- The South Western Region Environmental Justice Annual Assessment 2011 included a simple evaluation of the potential benefits and burdens upon communities of concern resulting from projects listed in the 2010-2013 TIP and 2011-2040 LRTP. The criteria used to assess the potential benefits and burdens of projects, based on best available information, are summarized below.
- Based on a review of the demographic profile of the Region and communities of concern, as well as the travel patterns of communities of concern, the following categories were used to evaluate the benefits and burdens of transportation investments in the Region:
 - Local congestion impacts
 - Air quality impacts
 - Access to transit
 - Bike or pedestrian access
 - Location in an LEP community
 - Funding allocations:
 - Proportion of funding for projects located in communities of concern
 - Proportion funds benefiting communities of concern
 - Proportion funds for projects with potential burdens to communities of concern
 - Proportions of funds for projects with in communities of concern with no impact
 - Proportion of total funding allocated to bus services
 - Proportion of total funding allocated to rail services
 - Additional information on the benefits and burdens assessment and evaluation criteria is included in the 2011 assessment.
- SWRPA will continue to research best practices used by other agencies to evaluate the distribution of benefits and burden associated with projects included in the TIP and LRTP and will continue to work to enhance the evaluation process.

Begin efforts to develop a Title VI/EJ Committee.

- SWRPA has chosen to continue working with community groups and organizations that are often members of communities of concern or located in geographic areas identified as Title VI/EJ stakeholders rather than create a Title VI/EJ Committee. This approach ensures diversity in outreach through special projects or technical assistance in transportation planning, regional planning, emergency management and environmental planning. Through the locally coordinated human services transportation planning (LOCHSTP), the needs and gaps in transit services are identified by the Bridgeport-Stamford Urbanized Area Working Group coordinated by SWRPA staff. Ongoing technical assistance to the Norwalk Transit District keeps SWRPA and the metropolitan transportation planning program in touch with the needs of transit dependent and ADA eligible populations in the region. In the conduct of corridor studies, socioeconomic characteristics are considered and public involvement helps shape the plans and programs that are developed. Through Region 1 Emergency Management and Homeland Security activities, SWRPA engages municipal emergency management programs in the development of mass care, sheltering and evacuation planning. SWRPA staff serves as the Chair of the Region 1 ESF 1 Transportation Committee, are members of the Region 1 Emergency Planning Team, and coordinate and support the Region 1 Citizen Corps Council.

- In addition to these planning and interactive activities that support the goals of Title VI and environmental justice, SWRPA makes quarterly reports on Title VI, EJ and Limited English Proficiency to CTDOT and USDOT. Beginning in the last quarter of FY2011, SWRPA will engage the region's Transportation Technical Advisory Group (TTAG) and the South Western Region Planners in quarterly discussions of Title VI/EJ/LEP issues and opportunities. The TTAG meets monthly and South Western Region Planners meet each quarter. These new initiatives will be reported in the quarterly reports submitted to CTDOT and USDOT.

Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.

- SWRPA uses the Census Bureau's definition of linguistically isolated households to identify LEP populations in the region. The Census Bureau defines a linguistically isolated household as "one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English 'very well.' In other words, this definition includes all members 14 years old and over who have at least some difficulty with English."¹
- Both decennial census data and American Community Survey data collected by the US Census Bureau have been used to identify LEP populations. A demographic profile of the Region was recently completed, *People and Places of the South Western Region of Connecticut: An Examination of 2010 Census and 2005-2009 American Community Survey Data*, using U.S. Census Bureau, 2010 Redistricting Data Summary File and 2005-2009 American Community Survey 5-Year Estimates. This report identified 7% of the Region's residents as linguistically isolated (LEP), with 53% of the LEP population identified as Spanish speakers. Thirty-seven percent of LEP population speaks another Indo-European language, while the remaining 10% speak some other language.²
- *The 2009 Public Participation Plan for the SWRMPO* built upon the fact that Spanish was the most prominent language other than English spoken in the region. A number of recommendations were incorporated into the public participation plan to improve access to information by and engage residents with limited English proficiency. As recommended in the public participation plan, project specific public involvement plans are developed to help tailor outreach efforts to the needs of individual communities. For projects affecting an area with a population identified as having LEP households, public involvement plans call for informational materials and notices to be provided in both English and Spanish (or the appropriate non-English language). Additionally, the demographic profile of project study areas are evaluated when developing the project scope of work and the demand for interpreters are considered.
- Additionally, a link to the Google Translate service is prominently placed on the front of SWRPA's homepage, which lets people view any page and some documents on the website in more than fifty other languages.

Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO

documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- SWRPA uses its website, www.swrpa.org, as the primary means of disseminating information about the agency's activities. The website underwent a complete overhaul in 2009. The front page of the website has a calendar bar that lists all upcoming meeting and links to additional information. A "What's New?" bar identifies recently completed projects, public involvement opportunities, and other newsworthy items, and links directly to project web pages and reports. SWRPA regular posts all meeting notices, agendas and summaries on the website along with project reports, presentations and other relevant information.
- A translation link is located on the front page of the website, which can be used to translate the website and some documents into Spanish or more than fifty other languages using Google Translate. Information on how to arrange for special language accommodations is included with all media releases issued by the SWRMPO; and included on meeting agendas and on the SWRMPO website in both English and Spanish (see F below).
- Where translations have been completed, documents are posted in both English and Spanish, including:
 - The South Western Region Strategy for Addressing Limited English Proficiency
 - The Guide to the SWRMPO Brochure
 - Coming in 2011: The executive summary of the Long Range Transportation Plan: Going Forward -The Plan to Maintain & Improve Mobility

Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)

- Information on how to arrange for special accommodations is included with all media releases issued by the SWRMPO; and included on meeting agendas and the SWRMPO website in both English and Spanish:
- *To arrange for special accommodations or translation services contact SWRPA at least five (5) days prior to the meeting at (203) 316-5190 (voice only)*
- *Para organizar especial de alojamiento o los servicios de traducción en contacto con SWRPA al menos cinco (5) días antes de la reunion al (203) 316-5190 (sólo voz)*

Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.

- Included in the 2009 updated of the SWRMPO public participation plan, were the recommendations to develop a framework for evaluation of the plan and its recommendations; and to conduct annual reviews of the plan for compliance and effectiveness. An evaluation matrix was developed by SWRPA to monitor implementation of the 2009 Public Participation Plan for the SWRMPO and evaluate the effectiveness of recommendations. A public involvement summary report is also completed annually and posted on the SWRMPO public involvement webpage. The first assessment, FY2010 Public Involvement Annual Evaluation and Summary, was completed in September 2010.

Consider alternative techniques other than newspapers and mailings to get out information regarding meetings.

- SWRPA uses media and methods besides traditional newspaper legal notices and mailing to reach out to the public regarding upcoming events and new publications. Prior to 2008, SWRPA placed legal notices of upcoming meetings in the Region's two highest circulation newspapers (Stamford Advocate and Norwalk Hour.) This method was costly and yielded little, if any, participation at meetings. Recognizing the inefficiency of this method, The 2009 Public Participation Plan for the SWRMPO instead recommended issuing news releases to a broad list of local and state media outlets. This list includes both daily and weekly newspapers, local radio stations, television stations, Spanish language media, and online media outlets. This method has proved more fruitful, resulting in numerous articles and reports.
- For some large projects, SWRPA has used more personal and innovative methods to encourage participation at meetings. This has been especially true of SWRPA's major corridor studies. For the *US 1-Dairen Study*, the technical advisory committee (TAC) sent hand written notes to key stakeholders to invite them to a study meeting. For the *US 1 Greenwich-Stamford Study*, the TAC telephoned stakeholders in the corridor to let them know about a study workshop. After the phone call, the TAC sent stakeholders an email containing information about the workshop, which they were asked to forward to others who might be interested.
- Meeting agendas and summaries are regularly posted to SWRPA's website. SWRPA's website update, launched in 2009, includes a calendar module on the front page that lists all upcoming meetings and links to more information. Building on its internet presence, SWRPA has experimented with pushing meeting information through social media like Facebook and Twitter. Social media postings point back to SWRPA's website or in the case of some large studies, a project website.

SWRPA has also experimented using a meet-and-greet at a public location to get the word out about major studies. For the *South Western Region Long Range Transportation Plan, 2011 – 2040*, SWRPA set up tables at the Norwalk Library, Stamford Government Center, and Westport Library to talk to passersby about the plan and let them know how they could comment.

Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.

- Since FY2003 SWRPA has included reports on Title VI, EJ and LEP activities in the quarterly reports submitted to CTDOT (Field Coordination) and FHWA and FTA (contacts). Additionally, each South Western Region Unified Planning Work Program contains Title VI, EJ and LEP as tasks, refer to Regional Planning Organizations Questions 6c for further information.

The following are SWRPA's answers to the 15 CTDOT questions to all RPOs

1. SWRPA recently issued a report summarizing key findings from the 2010 Census and 2005-2009 American Community Survey, with comparisons to 2000 Census figures. The *People and Places of the South Western Region of Connecticut: An Examination of 2010 Census and 2005-2009 American Community Survey Data* report presents current

findings and trends, with supporting tables, charts, and maps. The report includes socio-economic, racial and ethnic composition and income statistics for the Region. SWRPA also issues an annual environmental justice summary, which identifies the locations of communities of concern based on the following four criteria:

- percent of minority population (all persons except those identifying themselves as White, not Hispanic),
- per capita income,
- percent of persons below the poverty level,
- percent of households receiving public assistance income,

Beginning in 2006 the demographic profiles used by SWRPA to identify communities of concern/EJ populations were developed using Census Block Groups based on the data available from the 2000 Census. In

May of 2011 demographic profiles for the region were updated using the U.S. Census Bureau, 2010 Redistricting Data Summary File, and 2005-2009 American Community Survey 5-Year Estimates. Unfortunately these data are only available at the Census Tract level. Because of this, SWRPA's latest demographic profiles of the EJ and Title VI population were developed for Census tracts only. Future demographic profiles will be developed using the smallest geography for which data are available.

Samples of the demographic profiles prepared for the region using Census Block Groups and Census tract are included in Attachment A.

2. The SWRMPO's planning process seeks to engage communities of concern (defined above in Question 1) in the planning process and to ensure fair treatment of all citizens with respect to the distribution of benefits and burdens arising from transportation projects, programs and policies in the region. SWRPA regularly reviews the policies and practices of the SWRMPO and the Agency to ensure compliance with federal regulations concerning Environmental Justice, Title VI, and Limited English Proficiency. SWRPA annually assesses the Region's transportation planning program for compliance with applicable regulations to ensure that benefits and burdens are not disproportionately distributed. SWRPA also prepares an Environmental Justice assessment with each major revision to the Region's Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP).

The SWRMPO adheres to a Public Participation Plan, which ensures that information is easily accessible and understandable to all members of the community. The *2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization* was developed to help all stakeholders participate actively in the Region's transportation planning program. All regular SWRMPO activities follow the recommended public involvement strategies outlined in the Public Participation Plan. Project-specific Public Involvement Plans (PIP) are developed for special projects and studies. Project specific PIP's ensure that the unique requirements of each study area are addressed and that all study area residents have access to relevant project information. In order to identify the needs of the community, all SWRMPO projects and activities are developed through a collaborative planning process with input from the Transportation Technical Advisory Group (TTAG), municipalities, and other Non-government organizations as appropriate. SWRPA regularly works with groups and organizations that are members of communities of concern to facilitate outreach and involve the public in the planning process.

Considerations for impacts to the traditionally underserved are also identified in the Environmental Justice report prepared as part of the Transportation Improvement Program and the Long Range Transportation Plan. The methods used to assess the benefits and burdens associated with transportation investments in the Region and potential imbalances are discussed in SWRPA Question B and included in the South Western Region Environmental Justice Annual Assessment 2011.

3. The South Western Region public involvement process seeks to involve all members of the community and to ensure that all interested individuals and groups have access to pertinent project information. A customized outreach program is developed for the TIP, LRTP, major construction projects, and planning studies. Project specific public involvement plans are developed to ensure that the unique requirements of each study area are addressed and that all study area residents have access to relevant project information. The core of the outreach program includes media releases and legal notices of meetings, identification of stakeholders through the chief elected officials, planners, and community organizations, posting of all pertinent materials online, and use of visualization techniques whenever possible. It is SWRPA's practice to document all activities, to record all input, prepare responses, and to summarize all outreach activities. A description of techniques employed can be found in the *2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization, FY2010 Public Involvement Annual Evaluation and Summary, Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report, South Western Region Metropolitan Planning Organization*, Question 2 (above) and SWRPA Question H. The process used to evaluate public involvement is discussed as part of SWRPA Question G and is addressed in the reports listed above.
4. The process used to evaluate public involvement is discussed as part of SWRPA Question G and are addressed in the *2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization, FY2010 Public Involvement Annual Evaluation and Summary, Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report, South Western Region Metropolitan Planning Organization*, Questions 2 and 3(above).

As discussed in SWRPA Question C, SWRPA works with community groups and organizations as well as through locally coordinated human services transportation planning (LOCHSTP), transit agencies, Region 1 Emergency Management and Homeland Security activities, and municipal departments to identify and address the needs of communities of concern. Project specific public involvement plans are also developed to ensure that the unique requirements of each study area are addressed and all study area residents have access to relevant project information.

5. SWRPA uses other media and methods besides traditional newspaper legal notices and mailing to reach out to the public regarding upcoming events and new publications. Prior to 2008, SWRPA placed legal notices of upcoming meetings in the Region's two highest circulation newspapers (Stamford Advocate and Norwalk Hour.) This method was costly and yielded little, if any, participation at meetings. Recognizing the inefficiency of this method, *The 2009 Public Participation Plan for the SWRMPO* recommended issuing news releases to a broad list of local and state media outlets. This list includes both daily and weekly newspapers, local radio stations, television stations, Spanish-language media, and online media outlets. This method has proved more fruitful, resulting in

numerous articles and news reports. Additional information regarding the techniques employed by SWRPA are included in SWRPA Question H.

SWRPA's media distribution list and a sample media release have been included in Attachment B.

6. The SWRMPO is committed to ensuring that all transportation planning, policies and programs are equitable and information is available to all interested members of the community. An Environmental Justice evaluation of the South Western Region's TIP and LRTP has been completed annually since 2004. Beginning in 2003 and continuing until the present, SWRPA has included reports on Title VI, EJ and LEP activities in the quarterly reports submitted to CTDOT (Field Coordination) and FHWA and FTA (contacts.) Additionally, a *Title VI and Limited English Proficiency Assessment and Compliance Summary Report* has been completed annually for the South Western Region since 2009. The region maintains a Title VI policy and complaint procedure and a strategy for addressing limited English Proficiency in English and in Spanish.

(A) In addition to the items listed above, an Environmental Justice Evaluation is completed for each major revision to the LRTP. The *South Western Region Environmental Justice Annual Assessment 2011* includes an assessment of potential benefits and burdens upon the communities of concern resulting from projects recommended in the 2011-2040 LRTP. Public Review was conducted following the process established by the *2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization*, which was developed to comply with federal regulations dealing with Title VI, Environmental Justice and Limited English Proficiency. All public information sessions were held in transit accessible locations and at ADA compliant facilities. Media releases were issued in both English and Spanish and all information was posted online: <http://www.swrpa.org/Default.aspx?Transport=40>. Upon USDOT approval of the 2011-2040 LRTP the executive summary will be translated and made available online in Spanish.

(B) In addition to the items listed above an Environmental Justice Evaluation is completed for each major revision to the TIP. The *South Western Region Environmental Justice Annual Assessment 2011* reviews the potential benefits and burdens projects included in the 2010-2013 TIP may have on communities of concern. Public Review for the 2010-2013 TIP was conducted following the process established by the *2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization*, which was developed to comply with federal regulations dealing with Title VI, Environmental Justice and Limited English Proficiency. All public information sessions were held in transit accessible locations and at ADA compliant facilities.

(C) Each South Western Region Unified Planning Work Program contains Title VI, EJ and LEP as tasks. The current work program, *South Western Region FY2010 & FY2011 Unified Planning Work Program*, identifies objectives that support full public participation, the integration of CTDOT and USDOT environment justice and limited English proficiency in the planning process, and ensures compliance with Title VI. Refer to Task 3, pages 24-25 of the current UPWP. http://www.swrpa.org/Uploads/FY11&12%20UPWP-Final_6-15-10.pdf

(D) The South Western Region public involvement process seeks to involve all members of the community and to ensure that all interested and affected individuals have access to pertinent project information. The *2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization (2009 PPP)* was developed to comply with federal regulations dealing with Title VI, Environmental Justice and Limited English Proficiency. The *Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report* also includes a section on “Inclusive Public Participation,” which lists standard and ongoing practices, activities planned for implementation during the next fiscal year and future year goals that support outreach to communities of concern.

7. The South Western Region public involvement process seeks to involve all members of the community and to ensure that all interested and affected individuals and groups have access to pertinent project information. The following policies have been developed to ensure an inclusive and robust public participation program and are included in Attachment C:

- *South Western Region Transportation Planning Program's Title VI Policy and Complaint Procedure*; issued June 1, 2005 and revised January 15, 2010. To date no complaints have been filed.
- *South Western Region Strategy for Addressing Limited English Proficiency* (The Spanish Translation is posted online); issued May 12, 2011.
- *The 2009 Public Participation Plan for the South Western Region Metropolitan Planning Organization*; issued December 4, 1997 and revised May 28, 2009.
- MPO Operating Procedures; issued June 23, 1981 and revised June 26, 2006.
- MPO Planning Roles and Responsibilities; revised June 30, 2008.
- *South Western Region Affirmative Action Policy Plan and Policy Statement*; updated January 18, 2011

8. The South Western Region metropolitan transportation planning program actively seeks public involvement and comment in the overall program, individual tasks and special projects, as well as at technical (Transportation Technical Advisory Group) and policy (South Western Region MPO) meetings. As previously noted in SWRPA Question D, project specific public involvement plans are developed for metropolitan transportation plan activities. Meeting notices are sent to the media, stakeholders, posted on the SWRPA and special project websites, as are opportunities to comment and other ways to get involved. Any comments received are documented in meeting minutes and summaries, which are posted online. For core metropolitan transportation planning requirements including but not limited to the Long Range Transportation Plan, TIP, Air Quality Conformity, and special studies, a list of comments received and their disposition is recorded in a public involvement summary and made available to the public and stakeholders on the SWRPA and project websites and at technical, policy and advisory committee meetings. In addition, public involvement, Title VI, LEP, and DBE contract compliance are documented in quarterly reports. Annual assessments are performed and used to refine the processes and programs based on the findings and recommendations gleaned from SWRPA's experience and research on best practices.
9. Recommendations from the *South Western Region, Strategy for Addressing Limited English Proficiency* are regularly implemented as part of the Region's transportation planning program. Compliance is documented in *Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report, South Western Region*

Metropolitan Planning Organization completed annually by SWRPA and in project specific public involvement plans.

10. SWRPA works with and provides technical assistance to various stakeholders, including transit operators, on activities that monitor the transit system. However, much of the monitoring work is done by the transit operators themselves, which in the South Western Region are CT Transit, Norwalk Transit District, and CTDOT Rail Operations. Through LOCHSTP program coordination, evacuation planning, and on-going collaboration with transit operators, SWRPA identifies transit services, needs/gaps, and opportunities, and develops recommendations for projects, programs and services that relate to transit and other transportation operations that advance Title VI objectives, assist EJ communities of concern, and consider the needs of the LEP population.
11. SWRPA issued a formal Title VI complaint procedure in 2005, which is annual reviewed as part of the *Title VI and Limited English Proficiency Annual Assessment and Compliance Summary Report, South Western Region Metropolitan Planning Organization* and updated as necessary. The current *South Western Region Transportation Planning Program's Title VI Policy and Complaint Procedure*, issued January 15, 2010 is posted on the SWRPA website and included in Attachment C.

The Title VI Policy and Complaint procedure are posted on the SWRPA website under the Policies: <http://www.swrpa.org/Default.aspx?About=239>, and Environmental Justice, Title VI and LEP: <http://www.swrpa.org/Default.aspx?Transport=152>.

12. Not applicable to the South Western Region.
13. Contracting opportunities for planning studies, corridor studies, and other technical work are open to all groups and persons. SWRPA's procurement policy meets or exceeds the standards set forth by its Federal and State funding partners. Contracting opportunities are advertised in a number of locations in order to ensure that the work is open to all groups and persons and that SWRPA receives a sufficient number of responses to guarantee a competitive procurement process. All contracting opportunities are at a minimum posted to the procurement section of SWRPA's website and the e-procurement portal of Connecticut Department of Administrative Services' website. Depending on the nature of the goods or services being procured, contracting opportunities may also be advertised with professional associations, trade groups, and third party sites like Craigslist.org. SWRPA also provides information about transportation contracting opportunities directly to consultants and firms on Connecticut Department of Transportation pre-qualified consultant list. See CTDOT Consultant Services website for the current pre-qualified consultants list: <http://www.ct.gov/dot/cwp/view.asp?a=1527&q=300754>
14. The legal notices that accompany RFPs/RFQs always contain language which states that "Disadvantaged Business Enterprises certified by the Connecticut Department of Transportation are strongly encouraged to submit a proposal/statement of qualification." For more information, please Attachment D *Recommended Procurement Process*.
15. SWRPA agreements with consultants include any and all Title VI requirements. The SWRPA- consultant agreement is reviewed before execution by the CTDOT project manager to assure the correct Title VI and other requirements are included as provisions. All agreements by and between SWRPA and a consultant include an article

that requires the signee to “comply with all applicable federal, state, and local laws in the jurisdictions in which the services covered under this Agreement are performed.”

ARTICLE XIII. COMPLIANCE WITH OTHER LAWS

The CONSULTANT agrees to comply with all applicable federal, state and local laws in the jurisdictions in which the services covered under this Agreement are performed. Further, the CONSULTANT shall cause all persons employed by him including subcontractors, agents, officers, and employees to comply with all such applicable laws. Any persistent, deliberate, or substantial failure of the CONSULTANT, his sub-contractors, agents or employees to comply with such laws may result in the cancellation or termination of this Agreement. All agreements by and between SWRPA and consultant include an article which states that the consultant must agree to not discriminate nor permit discrimination against any groups or persons.

ARTICLE VIII. NONDISCRIMINATION IN CONTRACTS

- A.** The contractor agrees and warrants that in the performance of this contract he will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, sex, mental retardation or physical disability, including, but not limited to, blindness, unless it is shown by such contractor that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the State of Connecticut. If the contract is for a public works project, the contractor agrees and warrants that he will make good faith efforts to employ minority business enterprises as subcontractors and suppliers of materials on such project. The contractor further agrees to provide the commission on human rights and opportunities with such information requested by the commission concerning the employment practices and procedures of the contractor as relate to the provisions of this section and section 46a-56. For the purposes of this section, ‘minority business enterprise’ means any subcontractor or supplier of materials fifty-one per cent or more of the capital stock, if any, or assets of which is owned by a person or persons: (1) Who are active in the daily affairs of the enterprise; (2) who have the power to direct the managements and policies of the enterprise; and (3) who are members of a minority, as such term is defined in subsection (a) of section 32-9n of the Connecticut General Statutes.
- B.** For the purposes of this section, ‘good faith’ means that degree of diligence which a reasonable person would exercise in the performance of legal duties and obligations. ‘Good faith efforts’ shall include, but not be limited to, those reasonable initial efforts necessary to comply with statutory or regulatory requirements and additional or substituted efforts when it is determined that such initial efforts will not be sufficient to comply with such requirements.
- C.** Determination of the contractor’s good faith efforts shall include but shall not be limited to the following factors: The contractor’s employment and subcontracting policies, patterns, and practices; affirmative advertising, recruitment and training; technical assistance activities and such other reasonable activities or efforts as the commission may prescribe that are designed to ensure the participation of minority business enterprises in public works projects.
- D.** The contractor shall develop and maintain adequate documentation of its good faith efforts.

If a Consultant is found to be in violation of these articles, SWRPA has the right to terminate an agreement. For consultant contracts with a Disadvantaged Business Enterprise set aside, SWRPA tracks project expenditures and works with the consultant to ensure that all requirements are met or exceeded.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by SWRPA and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a

meeting with SWRPA to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT recommends the region to revise their complaint procedure to ensure it is clear on how to file a complaint
- DOT requires the region to provide a sample/example of how they conveyed their public outreach through media vehicles such as but not limited to: Press, Newspapers, Internet, Television, Radio, & Social networking. The sample provided is not a sample of what is submitted to the media outlets. Please provide a copy of an actual sample sent out to their media outlets

Valley Council of Governments

The Valley Regional Planning Agency was created in 1966. In 1981 the Valley Regional Planning Agency and the Greater Bridgeport Regional Planning Agency were designated by the Governor as a Metropolitan Planning Organization. As of July 1, 2002, the Valley Regional Planning Agency (VRPA) assigned all its rights and responsibilities to the Valley Council of Governments (VCOG). The VCOG assumed all the obligations of the VRPA, including coordination of planning activities and regional transportation support services.

The 2000 Census redefined the urban area boundaries for the Region, and created the new Bridgeport-Stamford Urbanized Area, and an expanded Transportation Management Area (TMA). The expanded TMA now includes the following regional planning organizations: South Western Regional Planning Agency, Valley Council of Governments and Greater Bridgeport Regional Planning Agency. The membership of the VCOG is governed by the Chief Elected Officials of the four participating municipalities, which include Ansonia, Derby, Seymour and Shelton.

The population of the Region is 88,250 according to the 2000 Census, and 45% of the Region's population resides within the city of Shelton. The household incomes range from a low of \$21,783 in Ansonia, to a high of \$35,643 in Shelton. The towns of Ansonia and Derby demonstrate more ethnic diversity than Seymour or Shelton.

Following the May 8th, 2003 meeting with CTDOT (and its committee), VCOG is still trying to incorporate Title VI, EJ, and LEP in the Region's planning process.

The following are identified areas of concern which were included in the February 2004 document. The Department has asked the VCOG to provide documentation showing how they addressed, are addressing or plan to address these identified areas of concern and improvements.

VCOG has not addressed any of the following 2004 identified areas of concern for their region.

- *Reexamine the demographic profile using Census Block Groups (rather than Census Tracts) to be sure that all Title VI/EJ population clusters are being addressed.*
- *Examination of the distributions of benefits and burdens of the transportation investments in the TIP and Long Range Plan to the Title VI/EJ groups.*
- *Begin efforts to develop a Title VI/EJ Committee.*

- *Establish/Expand the identification process for LEP groups, ensuring that all significant languages are identified and incorporated into the public participation guidelines.*
- *Continue to update the Region's website, to include a notice regarding availability, where practical, of alternative language documents. This could include a summary of major RPO documents. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)*
- *Add a statement on all meeting agendas alerting the public to the availability of assistance in alternative languages upon request, within a reasonable time frame. (Note: The statement should be listed in the appropriate alternative language for the Region as needed.)*
- *Develop and document a systematic way to review the effectiveness of public outreach efforts and citizen involvement, and include in next update of the public participation guidelines.*
- *Include Title VI as part of the UPWP and assure that quarterly reports include updates on Title VI activities.*

The following are VCOG's answers to the 15 CTDOT questions to all RPOs.

1. Yes, by census Block Group. Please see the Agency's Title VI plan mapping beginning on page 11 for samples.
2. Yes, the planning process identifies these needs using public outreach and continued EJ monitoring and census analyses. Imbalances are identified in evaluating disproportionate investment in areas with high or low concentrations minority, LEP, and/or low income neighborhoods.
3. The public involvement process does identify these groups as stakeholder population in the transportation planning process. The effectiveness of this strategy is consistent with other outreach initiatives in the transportation planning process which is typically low to moderate interest until a project is proposed in the area at which time significant interest is generated through public involvement meetings, and public hearings.
4. Yes, we review these procedures every year as part of our FTA Designated Recipient Status requirements, or more frequently as required. These populations are notified through our public outreach policies and notices, including print and online.
5. Yes, Newspaper print notices in the CT Post, Waterbury Republican, Valley Gazette, VCOG website, radio, and local paper.
6. Yes
7. Please see attached Policy in Plan
8. Through public notices and public sessions.
9. Yes
10. We monitor these programs through ridership data, submitted public comments, and public outreach on fare changes, project informational meetings, complaint records, etc.
11. Yes, please see attached plan.
12. Yes, <http://www.valleycoq.org/transportation.html>
13. There are no Native American Tribal Governments in our region.
14. Yes, through legal notices, direct mailing to Pre-Qualified Consultants with an invitation to DBEs.
15. Through required FTA clauses, contract language, and contractor acknowledgements.

2011 Identified Areas of Deficiencies

The Department has reviewed the information provided by VCOG and has found the following deficiencies and areas of concern with their Title VI practices. The Department will schedule a meeting with VCOG to discuss these deficiencies and work with the region to develop an Action Plan to address these identified issues.

- DOT requires the region to update their demographic, population, age structure, educational attainment, labor force and socio-economic characteristics economic and social data using the 2010 Census Data.
- DOT requires the region to specifically address the benefits and burdens in the TIP.
- DOT requires the region to respond to the questions developed by the Department. Have efforts been undertaken to improve performance, especially with respect to low-income and minority populations? Have organizations representing low-income and minority populations been consulted as part of this evaluation? Have their concerns been considered?
- DOT requires the region to provide a sample/example of how they conveyed their public outreach through media vehicles such as but not limited to: Press, Newspapers, Internet, Television, Radio, & Social networking.
- DOT requires the region to respond to the questions developed by the Department. Has the MPO reviewed its decision-making process or developed a written policies or criteria that address consideration of all populations served by the RPO"? Is there written policies that address public comments or other types of public input for decision-making?
- DOT requires the region to respond to the questions developed by the Department. The Appendix D in reference to describing the LEP efforts is missing from their submission? Also, how is the public made aware of their materials posted to the website in Spanish? If a Region had posted information in any language on the website, a notice to the public must go out to the public and or related parties (in the identified language) with instructions on how to find the materials/documents on the website.
- DOT requires the region to provide a copy of their Region's Public Participation Plan
- DOT requires the region to provide a copy of their Region's Limited English Proficiency (LEP) Plan

VIII. A Quick Look at the Rural Planning Regions

Unlike the MPOs the CTDOT is responsible for a large portion of Title VI compliance in the rural regions of the State. A great deal of this work is done in a cooperative manner between the CTDOT and the Rural Regions. Each region does produce a Long Range Transportation Plan and hold public meetings and forums and thus must meet Title VI requirements in these areas.

In general all four rural regions appear to have comprehensive outreach programs. In small rural areas close interaction with municipal officials allows for a strong contact with the entire community.

Litchfield Hills Council of Elected Officials and the Northwestern Connecticut Council of Governments

The northwestern corner of Connecticut contains two rural regional planning organizations.

The Northwestern Connecticut Council of Governments' membership includes Canaan, Cornwall, Kent, North Canaan, Roxbury, Salisbury, Sharon, Warren, and Washington. The Region is homogeneous in its ethnicity and income level. The area is primarily Caucasian and well above the poverty level.

The Litchfield Hills Council of Elected Officials includes Barkhamsted, Colebrook, Goshen, Hartland, Harwinton, Litchfield, Morris, New Hartford, Norfolk, Torrington, and Winchester. The City of Torrington is the most intensively developed community in the Region and contains the only true ethnic and economic diversity in the Region. Like the Northwestern Region, the Litchfield Hills region is also primarily Caucasian and above the poverty level.

The main emphasis of Title VI activities within these regions has centered on the provision of transit services along major corridors. Overall the Regions do seem to be attempting to reach what little target communities exist within the two regions and provide them with transit options especially in the area of access to jobs. The Regions are encouraged to reexamine their activities with regard to the guidance items listed earlier in this report and evaluate where improvements if any need to be implemented

Northeastern Connecticut Council of Governments and the Windham Region Council of Governments

The northeastern corner of Connecticut also contains two rural planning regions; the Northeastern Connecticut Council of Governments and the Windham Region Council of Governments. These two regions unlike the regions in the northwestern corner of the State do have a great deal of diversity in both ethnicity and economic level. However, similar to the northwest corner most of the activity in the Title VI area has been centered on transit.

The Northeastern Connecticut Council of Governments consists of the towns of Brooklyn, Canterbury, Eastford, Killingly, Plainfield, Pomfret, Putnam, Sterling, Thompson, Union and Woodstock. Income levels in this Region are below those for the rest of the State, with six towns ranking in the bottom twenty for income. The staff of the Region is also staff to the local

transit district. The staff effectively interacts with a variety of human service agencies within the Region as part of its outreach to low-income and minority populations.

The Windham Council of Governments centered on the City of Windham includes Ashford, Chaplin, Columbia, Coventry, Hampton, Lebanon, Mansfield, and Scotland. The entire Region is below the Statewide median income and Mansfield and Windham have the highest percentage of minority population. The staff frequently assesses the public participation and modifies the outreach as a result of this effort. Bus schedules are available in both English and Spanish.

The review team will be meeting with the Rural RPOs to determine and discuss any area of concern that might exist.

IX. Next Steps

CTDOT, FHWA, and FTA will continue to monitor implementation of Title VI activities by the RPOs. It is the responsibility of CTDOT to assure that all Title VI requirements are met and that the MPOs are cognizant of these requirements.

CTDOT has reviewed each RPO's responses, documentations and websites cited. Each RPO's deficiencies and areas of concerns have been identified. CTDOT will schedule meetings with each RPO to discuss their respective deficiencies and areas of concern. The next Title VI process update will review the measures and steps taken by RPOs to address these deficiencies and areas of concerns.

The Department will continue to see that the MPOs emphasize/reemphasize Title VI (and incorporate EJ and LEP efforts/initiatives into the Title VI section) as a task item in their UPWPs and document updates in their quarterly reports. The Title VI process review and update will be conducted in conjunction with the Triennial Certification Review process in the TMAs.

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**State of Connecticut
Department of Transportation**



Exhibit XV
**Program Administration,
Monitoring of Subrecipients and
assistance to Subrecipients**

2011
Connecticut Department of Transportation
Title VI Compliance Assessment

Date: _____

Initial _____ Update _____

I. Agency Information: (please print)

Grantee/Subrecipient: _____

Address: _____

City/State: _____ County/Zip Code: _____

Phone/Fax: _____ Email: _____

Website Address: _____

Please list each program(s) or service or activity receiving financial assistance from the Connecticut Department of Transportation and the amount of the award.

<u>Anticipated Program/Service</u>	<u>Dollar Amount</u>	<u>Recurring</u>	
_____	_____	Yes _____	No _____
_____	_____	Yes _____	No _____
_____	_____	Yes _____	No _____
_____	_____	Yes _____	No _____

Does your agency received federal- aid/federal funding through the Connecticut Department of Transportation? Does your agency/organization receive Federal Highway Administration funding:
 Yes__ No__?

Please provide demographic information for your Service area population:

	%		%
Female		White	
Male		Black or African American	
American Indian/ Alaska Native		Native Hawaiian/ other Pacific Islander	
Asian		Hispanic	
Other			

(Please indicate the source and date of this data)

Does your organization have a Limited English Proficiency (LEP) plan? Yes___ No___
(If "yes" provide a copy of your plan) If no, please identify the corrective actions that will be taken to develop and implement a plan.

What steps are taken by your agency to ensure that LEP persons have access to the services that you provide?

Please provide the following information for your agency's designated Title VI Coordinator:

Name _____ Title _____

Phone: _____ Email: _____

Does the Title VI Coordinator have easy access to your organization's top level official?
Yes___ No___ (Please attach your agency's organizational chart)

Has the Title VI Coordinator attended Civil Rights training?

Yes___ No___

If yes, indicate who provided the training and the date(s) of training; the hours provided for each session; and a description of the training provided:

Has Title VI training been conducted for new and current employees? Yes___ No___

List Dates: _____

Facilitator: _____

Please provide a description of the training provided.

Does your agency have Title VI Assurances and an Implementation Plan? Yes___ No___
If "yes" provide a copy of the plan, if "no" please explain.

or

Has your agency adopted ConnDOT's Title VI compliance procedures? Yes___ No___

If "yes" provide a written statement on the agency's letterhead formally adopting ConnDOT's Title VI compliance procedures.

Please describe how your agency verifies that services provided to predominantly minority and low-income communities meet your established service standards for level and quality.

II. Non-Discrimination Information

Are all physical areas (i.e., rest rooms, waiting area, etc.) provided without regards to race, color, ethnicity or national origin?

Yes _____ No _____

Are all posters regarding Title VI visible and accessible to staff and service beneficiaries?

Yes _____ No _____

Do the posters show the name of the Title VI Coordinator to whom complaints should be referred?

Yes _____ No _____

Is Title VI information disseminated or made available to your employees, clients and constituents?

Yes _____ No _____

Please explain your process for dissemination:

Is your agency's Title VI Policy Statement and Title VI Complaint process posted on your website?

Yes _____ No _____ If no you must explain:

III. Transportation-related boards or commissions

Does your organization have any advisory groups, boards or commissions?
(if you please list)

Please provide the following demographic information for each advisory group member, board member and/or commission member.

Female		White	
Male		Black or African American	
American Indian/ Alaska Native		Native Hawaiian/ other Pacific Islander	
Asian		Hispanic	
Other			

Describe the recruitment and membership selection process (Attach by-laws).

What steps are taken to ensure diversity (females and minorities)?

IV. Procurement of Contracts

Describe the methods used to notify minority, female, and ConnDOT certified Disadvantaged Business Enterprise (DBE) firms of procurement opportunities with your organization? *(A listing of certified ConnDOT DBE firms can be found on the ConnDOT website at www.ct.gov/dot under "Doing Business")*

Are contractors /consultants/vendors clearly aware of your commitment to Title VI compliance?
 Yes _____ No _____

How are consultants/contractors/vendors monitored for Title VI compliance?

Indicate the dollar amount of contracting/purchasing awards to minority owned and female owned businesses.

Ownership	\$ of Awards	Ownership	\$ of Awards
Female (all)		Male (all)	
American Indian/ Alaskan Native		Native Hawaiian/ Other Pacific Islander	
Asian		Hispanic	
Black/African American		Social and Economic Disadvantaged	

Please provide the dollar amount of awards on federally-aided transportation contracts to ConnDOT certified DBE firms.

(List only ConnDOT certified DBE Firms)

Ownership	Dollar Amount	Ownership	Dollar Amount
Female (Total)		Minority (Total)	
American Indian/ Alaskan Native		Native Hawaiian/ Other Pacific Islander	

Asian		Hispanic	
Black/African American		Social and Economic Disadvantaged	

Do your second party contracts contain the required non-discrimination language?
(Please provide a copy of the language)

V. Public Involvement

Provide documentation describing efforts to identify and reach out to minority and low income communities within your service area:

Provide a description of the methods used to inform low-income and minority communities of planning efforts relating to services, changes and improvements:

Provide a written statement describing how minority, low-income, elderly, and disabled persons are afforded an opportunity to participate in local decision making processes that demonstrates the effectiveness of this participation.

Describe how minority media sources are appropriately included in all notification processes for public meetings/hearings or to review public agency documents.

Describe how meeting locations and meeting formats encourage or facilitate participation by minorities, low-income and other traditionally under-served populations.

List major transportation projects that were planned or programmed during the last two years where social, environmental, economic or demographic adverse impacts were identified.

VI. Complaints

How are customers and beneficiaries made aware of their rights under Title VI including the right to file a complaint? Yes___ No___

Provide a copy of complaint procedures, as well as the form used to log and track complaints.

Is your agency's Title VI complaint process posted on your website?
Yes___ No___ If no you must explain:

Have there been any complaints of Title VI violations on the basis of race, color, and national origin in your agency during the past three years? Yes___ No___

If so, were the complaints investigated? Yes___ No___
Please provide a copy of the complaint, the summary and findings and the complaint disposition.

1. If "no" provide a reason for not investigating the complaint.

VII. Title VI Assurance and Required Signatures

As required by your contractual agreement with the Connecticut Department of Transportation.
(your agency name) _____ shall comply with the requirements under Title VI and all other applicable federal and state Nondiscrimination laws and regulations.

DECLARATION OF RESPONDENT: I declare that I have completed this survey to the best of my knowledge and believe it to be true and correct.

Title VI Coordinator

Date

DECLARATION OF ADMINISTRATIVE HEAD: I declare that I have reviewed and approved the information provided in this survey and to the best of my knowledge; and believe that it is true, correct and complete.

Administrative Head

Date



CONNECTICUT DEPARTMENT OF TRANSPORTATION

POLICY STATEMENT

POLICY NO. EX.O.-27
August 23, 2011

SUBJECT: Title VI

The Connecticut Department of Transportation (Department) will effectuate the provisions of Title VI of the Civil Rights Act of 1964, as amended (42 USC Section 2000d), 49 CFR Part 21, and 23 CFR Part 200, FTA Circular 4702.1.A and other nondiscrimination directives. The Department prohibits discrimination on the basis of sex, age and disability and will make every effort to ensure that no person shall, on the ground 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 from the United States Department of Transportation. The Airport and Airway Improvement Act of 1982 (49 U.S.C. § 47123) added "sex" and "creed" as protected status in all Federal Aviation Administration activities. The Department further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not. The Department has developed a Title VI discrimination complaint process that is compliant with the Title VI requirements.

Special emphasis areas include the following programs:

Construction/Maintenance
Design
Planning and Research
Contract/Agreement Processing, Prequalification, and Award
Rights of Way
Environmental Planning
Education and Training
Transit and Ridesharing
Rails

The Commissioner, as Chief Executive Officer of the Department, has the overall responsibility for carrying out the Department's commitment to the Title VI Program. The Title VI Program is a Department wide initiative, and all managers, supervisors, and employees share the responsibility of ensuring compliance.

The Title VI Program implementation responsibilities have been delegated to the Department's Bureau Chiefs. The Bureau Chiefs will designate Title VI Liaisons who will be responsible for the day-to-day collection, analysis, and reporting of Title VI related data. The Title VI Liaisons will conduct compliance and program reviews to ensure that the Department is adhering to the procedures outlined in the Department's Title VI Implementation Plan.

The Office of Contract Compliance is responsible for the Department's Title VI Program activities, including coordinating procedures, overseeing implementation, and monitoring and reporting progress. The Manager of the Office of Contract Compliance has been designated as the Department's Title VI Coordinator, and can be reached at (860) 594-2169. The Office of Contract Compliance is located at 2800 Berlin Turnpike, Newington, CT 06131.

As Commissioner of this Department, I am personally committed to the effective implementation of the Department's Title VI Program. It is expected that all agency personnel will fully cooperate with the Title VI Coordinator in the implementation of the procedures outlined in the Title VI Implementation Plan.

(This Policy Statement supersedes Policy Statement No. EX.O.-27 dated September 22, 2008).

A handwritten signature in black ink, appearing to read "James Redeker", is written over a horizontal line.

James Redeker
Acting Commissioner

AUTHORITIES

- Title VI of the Civil Rights Act of 1964, as amended (42 USC 2000d to 2000d-4);
- Federal Transit Laws, as amended (FTA C 4702.1A) – This Circular delineates the Federal Transit Administration’s (FTA) Title VI requirements;
- Title VIII of the Civil Rights Act of 1968, as amended (42 USC 3601-3619) – This Act is known as the *Fair Housing Act* and Title VIII of this Act prohibits discrimination with respect to the sale or renting of housing;
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC 4601-4655) – This Act is known as the Uniform Act and provides for the uniform and equitable treatment of persons displaced from their homes, businesses, or farms by Federal and federally assisted programs and establishes uniform and equitable land acquisition policies for Federal and federally assisted programs;
- Section 504 of the Rehabilitation Act of 1973, as amended (29 USC 794) – *No otherwise qualified individual with a disability in the United States shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance* (cite taken from 49 CFR 27.1);
- 23 USC 109(h) – Requires the promulgation of guidelines intended to ensure that *possible adverse economic, social, and environmental effects relating to any proposed project on any Federal-aid system have been fully considered in developing such project, and that the final decision on the project are made in the best overall public interest....*;
- 23 USC 324 – Prohibits discrimination on the basis of sex;
- 23 CFR 200 – This part delineates the Federal Highway Administration’s (FHWA) Title VI regulation;
- 23 CFR 450 & 49 CFR 613 – “Planning Assistance and Standards” (October 28, 1993, unless otherwise noted);
- 23 CFR 771 – Joint FTA/FHWA regulation: “Environmental Impact and Related Procedures” (August 28, 1987);
- 28 CFR 42, Subpart F (Department of Justice regulation) – “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted);
- 49 CFR 21 – “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964, as amended” (June 18, 1970, unless otherwise noted);
- DOT Order 5610.2 – “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations” (EJ) (April 15, 1997);
- DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons (LEP) (December 14, 2005).

Sub-Recipient Monitoring

In an effort to ensure that sub-recipients are complying with the requirements under Title VI, the Department has developed a Title VI Compliance Assessment survey. This document will be mailed to sub-recipients receiving funding under the 5310, 5311, 5316 and 5317 programs. The Division of Contract Compliance will be responsible for mailing the surveys and the Bureau of Public Transportation will be responsible for providing the listing of sub-recipients. The survey will go out every two years.

The Department will use the assessments to obtain information about the Title VI processes that have been put into place by ConnDOT sub-recipients. We will be reviewing the surveys to determine if the sub-recipients have implemented the necessary processes and procedures to insure compliance with Title VI, Environmental Justice and Limited English Proficiency. The responses will also be used to determine the training needs for sub-recipients.

In addition to the survey that is mailed to each sub-recipient they also receive an "Information Packet" which includes a copy of the ConnDOT Title VI Policy Statement; the ConnDOT Discrimination Complaint process and procedure and all applicable forms; LEP Implementation Plan Guidance for Sub-recipients; a copy of the ConnDOT Title VI Poster and Brochure; and Title VI information posted on ConnDOT's webpage. Sub-recipients have the option of developing their own Title VI, LEP/EJ processes as long as they meet the requirements of the FTA Circular 4702.I A; or may state that they will adopt the program developed by ConnDOT.

2010 Survey Assessments Results

The initial survey was mailed on July 31, 2009 with a due date of September 1, 2009, the second request was mailed on December 10, 2009 with a due date of January 15, 2010, and the third request was mailed on February 17, 2010 with a due date of March 15, 2010. Multiple requests went out due to the lack of response by the recipients.

We received numerous calls from sub-recipients who had a multitude of questions. Some did not understand the applicability of Title VI to their program activities, many were looking for guidance as to what they needed to do, and some were not familiar with Title VI or thought that it had to do with nondiscrimination in employment. Most were not familiar with EJ and LEP. After reviewing the submissions and the types of questions that were being asked, it was determined that the need for Title VI training for sub-recipients was necessary.

On June 2, 2010, a three hour Sub-recipient Title VI training workshop was conducted by the Division of Contract Compliance. The training was held at the Connecticut Department of Transportation and was very well attended. The topics covered during the training included the following:

- What is Title VI and your Responsibilities as a Sub-recipient
- What is Environmental Justice and your Responsibilities as a Sub-recipient
- What is Limited English Proficiency and your responsibilities as a Sub-recipient
- How does Title VI impact what you do

- Roles and Responsibilities Under Title VI
- Notification to Beneficiaries
- Title VI Assurances and Posters
- Website Information
- Title VI Contract Clauses
- Title VI Sub-recipient Assessments
- What is a Title VI Complaint/How to Process a Title VI Complaint
- Public Involvement and Participation
- Engaging LEP and EJ Populations
- Public Hearings/Meetings

Assessment Surveys went out to a total of 94 Sub-recipients, 79 responses were received; 15 sub-recipients did not respond. The response rate was 84%, and the failure rate was 16%.

In reviewing the documents the following four major areas were reviewed:

- Do you have Environmental Justice/Limited English Plans
- Do you have a Title VI Policy
- Do you provide Notices to Beneficiaries of their rights under Title VI
- Do you plan to adopt ConnDOT's Title VI Program

LEP/EJ Plans - 38% said that they had plans; 13% said that they were currently developing plans; 38% indicated that they did not have plans; and 11% did not respond to the question.

Title VI Policy – 54% said they had a policy; 9% said no; and 37% did not respond to the question.

Provide Notice to Beneficiaries – 41% said they had; 25% said that they were in the process; 19% said no; and 15% did not respond to the question.

Adopt ConnDOT's Title VI Program – 54% said yes; 5% said they were in the process; 13% said no; and 28% did not respond to the question.

The Department is looking a ways to insure that all sub-recipients are compliant with Title VI. We will be providing additional training for sub-recipients and we are also looking into the feasibility of a web-based training tool.

TITLE VI/TITLE VIII COMPLAINT INVESTIGATION PROCESS

WHAT IS AN INVESTIGATION?

An investigation is an official inquiry for the purpose of determining whether there has been a violation of the laws or statutes and includes a determination of appropriate relief where a violation has been found. An investigation requires an objective gathering and analysis of the evidence, which will ensure that the final decision is as accurate as possible.

ROLE OF THE INVESTIGATOR

The investigator is a neutral party provided by the agency to conduct an investigation of the issues raised in a complaint. The investigator's behavior, demeanor, and attitude reflect the agency and may affect the degree of cooperation received from the parties. The investigator has an obligation to identify and obtain relevant evidence from all available sources in order to resolve all of the issues under investigation. *The investigator is not an advocate for the complainant or the respondent.* The investigator is a neutral fact finder.

RESPONSIBILITIES OF THE INVESTIGATOR

The Investigator MUST:

- Never express his/her opinions;
- Never tell the parties that the complaint represents a good case or that the complaint is frivolous;
- Always remain NEUTRAL. DO NOT take sides;
- Write the FACTS. State what the facts are based upon the evidence or testimony;
- Stay in control at all levels of the process;
- Decide who is to be interviewed. If the Complainant or the Respondent is adamant about a witness interview, perform the interview;
- Decide when sufficient evidence has been gathered to begin writing the investigative report;
- Always remain professional and polite;
- Be patient; and
- Be a good listener.

THEORIES OF DISCRIMINATION

A Theory of Discrimination refers to the Type of Discrimination:

- INTENTIONAL DISCRIMINATION/DISPARATE TREATMENT – The decision maker was aware of the complainant's race, color, national origin, sex, age, or disability and acted at least in part because of that information. The action was taken because of the complainant's race, color, national origin, sex, age; or disability;
- DISPARATE/ADVERSE IMPACT – Discrimination which occurs when a neutral policy or procedure has a disproportionate impact on a protected class. The practice, even though applied equally to all, has the effect of excluding or otherwise adversely affecting a particular group; and

- **RETALIATION** – Discrimination against persons because of the filing of a complaint, participation in an investigation, or opposing a practice made unlawful pursuant to the laws.

ELEMENTS OF PROOF

HOW DOES THE INVESTIGATOR PROVE DISCRIMINATION:

- **ESTABLISH A PRIMA FACIE CASE** – The complainant has the responsibility of initially establishing a prima facie case of discrimination. A prima facie case means that the complainant has provided information, which contains all of the elements necessary for a complaint of discrimination. Establishing a prima facie case requires the following elements:
 1. Complainant is a member of a protected group;
 2. Complainant was harmed by some decision; and
 3. Similarly situated persons of a different group were not or would not have been harmed under similar circumstances.

These elements constitute an ideal complaint of discrimination and establish a prima facie case. However, in many situations, the Investigator will not initially have all of these elements. It is the Investigator's responsibility to obtain from the complainant all missing information.
- **DURING THE INVESTIGATION** – One of the 1st items that must be determined by the Investigator from the Respondent is the reasons for the Respondent's actions against the Complainant. In other words, establish the Respondent's legitimate non-discriminatory reasons for the actions taken against the Complainant. The Investigator must also obtain evidence to determine whether Respondent's reasons are true based upon the evidence or whether the reasons are an excuse (pretext) to discriminate against the Complainant.
- **OBTAINING THE EVIDENCE** -- During the investigation, the Investigator should obtain the following types of evidence:
 1. Respondent's policies and procedures;
 2. Evidence establishing actions taken against the Complainant;
 3. Evidence establishing how others, not in the Complainant's group, were treated in similar situations;
 4. Evidence establishing the normal policies and procedures and how Respondent followed or did not follow the normal policies and procedures when making the decision/action involving the Complainant;
 5. Evidence establishing whether Respondent followed the normal policies and procedures for similarly situated persons; and
 6. A position statement from the Respondent outlining the reasons for the action taken against the Complainant.

EXAMPLES OF ELEMENTS OF PROOF

INTENTIONAL DISCRIMINATION –

- Complainant is a member of a protected group;
- Complainant was excluded from participation in or denied the benefits of a program or activity receiving federal financial assistance;
- Complainant was rejected despite his/her eligibility;
- Respondent selected applicants, whose race, color, national origin, sex, age, or disability were different from the Complainant; or
- The Program remained open and the Respondent continued to accept applications from applicants of a different race, color, national origin, sex, age, or disability than the Complainant.

DISPARATE/ADVERSE IMPACT –

- Respondent has a facially neutral policy or practice that has affected the Complainant;
- The policy or practice operates to disproportionately exclude members of the protected group;
- The policy or practice is a business necessity; or
- There is an effective business alternative with a less adverse impact.

RETALIATION –

- Complainant opposed any policy or practice made unlawful or participated in any manner in an activity pursuant to the laws prohibiting discrimination;
- The individual who allegedly retaliated against Complainant knew or should have known of the opposition or participation;
- An adverse action was taken against the Complainant subsequent to the protected activity;
- There was a *causal connection between the opposition or participation and the decision made involving the Complainant;
- There was a legitimate, non-discriminatory reason for the action taken; or
- The articulated reason is a pretext for retaliatory discrimination.

*Causal connection: To establish a causal connection, establish the following –

- Did the treatment of the Complainant change after the protected activity;
- Time line: How long after the initial protest did the adverse action occur; and
- Compare the Complainant's treatment with others who were not engaged in the protected activity.

COMPLAINT PROCESS

All Title VI complaints will be filed in accordance with the following Title VI Complaint Procedures:

Any person alleging to be aggrieved by a discriminatory practice may in person or through a legal representative, obtain a Title VI Complaint Reporting Form, fill it out and file said complaint with the Title VI Coordinator or the Public Transportation Bureau Head:

- Within 180 days following the date of the alleged discriminatory action;
- The date when the person(s) became aware of the alleged discriminatory action.

Alternatively, the Title VI Specialist may complete the Complaint Reporting Form and attach the Complainant's letter.

The Department's Title VI Coordinator will be notified of all Title VI complaints. The Title VI Coordinator will review the complaint and inform the appropriate Program Area Designee. Complaints must be in writing, signed by the Complainant or representative, and include the Complainant's name, address, and telephone number, or other means by which the Complainant may be contacted. Complaints shall explain as fully as possible the facts and circumstances surrounding the alleged discriminatory action, and identify the individual(s) and/or organization(s) responsible for the alleged discriminatory action. In cases where the Complainant will be assisted in converting an oral complaint into a written complaint, the Complainant is required to sign the written complaint. Signed allegations of discrimination received by facsimile or e-mail will be acknowledged and processed. Complaints received by telephone will be reduced to writing and provided to the complainant for confirmation, revision and signature before processing (see attachment A).

The Title VI Coordinator or the Bureau Head receiving the written complaint will review the written complaint to ensure that the required information is provided, the complaint is timely, and is within the appropriate jurisdiction. The complaint will be accepted unless it is withdrawn, is not filed timely, or the Complainant fails to provide the required information after a written follow-up request for the missing information.

Issues that do not involve discrimination or are not based upon a protected basis will not be directed to the appropriate entity. Individuals should never be discouraged from filing a written complaint.

Complaints Filed Against The Department

Written complaints filed with ConnDOT in which ConnDOT is named as the Respondent will be forwarded to the FTA for processing. The allegation(s) will be analyzed by FTA and the Complainant will be notified by FTA of the status of the complaint. The Title VI Specialist may conduct an independent evaluation regarding affected Department policy and may direct actions be taken within the Department to address any policy deficiencies.

Complaints Filed Against A Sub-recipient

Written complaints filed with the ConnDOT in which a ConnDOT sub-recipient (i.e., contractor, subcontractor, consultant, sub-consultant, or other sub-recipient) is named as the Respondent will be analyzed and investigated by the Title VI Coordinator. The Title VI Coordinator may forward a complaint against a sub-recipient to the FTA for investigation. Once the investigation has been conducted and the investigative report (IR) written, the Title VI Coordinator will forward a copy of the complaint and a copy of the IR within sixty (60) days of the complaint date of receipt by the Department to the FTA Civil Rights Coordinator.

A complaint log will be maintained for all complaints filed with and investigated by the Department (see Attachment B). The Investigator will advise the Complainant of his/her rights under Title VI, Title VIII, and related statutes.

The Respondent is notified by the Department that he/she has been named in a complaint. The letter will indicate the Investigator's name and inform the Respondent that he/she will be contacted for an interview. The complaint investigation will be completed within forty (40) days of the date of receipt.

INVESTIGATION PROCESS

The Investigative Process includes the following documents/actions:

- INVESTIGATIVE PLAN
- REQUEST FOR INFORMATION
- CONDUCTING INTERVIEWS
- ON-SITE VISIT
- OBTAINING EVIDENCE
- ANALYZING DATA
- WRITING THE INVESTIGATIVE REPORT

INVESTIGATIVE PLAN

The Investigative Plan is a working document intended to define the issues and provide a roadmap to complete the investigation. The Investigative Plan is an internal document for use by the Investigator and his/her supervisor to keep the investigation on track and focused on the issues. It is the Investigator's checklist. The following elements should be contained in an Investigative Plan:

- I. Complainant(s) Name and Address/ Attorney For Complainant with Name and Address
- II. Respondent(s) Name and Address/ Attorney For Respondent with Name and Address
- III. Applicable Law (i.e., Title VI, Title VIII, Compliance Review Under Regulations)
- IV. Basis
- V. Issue(s)
- VI. Background
- VII. Name of Person(s) to be Interviewed, including Questions for the Complainant, Respondent, and Witness(es)
- VIII. Evidence to be Obtained During the Investigation

REQUEST FOR INFORMATION

To prepare the Request for Information (RFI), refer to the Evidence section of the Investigative Plan. The RFI is sent to the appropriate official(s) at the Respondent's facility. Contact the Respondent to advise him/her of the complaint and to determine the appropriate official(s) to whom the RFI should be sent and eventually interviewed.

Prepare a cover letter to transmit the RFI. The cover letter should explain the process and provide information regarding any meetings that have been scheduled. Modify the cover letter to satisfy the circumstances. Provide the RFI to the Respondent prior to conducting the on-site visit. This will facilitate the availability of the evidence during the on-site visit.

CONDUCTING INTERVIEWS

When preparing for the interviews, the main objective is to obtain information from witnesses who can provide information that will either support or refute the allegations. A list of major questions will be prepared that address the issues involved in the complaint. During the interview, the following steps will be followed:

- Introduce yourself and outline the interviewing process (i.e., whether a signed statement will be requested, whether notes will be taken, etc.);
- Place the person being interviewed at ease;
- Listen effectively;
- Differentiate factual information from opinions;
- Ask questions best worded to provide factual responses;
- Take clear and precise notes; and
- Obtain a signed statement from the person being interviewed.

COMPLAINANT – The purpose of interviews is to gain a better understanding of the situation outlined in the complaint of discrimination. The Investigator needs to contact the Complainant to ensure that he/she understands the Complainant's allegation(s). It is recommended that the Investigator interview the Complainant prior to preparing the Investigative Plan. If this is not possible, be ready to make any changes as appropriate to the Investigative Plan based upon any new information provided by the Complainant. Always inquire of the Complainant whether he/she desires to resolve the complaint.

RESPONDENT – Respondents are interviewed to provide an opportunity to respond to the allegations raised by the Complainant as well as to provide the Investigator the opportunity to understand the Respondent's operation or policies that Complainant cites in the complaint. As the keeper of the records, you will need to discuss the RFI with the Respondent and be able to explain the need for requesting any document on the list. Inform the Respondent that he/she has the right to submit a formal position statement addressing the Complainant's allegations. Question the Respondent regarding possible settlement opportunities.

WITNESSES – Complainant or Respondent may request that additional persons be interviewed. Determine what relevant information, if any, a witness has to provide prior to conducting an interview. Only interview persons who have information relevant to the allegations raised in the complaint of discrimination. Determine whether the testimony to be provided is relevant. Determine when sufficient interviews have been conducted.

ON-SITE VISIT

An On-Site visit will be conducted when:

- Personal contact with the Complainant and the Respondent may yield information and clarification that might not otherwise be discovered by only reviewing the written documents or telephone contacts;
- It is necessary to review the physical environment;
- More effective communication can be established with representatives and witnesses of the Complainant and Respondent; and

- Documentation can only be examined on-site for reasons of convenience, cost, format, or volume.

OBTAINING EVIDENCE

Evidence requested shall be related to the issues cited in the complaint. An evidence request may contain some or all of the following:

- The policies and procedures regarding the practice that Complainant has alleged;
- All documents relating to Respondent's dealing with Complainant in the situation described in the complaint;
- Documents which exhibit how others, not in the Complainant's group, were treated under similar circumstances;
- Respondent's reason(s) for the action taken; and
- A formal position statement from Respondent addressing Complainant's allegations.

The Types of Evidence include the following:

- **CIRCUMSTANTIAL EVIDENCE** – Includes facts from which may be inferred intent or discriminatory motive and proves intent by using objectively observable data;
- **COMPARATIVE EVIDENCE** – A comparison between similarly situated individuals;
- **DIRECT EVIDENCE** – Related to the Respondent's motive, it is defined as any statement or action by an official of the Respondent that indicates a bias against members of a particular group;
- **DOCUMENTARY EVIDENCE** – Written material, which is generated during the course of normal business activity;
- **STATISTICAL EVIDENCE** – Statistics, facts, or data of a numerical type, which are assembled, classified, and tabulated so as to present significant information about a given subject; and
- **TESTIMONIAL EVIDENCE** – Evidence which is provided orally.

ANALYZING DATA

Data will be analyzed to determine whether a violation has occurred. When analyzing data, you must:

- Review what happened to the Complainant;
- Compare Complainant's treatment with the appropriate policies and procedures;
- Compare Complainant's treatment with others in the same situation;
- Review Respondent's reason(s) for the treatment afforded the Complainant; and
- Compare Respondent's treatment of the Complainant with the treatment afforded others.

WRITING THE INVESTIGATIVE REPORT

The Investigative Report (IR) will contain the following sections:

- Complainant(s) Name and Address
- Respondent(s) Name and Address

- **Applicable Law**
- **Basis**
- **Issues**
- **Findings For Each Issue with a corresponding Conclusion For Each Issue**
- **Recommended Decision**
- **Recommendations (If Applicable)**

Connecticut Department of Transportation TITLE VI DISCRIMINATION COMPLAINT FORM

Complainants Name: _____

Street Address: _____

City/State/Zip: _____

Phone: _____

Discrimination because of: Race/ Color/ National
Origin/ Sex/ Age/ Disability/ Creed(FAA only)/ Other

Please provide the date(s) and location of the alleged discrimination, the name(s) of the individual(s) who allegedly discriminated against you including their titles (if known).

Please provide the names, addresses and telephone numbers of any witnesses.

Explain as briefly and as clearly as possible what happened, how you feel that you were discriminated against and who was involved. Please include how other persons were treated differently from you.

Signature: _____

Date: _____

You may use additional sheets of paper if necessary. Also include any written materials pertaining to your complaint.

If you believe that a Federal Transit Administration (FTA) recipient has retaliated against you, immediately contact the FTA to investigate your allegation. Filing a complaint does not prevent an individual or group from seeking remedy through other sources.

Who may file a Title VI complaint?

A complaint may be filed by any individual or group that believes that they have been subjected to discrimination or retaliation based on their race, color, national origin, sex, age, disability/handicap and/or income level. The complaint may be filed by the affected party or a representative, and must be in writing.

What information do I include in my complaint?

A signed, written complaint should be filed within 180 days of the date of the alleged discrimination, including:

- Your name, address and telephone number. If you are filing on behalf of another person, include their name, address, telephone number and your relation to that person.
- The name and address of the agency, firm or department you believe discriminated against you.
- Your signature.
- A description of how, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged acts.
- The names of individuals whom you allege discriminated against you if you know them.
- The names of any persons, if known, that can be contacted for additional information to support or clarify your allegations.

How can I file a discrimination complaint?

If you believe that a USDOT recipient has discriminated against you or others protected by Title VI, you may file a complaint. Complaints may be filed with any of the following person:

Debra Goss, Title VI Coordinator
CT Department of Transportation
Newington, CT 06131-7546
Tel: (860) 594-2169

Complaints may also be filed directly with the United States Department of Transportation (USDOT). For information on how to file a complaint directly with USDOT please contact Ms. Debra Goss.

Your Rights Under Title VI of the Civil Rights Act of 1964

TITLE VI

"No person in the United States shall, on the ground 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." (42 U.S.C. 2000d)

This brochure is designed to assist you to understand your rights under the Title VI of the Civil Rights Act of 1964.

**STATE OF CONNECTICUT
DEPARTMENT OF TRANSPORTATION**

What is Title VI?

Title VI of the Civil Rights Act of 1964 is the Federal Law that protects individuals and groups from discrimination on the basis of their race, color, and national origin in programs and activities that receive Federal financial assistance. However, USDOT's reference to Title VI includes other Civil Rights provisions of Federal statutes and related authorities to the extent that they prohibit discrimination in programs and activities receiving Federal financial assistance.

Title VI Policy

Pursuant to Title VI of the Civil Rights Act of 1964, the Restoration Act of 1987 and other nondiscrimination authorities, it is the policy of ConnDOT that discrimination on the ground of race, color, national origin, disability/handicap, sex, age, or income status shall not occur in connection with programs or activities receiving financial assistance from the USDOT.

The Connecticut Department of Transportation will ensure that no person in the United States shall, on the grounds of race, color, national origin, sex, age or disability 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 from the USDOT.

Title VI Compliance

Title VI compliance is a situation where a recipient has effectively implemented all the Title VI requirements or can demonstrate that every good faith effort has been made toward achieving this end.

USDOT Recipient

A USDOT Federal-aid recipient is any State, territory, possession, political subdivision, instrumentality, public or private agency, organization, entity or individual to whom USDOT assistance is extended either directly or through another recipient.

Programs Covered

Federally-assisted programs include any USDOT Project, program or activity for the provision of services, financial aid, and other benefits. This includes education or training, work opportunities, health,

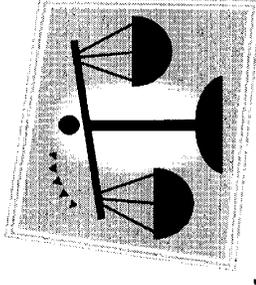
welfare, rehabilitation, housing or other services, whether provided directly by the recipient or other agents, through contracts or other arrangements with the recipient.

What discrimination is prohibited by the ConnDOT Title VI Program?

Discrimination under our Title VI program is an act (action or inaction) whether intentional or unintentional, through which a person or group, solely because of race, color, national origin, disability/handicap, sex, age, or income status has been otherwise subjected to unequal treatment or impact, under any program or activity receiving financial assistance from USDOT.

In operating USDOT-assisted programs, a recipient cannot discriminate either directly or through contractual or other means by:

- Denying programs services, financial aids, or other benefits;
- Providing different program services, financial aids or other benefits, or providing them in manner different from that provided to others;
- Segregating or separately treating individuals or groups in any matter related to the receipt of any program service, financial aid or benefit;
- Restricting in any way the enjoyment of any advantage or privilege enjoyed by others receiving any program service, financial aid or other benefits;
- Denying person(s) the opportunity to participate as a member of a planning, advisory or similar body,
- Denying person(s) the opportunity to participate in the program through the provision of services, or affording the opportunity to do so differently from those afforded others.



State of Connecticut Department of Transportation
Division of Contract Compliance

TITLE VI COMPLAINT REPORTING FORM

Reviewer: _____ Date: _____

Complainant Information	
Name:	Race: Sex:
Street Address:	City: State: Zip:
Home Phone:	Work Phone:

Complaint Details:

Discrimination based on:
Race _____ Color _____ National Origin _____ Sex _____ Age _____ Disability _____ Other _____

Signature of Complainant: _____ Date: _____

Signature of Reviewer: _____ Date: _____

TITLE VI LOG

<u>Complainant's Name</u> _____	<u>Race/Sex/Color/National Origin/Age/Disability</u>	<u>Date Received</u>
<u>Investigated by:</u>	<u>Date to ConnDOT/FTA:</u>	
<u>Allegations:</u>		
<u>Findings:</u>		
<u>Disposition:</u>		
<u>Date of Deposition:</u>		

<u>Complainant's Name</u> _____	<u>Race/Sex/Color/National Origin/Age/Disability</u>	<u>Date Received</u>
<u>Investigated by:</u>	<u>Date to ConnDOT/FTA:</u>	
<u>Allegations:</u>		
<u>Findings:</u>		
<u>Disposition:</u>		
<u>Date of Disposition:</u>		

Section XVI
Requested Additional Info.

Connecticut Department of Transportation Corrective Action Plan Status Report

Access to Service by Persons with LEP

Requirement: Submit complete four-factor analysis and language implementation plan.

Action Taken: The four-factor analysis process has been initiated; the methodology for the analysis has been developed. Factors 1 and 2 were submitted to FTA for review and are included as part of the Title VI program. Factors 3 and 4 are included as part of the Title VI Program. The Department currently has a consultant under contract that will be assisting the department with the enhancement to the Department's LEP Program.

Inclusive Public Participation

Requirement: Submit Summary of activities since last update.

Action Taken: The Department has included a listing of all public meetings covering June 1, 2009 through August 1, 2011 in the Title VI Program. The Department has taken steps to insure that as part of our public outreach that we develop targeted strategies to reach out to minority, low income and LEP populations. These strategies are outlined in the Title VI program.

Procedures the agency uses to pass through financial assistance in a non-discriminatory manner

Action Taken: The Department submitted a listing of funding proposals originally submitted as part of the 2010 State Management Reviews, for sections 5310, 5311, 5316 and 5317 to FTA on May 11, 2011. The Department is also in the process of updating the nondiscrimination language for the sections 5310, 5311, 5316 and 5317 of the State Management Plan. This information will be submitted to FTA immediately upon completion by the consultant.

Technical Assistance in a non-discriminatory manner:

Requirement: Submit process used by ConnDOT to provide technical assistance to ensure non-discrimination.

Action Taken: The Department is also in the process of updating the technical assistance language for the sections 5310, 5311, 5316 and 5317 of the State Management Plan. This information will be submitted to FTA immediately upon completion by the consultant.

Monitoring subrecipients for compliance with Title VI

Requirement: Describe monitoring for compliance

Action Taken: The Department is in the process of updating the monitoring language for the sections 5310, 5311, 5316 and 5317 of the State Management Plan. This information will be submitted to FTA immediately upon completion by the consultant. The Department mailed a notice to subrecipients/grantees requesting information regarding their compliance and implementation of Title VI. Included with the notice they were provided with information packet that included information regarding their Title VI requirements and responsibilities and sample guidance on compliance. This information was submitted to FTA on June 1, 2011, and is included as part of the Title VI Program.

Urbanized Areas with Populations of 200,000 People or Greater

Requirement: Access to Services by persons with LEP

Action: The four-factor analysis process has been initiated; the methodology for the analysis has been developed. Factors 1 and 2 were submitted to FTA for review and are included as part of the Title VI program. Factors 3 and 4 are included as part of the Title VI Program. The Department currently has a consultant under contract that will be assisting the department with the enhancement to the Department's LEP Program.

Inclusive Public Participation:

Requirement: Submit a summary of activities since last update

Action: The Department has included a listing of all public meetings covering June 1, 2009 through August 1, 2011 in the Title VI Program. The Department has taken steps to insure that as part of our public outreach that we develop targeted strategies to reach out to minority, low income and LEP populations. These strategies are outlined in the Title VI program.

Equity and Evaluation of Service and Fare Changes

Requirement: Existing policy submitted without Title VI considerations

Action: Submitted to FTA on July 15, 2011, and is included as part of the Department's Title VI Program.

Monitoring

Requirement: Resubmit a comprehensive service monitoring procedure and the results of such monitoring.

Action: The monitoring review process is included as part of the Department's Title VI Program. The results of the monitoring review will be submitted upon approval by FTA of the proposed process and completion of the assessment.

Metropolitan Planning Organizations

Requirement: Access to services by Persons with LEP

Action: The final report has been completed and was submitted to FTA on September 9, 2011. This information is included as part of the Department's Title VI Program.

Notifying beneficiaries of their rights under Title VI

Requirement: Title VI notices and complaint process

Action: The Department submitted copies of the MPO's notices and complaint procedures to FTA on September 9, 2011. This information is included as part of the Department's Title VI Program.

Inclusive Public participation

Requirement: Submit information on outreach activities and actions to encourage public participation

Action: Action: The Department submitted copies of the MPO's public outreach plans to FTA on September 9, 2011. This information is included as part of the Department's Title VI Program.

CONNECTICUT DEPARTMENT OF TRANSPORTATION
TITLE VI CORRECTIVE ACTION PLAN
MARCH 2011

This action plan is being submitted to the Federal Transit Administration (FTA) to address deficiencies presented to the Connecticut Department of Transportation (ConnDOT) as a result of the 2007 and 2010 Triennial and State Management Reviews, FTA's 2008 Title VI Review, and FTA's review of the Department's June 2009 submission of ConnDOT's Title VI Report. The aggregate deficiencies were presented as the recent Title VI Checklist provided by FTA to ConnDOT. This report will follow that format.

ConnDOT intends to fully comply with the requirements of 49 CFR Part 21 and the implementation guidance provided by FTA. ConnDOT proposes to take the following actions for each of the major categories – State DOTs, Urbanized Areas and Metropolitan Planning Organizations - and provide the indicated deliverables on the schedules noted below for each action item.

1.0 - Title VI Checklist – State DOTs

1.1 - Requirement: Access to Service by Persons with LEP

Corrective Action Requested by FTA: Submit complete four-factor analysis and language implementation plan

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: All relevant mapping has already been submitted to FTA. In the small urbanized areas under 200,000 in population where ConnDOT is a transit operator, and for the non-urbanized areas where ConnDOT is the designated FTA recipient and provides funding to subrecipients, this mapping should suffice.

Below is a draft outline of the planned actions for each factor of Four-Factor Analysis, submitted for FTA review and comment. This draft does outline current ongoing LEP language assistance activities undertaken by ConnDOT and its subrecipients. Tasks are laid out below to develop further definition within each factor, and any further modification of the outline can be made based upon comments received during the FTA review of the outline.

Factor 1. The number and proportion of LEP persons served or encountered in the eligible service population.

- The Department uses the US Decennial Census as the primary base data to identify LEP populations within the areas where services are provided. By juxtaposing the census data with our transportation framework in GIS mapping software, the Department is able to identify areas with potential language barriers.

Deliverables to FTA: The Department has provided printed copies of GIS maps identifying LEP populations and the Department’s public transportation service areas to FTA.	To FTA: Submitted
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- The Department will review additional data sources, such as, but not limited to, the American Community Survey and results from school district data, and the results will be used as necessary to complement the US Census within the transit service areas.

1.1a	Milestone 1: • Identify applicable additional data sources.	May 20, 2011 (Michael Sanders)
1.1b	Milestone 2: • Working with Debra Goss, Title VI Coordinator (TSC), to determine value and use of the additional data sources.	June 3, 2011 (Michael Sanders)
1.1c	Milestone 3: • Analyze and, if appropriate, produce GIS mapping based upon review of supplemental data.	July 8, 2011 (Michael Sanders)
1.1d	Milestone 4: • Submit any new mapping to Debra Goss, TSC for review.	July 8, 2011 (Michael Sanders)
1.1e	Milestone 5: • Submit any new mapping to FTA.	July 22, 2011 Debra Goss

Factor 2. The frequency with which LEP individuals come in contact with your programs, activities, and services.

- As any additional datasets become available, they will be used as additional layers in the GIS to further aid in the identification of areas that have a high proportion of LEP persons and that intersect with services provided through the Department.
- Frequency of contact will be assessed by surveying sources internal to public transportation operations. These sources include feedback from:
 - Bus Operators
 - Bus Supervisors
 - Bus Customer Service Representatives
 - Bus Public Outreach Staff
 - Rail Conductors
 - Rail Station Personnel
 - Rail Customer Service Staff

These sources were selected because they have direct contact with customers on a daily basis. The survey will be developed in coordination with the Department’s contracted service providers. The contracted service providers include CTTRANSIT, Shore Line East (SLE) customer service staff and Amtrak (SLE service provider) and Metro-North. The survey will include questions identifying language barriers with customers, frequency of contact with LEP individuals and which languages are being spoken.

1.1f	Milestone 1: Develop and submit survey and/or reporting form for review to Debra Goss, TSC.	April 15, 2011 (Michael Sanders)
1.1g	Milestone 2: Begin conducting survey	May 2, 2011 (Michael Sanders)
1.1h	Milestone 3: Complete survey	July 1, 2011 (Michael Sanders)
1.1i	Milestone 4: Submit to FTA	July 29, 2011 (Debra Goss)

- Language tool usage on the websites of the various transit services will be used as an additional tool to assess frequency of contact with LEP populations. The CTTRANSIT website (www.cttransit.com) has, since February 2009, a custom translated mirror site in Spanish (<http://esccttransit.convertlanguage.com/enes/>). Spanish was selected as an alternate language based on historical operator input, similar to the types of feedback that is being collected as part of the outreach effort described in the prior bullet. All other service websites include, at a minimum, the Google Translate toolbar for machine translation of service information. Analysis of website traffic will be used to assess the frequency with which these tools are being used and what information is being accessed.

1.1j	<p>Milestone 1:</p> <ul style="list-style-type: none"> • Issue News Release advertising availability of the Spanish-version of the cttransit.com website and the availability of the Google Translate service. Include Community Based Organizations on the distribution list to assure broader coverage to potential targeted communities. 	<p>March 31, 2011 (Michael Sanders)</p>
1.1 k	<p>Milestone 2:</p> <ul style="list-style-type: none"> • Develop collection methodology to gather data on alternate language websites and use of website language tools in excess of 1% of total website visits. Submit to Debra Goss, TSC for review. 	<p>April 15, 2011 (Michael Sanders)</p>
1.1l	<p>Milestone 3:</p> <ul style="list-style-type: none"> • Conduct two-month collection of data to put into an initial report on visits to alternate language websites or use of website language tools in excess of 1% of total website visits. 	<p>April 29, 2011 (Michael Sanders)</p>
1.1m	<p>Milestone 4:</p> <ul style="list-style-type: none"> • Submit report on frequency of use of alternative language options on websites to Debra Goss, TSC for review. 	<p>May 13, 2011 (Michael Sanders)</p>
1.1n	<p>Deliverable:</p> <ul style="list-style-type: none"> • Submit report on frequency of use of alternative language options on websites to FTA for review. 	<p>June 1, 2011 (Debra Goss)</p>

- The Department will:
 - Consolidate data from the GIS mapping in Factor 1 to locate bus and rail stops in identified potential LEP areas and analyze ridership information within these areas to estimate frequency of contact with LEP populations.
 - Review input from Factor 2 to assess field-related frequency of contact and website –related frequency and level of contact.
- The Department will then prepare a report on level and frequency of contact overall to use in Factor 3 to assess if any additional areas on contact need to be addressed.

1.1o	Milestone 1: <ul style="list-style-type: none"> • Review final products of Factors 1 and 2 for LEP interaction with the various transit service elements 	June 16, 2011 (Michael Sanders)
1.1p	Milestone 2: <ul style="list-style-type: none"> • Submit written report on transit service/LEP interaction and assessment of frequency of contact to Debra Goss, TSC for review. 	June 30, 2011 (Michael Sanders)
1.1q	Milestone 3: <ul style="list-style-type: none"> • Submit written report on transit service/LEP interaction and assessment of frequency of contact to FTA. 	July 22, 2011 (Debra Goss)

Factor 3. Assess the nature and importance of your programs, activities, and services to the LEP population.

- The Department has already made the determination that our public transportation services are important to the LEP populations. The contracted service providers work with a variety of community-based organizations that serve LEP populations. Discussions have included:
 - Safety/security issues
 - Awareness of and use of Department’s language assistance services
 - Suggestions to make riding Connecticut public transportation easier

Beginning in 2005, CTTRANSIT formed partnerships with providers of ESL services in service areas across the state. These include an active role in the Greater Hartford Literary Council and the Hartford Public Library Immigrant Advisory Council, presentations to ESL classes in various areas of the state, and the development and distribution of a Public Service Announcement PowerPoint slideshow that describes how to ride the bus in basic terms, in both English and Spanish.

1.1r

<p>Milestone 1:</p> <ul style="list-style-type: none">• Based upon review of written report on transit service/LEP interaction and assessment of frequency of contact, and any comments from Debra Goss, TSC or FTA, develop a listing of any additional opportunities for interaction and involvement in the community for inclusion in the final LEP Plan.	<p>8/28/11 August 19, 2011 (Michael Sanders)</p>
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Factor 4. The resources available to the recipient and costs

- The Department has undertaken many initiatives to meet LEP responsibilities. The Department has made substantial investments in GIS technology to identify areas that indicate a need for LEP assistance. Recent website revisions have been made to service websites to add machine translation (via Google Translate) to assist LEP individuals. CTTRANSIT has made significant efforts to make resources available to LEP persons:
 - The service website www.cttransit.com has been custom translated for Spanish, the predominant non-English language in all CTTRANSIT service areas.
 - CTTRANSIT has provided system maps that include all “how to ride” information, fare policies and payment options in English and Spanish versions since 2002.
 - In 2007, a Central Connecticut combined system map was produced in English, Spanish and Polish.
 - Interior bus notices that relate to safety, courteous behavior, fare policy, and pass and ticket options are printed in English and Spanish.
 - Printed brochures detailing upcoming service changes and service adjustments are printed in English and Spanish.
 - All notices for public hearings are printed in English and Spanish, and include a note that translators will be present at the meetings to facilitate comments submitted in Spanish.
 - System-wide CTTRANSIT on-board surveys and other service specific surveys are provided in English and Spanish.
 - Courtesy Cards for witness input following an accident are provided in English and Spanish.
 - Spanish speaking customer service staff is available at CTTRANSIT.

- A Spanish speaking operator option is available at the Shore Line East customer service phone number.
- The Department is planning to develop, print and distribute translation cards for use by fixed-route bus operator's at all state-owned transit properties.
- A new process has been developed to include use of GIS data to analyze LEP impacts of proposed service changes during service review meetings.

Currently the Department does not have a financial impediment to provision of needed LEP services.

1.1s	<p>Milestone 1: Based upon review of written report on transit service/LEP interaction and assessment of frequency of contact, and any comments from Debra Goss, TSC or FTA, develop a listing of any additional resources that could be used and include those potential new services in the final LEP Plan with proposed timelines for implementation</p>	<p>8/28/11 August 19, 2011 (Michael Sanders)</p>
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FINAL DELIVERABLE – Limited English Proficiency Plan

1.1t	<p>Deliverable: The final Four-Factor Analysis will reflect work done under factors 1 and 2 and further assessments or programs to develop and implement under factors 3 and 4. Submit to Debra Goss, TSC for review.</p>	<p>8/28/11 September 9, 2011 (Michael Sanders)</p>
1.1u	<p>Submit to FTA for review.</p>	<p>9/16/11 September 30, 2011 (Debra Goss)</p>

1.2 - Requirement: Inclusive Public Participation

Corrective Action: Submit a summary of activities since the last update.

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: For those areas where ConnDOT is the direct recipient responsible for delivering FTA-funded services in small urbanized and non-urbanized areas, ConnDOT will submit a listing of activities and describe how meaningful access was provided since the last report.

1.2a	<p>Milestone 1: Develop a listing of all public meetings since submission of the original Title VI report in June 2009. This will include website postings, on-board bus/rail postings, media notifications, a description of meeting locations to assure relative equity in distribution of meetings in all parts of the service area, etc. This will also include meetings related to service, fares, and projects.</p>	<p>To FTA: 9/16/11 April 29, 2011 (Michael Sanders)</p>
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1.3 – Requirement: Program Administration CH. VI part 2 – Procedures the agency uses to pass through financial assistance in a non-discriminatory manner

Corrective Action: Provide listing of funding proposals from agencies that would use funds to service predominantly minority and/or low-income from 2006-09 and whether these proposals were funded.

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: ConnDOT provided documentation of all approved and rejected applications during the State Management Review process in 2010. ConnDOT will continue to provide a record of approved and rejected applications with grant applications for the various state-managed programs. The listing will identify all applicants including funding applicants that are minority organizations or that provide assistance to minority or low-income communities.

1.3a 1.3a1	<p>Milestone 1: Submit copies of the list of funding proposals originally submitted as part of the 2010 State Management Reviews for sections 5310, 5311, 5316 and 5317.</p>	<p>April 29, 2011 (Michael Sanders) To FTA: May 11, 2011 (Debra Goss)</p>
1.3b 1.3b1	<p>Milestone 2: Submit copies of the relevant non-discrimination language from the existing State Management Plans for sections 5310, 5311, 5316 and 5317.</p>	<p>9/8/11 May 11, 2011 (Michael Sanders) To FTA: 9/16/11 May 25, 2011 (Debra Goss)</p>

1.4 - Requirement: Program Administration CH VI, part 2 - Technical Assistance in a non-discriminatory manner

Corrective Action: Submit process used by CDOT to provide technical assistance to ensure non-discrimination

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: The process for providing technical assistance opportunities is specified in the June 2009 Title VI Report as well as in the respective State Management Plans that document technical assistance offers and opportunities for each program.

1.4a	Milestone 1: Submit copies of the relevant non-discrimination language from the existing State Management Plans for sections 5310, 5311, 5316 and 5317.	9/8/11 May 11, 2011 (Michael Sanders) To FTA: 9/16/11 May 25, 2011 (Debra Goss)
1.4a1		

1.5 - Requirement: Program Administration CH VI, Part 3; Monitoring subrecipients for compliance with Title VI

Corrective Action: Describe monitoring for compliance

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: ConnDOT will describe the monitoring process, how it is required through the agreement process, and how it is monitored and enforced via site visits. In addition ConnDOT will provide actual monitoring results for the most recent surveys of subrecipients. ConnDOT also intends to submit an updated policy statement on agency requirements for collection and monitoring of Title VI-related data.

<p>1.5a</p> <p>1.5a1</p> <p>1.5b</p>	<p>Milestone 1: Submit copies of the relevant language from the existing State Management Plans for sections 5310, 5311, 5316 and 5317 that explain monitoring activities.</p>	<p>9/8/11 May 11, 2011 (Michael Sanders)</p> <p>To FTA: 9/16/11 May 25, 2011 (Debra Goss)</p>
<p>1.5c</p>	<p>Milestone 2: Submission of documentation of Title VI subrecipient reviews by Debra Goss, TSC</p>	<p>To FTA: June 1, 2011 (Debra Goss)</p>
	<p>Milestone 3: Submit updated policy statement on agency requirements for collection and monitoring of Title VI-related data.</p>	<p>To FTA: June 1, 2011 (Debra Goss)</p>

2.0 - Title VI Checklist –Urbanized Areas with Populations of 200,000 People or Greater

2.1 - Requirement: Access to Services by persons with LEP

Corrective Action: Submit complete four-factor analysis and language implementation plan

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: See the response to item 1.1 above.

All relevant mapping has already been submitted to FTA. To the extent that ConnDOT is an operator in all the UZAs of over 200,000 in population in the state, this mapping should suffice. In addition to the action items noted above in section 1.1 relating to State DOT requirements in small urbanized and non-urbanized areas, ConnDOT will assure preparation of plans that will cover any ConnDOT direct activities in these large urbanized areas as well as compliance by any relevant subrecipients in these UZAs who are not already direct recipients of FTA grant funding.

The LEP Plan proposed in section 1 to be submitted by November 28, 2011 will encompass all of ConnDOT’s requirements as both a state management entity and a state operating entity for all programs including the FTA section 5307, 5309, 5310, 5311, 5316 and 5317 programs.

WORK ACTIVITIES – See Section 1.1 above.

FINAL DELIVERABLE – Limited English Proficiency Plan

2.1a	Deliverable: The final Four-Factor Analysis will reflect work done under factors 1 and 2 and further assessments or programs to develop and implement under factors 3 and 4. Submit to Debra Goss, TSC for review.	September 9, 2011 (Michael Sanders)
2.1b	Submit to FTA for review.	September 16, 2011 September 30, 2011 (Debra Goss)

2.2 - Requirement: Inclusive Public Participation

Corrective Action: Submit a summary of activities since the last update.

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: For those areas where ConnDOT is the direct recipient responsible for delivering FTA-funded services in large urbanized areas, ConnDOT will submit a listing of activities and describe how meaningful access was provided since the last report.

2.2a	Milestone 1: Develop a listing of all public meetings since submission of the original Title VI report in June 2009.	April 29, 2011 (Michael Sanders)
2.2b	This will include website postings, on-board bus/rail postings, media notifications, a description of meeting locations to assure relative equity in distribution of meetings in all parts of the service area, etc. This will also include meetings related to service, fares, and projects.	To FTA: September 16, 2011 May 2, 2011 (Debra Goss)

2.3 - Requirement: Equity and Evaluation of Service and Fare Changes

Corrective Action: Existing policy submitted without Title VI considerations. Resubmit policy.

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: Since the last report, there have been no changes in fares on ConnDOT’s CTTransit services or Metro-North or Shore Line East services nor any service reductions that would be defined as significant according to the process submitted in the June 2009 Title VI Report. .

To the extent that ConnDOT is the direct recipient delivering services in large urbanized areas, or contracts for delivery of services through subrecipients who are not already direct recipients of FTA funding, Conn DOT will revise our fare and service equity policies to comply with current FTA Guidance on this matter.

2.3a	Deliverable 1: Revise current Service and Fare Change policy to incorporate Title VI considerations.	
2.3b	Submit to Debra Goss, TSC	June 30, 2011 (Michael Sanders)
	Submit to FTA	July 15, 2011 (Debra Goss)

2.4 - Requirement: Monitoring

Corrective Action: Resubmit a comprehensive service monitoring procedure and the results of such monitoring.

Responsible Party: Michael Sanders, Transit Administrator

Status and Planned Actions: ConnDOT’s service monitoring process and a comprehensive analysis was submitted in the June 2009 Title VI report. Deficiencies in that approach will be addressed by a revised monitoring process.

2.4a	<p>Milestone 1: Review the Circular, other Title VI guidance, and other agencies’ plans in order to develop a comprehensive revised approach to the “level of service” monitoring process.</p> <p>Submit to Debra Goss, TSC for review and comment.</p>	<p>8/25/11 June 30, 2011 (Michael Sanders)</p>
2.4b	<p>Milestone 2: Submit revised monitoring process and procedure to FTA for review, comment and acceptance.</p>	<p>8/25/11 July 28, 2011 (Debra Goss) - *To FTA 8/31/11- 9/7/11</p>
2.4c	<p>Milestone 3: Conduct level of service monitoring during the Fall operating season using the methodology approved by FTA.</p>	<p>October 1, 2011 August 30, 2011 (Michael Sanders)</p>
2.4c1	<p>Submit results to Debra Goss, TSC for review and comment.</p>	<p>October 24, 2011 September 16, 2011 (Michael Sanders)</p>
2.4d	<p>Milestone 4: Submit level of service monitoring review to FTA for review.</p>	<p>October 31, 2011 September 30, 2011 (Debra Goss)</p>

3.0 - Title VI Checklist – Metropolitan Planning Organizations

3.1 - Requirement: Access to services by Persons with LEP

Corrective Action: Submit Analysis and LEP Plans

Responsible Party: Maribeth Wojenski, Transportation Assistant Planning Director

Status and Planned Actions: The Department will complete its review of the compliance of MPOs with LEP requirements.

3.1a	<p>Milestone 1:</p> <ul style="list-style-type: none"> Evaluate and document results of previous survey of MPO compliance and develop letter to address areas of concern and any other items needing attention to be sent to the MPOs. Request copies of their LEP plan. 	April 29, 2011 (Maribeth Wojenski)
3.1b	<p>Milestone 2:</p> <ul style="list-style-type: none"> Receive response from the MPOs. 	May 31, 2011 (Maribeth Wojenski)
3.1c	<p>Milestone 3:</p> <ul style="list-style-type: none"> Evaluate MPO responses by Maribeth Wojenski, Thomas Maziarz, Bureau Chief, Policy and Planning and Debra Goss, Title VI Coordinator to see if necessary steps were taken and to determine if further corrective actions are necessary. 	June 30, 2011 (Maribeth Wojenski) & (Debra Goss)
3.1d	<p>Milestone 4:</p> <ul style="list-style-type: none"> Develop final report in cooperation with Debra Goss, Title VI Coordinator, for distribution to FTA, FHWA and MPOs. 	August 31, 2011 (Maribeth Wojenski)
3.1d1	<ul style="list-style-type: none"> Submit copies of MPO's LEP plans 	To FTA: September 9, 2011 (Debra Goss)
3.1e	<p>Milestone 5:</p> <ul style="list-style-type: none"> This process will continue biannually by involving the Title VI Coordinator in the review and approval of the MPOs Unified Planning Work Program. 	Spring of even years

3.2 - Requirement: Notifying beneficiaries of their rights under Title VI

Corrective Action: Title VI notices and complaint process

Responsible Party: Maribeth Wojenski, Transportation Assistant Planning

Status and Planned Actions: The Department will complete its review of the compliance of MPOs with Title VI notice and complaint process requirements.

3.2a	<p>Milestone 1:</p> <ul style="list-style-type: none"> Evaluate and document results of previous survey of MPO compliance and develop letter to address areas of concern and any other items needing attention to be sent to the MPOs. Request copies of their Title VI notices and complaint process. 	<p>April 29, 2011 (Maribeth Wojenski)</p>
3.2b	<p>Milestone 2:</p> <ul style="list-style-type: none"> Receive response from the MPOs. 	<p>May 31, 2011 (Maribeth Wojenski)</p>
3.2c	<p>Milestone 3:</p> <ul style="list-style-type: none"> Evaluate MPO responses by Maribeth Wojenski, Bureau Chief, Policy and Planning and Debra Goss, Title VI Coordinator to see if necessary steps were taken and to determine if further corrective actions are necessary. 	<p>June 30, 2011 (Maribeth Wojenski) & (Debra Goss)</p>
3.2d	<p>Milestone 4:</p> <ul style="list-style-type: none"> Develop final report in cooperation with Debra Goss, Title VI Coordinator, for distribution to FTA, FHWA and MPOs. 	<p>August 31, 2011 (Maribeth Wojenski)</p>
3.2d1	<ul style="list-style-type: none"> Submit copies of MPO's Title VI notices and complaint process. 	<p>To FTA: September 9, 2011 (Debra Goss)</p>
3.2e	<p>Milestone 5:</p> <ul style="list-style-type: none"> This process will continue biannually by involving the Debra Goss, Title VI Coordinator in the review and approval of the MPOs Unified Planning Work Program. 	<p>Spring of even years (Maribeth Wojenski)</p>

3.3 - Requirement: Inclusive public participation

Corrective Action: Submit info on outreach activities and actions to encourage public participation

Responsible Party: Maribeth Wojenski, Transportation Assistant Planning

Status and Planned Actions: The Department will complete its review of the compliance of MPOs with public participation requirements.

3.3a	<p>Milestone 1:</p> <ul style="list-style-type: none"> Evaluate and document results of previous survey of MPO compliance and develop letter to address areas of concern and any other items needing attention to be sent to the MPOs. Request copies of their Public outreach plan. 	<p>April 29, 2011 (Maribeth Wojenski)</p>
3.3b	<p>Milestone 2:</p> <ul style="list-style-type: none"> Receive response from the MPOs. 	<p>May 31, 2011 (Maribeth Wojenski)</p>
3.3c	<p>Milestone 3:</p> <ul style="list-style-type: none"> Evaluate MPO responses by Maribeth Wojenski, Thomas Maziarz, Bureau Chief, Policy and Planning and Debra Goss, Title VI Coordinator to see if necessary steps were taken and to determine if further corrective actions are necessary. 	<p>June 30, 2011 (Maribeth Wojenski) & (Debra Goss)</p>
3.3d	<p>Milestone 4:</p> <ul style="list-style-type: none"> Develop final report in cooperation with Debra Goss, Title VI Coordinator for distribution to FTA, FHWA and MPOs. 	<p>August 31, 2011 (Maribeth Wojenski)</p>
3.3d1	<ul style="list-style-type: none"> Submit copies of MPO's public outreach plan 	<p>To FTA: September 9, 2011 (Debra Goss)</p>
3.3e	<p>Milestone 5:</p> <ul style="list-style-type: none"> This process will continue biannually by involving the Debra Goss, Title VI Coordinator in the review and approval of the MPOs Unified Planning Work Program. 	<p>Spring of even years (Maribeth Wojenski)</p>